



# Environmental Assessment for the Expansion and Consolidation of the Base Exchange

## Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

**Final**

**August 2013**



Prepared for

**DEPARTMENT OF THE AIR FORCE**  
Joint Base Andrews-  
Naval Air Facility Washington,  
Maryland



Prepared by

**DEPARTMENTS OF THE ARMY AND AIR FORCE**  
Army and Air Force Exchange Service  
3911 South Walton Blvd.  
Dallas, Texas 75236-1598



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**Cover Sheet**  
**Environmental Assessment for the**  
**Expansion and Consolidation of the Base Exchange at**  
**Joint Base Andrews-Naval Air Facility Washington,**  
**Prince George's County, Maryland**

**Proposed Action:** The Army and Air Force Exchange Service (AAFES) proposes to renovate and expand the existing Base Exchange (BX) at Joint Base Andrews-Naval Air Facility Washington (JBA-NAFW). The Proposed Action construction activity would total approximately 166,864 square feet or an estimated 55,282 square feet of new construction and 111,582 square feet of renovation.

**Affected Location:** JBA-NAFW, Prince George's County, Maryland

**Report Designation:** Environmental Assessment (EA).

**Responsible Agency:** Department of the Air Force.

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**Abstract:** AAFES proposes to expand the BX on JBA-NAFW, Prince George's County, Maryland.

The Proposed Action complies with the JBA-NAFW General Plan and utilizes a site that has previously been developed. Currently, the BX operates in three separate buildings: Home Traditions (Building 1683) constructed in 1973; Four Seasons (Building 1805) constructed in 1983; and the BX (Building 1811) built in 1995. Each separate facility is out-of-date and inconsistent with current installation building codes and industry standards for retail space. Additionally, each facility lacks the adequate physical space necessary to meet the demand from an increasing customer base located both on- and off-installation. Therefore, the need for the Proposed Action is to upgrade retail facilities on-installation to comply with new building and industry standards and to provide adequate space to meet the current and future retail demand for JBA-NAFW.

Under the No Action Alternative, AAFES would not construct the new facilities and JBA-NAFW patrons would continue to utilize outdated facilities that have exceeded their useful life and are presently unable to meet customer demand.

This EA evaluates the Preferred Alternative and the No Action Alternative. Resources evaluated in this EA include: land use and visual resources; transportation; infrastructure and utilities; geology and soils; water resources; biological resources; socioeconomic, environmental justice, and protection of children; cultural resources; air quality; noise; hazardous material and waste management; and safety and occupational health. No significant impacts would result from implementation of the Proposed Action at the preferred site location or from the No Action Alternative.



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# Table of Contents

<u>Section</u>	<u>Page</u>
<b>Cover Sheet .....</b>	<b>iii</b>
List of Tables .....	ix
List of Illustrations .....	x
Acronyms and Abbreviations .....	xi
<b>1 Purpose and Need for Action .....</b>	<b>1-1</b>
1.1 Introduction .....	1-1
1.1.1 AAFES Mission .....	1-1
1.1.2 Andrews History .....	1-3
1.2 Purpose and Need for Action .....	1-3
1.3 Objectives of the Proposed Action .....	1-3
1.4 Scope of the EA .....	1-5
1.5 Decision to be Made .....	1-5
1.6 Public Review and Interagency Coordination .....	1-5
1.7 Applicable Regulatory Requirements .....	1-6
<b>2 Description of Alternatives, Including the Proposed Action .....</b>	<b>2-1</b>
2.1 Description of the Proposed Action .....	2-1
2.2 Alternatives Development Process .....	2-2
2.2.1 Selection Standards .....	2-2
2.2.2 Common Elements Among the Alternatives .....	2-2
2.2.3 Alternatives Eliminated from Further Analysis .....	2-3
2.2.4 Alternatives Carried Forward for Further Analysis .....	2-4
2.2.5 No Action Alternative .....	2-7
2.3 Description of Past and Reasonably Foreseeable Future Actions Relevant to Cumulative Impacts .....	2-7
2.4 Comparison of Environmental Consequences .....	2-9
<b>3 Affected Environment .....</b>	<b>3-1</b>
3.1 Land Use and Visual Resources .....	3-1
3.1.1 Land Use .....	3-1
3.1.2 Visual Resources .....	3-2
3.2 Transportation .....	3-2
3.3 Infrastructure and Utilities .....	3-3
3.3.1 Wastewater Collection and Treatment .....	3-3
3.3.2 Potable Water Supply .....	3-4
3.3.3 Solid Waste Management .....	3-5
3.3.4 Stormwater .....	3-5
3.3.5 Natural Gas .....	3-5
3.3.6 Electricity .....	3-5
3.3.7 Heating and Cooling .....	3-6
3.4 Geology and Soils .....	3-6

Tables of Contents, continued

<u>Section</u>	<u>Page</u>
3.5 Water Resources .....	3-7
3.5.1 Groundwater .....	3-7
3.5.2 Surface Water and Drainage .....	3-7
3.5.3 Wetlands .....	3-9
3.5.4 Floodplains .....	3-10
3.5.5 Coastal Zone .....	3-11
3.6 Biological Resources .....	3-11
3.6.1 Forestry and Vegetation .....	3-11
3.6.2 Wildlife .....	3-12
3.6.3 Threatened and Endangered Species .....	3-12
3.7 Socioeconomics, Environmental Justice, and Protection of Children .....	3-13
3.7.1 Population and Demographics .....	3-13
3.7.2 Economy and Income .....	3-14
3.7.3 Environmental Justice .....	3-14
3.8 Cultural Resources .....	3-14
3.9 Air Quality .....	3-15
3.9.1 Clean Air Act .....	3-15
3.9.2 Greenhouse Emissions .....	3-18
3.9.3 General Conformity Rule .....	3-19
3.9.4 Stationary Source Construction and Operating Permits .....	3-20
3.9.5 Regional Air Emissions .....	3-20
3.10 Noise .....	3-21
3.11 Hazardous Materials and Waste Management .....	3-21
3.12 Safety and Occupational Health .....	3-22
<b>4 Environmental Consequences .....</b>	<b>4-1</b>
4.1 Land Use, including Visual Resources .....	4-1
4.1.1 Alternative 1 (Preferred Alternative) .....	4-1
4.1.2 No Action Alternative .....	4-1
4.2 Transportation .....	4-1
4.2.1 Alternative 1 (Preferred Alternative) .....	4-1
4.2.2 No Action Alternative .....	4-2
4.3 Infrastructure and Utilities .....	4-2
4.3.1 Alternative 1 (Preferred Alternative) .....	4-2
4.3.2 No Action Alternative .....	4-4
4.4 Geology and Soils .....	4-4
4.4.1 Alternative 1 (Preferred Alternative) .....	4-4
4.4.2 No Action Alternative .....	4-4
4.5 Water Resources .....	4-5
4.5.1 Alternative 1 (Preferred Alternative) .....	4-5
4.5.2 No Action Alternative .....	4-6
4.6 Biological Resources .....	4-6
4.6.1 Alternative 1 (Preferred Alternative) .....	4-6
4.6.2 No Action Alternative .....	4-8

*Tables of Contents, continued*

<u>Section</u>	<u>Page</u>
4.7 Socioeconomics, Environmental Justice, and Protection of Children.....	4-8
4.7.1 Alternative 1 (Preferred Alternative) .....	4-8
4.7.2 No Action Alternative .....	4-8
4.8 Cultural Resources .....	4-9
4.8.1 Alternative 1 (Preferred Alternative) .....	4-9
4.8.2 No Action Alternative .....	4-9
4.9 Air Quality.....	4-9
4.9.1 Alternative 1 (Preferred Alternative) .....	4-9
4.9.2 No Action Alternative .....	4-12
4.10 Noise.....	4-12
4.10.1 Alternative 1 (Preferred Alternative) .....	4-12
4.10.2 No Action Alternative .....	4-12
4.11 Hazardous Materials and Waste Management .....	4-13
4.11.1 Alternative 1 (Preferred Alternative) .....	4-13
4.11.2 No Action Alternative .....	4-13
4.12 Safety and Occupational Health .....	4-13
4.12.1 Alternative 1 (Preferred Alternative) .....	4-13
4.12.2 No Action Alternative .....	4-14
4.13 Cumulative Impacts.....	4-14
4.14 Unavoidable Adverse Impacts.....	4-17
4.15 Relationship of Short-Term Uses and Long-Term Productivity .....	4-18
4.16 Irreversible and Irretrievable Commitment of Resources .....	4-18
 <b>5 List of Organizations and Individuals Contacted, Reviewers, and Preparers.....</b>	<b>5-1</b>
5.1 Individuals Contacted and Reviewers .....	5-1
5.2 List of Preparers .....	5-2
 <b>6 References.....</b>	<b>6-1</b>

**Appendices**

- A Correspondence and Consultation
- B Notice of Availability (NOA)
- C Finding of No Significant Impact (FONSI)
- D Memorandum of Agreement, January 2011
- E Construction Drawing, June 19, 2013
- F Wetland Map and Agency Correspondence
- G Coastal Zone Consistency Determination
- H Notice of Intent (NOI) for Stormwater Discharges Associated with Construction Activity
- I Air Conformity Analysis and Record of Non-Applicability

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## List of Tables

<u>Table</u>	<u>Page</u>
2-1 Comparison of Proposed Action Alternatives .....	2-2
2-2 Potential Resource Area Impacts.....	2-9
3-1 Andrews Existing Land Use Acreages .....	3-2
3-2 Local Population and Demographic Statistics, 2000 and 2010 .....	3-13
3-3 National Ambient Air Quality Standards .....	3-17
3-4 Global Warming Potentials .....	3-19
3-5 Air Emissions Inventory - Prince George's County, Maryland, Calendar Year 2008 .....	3-20
4-1 Total Estimated Construction Emissions Associated with the Proposed Action .....	4-10
4-2 Estimated Annual Emissions from Stationary Sources Associated with the Proposed Action During Operations .....	4-11
4-3 Air Emissions Inventory Prince George's County, Maryland - Calendar Year 2008 vs. Proposed Construction Emissions .....	4-12

## List of Illustrations

<u>Figure</u>	<u>Page</u>
1-1 Regional Location Map, Joint Base Andrews Naval-Air Facility Washington, Maryland....	1-2
1-2 Existing AAFES Facilities, Joint Base Andrews-Naval Air Facility Washington, Maryland.....	1-4
2-1 Base Exchange Expansion (Preferred Alternative), Joint Base Andrews-Naval Air Facility Washington, Maryland.....	2-5
2-2 Base Exchange Expansion (Preferred Alternative) Delineated Wetlands, Joint Base Andrews-Naval Air Facility Washington, Maryland.....	2-6
4-1 Locations of Potential Concurrent Projects, Joint Base Andrews-Naval Air Facility Washington, Maryland.....	4-15

## Acronyms and Abbreviations

AAFES	Army and Air Force Exchange Service
ACP	Architectural Compatibility Plan
AFB	Air Force Base
AFDW	Air Force District of Washington
AFI	Air Force Instruction
Andrews	Joint Base Andrews-Naval Air Facility Washington, Maryland; <i>also</i> JBA-NAF, <i>the</i> Base, <i>or the</i> Installation
AQCR	Air Quality Control Region
Base, the	Joint Base Andrews-Naval Air Facility Washington, Maryland; <i>also</i> JBA-NAF, Andrews, <i>or the</i> Installation
bgs	below ground surface
BMP	best management practice
BRAC EA	<i>Final Environmental Assessment for Fiscal Year 07-11 BRAC Construction Requirements at Andrews Air Force Base, Maryland</i>
BRAC	Base Closure and Realignment
BX	Base Exchange
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CH <sub>4</sub>	methane
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> eq	carbon dioxide equivalent
COMAR	Code of Maryland Regulations
CWA	Clean Water Act
DAP	Discharge Authorization Permit
dB	decibel(s)
DD	(United States) Department of Defense
DNL	day-night average sound level
DOD	(United States) Department of Defense
DOPAA	Description of the Proposed Action and Alternatives



Acronyms and Abbreviations (*continued*)

EA	Environmental Assessment
EIS	Environmental Impact Statement
EMS	emergency management system
EO	Executive Order
ERP	Environmental Restoration Program
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
FSE	food service establishment
GDP	General Discharge Permit
GHG	greenhouse gas
GWP	Global Warming Potential
HCFC	hydrofluorocarbon
I	Interstate
ICRMP	Integrated Cultural Resources Management Plan
IICEP	Interagency and Intergovernmental Coordination for Environmental Planning
Installation, the	Joint Base Andrews Naval Air Facility Washington, Maryland; <i>also</i> JBA-NAF, <i>the</i> Base, <i>or</i> Andrews
IPCC	Intergovernmental Panel on Climate Change
JBA-NAFW	Joint Base Andrews-Naval Air Facility Washington, Maryland; <i>also</i> Andrews, <i>the</i> Base, <i>or the</i> Installation
LEED	Leadership in Energy and Environmental Design
MACTEC	MACTEC Engineering and Consulting, Inc.
MD	Maryland
MDE	Maryland Department of the Environment
MDNR	Maryland Department of Natural Resources
MOA	Memorandum of Agreement
msl	mean sea level
MWR	morale, welfare, and recreation
N <sub>2</sub> O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act

Acronyms and Abbreviations (*continued*)

NO <sub>2</sub>	nitrogen dioxide
NOA	Notice of Availability
non-ODC	non-ozone-depleting compound
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O <sub>3</sub>	ozone
Pb	lead
PEPCO	Potomac Electric Power Company
PM <sub>10</sub>	particulate matter 10 microns or smaller in diameter
PM <sub>2.5</sub>	particulate matter smaller than 2.5 microns
RCRA	Resource Conservation and Recovery Act
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
tpy	ton(s) per year
U.S.C.	United States Code
UFC	Unified Facilities Code
USACE	United States Army Corps of Engineers
USAF	United States Air Force
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
VOC	volatile organic compound
WG/CC	Wing, Commanding Officer
WSSC	Washington Suburban Sanitary Commission
WWTP	waste water treatment plant

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# 1 Purpose and Need for Action

## 1.1 Introduction

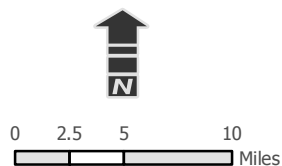
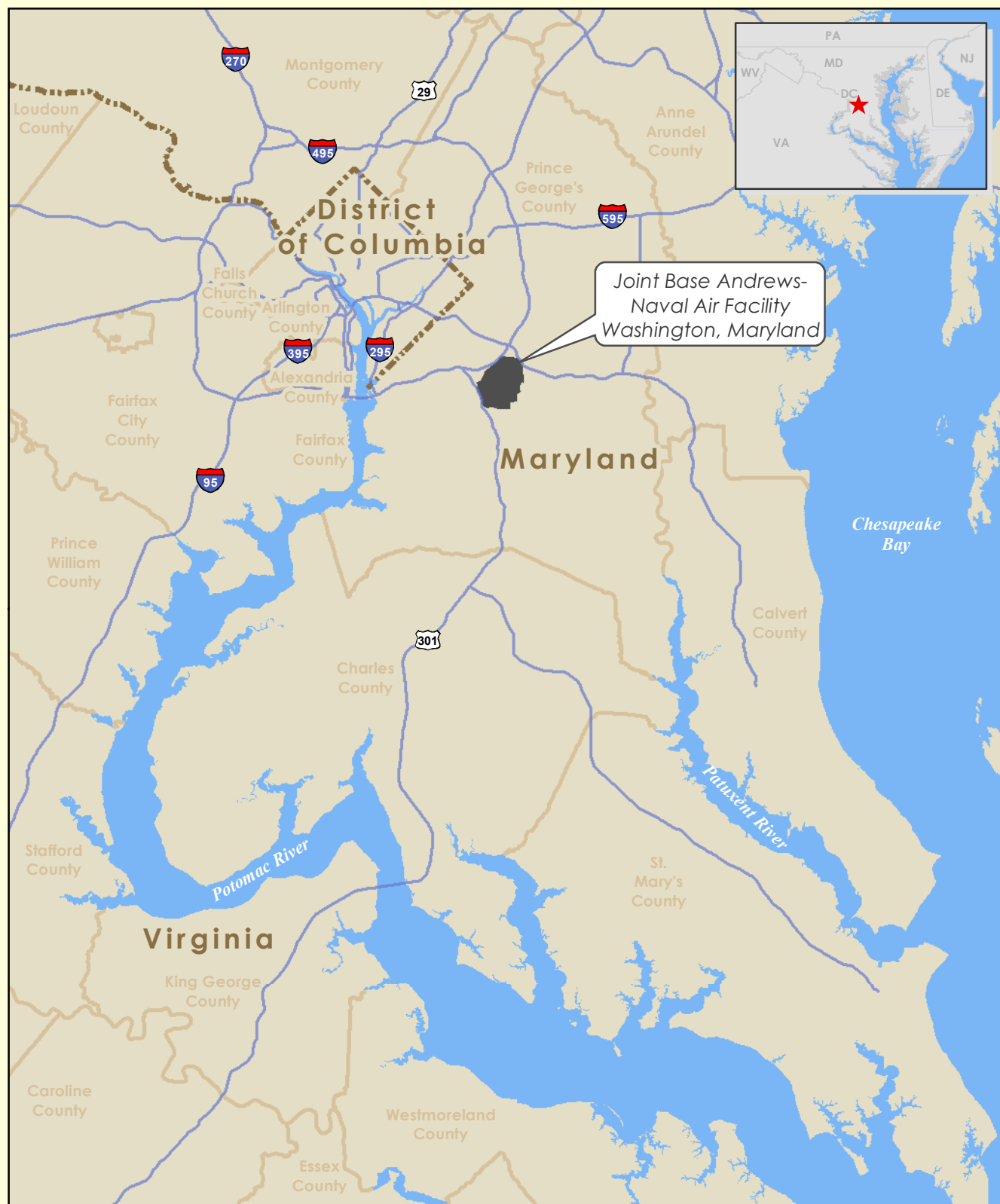
The Army and Air Force Exchange Service (AAFES) proposes to expand the Base Exchange (BX) on Joint Base Andrews-Naval Air Facility Washington, Maryland, formerly Andrews Air Force Base (Andrews AFB). Joint Base Andrews-Naval Air Facility Washington, Maryland, is referred to herein as JBA-NAFW (*also as ‘Andrews,’ the ‘Base,’ or the ‘Installation’*). Andrews is a 4,390-acre installation located approximately 6 miles southeast of Washington, D.C., in Prince George’s County, Maryland (see Figure 1-1). This Environmental Assessment (EA) has been prepared to address the potential impacts related to the construction and operation of the expanded facility, including all associated permit requirements. In addition, this EA identifies mitigation measures to minimize the potential environmental consequences associated with the implementation of the Proposed Action.

The BX (Building 1811) expansion would include retail and food services consolidating those previously provided in Building 1683 (Home Traditions) and Building 1805 (Four Seasons) (see Figure 1-2). The scope of the analysis does not include the final disposition of Buildings 1683 and 1805 which would be vacated (i.e., returned to the Base) upon construction of the Proposed Action. This EA was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, 42 United States Code (U.S.C.) 4321 et seq., as amended, and the following regulations:

- Council on Environmental Quality (CEQ), 40 Code of Federal Regulations (CFR) 1500-1508; and
- U.S. Air Force (USAF) Environmental Impact Analysis Process, 32 CFR 989.

### 1.1.1 AAFES Mission

For 117 years, AAFES, a United States Department of Defense (DOD) military command with a retail mission, has provided quality merchandise and services at competitive prices and has generated millions of dollars annually in dividends for the Directorate of Family, Morale, Welfare, and Recreation programs for military personnel. In more than 3,000 retail stores and other facilities around the world, AAFES serves 12.3 million active-duty military personnel, National Guard members, Reservists, military retirees, and their families.



### FIGURE 1-1

Regional Location Map  
Joint Base Andrews-Naval Air Facility  
Washington, Maryland



Source: ESRI 2011, Air Force 2013

### 1.1.2 Andrews History

The 2005 reactivation of the Air Force District of Washington (AFDW) for planning within the National Capital Region brought significant changes to the force structure at Andrews. Several tenant activities from Bolling AFB, Washington, D.C., were either combined or transferred to Andrews and stood up under the command of AFDW. In 2009, Andrews AFB and Naval Air Facility Washington became JBA-NAFW and, in 2010, AFDW's 11th Wing became the host tenant at the Base. Additionally, JBA-NAFW is home to numerous other partner units including the 89th Airlift Wing, the 79th Medical Wing, and the 459th Air Refueling Wing, Naval Air Facility Washington, and the 113th Wing, among others. JBA-NAFW also is home to the Air National Guard Readiness Center (USAF 2011).

## 1.2 Purpose and Need for Action

The purpose of the Proposed Action is to provide consolidated and centralized retail facilities on JBA-NAFW where authorized customers could obtain multiple services at a single location.

Currently, the BX operates in three separate buildings: Home Traditions (Building 1683) constructed in 1973; Four Seasons (Building 1805) constructed in 1983; and the BX (Building 1811) built in 1995 (see Figure 1-2). Each separate facility is out-of-date and inconsistent with current installation building codes and industry standards for retail space. Additionally, each facility lacks the adequate physical space necessary to meet the demand from an increasing customer base located both on- and off-installation. Therefore, the need for the Proposed Action is: 1) to upgrade retail facilities on-installation to comply with new building and industry standards; and 2) to provide adequate space to meet the current and future retail demand for Andrews.

## 1.3 Objectives of the Proposed Action

The objectives of the Proposed Action are to relocate the retail services provided by Buildings 1683 and 1805 through an expansion of Building 1811. These objectives would be met by the construction of the Proposed Action, which would consolidate and centralize retail facilities on Andrews where authorized customers could obtain multiple services at a single location. The expanded facility would therefore reduce costs, increase operational efficiency, and provide a more viable service to the authorized customer base.



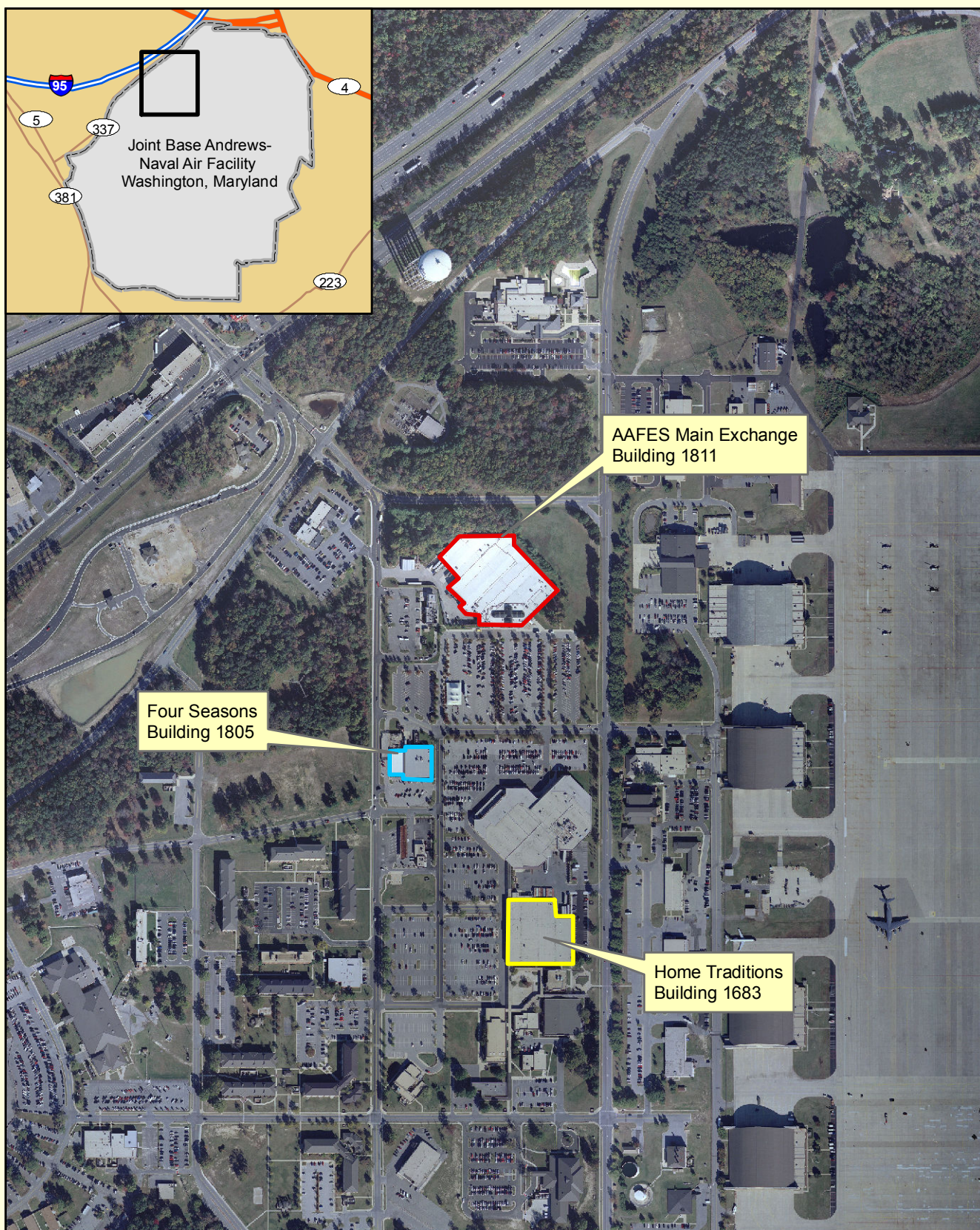


Figure 1-2  
Existing AAFES Facilities  
Joint Base Andrews-Naval Air Facility  
Washington, Maryland

Source:  
Air Force, 2008

0 280 560  
Feet



## 1.4 Scope of the EA

This EA evaluates potential impacts to the human and natural environments associated with the expansion and consolidation of the BX at JBA-NAFW. The Proposed Action is evaluated to determine the potential for significant adverse impacts to each resource or resource area, including short- or long-term; temporary or permanent; and cumulative adverse impacts. The scope of the EA does not include the disposition or future operation of Buildings 1683 and 1805, each of which would be vacated upon the construction of the Proposed Action.

Resources evaluated in this EA include: land use; transportation; infrastructure and utilities; geology and soils; water resources; biological resources; socioeconomics, environmental justice and protection of children; air quality; cultural resources; noise; hazardous materials and waste management; and safety and occupational health.

## 1.5 Decision to be Made

Final decisions with respect to the Proposed Action require the concurrence and signature of the JBA-NAFW 11th Wing, Commanding Officer (WG/CC).

## 1.6 Public Review and Interagency Coordination

As part of the Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) process, the Description of the Proposed Action and Alternatives (DOPAA) was sent to interested agencies on March 8, 2012, inviting the agencies to provide comments on the Proposed Action, and welcoming any relevant information about the resources under the agency's jurisdiction that may be present in the project area. Copies of the coordination letters and the agency comments received on the DOPAA are provided in Appendix A.

A Notice of Availability (NOA) of the Draft EA and Finding of No Significant Impact (FONSI) was published in the Prince George's County Gazette newspaper on May 9, 2013 (Appendix B), and copies of the Draft EA and FONSI were made available for review at the Upper Marlboro Branch of the Prince George's County Memorial Library System at 14730 Main Street, Upper Marlboro, Maryland, and the JBA-NAFW Library at 1642 Brookley Avenue, JBA-NAFW. Additionally, the Draft EA and Draft FONSI were available on the Andrews AFB website, [www.andrews.af.mil/library/environmental/](http://www.andrews.af.mil/library/environmental/). Copies of the agency comments received on the Draft EA are provided in Appendix A. The FONSI is provided in Appendix C.



## 1.7 Applicable Regulatory Requirements

NEPA (Public Law 91-190, 42 U.S.C. §4321 et. seq.) is a mandate for federal agencies to conduct a systematic, interdisciplinary approach to environmental planning and decision making. Under NEPA, a federal agency's proposed actions can either be "categorically excluded" from further analysis or evaluated in an EA or an Environmental Impact Statement (EIS). An EA is a concise public document intended to provide agency decision makers with sufficient information and analysis to determine whether to prepare an EIS. An EA thus results in either a Finding of No Significant Impact (FONSI) or a decision to prepare an EIS. An EIS is required for federal actions that may significantly affect the quality of the human environment. The intent of NEPA is to minimize adverse impacts to the human environment through information availability, the development of alternative actions, and the implementation of mitigation measures.

This EA was prepared in accordance with NEPA; the CEQ regulations implementing NEPA (40 CFR §§1500-1508); and the USAF "Environmental Impact Analysis Process" (Air Force Instruction 32-7061 as promulgated by 32 CFR 989).

Other environmental regulatory requirements relevant to the Proposed Action include, but are not limited to:

- Archeological Protection Act, 16 U.S.C 470 et. seq.;
- Clean Air Act, 42 U.S.C. 7401 et. seq.;
- Clean Water Act (CWA), 33 U.S.C. 1251 et. seq.;
- Endangered Species Act (ESA), 16 U.S.C. 1531 et. seq.;
- Energy Independence and Security Act, 42 U.S.C. 17094 et. seq.;
- Migratory Bird Treaty Act, 16 U.S.C. 703 et. seq.;
- National Capital Planning Act, 40 U.S.C. 8701 et seq
- National Historic Preservation Act (NHPA), 16 U.S.C. 470 et. seq.;
- Noise Control Act, 42 U.S.C. 4901 et. seq.;
- Occupational Safety and Health Act, 29 U.S.C. 651 et. seq.;
- Pollution Prevention Act, 42 U.S.C. 13101 et. seq.;
- Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6901 et. seq.; and
- Toxic Substances Control Act, 15 U.S.C. 2601 et. seq.

In addition, the Proposed Action must comply with a number of Executive Orders (EOs), including:

- EO 11514, “Protection and Enhancement of Environmental Quality”
- EO 11990, “Protection of Wetlands”
- EO 11988, “Floodplain Management”
- EO 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”
- EO 13045, “Protection of Children from Environmental Health Risks and Safety Risks”
- EO 13148, “Greening the Government Through Leadership in Environmental Management”
- EO 13423, “Strengthening Federal Environmental, Energy, and Transportation Management”
- EO 13508, “Chesapeake Bay Protection and Restoration”
- EO 13514, “Federal Leadership in Environmental, Energy and Economic Performance”

All contractors and/or subcontractors must comply with all applicable state and federal laws and regulations, including the requirements outlined in the “Andrews AFB Environmental Protection Standards for Contracts” (Andrews AFB 2009).

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## **2 Description of Alternatives, Including the Proposed Action**

This section describes the Proposed Action, the alternatives selection process, and the Preferred Alternative. The No Action Alternative, consistent with 32 CFR 989.8, is carried forward as a baseline for analyzing the alternatives that meet the selection criteria as described in Section 2.2.1 below.

### **2.1 Description of the Proposed Action**

AAFES proposes to renovate and expand the existing BX at JBA-NAFW. The scope of the proposed expansion would include the renovation and build-out of the existing foundation, structure/frame, and roof consistent with Base design standards. Key features associated with the construction of the Proposed Action include the addition of a food court, loading dock, food service dock, and an employee parking area. The Proposed Action would connect to existing utility and communication services and would include new and upgraded interior walls; lighting, mechanical, electrical, and safety systems; exterior surfaces such as sidewalks, curbs, and parking spaces; and other site improvements, as necessary. Construction of the Proposed Action would occur in phases over an estimated two-year period beginning during the summer of 2013. The construction phases would occur in the following order:

1. Construction of a food court retail space and portions of the merchandise processing area (MPA);
2. Construction of the administrative offices and the military clothing sales store (MCSS), and completion of the MPA;
3. Interior renovations to the eastern sales or “check-out” area, and the eastern half of the BX; and
4. Interior renovations to the western side of the sales or “check-out” area, and the western half of the BX (to include parking modifications).

In addition, the Proposed Action would be carried out in accordance with all applicable DOD Unified Facilities Criteria (UFC) and, where feasible and cost-effective, would be designed and constructed to meet Leadership in Energy and Environmental Design (LEED) construction standards.

## 2.2 Alternatives Development Process

### 2.2.1 Selection Standards

The selection factors considered during the development of the alternatives described in this section were based on the purpose and need as described in Section 1.2 of this EA and include the following:

- **Consistent with the AAFES Mission.** AAFES facilities must provide convenient, centrally located, and highly visible services to authorized Base personnel in a timely and efficient manner.
- **Compliance with the 2010 General Plan Update (JBA-NAFW 2010).** AAFES facilities must be consistent with the General Plan which guides the future development of the Base.
- **Meet Retail Demand.** AAFES facilities must be designed to meet existing and projected retail demand based on authorized personnel loading.
- **Minimize Environmental Impact.** AAFES facilities must be located and designed to minimize potential adverse impacts to the human and natural environment.

Table 2-1 Comparison of Proposed Action Alternatives				
Alternatives	Selection Standards			
	High Visibility and Accessibility	Consistency with General Plan	Meets Retail Demand	Minimizes Environmental Impact
Alternative 1: Limited Expansion of the Existing Base Exchange	Yes	Yes <sup>(a)</sup>	Yes	Yes
Alternative 2: Full Expansion of the Existing Base Exchange	Yes	Yes	Yes	No
Alternative 3: New Construction with Proposed Town Center	Yes	Yes	No	TBD <sup>(b)</sup>
No Action Alternative	Yes	Yes	No	Yes
Notes:				
(a) The Memorandum of Agreement between JBA-NAFW and AAFES allows for the expansion of the existing BX and the new construction of a BX as part of the Town Center development sometime after 2025.				
(b) To be determined, i.e., selection criteria cannot be evaluated at this time; however, the effects will be determined at a later date if this alternative is selected.				

### 2.2.2 Common Elements Among the Alternatives

#### Visibility and Accessibility

Under each of the alternatives, including the No Action Alternative, the site of the Proposed Action would provide for a highly visible and accessible BX (Table 2-1). The selection of Alternative 1 or Alternative 2 would expand the capacity of Building 1811, a site that already supports a

significant number of authorized customers. The selection of Alternative 3 would locate a new BX within a planned Town Center, a future development intended to concentrate pedestrian and automobile traffic. Under the No Action Alternative, the site of the existing BX would continue to provide a high level of visibility and accessibility on-installation.

### **2.2.3 Alternatives Eliminated from Further Analysis**

#### **Alternative 2: Full Expansion of the Existing Base Exchange**

Under Alternative 2, construction activity would total approximately 234,240 square feet or an estimated 122,658 square feet of new construction and 111,582 square feet of renovation. The selection of Alternative 2 would expand the building footprint onto semi-improved and previously undisturbed lands. Alternative 2 would directly impact wetlands classified as “atypical” (i.e., previously disturbed) grasslands (also termed emergent wetlands) and forested wetlands (located north of the existing BX). Selection of Alternative 2 would likely impact all 0.28 acre of wetlands on the site. EO 11990, “Protection of Wetlands,” directs federal agencies to minimize the destruction, loss, and degradation of wetlands and to preserve and enhance the natural and beneficial values of wetland communities. Selection of Alternative 2 would require a finding of no practicable alternative for construction in a wetland. . Alternative 2 would require the demolition and relocation of a fast-food restaurant in the vicinity of the existing BX. This would increase the surface area that would be disturbed during the construction of the Proposed Action.

Alternative 2 is consistent with the 2010 General Plan Update. The Alternative 2 location would be in proximity to the JBA-NAFW housing areas, as well as to the Interstate (I)-495/I-95 exchange that provides access to the Base. Therefore, Alternative 2 would meet the retail demand associated with an increasing on- and off-installation authorized customer base. The selection of Alternative 2, however, would not minimize environmental impacts to the wetland resources located adjacent to the current BX. Therefore, Alternative 2 is not carried forward for further analysis.

#### **Alternative 3: New Construction with Proposed Town Center**

Alternative 3 would involve construction of a new BX as part of a proposed Town Center development planned to be the future central hub for community, pedestrian-oriented activities on Andrews. In addition to the new AAFES BX, the Town Center would include a new fitness center, an education center or library, and similar quality-of-life enhancements for authorized Base personnel. The construction of Alternative 3 would occur in phases with demolition of select facilities scheduled for completion by 2015. Per a January 2011 Memorandum of Agreement (MOA) between AAFES,

the 11th Wing, and the 779th Medical Group (see Appendix D), the infrastructure and other facilities would be completed prior to AAFES beginning construction at the proposed Town Center. As such, the site would not be ready for the construction of Alternative 3 until the 2027 to 2030 time period.

Alternative 3 would be consistent with the Base's 2010 General Plan Update, which established the need for the proposed Town Center development. The selection of Alternative 3, however, would not meet the retail demand on Andrews prior to the 2027 timeframe – the estimated start date for construction of a new BX as part of the Town Center development. Although potential environmental impacts associated with Alternative 3 would be addressed under separate NEPA documentation (at a later date), the Town Center concept itself would be intended to minimize adverse impacts to the human and natural environments by concentrating commercial and community activities on the Base. Due to the planned timeframe for construction, however, Alternative 3 is not carried forward for further analysis.

## 2.2.4 Alternatives Carried Forward for Further Analysis

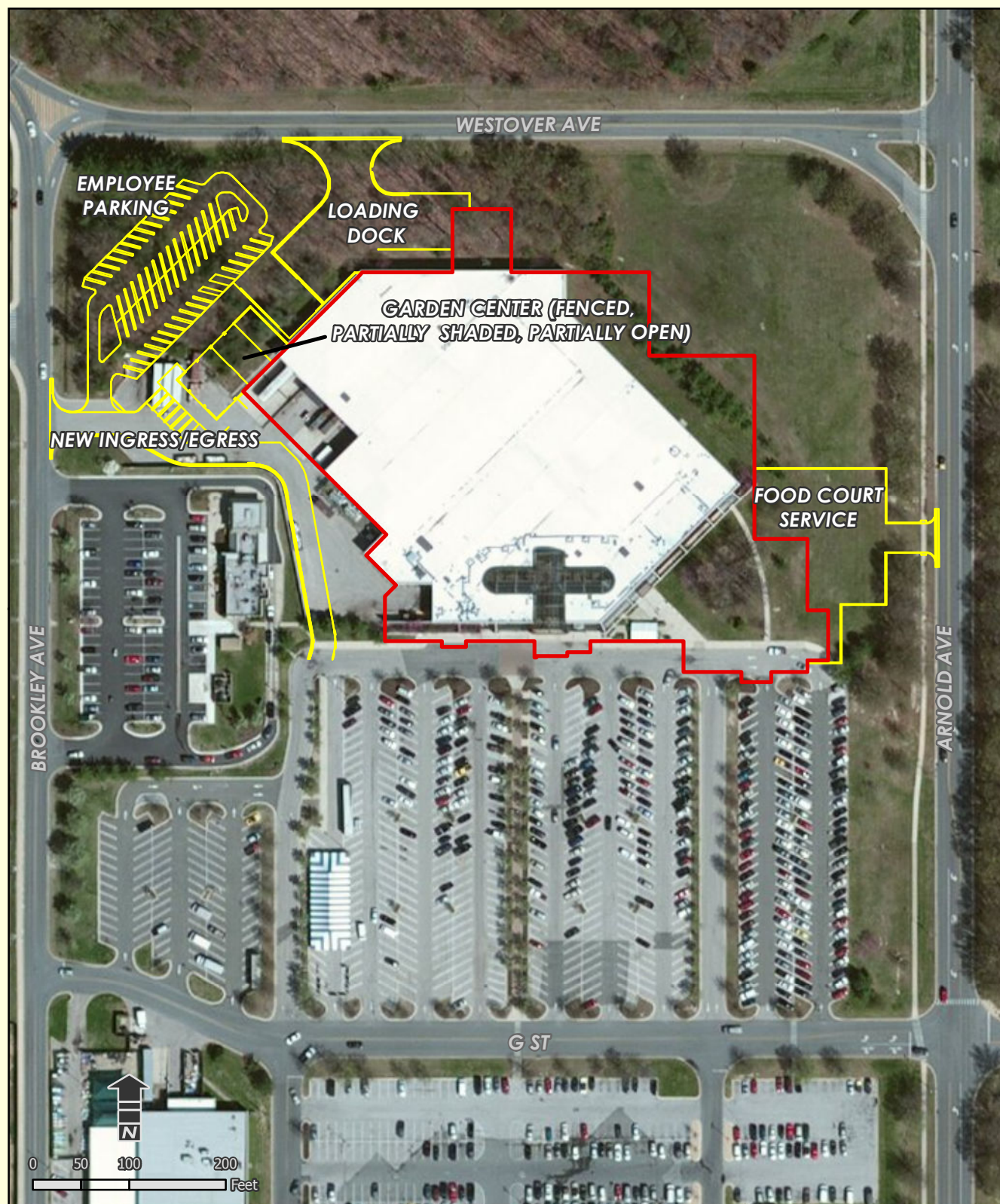
### Alternative 1: Limited Expansion of the Existing AAFES Base Exchange (Preferred Alternative)

Under Alternative 1 (see Figure 2-1 and Appendix E), construction activity would total approximately 166,864 square feet or an estimated 55,282 square feet of new construction and 111,582 square feet of renovation. The selection of Alternative 1 would expand the building footprint onto semi-improved and previously undisturbed lands. Alternative 1 would not directly impact any wetlands or involve construction in a wetland; however, two delineated wetlands exist in the vicinity: a 5,618-square-foot (0.13-acre) forested wetland immediately north of the project site and a 6,590-square-foot (0.15-acre) wetland mosaic to the northwest of the project site (see Figure 2-2 and Appendix E). Utilities for Alternative 1 would have a short-term impact during construction to the buffer zone around the forested wetland to the north of the BX.

Alternative 1 would not require the demolition of a fast-food restaurant in the vicinity of the existing BX, decreasing the surface area that would be disturbed during the construction of the Proposed Action and precluding any need for relocation to an equivalent facility on the Base.

The existing BX is currently part of the "Community" land use designation; however, Alternative 1 would not be consistent with the future land use in the 2010 General Plan Update. That is, the site of the existing BX is zoned as Industrial, precluding its long-term future use for other purposes. However, this alternative is consistent with the terms of the MOA which allows for the expansion of the existing BX and the new construction of a BX as part of the Town Center





- Extent of Proposed Expansion
- Proposed Associated Facilities

**FIGURE 2-1**

6UgY Exchange Expansion (Preferred Alternative)  
Joint Base Andrews-Naval Air Facility  
Washington, Maryland



Source: Microsoft 2011, Air Force 2013





- Extent of Proposed Expansion
- Proposed Associated Facilities
- Delineated Wetland
- - - Wetland Buffer (25 feet)

**FIGURE 2-2**  
Base Exchange Expansion (Preferred Alternative)  
Delineated Wetlands  
Joint Base Andrews-Naval Air Facility  
Washington, Maryland

 **ecology and environment, inc.**  
Global Environmental Specialists

Source: Microsoft 2011, Air Force 2013

development (Alternative 3) sometime after 2027. Additionally, it is AAFES's intent to open the new BX in the proposed Town Center after the expansion of the existing BX has been utilized for 15 years. Alternative 1 would be located in proximity to the JBA-NAFW housing areas, as well as the Interstate (I)-495/I-95 exchange that provides access to the Base. The Preferred Alternative would therefore meet the retail demand associated with an increasing on- and off-installation authorized customer base starting in 2014 – the scheduled completion date for the Preferred Alternative. The selection of Alternative 1 would also minimize environmental impacts to the wetland resources located adjacent to the BX. Therefore, based on the comparison of the Proposed Action alternatives, Alternative 1 is carried forward for further analysis.

### 2.2.5 No Action Alternative

Under the No Action Alternative, the renovation and expansion of the existing BX would not occur. The No Action Alternative would therefore maintain consistency with the 2010 General Plan Update; however, the selection of this alternative would not consolidate Buildings 1683 and 1805 or provide for the co-location of similar land uses on the Base. That is, under the No Action Alternative, these outdated facilities would remain in-service. In addition, the No Action Alternative would not meet the increasing demand for AAFES retail services on-installation through the 2025 timeframe when AAFES would relocate the BX to the proposed Town Center consistent with the provisions of the MOA. Further, Base personnel would not benefit from the expanded customer services and AAFES would not receive additional revenue from these services which, in turn, would not contribute to the Base's Morale, Welfare, and Recreation program budget. The No Action Alternative is carried forward for analysis in accordance with 32 CFR 989.8.

## 2.3 Description of Past and Reasonably Foreseeable Future Actions Relevant to Cumulative Impacts

This EA identifies actions that have been conducted in the past, are ongoing or in the planning stages, and future actions that are related to the Proposed Action. Actions proposed over the next five years, including the expansion of the BX (the Proposed Action) at JBA-NAFW are considered in the cumulative impacts. As an active military installation, JBA-NAFW and its tenant organizations undergo changes in mission and training requirements in response to defense policies, current threats, and tactical and technological advances, and as such, require new construction, facility improvements, infrastructure upgrades, and ongoing maintenance and repairs on a continual

basis. Known construction and upgrade projects are included in the cumulative impacts analysis, although future requirements could change and alter the reality of cumulative effects. NEPA analysis will be conducted for future projects, as necessary.

Actions considered in the analysis of cumulative impacts (Section 4.13) include, but are not limited to, the following planned projects for fiscal year (FY) 2013 to 2018 (JBA-NAFW 2013):

### **FY 2013 Projects**

- Expansion of the AAFES BX (2013-2014);
- Construction of helicopter operations facility near Hangar 1;
- Demolition and replacement of Building 1988 (traffic check house at the intersection of Maryland Drive and North Perimeter Road);
- Demolition of Buildings 1429 ( a generator building), 1679 (Chapel 3), 1732 (a heat plant), and the canopy and fuels tanks at Building 1685 (AAFES service station);
- Expansion of the parking lot and Building 1845 (Security Forces Group); and
- Replacement of Taxiway Sierra (2013-2014).

### **FY 2014 Projects**

- Modification of the entry control facilities at the Main Gate, Virginia Gate, and Pearl Harbor Gate to correct facility deficiencies related to safety and security.

### **FY 2015 Projects**

- Demolition of JBA's West Fitness Center (Building 1444) and replacement with a new fitness center near the current location of the West Fitness Center;
- Shoulder regrading on Taxiway W-1;
- Repair of West Apron; and
- Replacement of Taxiway Whiskey (2015-2016).

### **FY 2016 Projects**

- Demolition of the Child Development Center (CDC) #1 (Building 4575) and replacement with a new CDC near the current location of CDC #1; and
- Construction of a Security Forces Group Complex, which would require demolishing Building 1642 (the Base Library) and Building 1605 (a privately owned-vehicle [POV] wash rack). The Base Library would be moved to space within existing facilities and the wash rack would not be replaced (2016-2018).

**FY 2017 Projects**

- Reconstruction of Taxiway;
- Extension of west runway;
- Replacement of the United States Army Priority Air Transport facility;
- Replacement of Pads 12 and 13 (2017-2018); and
- Hot pit refueling pad.

**FY 2018 Projects**

- Reconstruction of Taxiway November;
- Air Sovereignty Alert phase II;
- Construction of an addition to Building 1900;
- Construction of Consolidated Aircraft Supply Center;
- Construction of new Base Civil Engineer Complex – 11th Wing; and
- Construction of Domino hangar, taxiway, and ramps.

**2.4 Comparison of Environmental Consequences**

Table 2-2 summarizes potential impacts to resources or resource areas that would result from the implementation of Alternative 1 and the No Action Alternative. The tabular summary of potential impacts to the human and natural environments reflects the analyses and findings presented in Sections 3 and 4.

<b>Table 2-2 Potential Resource Area Impacts</b>		
<b>Resource/Issue</b>	<b>Preferred Alternative</b>	<b>No Action</b>
Land Use and Visual Resources	Not consistent with the long-term land use in the 2010 General Plan Update (Consistency per the Memorandum of Agreement)	Consistent with the 2010 General Plan Update.
Socioeconomics, Environmental Justice, and Protection of Children	Minor, short-term benefit from new employment opportunities.	No change.
Transportation	Minor benefit from consolidation of separate services on-installation.	No change.
Infrastructure and Utilities	Minor, short-term impacts from increased impervious surfaces and energy usage.	No change.
Geology and Soils	Minor, short-term impacts from soil disturbance associated with construction activities.	No change.



<b>Table 2-2</b> <b>Potential Resource Area Impacts</b>		
<b>Resource/Issue</b>	<b>Preferred Alternative</b>	<b>No Action</b>
Water Resources	Potential long-term benefits from implementation of stormwater management best management practices to reduce nitrogen, phosphorus, and sediment runoff to assist in achieving Total Maximum Daily Load reduction goals.	No change.
Biological Resources	Minor, short-term impacts to wildlife during construction activity. Minor, permanent impact associated with tree removal requiring mitigation. No effect on federally listed threatened or endangered species.	No change.
Cultural Resources	No effect on architectural or archaeological cultural resources.	No change.
Air Quality	Minor, short-term impacts associated with particulate matter and other emissions from construction activity.	No change.
Noise	Minor, short-term impacts associated with noise from construction activity.	No change.
Hazardous Materials and Waste Management	Potential minor, short-term impacts associated with accidental releases during construction activity.	No change.
Safety and Occupational Health	Minor, short-term risks associated with construction activity.	No change.

## 3 Affected Environment

This section describes the existing physical, natural, and human environments that may be impacted by the implementation of the Proposed Action and the No Action Alternative.

### 3.1 Land Use and Visual Resources

#### 3.1.1 Land Use

JBA-NAFW encompasses 4,390 acres in Prince George's County, Maryland. Located on the Capital Beltway (I-495), the communities surrounding the Base are part of the greater Washington, D.C. metropolitan area and include Morningside, Woodyard, Clinton, and Camp Springs, Maryland. Land use on JBA-NAFW is characterized by past development with much of the existing land area previously disturbed by construction. Approximately 45 to 50 percent of land on the Base has been directly impacted by infill and development, 10 percent remains undisturbed, and the remainder consists of improved and semi-improved lands. The majority of undisturbed lands are adjacent to or on the golf course in the western part of the Base.

In general, the Base is divided by the airfield, which is oriented in a north-south direction. Beyond the airfield to the west, the majority of land is dedicated to morale, welfare, and recreation (MWR) facilities with limited industrial uses located in the northwest section of the Base. The primary MWR land uses on the western half of the Base consist of housing and community support services, a golf course, and a medical center. Beyond the airfield to the east, land use primarily supports airfield operations and includes administrative and industrial facilities. The Base is bounded on two sides by Allentown Road and Marlboro Pike. Table 3-1 summarizes the existing land use for JBA-NAFW.

In accordance with Air Force Instruction (AFI) 32-7062, "Air Force Comprehensive Planning," (USAF 1997/2009) the 2010 General Plan Update (JBA-NAFW 2010) identifies future land use categories that guide development activities at JBA-NAFW. The General Plan Update contains area development plans that identify parts of the Base determined to be suitable for redevelopment. The General Plan Update also notes that development opportunities are limited and may require land acquisition to accommodate future growth. Due to these circumstances, sustainable design and adaptive facility reuse are key pillars of the General Plan Update.

<b>Table 3-1 Andrews Existing Land Use Acreages</b>		
<b>Land Type</b>	<b>Acres</b>	<b>Percentage (%)</b>
Administration	127	2.9
Aircraft O & M	366	8.3
Airfield	1,525	34.7
Community	136	3.1
Industrial	144	3.3
Medical	47	1.1
Open Space	784	17.8
Outdoor recreation	731	16.7
Residential	508	11.6
Water	22	0.5
<b>Total</b>	<b>4,390</b>	<b>100</b>
Source: JBA-NAFW 2010.		

### 3.1.2 Visual Resources

Urban design for JBA-NAFW is guided by the Base's Architectural Compatibility Plan (ACP) (USAF 2009) which provides a visual overview of Andrews that includes design guidelines and architectural themes. The plan serves as an enforceable zoning ordinance by defining building setbacks, heights, materials, landscaping, and similar provisions that collectively determine the site characteristics for new development on the Base (USAF 2009).

## 3.2 Transportation

Roadways can be classified as either arterial (principal and minor highways), collector (major and minor roadways that direct users to arterial highways), or local roadways or streets that direct traffic to both arterial and collector highways/roadways. The Base is located approximately 6 miles southeast of Washington, D.C. (Figure 1-1). The Base's roadway system is primarily serviced by the "Capital Beltway" (Interstate 95/495 [I-95/495]), a principal highway that traverses the western part of the Base and provides direct access to Allentown Road (Maryland [MD] 337), Suitland Parkway, and Marlboro Pike. The on-Base transportation network consists of approximately 102 miles of paved roads. Access to and from JBA-NAFW is regulated by five entry-control facilities (AFDW 2009a), including the:

- **Main Gate** (7 days per week/24 hours per day). The main entrance from the northwest and accessible via Allentown Road and Suitland Road;



- **Pearl Harbor Gate** (7 days per week/24 hours per day). The main entrance from the east, accessible from Dower House Road via Pennsylvania Avenue, and is the only gate for use by commercial traffic;
- **North Gate** (weekday peak service only). Accessible from the north via Suitland Parkway;
- **Virginia Gate** (weekdays 0500 to 2300). Accessible from the south via Old Alexandria Ferry Road;
- **Maryland Gate** (restricted use). For use by visiting dignitaries or other visitors as appropriate; and
- **West Gate** (closed except for special events). Opened for use as a pedestrian gate in June 2012.

Beyond the active airfield and taxiways, the Base's roadway network generally forms a grid pattern bounded by Perimeter Road, a two-lane, 8.2-mile loop that runs along the inside boundary of the Base. Perimeter Road, along with the Main Gate entrance road, is classified as a minor arterial or a roadway that functions primarily to distribute traffic to all parts of the Base (JBA-NAFW 2010).

Collector roadways on JBA-NAFW direct traffic to/from the main arterials and provide access to the local roadway network. Collector roads on Base include the Avenues of Arnold, Patrick/Fetchet, Alabama (south of F Street), Brookley, Menoher, Arkansas, and Virginia, as well as San Antonio Boulevard. North Perimeter Road and South Perimeter Road provide the only connection points between the western and eastern portions of the Base. The site of the Proposed Action is adjacent to the National Executive Route, which runs along Arnold Avenue from its starting point at the Maryland Gate (AFDW 2009a).

## 3.3 Infrastructure and Utilities

### 3.3.1 Wastewater Collection and Treatment

#### Sanitary Sewer

The sanitary sewer system at JBA was privatized in February 2006. Terrapin Utility Services, Inc., owns and operates the sanitary sewer system (JBA-NAFW 2013). The majority of the sanitary sewer system on JBA-NAFW is approximately 60 years old and consists of more than 33 miles of sewer lines and approximately 1,000 manholes. Pipes range in size from 6 inches in diameter to more than 24 inches, including both gravity lines and force mains. The wastewater generated at JBA-NAFW is treated off-Base at facilities owned and operated by the Washington Suburban Sanitary Commission (WSSC).

On the western side of the Base, the sanitary sewer system discharges to the Piscataway Wastewater Treatment Plant (WWTP) in Accokeek, Maryland, which has a capacity of approximately 30 million gallons per day. The main trunk on the western side of the Base generally follows West Perimeter Road, Menoher Drive, San Antonio Boulevard, and Colorado Avenue. The 21-inch trunk line exits under Branch Avenue approximately 1,500 feet south of Georgia Avenue. The main trunk line on the eastern half of the Base exits at the north end of Dower House Road where it intersects with Pennsylvania Avenue. Wastewater discharges from the eastern half of the Base are collected and treated at the Western Branch WWTP, which also has a capacity of 30 million gallons per day. In total, the WSSC operates and maintains seven regional WWTPs with an operational capacity to handle approximately 74 million gallons of wastewater per day.

### **Food Services**

Food services on JBA-NAFW require the issuance of an industrial discharge permit from the WSSC for the proper disposal of waste such as food, oils, and greases (WSSC 2011a).

### **3.3.2 Potable Water Supply**

The water system infrastructure at JBA was privatized in February 2006. Terrapin Utility Services, Inc., owns and operates it under a 50-year contract. Terrapin purchases water from the WSSC to serve the Base (JBA-NAFW 2013). JBA-NAFW obtains its water supply from the WSSC's Potomac Water Treatment Plant, which has a capacity of approximately 285 million gallons per day (WSSC 2011b). The WSSC draws water from both the Potomac and Patuxent Rivers and operates two water treatment plants. The Potomac River supply consists of two storage reservoirs with a combined capacity of 43 billion gallons, while the Patuxent River supply consists of two impoundment dams with a combined storage capacity of 13 billion gallons.

The majority of the water distribution system on the Base consists of buried water mains/lines that vary in size and/or material. The system comprises more than 100 miles of service lines and approximately 1,000 service connections. The system has three main service connections: 1) a 12-inch service connection located south of the intersection of Perimeter Road West and Arkansas Road; 2) a 14-inch service connection located at the north end of Maryland Drive; and 3) an 8-inch connection currently not in service.

The use of groundwater as a potable source of water is prohibited on the Base and all such wells are used for monitoring purposes only (JBA-NAFW 2010).

### 3.3.3 Solid Waste Management

Solid waste management on the Base includes the collection and disposal of non-hazardous solid waste, as well as overseas, infectious, and pathological waste (referred to collectively as medical waste). JBA-NAFW does not maintain an active landfill and, therefore, all such activities are contracted services that utilize licensed landfill facilities located in Prince George County, Maryland. The Base recycling program collects, segregates, and processes industrial and domestic materials for reuse (JBA-NAFW 2010).

### 3.3.4 Stormwater

In Maryland, construction projects that disturb more than 5,000 square feet of land area must apply for either a General or Individual stormwater permit issued by the Maryland Department of the Environment (MDE 2010a). The stormwater management system on JBA-NAFW consists of eight separate basins that collect stormwater and drain to the Potomac and Patuxent Rivers, part of the larger Chesapeake Bay watershed. Approximately 90 percent of the stormwater- outfalls on the Base discharge to the tributaries of the Potomac River, while the remaining outfalls discharge to the Patuxent River. The Base has a relatively flat terrain with areas where water accumulates due to lack of drainage. The Base has a Stormwater Pollution Prevention Plan (United States Army Corps of Engineers [USACE] 2007a) and maintains a National Pollutant Discharge Elimination System (NPDES) General Industrial Stormwater Discharge Permit and an NPDES General Permit for Stormwater Associated with Construction Activity.

### 3.3.5 Natural Gas

Washington Gas Light Company provides natural gas service to JBA-NAFW via seven connection points, five of which are located on the western part of the Base. The company is responsible for the installation and maintenance of the approximately 10-mile Base-wide natural gas distribution system. A 6-inch natural gas line connects to the Washington Gas Light Company distribution system at the corner of West Perimeter Road and San Antonio Boulevard (JBA-NAFW 2010).

### 3.3.6 Electricity

Potomac Electric Power Company (PEPCO) provides electrical power to the Installation via two 69-kilovolt off-Base electrical feeds that connect to the main substation (Building 1870) located at the intersection of North Perimeter Road and Westover Drive. The main substation on the Base is

owned and operated by the Air Force and distributes electricity Base-wide. From this substation, a total of 20 primary circuits and a switching station (Building 3297) distribute electricity to various parts of the Base. In addition, approximately 90 percent of the on-Base power lines have been placed underground. Electrical services to the Base housing areas are outsourced to the private sector, while the remaining components of the distribution system are owned and operated by the Air Force. The electrical distribution system on JBA-NAFW is in relatively good condition (JBA-NAFW 2010).

### 3.3.7 Heating and Cooling

The JBA heating and cooling system has been decentralized and no longer includes central heating plants. More than 300 oil-fired and natural gas boilers are still operational, about 95 percent of which run on natural gas and the rest on oil. Approximately 60 percent of the buildings on Base are on an automated heating and cooling system. Overall, the heating and cooling system is in fair condition. Eighty (80) percent of the system is new and in good condition; the remaining 20 percent is in mediocre to poor condition.

## 3.4 Geology and Soils

JBA-NAFW is located on a plateau between the Anacostia River to the west and the Patuxent River to the east. It is near the western edge of the Middle Atlantic Coastal Plain physiographic province. The topography on the Base is level to gently sloping with elevations that range from approximately 220 feet above mean sea level (msl) in the southeast to approximately 280 feet above msl farther north (JBA-NAFW 2010).

The Coastal Plain plateau consists of the Brandywine Formation, coarse-grained sediments of gravel and sand with variable amounts of silt and clay estimated to be 40 feet or less in thickness. The Brandywine Formation is underlain by the Calvert Formation, fine to very fine sand, silt, and clay of marine origin estimated to be up to 80 feet in thickness. Other Coastal Plain deposits underlie the Calvert Formation to depths greater than 1,000 feet where it transitions to crystalline bedrock (Schnabel Engineering 2011).

There are two dominant soil associations at JBA-NAFW, the Sassafras-Croom and the Beltsville-Leonardtown-Chillum. Sassafras-Croom is typically found along major drainage ways such as Tinkers and Piscataway Creeks and consists of well-drained, gravel-dominant soils with compact sub-soils. The latter association, Beltsville-Leonardtown-Chillum, is most prevalent on the northern end of the Base, extending through its central portion towards the southeast (JBA-NAFW 2010).

Mapped soil series at the site of the Proposed Action include the following non-hydric soils: Aquasco silt loam, Beltsville-Urban land complex, Hoghole-Grosstown complex, Udorthents loam, Urban land, and Woodstown sandy loam. The site has been previously disturbed and altered by construction activity (AMT, Inc. 2010).

In accordance with the MDE erosion and sediment control guidelines for state and federal projects, an erosion and sediment control plan is required for any project that disturbs over 5,000 square feet of land area and involves more than 100 cubic yards of earth movement (MDE 2011c).

## 3.5 Water Resources

### 3.5.1 Groundwater

JBA-NAFW is located within a portion of the Maryland Coastal Plain that includes several important regional water supply aquifers. These aquifers are located several hundred feet below ground surface (bgs) and include, in order of descending stratigraphic sequence, the Aquia, Magothy, Patapsco, and Patuxent formations. The Aquia formation, located at a depth of 150 feet bgs, is a primary source of groundwater for Prince George's, Anne Arundel, Charles, and St. Mary's counties, and is primarily recharged by infiltration in an area northwest of the Main Base. The underlying Patapsco and Patuxent aquifers supply groundwater to consumers in Prince George's, Anne Arundel, and Charles counties. There are two non-potable water supply wells for the golf courses at the Main Base. One of the wells was completed in the Magothy Formation at a depth of about 385 feet bgs, while the second well was completed in the Patapsco Formation at a depth of about 650 feet bgs. Potable water supply on base is provided by the WSSC.

Groundwater underlying the Main Base occurs at or near the ground surface, with shallow groundwater occurring at depths of less than 20 feet bgs, likely under unconfined conditions. Groundwater recharge occurs primarily through precipitation. Groundwater flow is believed to be down-gradient toward local streams or downward toward deeper underlying aquifers (JBA-NAFW 2012). As previously noted, groundwater is not a source of potable water at JBA-NAFW.

### 3.5.2 Surface Water and Drainage

JBA-NAFW is in the watersheds of the Potomac River and the Patuxent River. A small portion of the Base in the northeast drains to the Patuxent River watershed.

Several major tributaries to the Potomac River originate on the Main Base or are within short distance from its boundaries. Meetinghouse Branch and Paynes Branch both originate in the

southwestern quadrant of the Base and flow west to the Potomac. Piscataway Creek originates in the southeast corner of Andrews AFB and flows through primarily forested and agricultural lands before it discharges to the Potomac River. The headwaters of Tinkers Creek lie near the southwest corner of the Base. Tinkers Creek flows through highly forested areas as it nears its confluence with Piscataway Creek. Henson Creek is located northwest of Andrews AFB and flows through predominantly forested areas before it discharges into Broad Creek. The headwaters of Cabin Creek and Charles Branch lie within the northern portion of the Base's boundaries and flow eastward to the Patuxent River (USACE 2007b). Stormwater from the existing BX and the proposed project drains to the storm sewer system along Arnold Avenue and then toward Henson Creek.

Surface water features on JBA-NAFW include the approximately 14-acre Bass Lake in the southern part of the Base. The lake water supply is drawn from an aquifer formation approximately 600 feet below ground surface. Additionally, there are several small ponds in various locations throughout the Base (JBA-NAFW 2010). The site of the Proposed Action is located within Watershed 4 which discharges to Henson Creek. Behind the existing facility, precipitation and groundwater flow west to southwest toward the lowest level of the site – the forested wetland area (USACE 2009a).

The USEPA published regulations addressing stormwater discharges under the NPDES permitting program. The USEPA delegated to the MDE the authority to administer the NPDES program in Maryland. JBA-NAFW maintains coverage under the MDE's General Discharge Permit (GDP) for industrial activities (GDP No. 02-SW) and under MDE's GDP for discharges by Municipal Separate Stormwater Sewer System operators (No. 05-SF-5501). JBA-NAFW is also required to comply with the requirements of the USEPA's Chesapeake Bay Total Maximum Daily Load and EO 13508, "Chesapeake Bay Protection and Restoration."

The BX expansion would be designed in accordance with EO 13514, "Federal Leadership in Environmental, Energy, and Economic Performance;" the Energy Independence and Security Act of 2007; and the current version of the "Maryland Stormwater Management Guidelines for State and Federal Projects" (MDE 2010b). The regulations require that environmental site design be implemented to the maximum extent practicable through the use of nonstructural best management practices (BMPs) and other site design techniques.

Comprehensive environmental site design methods would be integrated into stormwater control designs. Emphasis would be on the use of non-structural BMPs when designing stormwater management controls, and structural BMPs would only be used after all practical non-structural options are exhausted. Watershed impacts resulting from construction and stormwater controls would



be assessed. Stormwater design for facilities would be in compliance with JBA-NAFW plans, guidance, and analyses.

Sustainable design and development and energy conservation principles would be integrated into facility design and construction would be in accordance with EO 13423 and EO 13514, the Energy Policy Act of 2005, the Energy Independence and Security Act of 2007, Army Sustainable Design and Development Policy, the Installation Design Guide, and other applicable codes, laws, and EOs. Section 438 of the Energy Independence and Security Act of 2007 establishes strict stormwater runoff requirements for federal development and redevelopment projects:

**Stormwater runoff requirements for federal development projects.** The sponsor of any development or redevelopment project involving a Federal facility with a footprint that exceeds 5,000 square feet shall use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow.

### 3.5.3 Wetlands

EO 11990, "Protection of Wetlands," directs federal agencies to minimize the destruction, loss, and degradation of wetlands and to preserve and enhance the natural and beneficial values of wetland communities. Under Section 404 of the Clean Water Act (CWA), the USACE regulates wetlands and waterbodies meeting the definition of *waters of the U.S.* (33 CFR 328). USACE permits are required for the discharge of dredged or fill materials into wetlands or other waters of the U.S. The USACE and the MDE have joint authority for compliance with the CWA provisions for construction-related "cut/fill" activities in USACE-jurisdictional wetlands. MDE authority to govern non-tidal wetlands and waterways closely parallels the federal controls administered through the USACE and the CWA Section 404 program. The Maryland State General Permit is provided by the USACE and is updated every five years (MDE 2011a). In addition to CWA provisions, Maryland regulates wetlands under state laws, including a minimum 25-foot wide buffer along the perimeter of the wetland. EO 11990, "Protection of Wetlands," requires federal agencies to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. AFI 32-7064, Chapter 3, Integrated Natural Resources Management, implements this program at JBA-NAFW. Although wetlands were identified in the vicinity of the site of the Proposed Action in 2012, none of those wetlands are identified by the United States Fish and Wildlife Service (USFWS), National Wetlands Inventory (USFWS 2011); the Maryland Department of Natural Resources (MDNR) wetland maps (MDE 2005); or the 2004 Base-wide wetlands inventory (Andrews AFB 2004). In addition, no wetlands of special state concern are located on or proximate to the site.

Non-tidal wetlands refer to inland, freshwater areas not subject to tidal influence where the water table is at or near the surface or the land is covered by shallow water. There are various types of non-tidal wetlands including palustrine emergent, scrub-shrub, and forested, among others. Palustrine emergent wetlands have marsh or swamp features that support the presence of herbaceous (i.e., non-woody) plants. Palustrine scrub-shrub wetlands include bogs, swamps, and other areas dominated by trees and/or shrubs that are generally less than 20 feet in height. Palustrine forested wetlands occur in areas with a similar hydrology, but contain mature trees of more than 20 feet in height (MDE 2011a).

A 2004 wetlands delineation (Andrews AFB 2004) identified areas on the Base with hydric features determined to be within the jurisdiction of Section 404 of the Clean Water Act (CWA), which are termed “jurisdictional” wetlands. The delineation identified approximately 87 acres of wetland areas on JBA-NAFW from three main palustrine community types: emergent, scrub-shrub, and forested. The study documented that approximately 36 acres on the Base consist of forested wetlands; 31 acres of emergent wetlands; and 20 acres of open water habitat. JBA-NAFW has since demarcated a 25-foot buffer boundary around the delineated wetlands to protect the function and quality of these natural resources (USACE 2007b).

The existing BX on the site of the Proposed Action was built in the mid-1990s. The building footprint was placed within a swale or drainage channel that currently traverses the BX along its northeastern boundary and continues in a northwest direction opposite Westover Drive. It is likely that the present-day site conditions were created by the placement of the existing structure which impeded the site’s natural drainage. Soil samples taken in unaffected sections of the swale on and adjacent to the site indicate that upland deposits of non-hydric soils are predominant within the swale and suggest that the existing wetland areas were more a result of the building placement than the natural hydrology of the site (AMT, Inc. 2010). In 2012, a wetland delineation for the wetlands in the vicinity of the BX was completed. Two wetland areas exist in the vicinity, a 5,616-square-foot (0.13-acre) forested wetland to the north of the BX and a 6,590-square-foot (0.15-acre) wetland mosaic to the northeast. On August 1, 2012, the USACE, Baltimore District, concurred with the Wetland Delineation Report (see Appendix F). The USACE also determined that these were isolated wetlands that are not jurisdictional waters of the U.S, and, therefore, they are not regulated by the CWA. They are, however, still regulated under provisions of the State Laws of Maryland.

#### 3.5.4 Floodplains

EO 11988, “Floodplain Management,” requires federal agencies to identify and consider practicable alternatives for actions within 100-year floodplains. Where practicable alternatives are not

available, federal structures and facilities must be constructed in accordance with and consistent with the intent of the standards and criteria of the National Flood Insurance Program.

The Federal Emergency Management Agency (FEMA) defines “floodplains” as areas that adjoin inland or coastal surface waters and are prone to inundation during or after storm events. At JBA-NAFW, the 100-year floodplain is limited to the immediate areas surrounding small, first-order streams. There are no FEMA-delineated floodplains associated with the site of the Proposed Action (JBA-NAFW 2010).

### **3.5.5 Coastal Zone**

JBA-NAFW is within the designated Maryland coastal zone. When a federal agency conducts an activity or development project or has an activity performed by a contractor for the benefit of the federal agency, the agency must determine whether its activities are reasonably likely to affect any coastal use or resource and must conduct the activities in a manner that is consistent, to the maximum extent practicable, with the enforceable policies of the applicable state coastal program. The federal agency must provide a consistency determination and supporting materials to the state Coastal Zone Management Program agency at least 90 days before starting the proposed activity (unless a different arrangement has previously been made between the federal agency and the authorized state agency) (Ghigiarelli 2004). An assessment of the consistency of the proposed activities with the enforceable policies of the Maryland Coastal Program is in Appendix G.

## **3.6 Biological Resources**

### **3.6.1 Forestry and Vegetation**

JBA-NAFW is located within the Oak-Pine Forest Region of the Atlantic Slope; however, much of the native vegetation has been altered, disturbed, or lost due to past or present development activities on the Base. The majority of vegetation consists of improved or semi-improved (managed) landscape areas interspersed with patches of natural plant communities. Unimproved areas, such as forested land, are limited to approximately 17 percent of the total land area on the Base or roughly 600 acres. Surface water bodies comprise an additional 1 percent of the total land area. The majority of unimproved areas on JBA-NAFW are located to the south and around the perimeter of the Base (JBA-NAFW 2010).

The Installation’s Arbor Plan (MACTEC Engineering and Consulting, Inc. [MACTEC] 2011) contains forest management objectives that are compatible with the military mission, including

guidelines and recommendations to achieve and maintain healthy forest ecosystems. All military construction projects are reviewed to determine the need for tree removal and replacement, as appropriate. In addition, various locations on JBA-NAFW contain herbaceous communities dominated by nonindigenous, invasive plant species, such as the Japanese honeysuckle (*Lonicera japonica*), English ivy (*Hedera helix*), wintercreeper (*Euonymus fortunei*), privet (*Ligustrum* spp.), periwinkle (*Vinca minor*), wineberry (*Rubus phoenicolasius*), tree-of-heaven (*Ailanthus altissima*), oriental bittersweet (*Celastrus orbiculatus*), autumn olive (*Elaeagnus umbellata*), Russian olive (*Elaeagnus angustifolia*), beggar-ticks (*Bidens polylepis*), tall fescue (*Festuca elatior*), purple loosestrife (*Lythrum salicaria*), Korean lespedeza (*Lespedeza cuneata*), common reed (*Phragmites australis*), and multiflora rose (*Rosa multiflora*). These species are managed on a case-by-case basis with an overall goal of removing invasive plants and replacing them with native plant varieties over time (USACE 2007b).

### 3.6.2 Wildlife

The built environment on JBA-NAFW is consistent with the Naval Air Facility's bird-aircraft strike hazard plan (Andrews AFB 2006). Forested areas on the Installation, however, support native species such as small birds and mammals. Additionally, JBA-NAFW is located within the Atlantic migratory bird flyway and is therefore subject to seasonal populations of migrating birds (USACE 2007b).

### 3.6.3 Threatened and Endangered Species

The federal Endangered Species Act (ESA) protects populations of plant and animal species determined to be "threatened" or "endangered." Previous surveys on the Base, including a report published by the MDNR, Wildlife and Heritage Service, have concluded that no ESA-listed animal species are residents of JBA-NAFW (MDNR 2007). Previous surveys for ESA-listed plant species on the Base found one such species – the sandplain gerardia (*Agalinis acuta*) – which is listed as "endangered" under the ESA. Additionally, several plant species on the Base have been identified by the State of Maryland as threatened, rare, or endangered, including the ten-lobed agalinis (*Agalinis obtusifolia*), Carolina foxtail (*Alopecurus carolinianus*), Curtis' three-awn (*Aristida curtissii*), spiral pondweed (*Potamogeton spirillus*), swollen bladderwort (*Utricularia gibba*), and tall nut-rush (*Scleria triglomerata*). In accordance with Base-wide surveys completed as part of a 2007 update of the Integrated Natural Resources Management Plan, no known federally or state-listed plant or animal species are located at the site of the Proposed Action (USACE 2007b; JBA-NAFW 2012).

## 3.7 Socioeconomics, Environmental Justice, and Protection of Children

### 3.7.1 Population and Demographics

The 2010 Census estimates the total population of Prince George's County to be 863,420 persons (U.S. Census Bureau 2010). Between 2000 and 2010, the county population increased by an estimated 7.7 percent and is projected to increase by approximately 9.3 percent over the next several decades (Maryland Department of Planning 2010a). The 2000 and 2010 population estimates for the larger Washington-Baltimore-Northern Virginia CSA reflect this trend. Table 3-2 presents census and other demographic data for Prince George County and the Baltimore-Washington-Northern Virginia CSA for 1990, 2000, and 2010.

Table 3-2 Local Population and Demographic Statistics, 2000 and 2010								
Socioeconomic Parameter	Prince George's County, MD				Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CSA <sup>(a)</sup>			
	2000		2010		2000		2010	
Population								
Total Population	801,515	-	863,420	-	7,608,070	-	8,572,971	-
% Change from previous year	9.90%	-	7.72%	-	-	-	9.03%	-
Race								
White	216,774	27%	166,059	19%	4,791,400	63%	4,973,717	58%
Black/African American alone	501,431	63%	556,620	64%	1,980,986	26%	2,245,992	26%
American Indian/Alaska Native alone	2,643	<1%	4,258	<1%	23,529	<1%	32,302	<1%
Asian alone	30,390	4%	35,172	4%	393,957	5%	645,203	8%
Native Hawaiian/Pacific Islander alone	380	<1%	541	<1%	3,900	<1%	5,639	<1%
Other (alone and two or more)	49,897	6%	100,770	12%	414,298	5%	670,118	8%
Ethnicity								
Hispanic	56,813	7%	128,972	15%	483,549	6%	912,129	11%
Non-Hispanic	744,702	93%	734,448	85%	7,124,521	94%	7,660,842	89%
Source: Maryland Department of Planning 2010b.								
Note: (a) Known as Washington-Baltimore Consolidated Metropolitan Statistical Area (CMSA) in 2000. Changed to Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CSA in 2010 Census.								
Key: CMSA = Consolidated Metropolitan Statistical Area. CSA = Combined Statistical Area. MD = Maryland. WV = West Virginia. DC = District of Columbia. VA = Virginia.								

The total population living and working on JBA-NAFW in 2011 was approximately 15,082 persons (Hodges 2013); however, due to its location within the greater Washington, D.C. metropolitan area, the Base also supports approximately 15,972 military retirees in the region (Smith 2013).

### 3.7.2 Economy and Income

In general, the National Capital Region has a stable and growing economy driven primarily by a large federal government presence supported by the private sector. JBA-NAFW is the largest employer in the state of Maryland and directly employs approximately 8,475 personnel. The estimated total annual economic impact of the Base is roughly \$1.2 billion, including payroll expenditures and indirect job generation. The November 2011 unemployment rate for the State of Maryland was estimated to be approximately 6.9 percent (Bureau of Labor Statistics 2011).

### 3.7.3 Environmental Justice

EO 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” mandates that federal agencies identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. EO 13045 “Protection of Children from Environmental Health Risks and Safety Risks” provides a similar mandate for environmental health and safety risks that may disproportionately affect children (62 *Federal Register* 19883-19888). A disproportionate environmental, safety and health impact occurs when the risk or rate for a minority, low-income or vulnerable population such as children to be exposed to an environmental hazard exceeds the risk or rate of the general population and, as available, to another appropriate comparison group (United States Environmental Protection Agency [USEPA] 1998).

## 3.8 Cultural Resources

The National Historic Preservation Act (NHPA; 16 U.S.C. 470, as amended) requires federal agencies to inventory, protect, and maintain historic properties under their jurisdiction. Section 110 of the NHPA establishes broad historic preservation responsibilities for federal agencies and intends to integrate historic preservation into ongoing programs. Under Section 106, federal agencies are obligated to take into account the effect of their undertakings on cultural resources and to provide the Advisory Council on Historic Preservation an opportunity to comment on these undertakings. JBA-NAFW maintains an Integrated Cultural Resources Management Plan (ICRMP) to guide the



management of known or discovered cultural resources and historic sites on the Base (USACE 2009b).

The 2009 update to the ICRMP (USACE 2009b) surveyed the Base for the presence of cultural resources. JBA-NAFW also conducted an archaeological survey of approximately 140 acres of relatively undisturbed lands on the Base. Three sites were determined to be potentially eligible for the National Register of Historic Places (NRHP). After a Phase II investigation, one site (18PR447) was found to be eligible for the NRHP. There are three historic structures on the Base (Building 1966, 1967, and 1968), collectively termed the Belle Chance, that also have been determined to be eligible for the NRHP. In accordance with the Base ICRMP, there are no known cultural or historic resources located at the Proposed Action site (JBA-NAFW 2010).

JBA-NAFW takes Native American concerns into consideration in base planning as a part of compliance with the American Indian Religious Freedom Act and the Native American Graves Protection and Repatriation Act. No federally recognized Indian tribes reside in Maryland. The descendants of the area's early 17th Century Algonquian-speaking American Indian residents are not federally recognized. The closest federally recognized tribe that may have an interest in the area of JBA-NAFW may be the Oneida Nation of New York and the Oneida Tribe of Wisconsin. This association comes from the Susquehannock who moved into the area of Washington D.C. during the late 17th Century and subsequently lived with the Oneida Tribe. As of FY 2008, JBA-NAFW has not consulted with any federally recognized Indian tribes. Archeological surveys have not identified Native American graves or other culturally sensitive areas on JBA-NAFW. If future activity identifies unanticipated Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony on JBA-NAFW, the Cultural Resources Manager will contact the Maryland Commission on Indian Affairs and the National Park Service to determine the appropriate Native American groups to consult.

## **3.9 Air Quality**

### **3.9.1 Clean Air Act**

USEPA Region 3 and the MDE regulate air quality in Maryland. The Clean Air Act (42 U.S.C. 7401– 7671q), as amended, assigns the USEPA the responsibility to establish the primary and secondary National Ambient Air Quality Standards (NAAQS; 40 CFR Part 50). The Clean Air Act is the primary federal statute governing air pollution. The Act designates six pollutants as criteria pollutants for which NAAQS have been promulgated to protect public health and welfare. The six

criteria pollutants are respirable particulate matter 10 microns or smaller in diameter (PM<sub>10</sub>) and particulate matter smaller than 2.5 microns (PM<sub>2.5</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), lead (Pb), and ozone (O<sub>3</sub>).

The primary NAAQS represent maximum background air pollution levels with an adequate margin of safety to protect public health. Secondary NAAQS represent the maximum pollutant concentration allowable to protect vegetation, crops, and other public resources along with maintaining visibility standards (Table 3-3). Areas that meet the NAAQS are designated as “in attainment,” while those where the ambient pollutant concentration exceeds one or more of the NAAQS are designated as “nonattainment” for each criteria pollutant that is exceeded.

The number of exceedances and their concentrations determine the nonattainment classification of an area. There are six classifications of O<sub>3</sub> nonattainment status—transitional, marginal, moderate, serious, severe, and extreme—and two classifications of CO and PM<sub>10</sub> nonattainment status—moderate and serious.

The Clean Air Act requires states or local air quality control agencies to adopt state implementation plans (SIPs) that prescribe measures to eliminate or reduce the severity or number of NAAQS violations and to achieve and maintain attainment of the NAAQS.

Areas that achieve the air quality standards after being designated as nonattainment are re-designated as being in attainment following USEPA approval of a maintenance plan. These areas are commonly known as “maintenance areas.”

**Table 3-3**  
**National Ambient Air Quality Standards**

Pollutant (Final Rule Cite)		Primary/ Secondary	Averaging Time	Level	Form
Carbon Monoxide [76 FR 54294, Aug 31, 2011]		Primary	8-hour	9 ppm	Not to be exceeded more than once per year
			1-hour	35 ppm	
Lead [73 FR 66964, Nov 12, 2008]		Primary and Secondary	Rolling 3-month average	0.15 µg/m <sup>3</sup> (a)	Not to be exceeded
Nitrogen Dioxide [75 FR 6474, Feb 9, 2010] [61 FR 52852, Oct 8, 1996]		Primary	1-hour	100 ppb	98th percentile, averaged over 3 years
		Primary and Secondary	Annual	53 ppb (b)	Annual Mean
Ozone [73 FR 16436, Mar 27, 2008]		Primary and Secondary	8-hour	0.075 ppm (c)	Annual fourth-highest daily maximum 8-hr concentration, averaged over 3 years
Particle Pollution [71 FR 61144, Oct 17, 2006]	PM <sub>2.5</sub>	Primary and Secondary	Annual	15 µg/m <sup>3</sup>	annual mean, averaged over 3 years
			24-hour	35 µg/m <sup>3</sup>	98th percentile, averaged over 3 years
	PM <sub>10</sub>	Primary and Secondary	24-hour	150 µg/m <sup>3</sup>	Not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide [75 FR 35520, Jun 22, 2010] [38 FR 25678, Sept 14, 1973]		Primary	1-hour	75 ppb (d)	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
		Secondary	3-hour	0.5 ppm	Not to be exceeded more than once per year

## Notes:

- (a) Final rule signed October 15, 2008. The 1978 lead standard (1.5 µg/m<sup>3</sup> as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- (b) The official level of the annual NO<sub>2</sub> standard is 0.053 ppm, equal to 53 ppb, which is shown here for the purpose of clearer comparison to the 1-hour standard.
- (c) Final rule signed March 12, 2008. The 1997 ozone standard (0.08 ppm, annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years) and related implementation rules remain in place. In 1997, EPA revoked the 1-hour ozone standard (0.12 ppm, not to be exceeded more than once per year) in all areas, although some areas have continued obligations under that standard ("anti-backsliding"). The 1-hour ozone standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above 0.12 ppm is less than or equal to 1.
- (d) Final rule signed June 2, 2010. The 1971 annual and 24-hour SO<sub>2</sub> standards were revoked in that same rulemaking. However, these standards remain in effect until one year after an area is designated for the 2010 standard, except in areas designated nonattainment for the 1971 standards, where the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standard are approved.

## Key:

- µg/m<sup>3</sup> = Micrograms per cubic meter.  
 mg/m<sup>3</sup> = Milligrams per cubic meter.  
 PM<sub>10</sub> = Particulate matter less than 10 microns in diameter.  
 PM<sub>2.5</sub> = Particulate matter less than 2.5 microns in diameter.  
 ppm = Parts per million.

Source: USEPA 2011a.

### 3.9.2 Greenhouse Emissions

Greenhouse gases (GHGs) are components of the atmosphere that trap heat relatively near the surface of the earth and, therefore, contribute to the greenhouse effect and climate change. EO 13514, “Federal Leadership in Environmental, Energy, and Economic Performance,” outlines policies intended to ensure that federal agencies evaluate climate-change risks and vulnerabilities, and to manage the short- and long-term effects of climate change on their operations and mission. The EO requires the DOD to measure, report, and reduce their GHG emissions from both their direct and indirect activities. The DOD has committed to reduce GHG emissions from non-combat activities 34 percent by 2020 (DOD 2010). In addition, the CEQ recently released draft guidance on when and how federal agencies should consider GHG emissions and climate change in NEPA analyses. The draft guidance includes a presumptive effects threshold of 27,563 tons per year (tpy) (25,000 metric tpy) of carbon dioxide equivalent (CO<sub>2</sub>eq) emissions from a federal action (CEQ 2010).

Some GHGs such as carbon dioxide (CO<sub>2</sub>) are emitted through natural processes and through human activities. Other GHGs are emitted solely through human activities. CO<sub>2</sub> enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and as a result of other chemical reactions (e.g., manufacture of cement). Methane (CH<sub>4</sub>) is emitted during the production and transport of coal, natural gas, and oil. Nitrous oxide (N<sub>2</sub>O) is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste (USEPA 2011b).

To assist with the determination of GHGs emitted for a proposed project, the Intergovernmental Panel on Climate Change (IPCC) has developed Global Warming Potentials (GWPs), which analyze the abilities of different GHGs to trap heat in the atmosphere. GWPs are based on the heat-absorbing ability of each gas relative to that of CO<sub>2</sub>, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of CO<sub>2</sub>. The GWPs provide a factor for converting emissions of various gases into a common measure denominated in carbon or carbon dioxide equivalent (CO<sub>2</sub>eq). The 2007 GWP factors released by the IPCC are specified in Table 3-4.

Table 3-4 Global Warming Potentials	
Greenhouse Gas	2007 IPCC GWP Factors (100-year)
Carbon Dioxide (CO <sub>2</sub> )	1
Methane (CH <sub>4</sub> )	25
Nitrous Oxide (N <sub>2</sub> O)	298
Key: IPCC = Intergovernmental Panel on Climate Change.	
Source: Columbia 2007.	

### 3.9.3 General Conformity Rule

Under a 1990 amendment to the Clean Air Act, commonly known as the General Conformity Rule, federal actions in nonattainment and maintenance areas are required to conform to the applicable SIP. General conformity is demonstrated if the total net emissions expected to result from a federal action in a nonattainment or maintenance area will not:

- Cause or contribute to any new violation of any NAAQS;
- Interfere with provisions in the applicable SIP for the maintenance of any standard;
- Increase the frequency or severity of any existing violation; or
- Delay the timely attainment of a standard, interim emission reduction, or milestone, including, where applicable, emission levels specified in the applicable SIP for purposes of demonstrating reasonable further progress, attainment, or maintenance.

A federal action is exempt from the General Conformity Rule requirements if the action's total net emissions are below the *de minimis* levels or are otherwise exempt per 40 CFR 51.153. Total net emissions include direct and indirect emissions from all stationary point and area sources, construction sources, and mobile sources caused by the federal action (see Table 3-3).

JBA-NAFW is part of Prince George's County, Maryland, and the Washington Metropolitan Area Air Quality Control Region (AQCR). Prince George's County is currently in attainment for NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>2.5</sub> (daily only), PM<sub>10</sub>, and Pb. Portions of the Washington Metropolitan Area AQCR, including Prince George's County, are designated as nonattainment for 8-hour O<sub>3</sub> (moderate) and for annual PM<sub>2.5</sub>. The area also is designated as a maintenance area for CO (USEPA 2011c).

### 3.9.4 Stationary Source Construction and Operating Permits

In the state of Maryland, the Air and Radiation Management Administration regulates permits for stationary air pollution sources (Code of Maryland Regulations [COMAR] 26.11). Air quality permits must be obtained for certain new or modified sources (MDE 2011b). Title V of the Clean Air Act Amendments of 1990 requires states to issue federal operating permits for major stationary sources. A major stationary source in a nonattainment or maintenance area is a facility that emits more than 25 tpy of volatile organic compounds (VOCs) or nitrogen oxides (NO<sub>x</sub>), 100 tpy of any other nonattainment criteria air pollutant, 10 tpy of a single hazardous air pollutant, or 25 tpy of any combination of hazardous air pollutants.

JBA-NAFW has an original Title V Operating Permit issued by the MDE for Air Force operations and was revised in April 2006 to a non-Title V synthetic minor permit. The AAFES facilities at JBA-NAFW are considered separate from the Installation's other sources. AAFES will be required to obtain a General Permit to Construct for any boilers or other fuel-burning equipment with a heat input of 1 million British thermal units per hour or greater. A state operating permit also may be required. State requirements will be incorporated into final design for heating and cooling equipment.

### 3.9.5 Regional Air Emissions

Table 3-5 lists county-wide emissions for Prince George's County as compiled by the USEPA in its National Emissions Inventory, last updated in 2008 (USEPA 2008). The 2008 National Emissions Inventory contains estimates of annual emissions for stationary and mobile sources of air pollutants in the county.

<b>Table 3-5</b> <b>Air Emissions Inventory - Prince George's County, Maryland</b> <b>Calendar Year 2008</b>					
<b>Pollutants (tons per year)</b>					
<b>Prince George's County, Maryland</b>	<b>Carbon Dioxide (CO)</b>	<b>Volatile Organic Compounds (VOCs)</b>	<b>Nitrogen Oxides (NO<sub>x</sub>)</b>	<b>Sulfur Oxides (SO<sub>x</sub>)</b>	<b>Particulate Matter less than 2.5 microns (PM<sub>2.5</sub>)</b>
All Sources	141,068	18,881	24,026	43,446	1,864
Source: USEPA 2008.					



### 3.10 Noise

The primary source of noise at JBA-NAFW is associated with aircraft operations. Airfield noise zones are described using a measure of the cumulative noise exposure (i.e., day-night average sound level [DNL]) that results from various aircraft operations. DNL takes into consideration the time of day that aircraft events occur. Noise that occurs between 10:00 p.m. and 7:00 a.m. includes a 10-decibel (dB) penalty to account for the difference in human noise perception during the nighttime hours. Within a 65-dB DNL noise contour, noise levels are similar to an urban environment. Noise levels in a 75-dB DNL noise contour are similar to the downtown area of a major city.

Noise zones associated with JBA-NAFW are concentrated east of the airfield runway. The 80+dB DNL or the 75- to 80-dB DNL noise zone encompasses the central part of the Base and several areas on its eastern side. The 65- to 75-dB DNL noise zone covers a portion of the Base both east and west of the flight line (USAF 2007).

### 3.11 Hazardous Materials and Waste Management

Under the Resource Conservation and Recovery Act (RCRA), JBA-NAFW is categorized as a large-quantity generator of hazardous waste (EPA identification number MD0570024000). RCRA defines “hazardous waste” as any solid, liquid, or contained gaseous material for disposal or recycle that poses significant potential harm to human health or environmental quality. Hazardous waste generation on Base is primarily associated with aircraft operations, including materials and waste such as batteries, used fuel/oil and solvents, fluorescent bulbs, and contaminated materials such as rags and filters.

Due to historic waste storage and disposal practices at JBA-NAFW, there are land areas and surface waters on the Base contaminated with metals, VOCs (and semi-VOCs), polyaromatic hydrocarbons, polychlorinated biphenyls, and pesticides. These sites are managed under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) with enforcement delegated to the State of Maryland via the MDE’s Waste Management Administration (Oil Control Program) and Federal Facilities Program. The Installation’s Environmental Restoration Program (ERP) is responsible for approximately 33 ERP sites at JBA-NAFW, including six spill sites, three former training areas, three former landfills, nine storage tank sites, one sludge disposal area, and one waste accumulation site. Groundwater wells on the Base are used to monitor the ERP sites (JBA-NAFW 2010).

### **3.12 Safety and Occupational Health**

Safety and occupational health programs at JBA-NAFW are implemented to prevent worker mishaps and protect the public health (DOD 1998; Department of the Air Force 2004 and 2011). Compliance with safety regulations includes minimum standards for personal protective equipment, equipment operator certifications, and the management of site access, among others. In addition, UFC 4-010-01 addresses DOD anti-terrorism standards associated with facility design and construction in order to mitigate potential security threats on the Base.

## 4 Environmental Consequences

This section analyzes the potential environmental, safety and health consequences associated with the implementation of Alternative 1 (Preferred Alternative) and the No Action Alternative, respectively.

### 4.1 Land Use, including Visual Resources

#### 4.1.1 Alternative 1 (Preferred Alternative)

Alternative 1 would expand the existing BX and this alternative would best position AAFES to meet retail demands until eventual relocation in the 2025 to 2030 timeframe. Per the MOA between AAFES and JBA-NAFW, AAFES would relocate the BX to the planned Town Center development at a future date consistent with the Base's 2010 General Plan Update. The existing BX is currently part of the "Community" land use designation, while the future land use is identified as "Industrial." Alternative 1 would not be consistent with the site's future land use; however, the terms of the MOA ensure that this alternative would be consistent with the future plans articulated in the 2010 General Plan Update. Alternative 1 also would be consistent with the Base's ACP (USAF 2009) for facility upgrades or renovations and other urban design-related variables, such as the protection of character amenities (e.g., viewsheds) on the Base.

#### 4.1.2 No Action Alternative

The selection of the No Action Alternative would not alter the existing land use, which would remain consistent with the 2010 General Plan Update. The No Action Alternative would, however, not be consistent with the site's future land use classification (i.e., 'Industrial') as the MOA would cease to exist under this alternative. Further, the No Action Alternative would not be consistent with several of the development principles and concepts put forth by the General Plan, such as sustainable design and adaptive facility reuse.

### 4.2 Transportation

#### 4.2.1 Alternative 1 (Preferred Alternative)

Under Alternative 1, the Base transportation network would be temporarily impacted by the presence of construction vehicles and equipment. Traffic volume increases would be expected to

occur during the morning (a.m.) and evening (p.m.) peak hours or during lunch hours (between 1100 and 1300 hours).

The “Final Environmental Assessment for Fiscal Year 07-11 BRAC Construction Requirements at Andrews Air Force Base, Maryland” (referred to herein as the BRAC EA) analyzed the potential traffic impacts associated with an increase of approximately 2,700/3,100 personnel for the entire Base (Department of the Air Force 2007). The study concluded that planned roadway projects on and in the vicinity of JBA-NAFW would mitigate potential significant impacts to the transportation system that would result from the BRAC decision. These transportation projects are part of the AFDW (2009) Transportation Management Plan. Additionally, Alternative 1 would have beneficial impacts to the ingress/egress routes that surround the site of the Proposed Action and would be carried out consistent with the ACP standards for roadway development, including the National Executive Route (Arnold Avenue).

#### **4.2.2 No Action Alternative**

The No Action Alternative would not impact the Base transportation network. Under this alternative (and Alternative 1), the BRAC-related personnel increase (i.e., up to 2,700/3,100) would impact the local transportation resources over time as traffic volumes increase with additional or new personnel assignments (USAF 2007). The No Action Alternative would not, however, improve the ingress/egress routes that surround the site of the Proposed Action.

### **4.3 Infrastructure and Utilities**

#### **4.3.1 Alternative 1 (Preferred Alternative)**

##### **Stormwater**

Alternative 1 would disturb more than 5,000 square feet of soil and, therefore, would require the preparation of a Notice of Intent for submission to the MDE to comply with the NPDES General Permit for Stormwater Associated with Construction Activities (NPDES Number MDR10, State Discharge Permit Number 09GP, July 13, 2009; see Appendix H). Under Alternative 1, construction would not proceed without an approved permit from the MDE.

Stormwater quantity and quality control measures (both structural and non-structural) would be provided on site to address the overall stormwater management requirements in compliance with the MDE-approved stormwater management plan. Further, the implementation of the Proposed Action would be consistent with the JBA-NAFW Stormwater Pollution Prevention Plan (USACE

2007), as well as with the NPDES requirements found in 40 CFR 126.26. Alternative 1 also would include the preparation of an MDE-approved Sedimentation and Erosion Control Plan and a post-construction Stormwater Management Plan to collect and treat stormwater from the developed site. Prior to submitting an NOI for submission to the MDE to comply with the NPDES General Permit for Stormwater Associated with Construction Activities, an erosion and sediment control plan must be submitted to the Prince George's Soil Conservation District. Alternative 1 would include the implementation of BMPs to mitigate potential stormwater impacts consistent with the "Maryland Stormwater Management Guidelines for State and Federal Projects" (MDE 2010b), the Maryland Stormwater Design Manual, Volumes I and II (MDE 2000); and the Maryland Standards and Specifications for Soil Erosion and Sediment Control (MDE 2011c). No excess borrow material would be disposed of on the site of the Proposed Action.

**Potable Water**

Alternative 1 would meet the duration, flow rate, and pressure requirements of industrial and domestic potable and non-potable water consumption on the Base, including fire protection. The capacity of the WSSC's Potomac Water Treatment Plant (approximately 285 million gallons per day) is adequate to support the Proposed Action, and water quality currently meets or exceeds standards put forth by the USEPA and the State of Maryland. Alternative 1 also would improve the water distribution at the site of the Proposed Action. Per COMAR 26.03.01.05.A, Alternative 1 would not include use of potable water from any of the local groundwater resources.

**Wastewater Collection and Disposal**

**Sanitary Sewer.** Under Alternative 1, the sanitary sewer system would be adequate to meet the increased demand associated with the BX expansion. WSSC collection and treatment facilities have adequate capacity to support the Proposed Action. Alternative 1 also would improve the sanitary sewer system at the site of the Proposed Action. The implementation of Alternative 1 would comply with the provisions of WSSC Discharge Authorization Permit 00001, issued to JBA-NAFW on October 10, 2009. Sanitary sewer discharges associated with Alternative 1 would include standard domestic sewage only, and no other regulated substances such as industrial or hazardous waste would enter the system.

In the context of the 2,700/3,100 BRAC personnel increase, and given the regional wastewater treatment capacity provided by the WSSC (approximately 74 million gallons), wastewater impacts associated with the Proposed Action would be minor.

**Food Services.** Alternative 1 would comply with WSSC regulations for the disposal of food-generated wastewater.

#### **Electric and Natural Gas**

The electrical and natural gas supply/distribution systems on the Base would be adequate to support the implementation of Alternative 1. The implementation of Alternative 1 also would improve electrical and natural gas system components at the site of the Proposed Action.

#### **Solid Waste**

Construction debris associated with Alternative 1 would be recycled to the maximum extent practicable. For example, green waste (e.g., trees and plants) resulting from this alternative would be processed for composting. All other solid waste generated by construction debris would be disposed of at a certified off-Base landfill.

### **4.3.2 No Action Alternative**

Under the No Action Alternative, infrastructure and utility systems such as those associated with the conveyance of stormwater, sanitary sewer, potable water, electricity, and natural gas systems would not experience the increased demand created by the Proposed Action. In addition, the selection of this alternative would not generate any construction debris. Therefore, no change to existing Base infrastructure and utility systems would occur.

## **4.4 Geology and Soils**

### **4.4.1 Alternative 1 (Preferred Alternative)**

Under Alternative 1, existing pavement, topsoil, and organic matter would be collected and replaced with compacted structural fill necessary for building and pavement support. The implementation of BMPs at the site of the Proposed Action would include the establishment of silt fences, hydro-seeding to re-establish ground cover, limited construction traffic to reduce disturbance to underlying soils, and similar measures for erosion and sedimentation management. There would be minor, temporary impacts to site soils during construction.

### **4.4.2 No Action Alternative**

The No Action Alternative would not disturb the existing geology or soils at the site of the Proposed Action and no construction would occur; therefore, there would be no change to existing conditions.



## 4.5 Water Resources

### 4.5.1 Alternative 1 (Preferred Alternative)

#### Groundwater

Groundwater levels across the Proposed Action site are variable, ranging from approximately 8.5 to 15 feet below ground surface. The majority of the site is absent of groundwater to a depth of approximately 10 feet below ground surface. Under Alternative 1, groundwater levels would be below the lowest floor of the facility renovation and, therefore, dewatering during construction or permanent under-floor drainage would not be required. In addition, Alternative 1 would not be located within 6 feet of any existing groundwater wells. Therefore, the implementation of Alternative 1 would result in only temporary and minor impacts to the local groundwater resource.

#### Surface Water

No natural surface waters are associated with the site of the Proposed Action. Alternative 1 would include the construction of new impervious surface (i.e., buildings and parking lots), and the demolition and excavation of a limited amount of the existing pavement and soil so that additional structural fill could provide support to the expanded facility and its related infrastructure. Alternative 1 also would include the implementation of various BMPs to control surface drainage and reduce the potential for construction site runoff to impact local surface waters, such as Henson Creek. For example, under Alternative 1, the area surrounding the pavement would be graded to direct surface water away from impervious areas on the site, and construction traffic on stripped or undercut subgrades would be limited to reduce soil disturbance and enhance on-site infiltration. Alternative 1 would be consistent, to the maximum extent practicable, with the “Maryland Stormwater Management Guidelines for State and Federal Projects” (MDE 2010b), and the Draft Maryland Standards and Specifications for Soil Erosion and Sediment Control (MDE 2011c). Therefore, surface water impacts associated with Alternative 1 would be minor with the implementation of BMPs at the site of the Proposed Action.

#### Wetlands

Alternative 1 would not directly impact any wetlands. Two wetland areas exist in the vicinity of the BX: a 5,618-square-foot (0.13-acre) forested wetland to the north of the BX and a 6,590-square-foot (0.15-acre) wetland mosaic to the northeast. Approximately 4,326 feet of the State of Maryland 25-foot wetland buffer would incur permanent impacts during the expansion of the BX—1,084 square feet to the 25-foot buffer around the forested wetland and 3,242 square feet to the 25-foot buffer around the wetland mosaic... These activities would require an MDE nontidal wetlands

permit. Potential indirect impacts to the wetlands would be minimized in accordance with the MDE-approved Sediment and Erosion Control Plan and Stormwater Management Plan.

### **Coastal Zone**

No effects on Maryland's coastal resources would be expected from implementing the Proposed Action. All activities would be conducted in accordance with applicable laws, regulations, and policies governing erosion and sediment control and stormwater management, which would ensure that all the projects would occur in a manner consistent with the applicable Maryland Coastal Program enforceable policies. An assessment of the consistency of the proposed activities with the enforceable policies of the Maryland Coastal Program is in Appendix G.

### **4.5.2 No Action Alternative**

Under the No Action Alternative, there would be no change from existing conditions for groundwater, surface water, or wetland areas on the Base. The amount of impervious surface would remain the same at the site of the Proposed Action, and no impacts to water resources would be associated with the implementation of the No Action Alternative. Runoff from the existing BX would still be directed to the storm sewer system that runs along Arnold Avenue and flows toward Henson Creek. The No Action Alternative would not, however, provide the opportunity to improve the natural and physical characteristics of the site through design/redesign, and to the benefit of its drainage system. That is, the No Action Alternative would not incorporate BMPs that would benefit the site's drainage system over the long-term.

## **4.6 Biological Resources**

### **4.6.1 Alternative 1 (Preferred Alternative)**

#### **Vegetation**

Beyond the wetland areas at the site of the Proposed Action (analyzed in Section 4.5), there is limited vegetation due to past development of the Base. Vegetation typically consists of maintained grass areas with ornamental trees and shrubs that are intermixed with developed areas. Under Alternative 1, there would be minor, temporary impacts to the vegetation of these improved/semi-improved areas on the site. Over the long-term, landscape improvements such as native species establishment would improve the vegetative communities on the site of the Proposed Action.

Implementation of Alternative 1 would involve the removal of approximately 193 trees—90 from the forested area and 103 isolated trees. All tree removal associated with Alternative 1 would be replaced in accordance with the Base Arbor Plan (MACTEC 2011), including:

- For removal of canopy cover of less than 1 acre, one tree shall be planted for each removed according to a 1:1 ratio
- For more than 1 acre, 60 percent of canopy cover must be reforested

Replacement trees for those removed under Alternative 1 would be selected native species arranged in stands similar to those removed and would be replaced prior to tree removal, to the extent practicable.

Additionally, the Arbor Plan (MACTEC 2011) proposes a 1.6-acre reforestation area to the northeast of the BX on the southwest corner of Westover Drive and Arnold Avenue. The proposed reforestation plans for Alternative 1 emulate a natural process called Old Field Succession, the ecological process that occurs on abandoned farmland when a field is no longer harvested and becomes a new habitat for plant species to colonize. Because it is basically bare soil, the habitat is difficult for most plants. There are no trees to provide shade or serve as wind breaks. This environment is first colonized by plants called pioneer species. As the pioneer plants die, the plant litter enriches the soil creating an environment better suited for grasses and shrubs. These plants out-compete the pioneer plants and they create an environment where trees can grow. The first tree species are primary species and create an environment for the trees that will become the climax forest (MACTEC 2011).

### **Wildlife**

The wildlife habitat associated with the site of the Proposed Action is generally limited to the forested area north of the BX. Moreover, the majority of the site has been disturbed by previous development and does not provide a high quality wildlife habitat. Alternative 1 would remove some wildlife habitat as the BX would expand to the north; however, reforestation efforts elsewhere would partially offset the loss of habitat. Therefore, Alternative 1 would result in minor impacts to wildlife species that use this forest stand (and the other vegetative communities on the site) for feeding, breeding, or habitat.

### **Threatened and Endangered Species**

There are no known ESA-listed species that use or inhabit the site of the Proposed Action. Therefore, the implementation of Alternative 1 would have no effect on any federally protected plant or wildlife species.

The only federally listed species present at JBA-NAFW is sandplain gerardia (*Agalinis acuta*); the only known population of the sandplain gerardia is south of the flightline near the 13th tee of the golf course (USACE 2007b). The habitat is protected by fencing and signage that warns of the presence of a protected species. JBA-NAFW maintains a management action plan for sandplain gerardia which includes the overall management situation; a discussion of specific management issues and concerns; management goals and objectives to address issues and concerns; and a five-year work plan (JBA-NAFW 2012). No state-listed species are known to occur at the site of the Proposed Action; therefore, there would be no impact on these species.

#### **4.6.2 No Action Alternative**

Under the No Action Alternative, there would be no changes to existing biological resources on the site of the Proposed Action.

### **4.7 Socioeconomics, Environmental Justice, and Protection of Children**

#### **4.7.1 Alternative 1 (Preferred Alternative)**

Alternative 1 would result in a minor, temporary benefit to the local economy in the form of construction jobs, and a minor, sustained benefit associated with additional retail job creation. Alternative 1 would consolidate and expand customer services for authorized personnel that use the BX and would contribute to better quality of life on the Base. Alternative 1 would take place within a military installation, so Alternative 1 would not cause any disproportionate high or adverse health or environmental effects on minority or low-income populations or children pursuant to EOs 12898 and 13045, respectively.

#### **4.7.2 No Action Alternative**

Under the No Action Alternative, no socioeconomic benefit would accrue from the renovation and expansion of the BX. Additionally, there would no impacts to minority, low-income, or vulnerable populations such as children associated with the No Action Alternative.

## 4.8 Cultural Resources

### 4.8.1 Alternative 1 (Preferred Alternative)

The selection of Alternative 1 would have no effect on known cultural resources either listed or nominated for the NRHP, including any known historic sites or structures. Under Alternative 1, any unknown cultural resources discovered on the site of the Proposed Action would be subject to programmatic agreement between JBA-NAFW, the Advisory Council on Historic Preservation, and the Maryland Historical Trust. Upon such findings, the Base would notify the Maryland Historical Trust consistent with 36 CFR, Part 800.11 and would suspend construction work until further investigation.

### 4.8.2 No Action Alternative

Under the No Action Alternative, since there would be no construction, no potential for discovery of unknown cultural resources exists.

## 4.9 Air Quality

### 4.9.1 Alternative 1 (Preferred Alternative)

Implementation of the Proposed Action would result in temporary emissions during construction and minor emissions from an expanded operation over the long-term. Calculations for the air quality analysis are provided in Appendix I.

#### Construction

Construction is assumed to begin in summer 2013 and to take approximately 22 months to complete (five days per week and eight hours per day) spanning 2013, 2014, and 2015. Operation of construction vehicles and heavy equipment during the construction phase (demolition, site preparation, grading, and paving) would result in temporary, minor impacts to air quality. Air emissions primarily would be in the form of increased exhaust pollutants that would be minimized through good vehicle maintenance.

Windblown soil and dust could occur during the construction phase as a result of equipment movement over exposed soil areas. Generation of fugitive dust would be minimized through the use of BMPs to control dust (i.e., wetting the surfaces, and through the re-vegetation of disturbed areas as soon as possible).

Air quality data calculation tables are provided in Appendix I. To calculate construction emissions for the proposed project, the construction schedule was considered to include site mobilization and demobilization, grading, paving, exterior and interior construction, and the associated equipment necessary to perform these tasks. Table 4-1 presents separate emission estimates for each of the three years during which construction would occur. The *de minimis* values from 40 CFR 93.153(b)(1) and (2) also are shown in Table 4-1. Emissions from construction equipment, construction materials delivery, and construction employee commuting have been considered using USEPA and other emission factors and methods. GHG emissions anticipated from construction also have been estimated by using the corresponding GWP factors given in Table 3-4.

<b>Table 4-1</b>						
<b>Total Estimated Construction Emissions Associated with the Proposed Action</b>						
<b>Emissions (tons per year)</b>						
<b>Year</b>	<b>Nitrogen Oxide (NO<sub>x</sub>)</b>	<b>Volatile Organic Compounds (VOCs)</b>	<b>Carbon Monoxide (CO)</b>	<b>Sulfur Dioxide (SO<sub>2</sub>)</b>	<b>Particulate Matter 2.5 Microns or Less (PM<sub>2.5</sub>)</b>	<b>Carbon Dioxide Equivalent (CO<sub>2</sub>eq)</b>
2013 (6 Months)	2.69	2.30	16.82	0.0014	4.06	27.20
2014 (12 Months)	16.85	6.11	38.69	0.016	1.04	54.40
2015 (4 Months)	1.17	14.78	10.94	0.00022	0.15	18.13
<i>De Minimis</i> Thresholds <sup>(a)</sup>	100	50	100	100	100	--
Note: (a) 40 CFR 93.153(b)(1) and (2) for moderate ozone nonattainment inside ozone transport region and maintenance for CO.						

## Operation

Operations emissions would include emissions from heating and cooling the facility, and the emergency generator. The BX would be heated by condensing-type boilers using natural gas for fuel. Cooling would use electrically powered water chillers. The heating system would use low NO<sub>x</sub> emission technology and the cooling systems would use non-ozone-depleting compounds (non-ODCs) or exempt hydrofluorocarbons (HCFCs) as refrigerants. The emergency generator would be a diesel-operated engine and would have limited annual hours of operation. Potential emissions from heating are based on maximum natural gas usage at 8,760 hours per year using USEPA emission factors. There should not be a significant increase in traffic, only a redistribution of existing traffic, since access to the installation is restricted.

The estimated annual operations emissions from stationary sources for the Proposed Action are listed in Table 4-2 and data calculation tables are provided in Appendix I. *De minimis* thresholds also are shown in Table 4-2.

<b>Table 4-2</b> <b>Estimated Annual Emissions from Stationary Sources Associated with</b> <b>the Proposed Action During Operations</b>					
Emissions (tons/year)					
Activity	Nitrogen Oxide (NO <sub>x</sub> )	Volatile Organic Compounds (VOCs)	Carbon Monoxide (CO)	Sulfur Dioxide (SO <sub>2</sub> )	Particulate Matter 2.5 Microns or Less (PM <sub>2.5</sub> )
Total Annual Operating Emissions	0.90	0.10	1.51	0.01	0.14
<i>De Minimis</i> Thresholds <sup>(a)</sup>	100	50	100	100	100
Note: (a) 40 CFR 93.153(b)(1) and (2) for moderate ozone nonattainment inside ozone transport region and maintenance for CO.					

## Conclusion

The Proposed Action would not be expected to have any significant impact on air quality in Washington Metropolitan Area AQCR. Air emissions from construction would be temporary and below *de minimis* thresholds. Construction emissions would be less than 10 percent of the county's current criteria pollutant emissions for any one of the nonattainment pollutants (Table 4-3). A General Permit to Construct and a State Operating Permit from the MDE may be required, depending on the final type of heating equipment chosen for the facility. Operating emissions would include emissions from heating and cooling units of stationary sources. Criteria emissions would be minimal as heating systems would use low NO<sub>x</sub> emission technology, and the cooling systems would use non-ODCs or exempt HCFCs as refrigerants.

Currently, the JBA-NAFW area is designated as *nonattainment* for eight-hour O<sub>3</sub> (moderate) and for annual PM<sub>2.5</sub>. The area also is designated as a *maintenance area* for CO. Therefore, a Record of Non-Applicability for the General Conformity Rule has been prepared and is provided in Appendix I. Total emissions from the implementation of the Proposed Action would not impact O<sub>3</sub>, PM<sub>2.5</sub>, or CO concentrations in the area.



<b>Table 4-3</b> <b>Air Emissions Inventory Prince George's County, Maryland</b> <b>Calendar Year 2008 vs. Proposed Construction Emissions</b>					
<b>Pollutants (tons per year)</b>					
<b>Prince George's County, Maryland</b>	<b>Carbon Dioxide (CO)</b>	<b>Volatile Organic Compounds (VOCs)</b>	<b>Nitrogen Oxides (NO<sub>x</sub>)</b>	<b>Sulfur Oxides (SO<sub>x</sub>)</b>	<b>Particulate Matter less than 2.5 microns (PM<sub>2.5</sub>)</b>
Current Emissions (2008)	141,068	18,881	24,026	43,446	1,864
Proposed Highest Annual Emissions (2014)	38.69	6.11	16.85	0.016	1.04
Proposed Emissions Percentage of Current Emissions	0.03%	0.03%	0.07%	>0.01%	0.06%
Source: USEPA 2008.					

#### 4.9.2 No Action Alternative

The No Action Alternative would result in no new construction of an AAFES facility. However, the existing AAFES facilities would continue to operate and would result in the same quantities of air emissions that currently exist. There would be no change in existing conditions.

### 4.10 Noise

#### 4.10.1 Alternative 1 (Preferred Alternative)

Noise from construction vehicles and equipment associated with Alternative 1 would occur during site preparation and facility construction; however, all such impacts would be minor and temporary, after which noise levels would return to normal. In comparison to noise levels generated by persistent airfield operations, noise impacts from the implementation of Alternative 1 would be minor. No long-term noise impacts would be associated with Alternative 1.

#### 4.10.2 No Action Alternative

Under the No Action Alternative, the noise environment at JBA-NAFW would remain consistent with existing conditions on the Base with the predominant noise source from airfield operations.

## 4.11 Hazardous Materials and Waste Management

### 4.11.1 Alternative 1 (Preferred Alternative)

Any hazardous waste resulting from the implementation of Alternative 1 could include small amounts of construction-related debris, as well as materials/waste generated from support vehicles and equipment that require maintenance and fueling. Under Alternative 1, hazardous waste storage on site would be limited to the initial accumulation point criteria and not more than 55 gallons (or 1 quart of acute hazardous waste) would be stored on the site of the Proposed Action at any one time. Hazardous waste resulting from Alternative 1 would then be transferred to Building 3304, the designated hazardous waste storage area on the Base, prior to its removal and disposal by a licensed private firm at an approved facility or landfill. No construction activity or soil disturbance to ERP sites would occur as none are located on the site of the Proposed Action. Alternative 1 would be consistent with the JBA-NAFW Spill Prevention, Control, and Countermeasures Plan (Defense Energy Support Center 2006), Environmental Protection Standards for Contracts (Andrews AFB 2009), the Asbestos Management Program Plan (AFDW 2008), and the Lead-based Paint Management Plan (AFDW 2009b), which collectively support the safe handling and monitoring of hazardous materials and waste on the Base. All hazardous materials and waste associated with Alternative 1 would be managed, stored, transported, and disposed of in accordance with all applicable federal, state, and local regulations. Therefore, potential adverse impacts from hazardous materials and waste resulting from the construction of the Proposed Action would be minor and temporary in nature.

### 4.11.2 No Action Alternative

No construction activities would be associated with the No Action Alternative, therefore, no hazardous materials and waste would be generated.

## 4.12 Safety and Occupational Health

### 4.12.1 Alternative 1 (Preferred Alternative)

Alternative 1 would result in a slight increase in the short-term risks associated with construction activity on JBA-NAFW. However, all contractors would be required to maintain and implement safety programs in compliance with all applicable federal, state, and local safety and occupational health regulations. Therefore, safety and health risks associated with Alternative 1

would be minor and temporary, and largely mitigated by the implementation of standardized contractor safety and health programs.

#### 4.12.2 No Action Alternative

There would be no safety and occupational health risks associated with the implementation of the No Action Alternative.

### 4.13 Cumulative Impacts

Per 40 CFR 1508.7, NEPA analyses must assess the cumulative effects resulting from the incremental environmental impact of separate past, present, and reasonably foreseeable future actions, including the Proposed Action. Cumulative effects accrue from individually minor, collectively significant actions occurring over an extended time period (40 CFR 1508.4).

The geographic area considered for cumulative impacts would be limited to JBA-NAFW, and no potential effects would be expected to impact areas outside the Base. The proposed AAFES facility is expected to be constructed over an approximate two-year period (22 months) beginning in summer 2013.

Other proposed projects during this same two-year period are illustrated on Figure 4-1 and described below.

**Helicopter Operations Facility (HOF) near Hangar 1.** The HOF would be constructed on the north side of G Street along the west flight line adjacent to Hangar 1 and the south ramp. The new facility would have two stories with a total area of approximately 60,000 square feet. Construction is anticipated to begin in 2013 and would include site clearance, excavation, foundation and floor, utility and infrastructure systems, a concrete block exterior with brick facing, a standing seam metal roof, a fire suppression system, a parking lot, landscaping, stormwater management, and relocation of the Pathfinder fence to the exterior of the HOF.

A construction laydown area would be established in the vicinity of the site proposed for the HOF. A possible site is north of Fairbanks Street and east of Arnold Avenue. An 8-foot solid screen fence would be established at this site to screen the site from the Executive Route along Arnold Avenue, and construction traffic control would be established to avoid conflicts between construction traffic and traffic along Arnold Avenue.



- Existing AAFES Facilities
- Facilities to be Removed
- New Construction
- Gates to be Upgraded
- - - JBA Boundary

**FIGURE 4-1**  
Locations of Potential Concurrent Projects  
Joint Base Andrews-Naval Air Facility  
Washington, Maryland



**Building 1988 Replacement.** Building 1988, a traffic check house at the intersection of Maryland Drive and North Perimeter Road at the Maryland Gate, is proposed to be demolished in 2013 and replaced with a similar structure at the same location. The Maryland Gate is JBA's only Distinguished Visitor entrance. Demolition of Building 1988 would consist of the complete tear down and demolition of building structures and equipment. The adjoining parking lot would remain. The replacement building would be approximately the same size as the existing structure, but would be configured to correct the security and aesthetic deficiencies of Building 1988: location of door opening, lack of ballistic glass, lack of professional image, and inconsistency with antiterrorism/force protection requirements.

**Building 1845 Parking Lot Addition.** Starting in 2013, the parking lot adjacent to Building 1845 (used by the Security Police Operations) would be enlarged by approximately 40 percent (from 93,110 square feet to approximately 133,000 square feet), adding approximately 100 parking spaces. This action would provide sufficient parking for Building 1845 personnel so they would no longer have to seek out alternate parking locations.

**Facility Demolitions.** Three buildings (Buildings 1429, 1679, and 1732) and the canopy and fuel tanks at Building 1685 are scheduled for demolition in 2013. Building 1429 is old (constructed in 1955) and no longer used. The cinder block walls of the 797-square-foot building are crumbling and deteriorating, thus posing a potential safety risk. The 12,148-square-foot Building 1679 (Chapel 3) has mold and structural fractures, creating a safety and health hazard. The 5,514-square-foot building (Building 1732) is no longer needed as it is a steam electrical plant and steam is no longer used on JBA-NAFW. The canopy and fuel tanks at Building 1685 are no longer needed as AAFES has constructed a new gas station.

**Gate Modifications (Main, Pearl Harbor, and Virginia).** Starting in 2014, the Main Gate, Pearl Harbor Gate, and Virginia Gate are scheduled for modification. Each gate must accommodate the anticipated amount of traffic at peak periods with a reasonable level of service and wait time. Additionally, each modification would address and correct deficiencies related to safety and security.

**West Fitness Center replacement.** Under the Proposed Action, a fitness center (including courts for basketball, volleyball, and racquetball; cardiovascular rooms; a health and wellness center; men's and women's locker rooms; weight training rooms; a stretching area; a group exercise area; an indoor six-lane lap pool; an indoor running track; distinguished visitor locker rooms; a sauna; food demonstration areas; storage; laundry; and administration space) would be constructed southeast of the existing West Fitness Center where there are recreational fields. The new facility would have an

area of approximately 84,000 square feet. Construction would include site clearance, excavation, a reinforced concrete foundation and floor, masonry exterior with brick, a standing seam metal roof, parking, utilities connections, soil remediation, landscaping, and stormwater management.

Construction of the new center would require the removal of some recreational ball fields. JBA-NAFW would determine whether to replace the fields in a separate decision process. The West Fitness Center, with an area of 42,055 square feet, would be demolished after the new fitness center was constructed. Demolition would consist of the complete tear down and demolition of building structures, equipment, and related impervious surfaces, such as parking lots in the building demolition project area. Utilities at the project site would be capped and left in place.

Solid and hazardous waste (including asbestos-containing materials [ACM] and lead-based paint [LBP]) would be disposed of consistent with federal, state, and Base requirements. The Base would identify potential recycling opportunities for materials such as copper piping, aluminum, and steel, and would coordinate with the demolition contractor to ensure that materials generated during demolition are recycled if possible.

Cumulative impacts associated with the Proposed Action and reasonably foreseeable future actions may result from temporarily increased construction traffic. The Proposed Action would not be expected to increase operations traffic because new personnel would not be assigned to the Base. With the implementation of mitigation measures, such as the utilization of proper equipment, implementation of BMPs, phasing of construction activities, adherence to permit requirements, and existing standard operating procedures, as well as other guidance in place at JBA-NAFW, it is anticipated that any cumulative construction impacts would not be significant.

Operations of the new AAFES facility would not result in any significant, long-term, cumulative impacts, as the Proposed Action would essentially result in the same impacts as operations at the existing AAFES facilities.

## **4.14 Unavoidable Adverse Impacts**

This EA identifies potential adverse impacts associated with the implementation of the Proposed Action. CEQ NEPA guidance defines “significant, unavoidable” adverse impacts as those that cannot be reduced to “less than significant” levels through the application of mitigation measures. Small portions of the State of Maryland 25-foot wetland buffer would incur minor impacts. These would be short-term temporary impacts to the buffer only and would not have any significant or long-term adverse impact to the wetlands. Some unavoidable adverse impacts would be associated with

tree stands located at the site of the Proposed Action; however, the implementation of mitigation measures would largely offset the loss of these natural resources. Under the Proposed Action, there would be no “significant, unavoidable” adverse impacts to the natural and human environment at JBA-NAFW.

## **4.15 Relationship of Short-Term Uses and Long-Term Productivity**

To the extent practicable, short-term impacts associated with the Proposed Action should not adversely affect the long-term productivity of an environmental, safety, and health resource or resource area. NEPA regulations require decisions to be made that strike a balance between the short-term use of a resource and its long-term, enhanced productivity. Short-term effects associated with the Proposed Action would include those resulting from construction activities such as cut-and-fill activity, stormwater runoff, vegetation and tree removal, noise generation, among other temporary effects; however, there would be no adverse effects that would degrade the long-term productivity at the site of the Proposed Action.

## **4.16 Irreversible and Irretrievable Commitment of Resources**

Per 40 CFR 1502.16, NEPA requires a discussion of any irreversible or irretrievable commitment of resources associated with the Proposed Action. An “irreversible commitment” would result from the permanent use or destruction of a particular resource (e.g., energy use) that cannot be replaced within a reasonable timeframe, whereas an “irretrievable commitment” would result in a loss of value to an affected resource that cannot be restored as a result of the Proposed Action (e.g., extinction of a species). Short-term irreversible and irretrievable commitments of resources that would result from the implementation of the Proposed Action include planning, engineering, and construction labor and cost; building material and supply; and energy consumption during construction. Long-term irreversible and irretrievable commitments of resources would result from the implementation of the Proposed Action would include increased energy consumption from the operation and maintenance of an expanded BX.



## **5 List of Organizations and Individuals Contacted, Reviewers, and Preparers**

### **5.1 Individuals Contacted and Reviewers**

The following individuals at JBA-NAFW provided consultation and review during the development of this document:

- Anne Hodges, Environmental Planner NEPA/EIAP, 11 CES/CEIE
- Steve Richards, Chief of Environmental Management, 11 CES/CEIE
- Michelle Quinn, Tanks (AST/UST), 11 CES/CEIE
- David Humphreys, Community Planner, 11 CES/CENP
- Todd Braun, Water/Wastewater and Energy Compliance, 11 CES/CEIE
- Jun Morales, Air Quality, Asbestos, Natural and Cultural, 11 CES/CEIE
- David Connolly, Environmental Restoration Program, 11 CES/CEIE
- Lisa Carter, Grounds Safety Manager, 11 WG/SEG
- Keith Freihofer, Hazardous Waste, 11 CES/CEIE
- Aaron Spouse, Pollution Prevention/Recycling/Hazmat/EMS, 11 CES/CEIE
- Donna Jackson, Real property, 11 CES/CEIA
- Capt. Aspery, Bioenvironmental (Occupational Health and Environmental Protection), 779 AMDS/SGPD
- SSgt Cherry, Geobase Technical Support, NCOIC, 11 CES/CENP
- Major Ryan Albrecht, Judge Advocate Environmental Liaison Officer AFLOA/JACE-ELFSC (AMC)

Army and Air Force Exchange Service:

- Greg Smith, Environmental Engineer, AAFES HQ, Dallas, Texas
- Robert Johnson, Design and Construction Project Manager, AAFES HQ, Dallas, Texas

## 5.2 List of Preparers

The contractor responsible for preparing this EA is:

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Tallahassee, Florida 32303

The following individuals contributed to the preparation of this document:

Name	Role	Years Experience	Responsibilities
Richard Stephens	Project Manager	24	<ul style="list-style-type: none"><li>▪ Project Management</li><li>▪ Project Coordination</li><li>▪ Affected Environment</li><li>▪ Environmental Consequences</li><li>▪ Cumulative Impacts</li></ul>
Peggy Farrell	NEPA Specialist	32	<ul style="list-style-type: none"><li>▪ Quality Assurance/Quality Control</li></ul>
Michael Robertson	NEPA Specialist	9	<ul style="list-style-type: none"><li>▪ Proposed Action and Alternatives</li><li>▪ Affected Environment</li><li>▪ Environmental Consequences</li></ul>
Jeff Hughes	Air Quality Specialist	22	<ul style="list-style-type: none"><li>▪ Air Conformity Analysis</li></ul>
Gina Edwards	Technical Editor	29	<ul style="list-style-type: none"><li>▪ Document Editing and Control</li></ul>
Mark Moore	GIS/Graphics	11	<ul style="list-style-type: none"><li>▪ Figures</li></ul>

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## **Appendix A**

# **Correspondence and Consultation**

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## **DOPAA Letters**

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**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 11TH WING (AFDW)  
JOINT BASE ANDREWS, MARYLAND 20762**

8 Mar 2012

Mr. Greg Golden, Environmental Review Unit  
Maryland Department of Natural Resources  
Tawes State Office Building B-3  
580 Taylor Ave  
Annapolis, MD 21401

Dear Mr. Golden,

Joint Base Andrews-Naval Air Facility, Washington (JBA) is preparing an Environmental Assessment (EA) to address the potential impacts related to expansion of the Army and Air Force Exchange Service (AAFES) Base Exchange (BX) at building 1811. We invite your agency to comment on the Proposed Action and welcome any relevant information about resources under your jurisdiction that may be present in the project area. Once the EA has been prepared, you will have the opportunity to review the full draft analysis at that time.

Currently the BX operates in three separate buildings: 1683 (Home Traditions) constructed in 1973; 1805 (Four Seasons) constructed in 1983; and 1811 (AAFES Main BX) constructed in 1995. The proposed action would relocate the retail services provided by buildings 1683 and 1805 through an expansion of building 1811. The purpose is to provide consolidated and centralized retail facilities on JBA where authorized customers could obtain multiple services at a single location thus reducing costs, increasing operational efficiency, and providing a more viable service to customers.

Attached please find a copy of the Description of Proposed Action and Alternatives (DOPAA) for the Proposed Action. To help maintain the project schedule please provide written comments within 30 days of receipt of this letter to Anne Hodges, 11 CES/CEAO, 3466 North Carolina Ave., Joint Base Andrews, MD 20762 (or email [anne.hodges@afncr.af.mil](mailto:anne.hodges@afncr.af.mil)).

Also included is a copy of the distribution list of those federal, state, and local agencies included in this notification. If you feel additional agencies should be included, please forward this letter and attachments. I may be reached at (301) 981-1426 if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne M. Hodges".

Anne M. Hodges  
Environmental Planner

Attachments:

1. Distribution List
2. DOPAA

## Distribution List

The following agencies have been notified. If you consider any additional agencies should review and comment on this proposal; please feel free to include them in a re-distribution of this letter.

Mr. Greg Golden, Environmental Review Unit  
Maryland Department of Natural Resources  
Tawes State Office Building B-3  
580 Taylor Ave  
Annapolis, MD 21401

Mrs. Linda C. Janey, JD  
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Ms. Brigid E. Kenney  
Planning Director  
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Marie Halka  
Deputy Director  
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Mr. J. Rodney Little  
Maryland Historical Trust  
Office of Preservation Services  
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Crownsville, MD 21032

Ms. Genevieve LaRouche  
US Fish & Wildlife Service  
Chesapeake Bay Field Office  
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Annapolis, MD 21401

Ms. Fern Piret  
Director of Planning  
Prince George's County Department of Planning  
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Mr. Carlton E. Hart, AICP, Urban Planner  
National Capital Planning Commission  
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North Lobby, Suite 500  
Washington, DC 20004

Mr. Michael W. Weil, Urban Planner  
National Capital Planning Commission  
401 9th Street, NW  
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**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 11TH WING (AFDW)  
JOINT BASE ANDREWS, MARYLAND 20762**

8 Mar 2012

Marie Halka  
Deputy Director  
Maryland Department of the Environment  
SSA-Director's Office  
1800 Washington Blvd  
Baltimore, MD 21230

Dear Ms. Marie Halka,

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Environmental Planner

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1650 Arch Street  
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401 9th Street, NW  
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**DEPARTMENT OF THE AIR FORCE  
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JOINT BASE ANDREWS, MARYLAND 20762**

8 Mar 2012

Mr. Carlton E. Hart, AICP, Urban Planner  
National Capital Planning Commission  
401 9th Street, NW  
North Lobby, Suite 500  
Washington, DC 20004

Dear Mr. Hart,

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JOINT BASE ANDREWS, MARYLAND 20762**

8 Mar 2012

Mrs. Linda C. Janey, JD  
Director, Maryland State Clearinghouse  
Maryland Office of Planning, Room 1104  
301 West Preston St.  
Baltimore, MD 21201-2365

Dear Mrs. Janey,

Joint Base Andrews-Naval Air Facility, Washington (JBA) is preparing an Environmental Assessment (EA) to address the potential impacts related to expansion of the Army and Air Force Exchange Service (AAFES) Base Exchange (BX) at building 1811. We invite your agency to comment on the Proposed Action and welcome any relevant information about resources under your jurisdiction that may be present in the project area. Once the EA has been prepared, you will have the opportunity to review the full draft analysis at that time.

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Sincerely,

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Anne M. Hodges  
Environmental Planner

Attachments:

1. Distribution List
2. DOPAA

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US Fish & Wildlife Service  
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177 Admiral Cochrane Dr.  
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Ms. Fern Piret  
Director of Planning  
Prince George's County Department of Planning  
14741 Governor Oden Bowie Dr, Room 4150  
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Mr. Alex Romero  
National Capital Parks-East  
1900 Anacostia Dr, SE  
Washington, DC 20020

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National Capital Planning Commission  
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Mr. Michael W. Weil, Urban Planner  
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**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 11TH WING (AFDW)  
JOINT BASE ANDREWS, MARYLAND 20762**

8 Mar 2012

Ms. Brigid E. Kenney  
Planning Director  
Maryland Department of the Environment  
Office of the Secretary  
1800 Washington Blvd.  
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Dear Ms. Kenney,

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Environmental Planner

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HEADQUARTERS 11TH WING (AFDW)  
JOINT BASE ANDREWS, MARYLAND 20762**

8 Mar 2012

Ms. Genevieve LaRouche  
US Fish & Wildlife Service  
Chesapeake Bay Field Office  
177 Admiral Cochrane Dr.  
Annapolis, MD 21401

Dear Ms. LaRouche,

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8 Mar 2012

Mr. J. Rodney Little  
Maryland Historical Trust  
Office of Preservation Services  
100 Community Place  
Crownsville, MD 21032

Dear Mr. Rodney Little,

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8 Mar 2012

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Prince George's County Department of Planning  
14741 Governor Oden Bowie Dr, Room 4150  
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8 Mar 2012

Mr. Alex Romero  
National Capital Parks-East  
1900 Anacostia Dr, SE  
Washington, DC 20020

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***Vigilance - Precision - Global Impact***

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8 Mar 2012

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1650 Arch Street  
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8 Mar 2012

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National Capital Planning Commission  
401 9th Street, NW  
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Attached please find a copy of the Description of Proposed Action and Alternatives (DOPAA) for the Proposed Action. To help maintain the project schedule please provide written comments within 30 days of receipt of this letter to Anne Hodges, 11 CES/CEAO, 3466 North Carolina Ave., Joint Base Andrews, MD 20762 (or email [anne.hodges@afncr.af.mil](mailto:anne.hodges@afncr.af.mil)).

Also included is a copy of the distribution list of those federal, state, and local agencies included in this notification. If you feel additional agencies should be included, please forward this letter and attachments. I may be reached at (301) 981-1426 if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne M. Hodges".

Anne M. Hodges  
Environmental Planner

Attachments:

1. Distribution List
2. DOPAA

## Distribution List

The following agencies have been notified. If you consider any additional agencies should review and comment on this proposal; please feel free to include them in a re-distribution of this letter.

Mr. Greg Golden, Environmental Review Unit  
Maryland Department of Natural Resources  
Tawes State Office Building B-3  
580 Taylor Ave  
Annapolis, MD 21401

Mrs. Linda C. Janey, JD  
Director, Maryland State Clearinghouse  
Maryland Office of Planning, Room 1104  
301 West Preston St.  
Baltimore, MD 21201-2365

Ms. Brigid E. Kenney  
Planning Director  
Maryland Department of the Environment  
Office of the Secretary  
1800 Washington Blvd.  
Baltimore, MD 21230

Ms. Marie Halka  
Deputy Director  
Maryland Department of the Environment  
SSA-Director's Office  
1800 Washington Blvd  
Baltimore, MD 21230

Mr. J. Rodney Little  
Maryland Historical Trust  
Office of Preservation Services  
100 Community Place  
Crownsville, MD 21032

Ms. Genevieve LaRouche  
US Fish & Wildlife Service  
Chesapeake Bay Field Office  
177 Admiral Cochrane Dr.  
Annapolis, MD 21401

Ms. Fern Piret  
Director of Planning  
Prince George's County Department of Planning  
14741 Governor Oden Bowie Dr, Room 4150  
Upper Marlboro, MD 20772

Ms. Barbara Rudnick, NEPA Team Leader  
Office of Environmental Programs (3EA30)  
US Environmental Protection Agency, Region  
III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Mr. Alex Romero  
National Capital Parks-East  
1900 Anacostia Dr, SE  
Washington, DC 20020

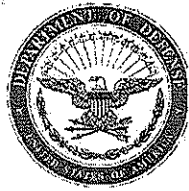
Mr. Carlton E. Hart, AICP, Urban Planner  
National Capital Planning Commission  
401 9th Street, NW  
North Lobby, Suite 500  
Washington, DC 20004

Mr. Michael W. Weil, Urban Planner  
National Capital Planning Commission  
401 9th Street, NW  
North Lobby, Suite 500  
Washington, DC 20004

## **DOPAA Comments**



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DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 11TH WING (AFDW)  
JOINT BASE ANDREWS, MARYLAND 20762

USAF  
EJL/ARA  
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8 Mar 2012

AAFES Exchange

Mr. J. Rodney Little  
Maryland Historical Trust  
Office of Preservation Services  
100 Community Place  
Crownsville, MD 21032

Dear Mr. Rodney Little,

Joint Base Andrews-Naval Air Facility, Washington (JBA) is preparing an Environmental Assessment (EA) to address the potential impacts related to expansion of the Army and Air Force Exchange Service (AAFES) Base Exchange (BX) at building 1811. We invite your agency to comment on the Proposed Action and welcome any relevant information about resources under your jurisdiction that may be present in the project area. Once the EA has been prepared, you will have the opportunity to review the full draft analysis at that time.

Currently the BX operates in three separate buildings: 1683 (Home Traditions) constructed in 1973; 1805 (Four Seasons) constructed in 1983; and 1811 (AAFES Main BX) constructed in 1995. The proposed action would relocate the retail services provided by buildings 1683 and 1805 through an expansion of building 1811. The purpose is to provide consolidated and centralized retail facilities on JBA where authorized customers could obtain multiple services at a single location thus reducing costs, increasing operational efficiency, and providing a more viable service to customers.

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Sincerely,

Anne M. Hodges  
Environmental Planner

The Maryland Historical Trust has determined that there are no historic properties affected by this undertaking.

*[Signature]* Date 3/23/12

Attachments:

1. Distribution List
2. DOPAA

Vigilance - Precision - Global Impact

Archaeo: 1A/BC 3/23/2012

3/23/12  
10

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Tawes State Office Building B-3  
580 Taylor Ave  
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Mrs. Linda C. Janey, JD  
Director, Maryland State Clearinghouse  
Maryland Office of Planning, Room 1104  
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Ms. Brigid E. Kenney  
Planning Director  
Maryland Department of the Environment  
Office of the Secretary  
1800 Washington Blvd.  
Baltimore, MD 21230

Ms. Marie Halka  
Deputy Director  
Maryland Department of the Environment  
SSA-Director's Office  
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Mr. J. Rodney Little  
Maryland Historical Trust  
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100 Community Place  
Crownsville, MD 21032

Ms. Genevieve LaRouche  
US Fish & Wildlife Service  
Chesapeake Bay Field Office  
177 Admiral Cochrane Dr.  
Annapolis, MD 21401

Ms. Fern Piret  
Director of Planning  
Prince George's County Department of Planning  
14741 Governor Oden Bowie Dr, Room 4150  
Upper Marlboro, MD 20772

Ms. Barbara Rudnick, NEPA Team Leader  
Office of Environmental Programs (3EA30)  
US Environmental Protection Agency, Region  
III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Mr. Alex Romero  
National Capital Parks-East  
1900 Anacostia Dr, SE  
Washington, DC 20020

Mr. Carlton E. Hart, AICP, Urban Planner  
National Capital Planning Commission  
401 9th Street, NW  
North Lobby, Suite 500  
Washington, DC 20004

Mr. Michael W. Weil, Urban Planner  
National Capital Planning Commission  
401 9th Street, NW  
North Lobby, Suite 500  
Washington, DC 20004

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*Maryland Department of Planning*

*Martin O'Malley*  
Governor  
*Anthony G. Brown*  
Lt. Governor

*Richard Eberhart Hall*  
Secretary  
*Matthew J. Power*  
Deputy Secretary

March 13, 2012

Ms. Anne Hodges, Environmental Planner  
U.S. Department of the Air Force  
11 CES/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

**STATE CLEARINGHOUSE REVIEW PROCESS**

**State Application Identifier:** MD20120313-0150

**Reviewer Comments Due By:** April 5, 2012

**Project Description:** Scoping prior to EA: Description of Proposed Actions and Alternatives: relocate the retail services offered in 3 buildings to one expanded retail facility: upgrade facilities and provide adequate space for current and future retail demand

**Project Address:** BX Building 1811

**Project Location:** County of Prince George's

**Clearinghouse Contact:** Bob Rosenbush

Dear Ms. Hodges:

Thank you for submitting your project for intergovernmental review. Participation in the Maryland Intergovernmental Review and Coordination (MIRC) process helps ensure project consistency with plans, programs, and objectives of State agencies and local governments. MIRC enhances opportunities for approval and/or funding and minimizes delays by resolving issues before project implementation.

The following agencies and/or jurisdictions have been forwarded a copy of your project for their review: the Maryland Department(s) of Business and Economic Development, Transportation, the Environment, Natural Resources; the Maryland Military Department; the County of Prince George's; and the Maryland Department of Planning; including the Maryland Historical Trust. They have been requested to contact your agency directly by **April 5, 2012** with any comments or concerns and to provide a copy of those comments to the State Clearinghouse for Intergovernmental Assistance. Please be assured that after **April 5, 2012** all MIRC requirements will have been met in accordance with Code of Maryland Regulations (COMAR 34.02.01.04-.06). The project has been assigned a unique State Application Identifier that should be used on all documents and correspondence.

If you need assistance or have questions, contact the State Clearinghouse staff noted above at 410-767-4490 or through e-mail at [brosenbush@mdp.state.md.us](mailto:brosenbush@mdp.state.md.us). Thank you for your cooperation with the MIRC process.

Sincerely,

Linda C. Janey, J.D., Assistant Secretary

LCJ:BR

cc: Beth Cole – MHT\*  
Tammy Edwards – DBED\*  
Melinda Gretsinger –  
MDOT\*

Joane Mueller – MDE\*  
Greg Golden – DNR\*  
Lawrence Leone – MILT\*

Beverly Warfield – PGEO\*  
Mike Paone – MDPL\*

12-0150\_NDC.NEW.doc

rec'd 3/19/12

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

April 4, 2012

Ms. Anne Hodges  
11. CES/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

Re: Description of Proposed Action and Alternatives for the Proposed Environmental Assessment for the Expansion of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Maryland

Dear Ms. Hodges:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and Section 309 of the Clean Air Act and Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) has reviewed the Description of Proposed Action and Alternatives (DOPAA) for the Proposed Environmental Assessment for the Expansion of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Maryland. EPA has comments on the DOPAA which are enclosed in the "Technical Comment" document.

Thank you for providing EPA with the opportunity to review this project. If you need assistance in the future, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara Rudnick", is positioned above the typed name.

Barbara Rudnick  
NEPA Team Leader  
Office of Environmental Programs

Enclosure

## Technical Comments

### Purpose and Need

The EA states that Base Exchange (BX) operates in three separate buildings which are out-of-date and inconsistent with current installation building codes and industry standards for retail space. In addition, each facility lacks adequate physical space necessary to meet the demand from an increasing customer base located both on- and off-installation. Please describe the current and future customer demand so as to support and/or justify the need for the BX expansion. Describe the inefficiencies and inadequacies of operating out of three separate facilities as well as the advantage of consolidating retail functions into one building.

### Executive Order 13508 -- Chesapeake Bay Protection and Restoration

Section 1.7, Regulatory Compliance and Permit Requirements, lists various permits, laws/regulations, and Executive Orders that the Proposed Action must comply with. Since the Proposed Action is within the Chesapeake Bay Watershed, it is the responsibility of the Departments of the Army and Air Force to comply with and address the requirements of Executive Order 13508.

The Executive Order provides information and data on land management practices for federal agencies with land, facilities, or installation management responsibilities affecting ten or more acres within the watershed of the Chesapeake Bay to contribute towards the restoration of the Chesapeake Bay and its watershed. As required by Section 502 of the Executive Order, this document (1) provides guidance for federal land management in the Chesapeake Bay and (2) describes proven, cost-effective tools and practices that reduce water pollution, including practices that are available for use by federal agencies. Federal agencies in the Chesapeake Bay watershed will find this guidance useful in managing their lands, ranging from the development and redevelopment of federal facilities to managing agricultural, forested, riparian, and other land areas the federal government owns or manages. Please address Executive Order 13508 in relation to the Proposed Action.

### Description of the Proposed Action/Alternatives

As stated in the EA (page 2-1), "Key features associated with the construction of the Proposed Action include the addition of a food court, loading dock, food service dock, and an employee parking area."

The DOPAA describes two alternatives that were eliminated from further analysis and presents two alternatives which are to be carried forward for further analysis. These two alternatives are: Alternative 1, the Preferred Alternative, Limited Expansion of the Existing AAFES Base Exchange, and the No Action Alternative.

The Preferred Alternative would expand the building footprint onto semi-improved and previously undisturbed lands. Please quantify and describe the "semi-improved and previously undisturbed lands." In addition, when looking at Figures 2-1 and 2-2, it is apparent that a large open parking lot is adjacent to the BX building. Please describe the need for an additional employee parking lot which is proposed to be located in an area that would impact natural resources. Include quantitative data which indicates existing use of the BX building as well as projected future use of the proposed expansion building. What is the existing customer base and proposed customer base?

Have alternative site design plans for expansion of the BX building been explored so as not to disturb natural resources? Who uses the existing parking lots depicted in Figures 2-1 and 2-2? Has conversion of the existing open parking lot(s) to a structured parking garage been evaluated? If a raised parking structure is feasible, can the proposed food court and/or loading dock be incorporated into the space of the existing open parking lot so as not to disturb natural areas?

### Wetlands

Page 2-4 of the DOPAA states, "Alternative 1 would directly impact approximately 0.25 acre of wetlands classified as "atypical" (i.e., previously disturbed) grasslands (also termed emergent wetlands) and approximately 0.0004 acre, or 1.6 square feet, classified as forested wetlands. Figure 2-2 depicts the Preferred Alternative in relation to these wetland areas." Please note that Figure 2-2 is a black and white map and the key of delineated wetlands is not distinguishable. Thus, a more appropriate depiction of the wetlands in association with the Preferred Alternative should be provided.

The Preferred Alternative would directly impact wetlands as described above. Impacts to wetlands should be avoided or minimized whenever possible. Wetlands present on, or immediately surrounding the site should be delineated according to the 1987 Federal Manual for Identifying and Delineating Jurisdictional Wetlands. The total size of the wetlands should be provided, in addition to the size of the wetland in the study area and size of the direct and indirect impact. The EA must analyze the size and functional values of all impacted wetlands and develop a mitigation plan for their replacement.

Forested wetland systems act as a natural filter and sediment trap and absorb flood waters. They provide vital ecological functions that are critical to several wetland dependent animal and plant species. This type of wetland system is vulnerable to a variety of human practices, such as agriculture, urbanization, and forestry. Therefore, wetland impacts from human activities should be avoided to the maximum extent practicable and be properly protected. EPA's mandates include the preservation of these environmentally significant values and functions. Please consider exploring alternatives that would avoid these functioning systems.





**Description of Past and Reasonably Foreseeable Future Actions Relevant to Cumulative Impacts**

Section 2.3 of the DOPAA lists planned projects for FY 2012 and beyond which are actions to be considered in the analysis of cumulative impacts. One noted project is the construction of AAFES Shoppette. Where is this in relation to the BX building? Can infrastructure be shared with any of the proposed projects (i.e. parking lot)? Indicate location and proximity of proposed projects to the Proposed Action discussing impacts, if any, to evaluated resources. The proposed Town Center was not included in the list of proposed projects. Please include the Proposed Town Center in the list of proposed planned projects and indicate its proximity to the Proposed Action as well as discuss cumulative impacts, if applicable.

AAPTS Exchange



## MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore, Maryland 21230

410-537-3000 • 1-800-633-6101 • <http://www.mde.state.md.us>

Martin O'Malley  
Governor

Robert M. Summers, Ph.D  
Secretary

Anthony G. Brown  
Lieutenant Governor

April 4, 2012

Ms. Anne Hodges  
U.S. Department of the Air Force  
11 CBS/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

RE: State Application Identifier: MD20120313-0150  
Project: Scoping...relocate the retail services

Dear Ms. Hodges:

Thank you for the opportunity to review the above referenced project. The document was circulated throughout the Maryland Department of the Environment (MDE) for review, and the following comments are offered for your consideration:

1. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.
2. If the proposed project involves demolition -- Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.
3. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Waste Diversion and Utilization Program at (410) 537-3314 for additional information regarding recycling activities.
4. Any contract specifying "lead paint abatement" must comply with Code of Maryland Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1950 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.

In addition, information from MDE's Science Services Administration is enclosed.

Again, thank you for giving MDE the opportunity to review this project. If you have any questions or need additional information, please feel free to call me at (410) 537-4120.

Sincerely,

Joane D. Mueller  
MDE Clearinghouse Coordinator  
Office of Communications

Enclosure

cc: Bob Rosenbush, State Clearinghouse

**Andrews Airforce Base Joint Base Relocation Activities**

**Maryland Department of the Environment - Science Services Administration**

**REVIEW FINDING: R1 Consistent with Qualifying Comments**

**(MD2012 0313-0150)**

The following additional comments are intended to alert interested parties to issues regarding water quality standards. The comments address:

**A. Water Quality Impairments:** Section 303(d) of the federal Clean Water Act requires the State to identify impaired waters and establish Total Maximum Daily Loads (TMDLs) for the substances causing the impairments. A TMDL is the maximum amount of a substance that can be assimilated by a waterbody such that it still meets water quality standards.

**Planners should be aware of existing water quality impairments identified on Maryland's 303(d) list. The Project is situated in the Piscataway Creek watershed, identified by the MD 8-digit code 02140203 which is currently impaired by several substances and subject to regulations regarding the Clean Water Act.**

Planners may find a list of nearby impaired waters by entering the 8-digit basin code into an on-line database linked to the following URL:  
<http://www.mde.state.md.us/programs/Water/TMDL/Integrated303dReports/Pages/303d.aspx>.

This list is updated every even calendar year. Planners should review this list periodically to help ensure that local decisions consider water quality protection and restoration needs. **Briefly, the current impairments that are relevant to the Project include the following:**

**Piscataway Creek (02140203):**

<b>Nutrients:</b>	<b>Tidal. A TMDL is pending development.</b>
<b>Sediments:</b>	<b>Tidal. A TMDL is pending development.</b>
<b>Bacteria:</b>	<b>Non-tidal. A TMDL has been written and approved by EPA.</b>
<b>Biological:</b>	<b>Non-tidal. A TMDL is pending development.</b>

**B. TMDLs:** Development and implementation of any Plan should take into account consistency with TMDLs developed for the impaired waterbodies referenced above. Decisions made prior to the development of a TMDL should strive to ensure no net increase of impairing substances. TMDLs are made available on an updated basis at the following web site:

<http://www.mde.state.md.us/programs/Water/TMDL/CurrentStatus/Pages/Programs/WaterPrograms/TMDL/Sumittals/index.aspx>

Special protections for high-quality waters in the local vicinity, which are identified pursuant to Maryland's anti-degradation policy;

**C. Anti-degradation of Water Quality:** Maryland requires special protections for waters of very high quality (Tier II waters). The policies and procedures that govern these special waters are commonly called "anti-degradation policies." This policy states that "proposed amendments to county plans or discharge permits for discharge to Tier II waters that will result in a new, or an increased, permitted annual discharge of pollutants and a potential impact to water quality, shall evaluate alternatives to eliminate or reduce discharges or impacts." These permitted annual discharges are not just traditional Point Sources, it can include all discharges such as Stormwater.

**Piscataway Creek 1, which is located within the vicinity of the Project, has been designated as a Tier II stream. (See attached map)**

Planners should be aware of legal obligations related to Tier II waters described in the Code of Maryland Regulations (COMAR) 26.08.02.04 with respect to current and future land use plans. Information on Tier II waters can be obtained online at: <http://www.dsd.state.md.us/comar/getfile.aspx?file=26.08.02.04.htm> and policy implementation procedures are located at <http://www.dsd.state.md.us/comar/getfile.aspx?file=26.08.02.04-1.htm>

Planners should also note that since the Code of Maryland Regulations is subject to periodic updates. A list of Tier II waters pending Departmental listing in COMAR can be found, with a discussion and maps for each county, at the following website: <http://www.mde.state.md.us/programs/researchcenter/EnvironmentalData/Pages/researchcenter/data/waterqualitystandards/antidegradation/index.aspx>

## **ADDITIONAL COMMENTS**

### **Chesapeake Bay TMDL**

With the completion of the Chesapeake Bay TMDL, the Chesapeake Bay Program Office (CBPO) will be able to provide loading data at a more refined scale than in the past. MDE will be able to use the CBPO data to estimate pollution allocations at the jurisdictional level (which will include Federal Facilities) to provide allocations to the Facilities. These allocations, both Wasteload (WLA) and Load Allocation (LA) could call for a reduction in both Point Sources and Nonpoint Sources. Facilities should be aware of reductions and associated implementation required by WIPs or FIPs.

### **Stormwater**

The project should consider all Maryland Stormwater Management Controls. Site Designs should consider all Environmental Site Design to the Maximum Extent Practicable and "Green Building" Alternatives. Designs that reduce impervious surface and BMPs that increase runoff infiltration are highly encouraged.

#### **Further Information:**

<http://www.mde.state.md.us/programs/Water/StormwaterManagementProgram/Pages/Programs/WaterPrograms/SedimentandStormwater/swm2007.aspx>

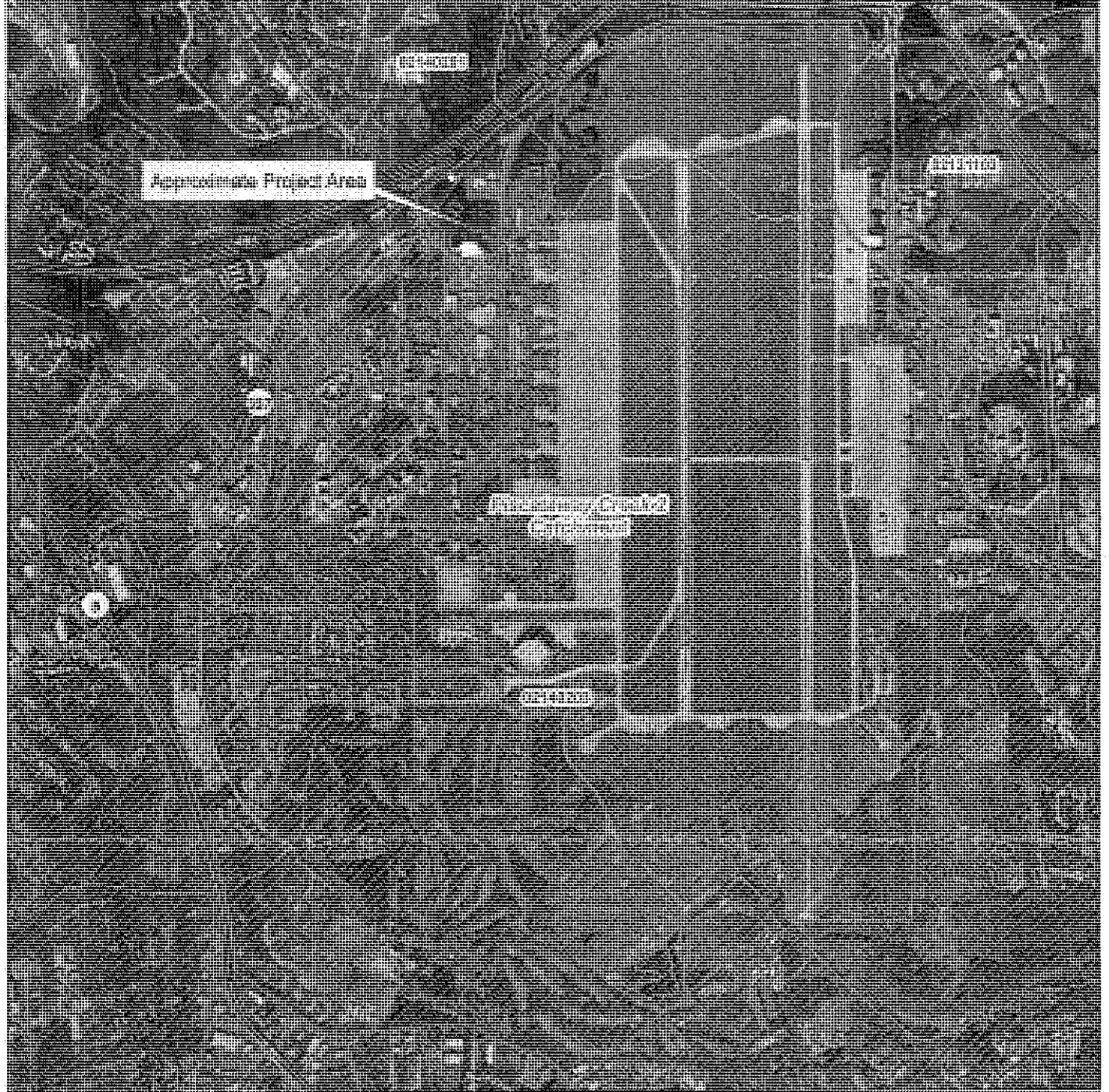
#### **Environmental Site Design (Chapter 5):**

<http://www.mde.state.md.us/programs/Water/StormwaterManagementProgram/MarylandStormwaterDesignManual/Documents/www.mde.state.md.us/assets/document/chapter5.pdf>






#### **Redevelopment Regulations:**

<http://www.dsd.state.md.us/comar/comarhtml/26/26.17.02.05.htm>

# Andrews Airforce Base Prince Georges County, MD MD2012 0313-0150



## Legend

-  Stream
-  Andrews Airforce Base
-  Edge Watershed
-  Major Road
-  MD High Quality Waters



## Data Sources:

Streams - State Highway Administration  
Major Roads - State Highway Administration  
Watersheds - 8-digit - MD Dept. of the Environment  
Municipal Boundaries - State Highway Administration

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IN REPLY REFER TO:  
NCPC File No. 7363

April 10, 2012

Ms. Anne Hodges  
11 CES/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762



Re: Proposed Army and Air Force Exchange Service (AAFES) Building # 1811 Expansion  
Environmental Assessment Scoping Comments

Dear Ms. Hodges:

Thank you for the opportunity to provide scoping comments on the proposed expansion of the Army and Air Force Exchange Service (AAFES) Building # 1811 on behalf of the National Capital Planning Commission (NCPC). As the central planning agency for the federal government in the National Capital Region, NCPC has reviewed authority related to the overall project under the National Capital Planning Act (40 USC § 8722 (b) (1)).<sup>1</sup> As indicated in your letter, dated March 8, 2012, the Proposed Action will relocate retail services provided at Buildings # 1683 and 1805 to an expanded Building # 1811 to better serve the needs of Joint Base Andrews-Naval Air Facility Washington, Maryland (JBA-NAF). As such, the project appears to be consistent with several policies contained in the Federal Workplace: Location, Impact, and the Community Element of the Federal Elements of the Comprehensive Plan for the National Capital, in particular:

- Give preference to ... areas that are under redevelopment with infrastructure and services in place, when locating federal workplaces. (Locating Federal Workplaces policies # 1)
- Consider the modernization, repair, and rehabilitation of existing federally owned facilities for federal workplaces before developing new facilities. (Locating Federal Workplaces policies # 7)
- Minimize development of open space by selecting disturbed land or brownfields for new federal workplaces or by reusing existing buildings or sites. (Locating Federal Workplaces policies # 9)

The following sections provide additional NCPC staff comments that should be addressed in the draft and final Environmental Assessment (EA) documents to assist with Commission review of the project.

---

<sup>1</sup> The Planning Act requires federal and District of Columbia agencies to advise and consult with NCPC in the preparation of agency plans prior to preparation of construction plans.



## 1.7 Regulatory Compliance and Permit Requirements

Staff notes that Table 1-1 – Environmental Permits, Approval, and Coordination (page 1-6) of the Description of Proposed Action and Alternatives (DOPAA) document summarizes applicable federal and local statutes that apply to the project. However, the table does not include NCPC's review authority under the National Capital Planning Act, nor the Federal Elements of the Comprehensive Plan for the National Capital Region, which is also applicable to the proposed project. Please include a description of the Planning Act and Federal Elements in the EA document, and analyze the proposed building expansion for consistency with all relevant Comprehensive Plan policies accordingly, included in the following sections.

### Transportation Element - Parking

Staff notes that based on the location of JBA-NAF in a suburban area beyond 2,000 feet of Metrorail, the installation should adhere to a minimum ratio goal of one employee parking space for every 1.5 employees per the NCPC Comprehensive Plan.<sup>2</sup> If the installation does not currently meet this goal, the building expansion project should help evolve the overall JBA-NAF ratio to comply with the 1:1.5 goal by limiting employee parking capacity below the ratio. Please provide sufficient information in the EA to demonstrate compliance with the 1:1.5 goal and if not, how excessive parking capacity will be reduced through future projects (with less parking capacity than allowed under the 1:1.5 goal) contained in the current master plan. The following Comprehensive Plan policies appear to be especially relevant to this project and the EA should demonstrate project compliance.

- Provide parking only for those federal employees who are unable to use other travel modes;
- Give priority to carpool and vanpool parking over that for single-occupant vehicles;
- Provide parking for disabled persons in accordance with federal law;
- Place parking in structures, preferably below ground, in the interest of efficient land use and good urban design;
- Position parking facilities so as not to obstruct pedestrian and bicycle access to buildings.

While the Comprehensive Plan does not regulate visitor/customer parking, we encourage AAFES and the Air Force to evaluate reducing the amount of customer parking to the maximum extent practicable. The customer parking should not exceed Prince George's County's parking requirements<sup>3</sup> and we encourage reducing customer parking below the County standard. Furthermore, we request that AAFES and the Air Force evaluate multiple alternative parking layouts and designs to ensure that the amount of on-site impervious surface and parking capacity

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<sup>2</sup> Comprehensive Plan for the National Capital, Transportation Element (page 85): "Suburban areas beyond 2,000 feet of Metrorail" – Phased approach linked to planned improvements over time (1:1.5-1:2)"

<sup>3</sup> Comprehensive Plan for the National Capital, Federal Workplace Element (page 52): "Develop sites and buildings consistent with local agencies' zoning and land use policies and development, redevelopment, or conservation objectives, to the maximum extent feasible."

are minimized. Parking should be placed in structures or located underground pursuant to the NCPC Comprehensive Plan, and surface parking should utilize permeable pavement to the maximum extent possible. We request that these strategies be analyzed through one or more additional Action Alternatives in the draft and final EAs.

#### Transportation Element – Transportation Demand Management

Please include the net change in employment resulting from the project in the EA to help NCPC staff determine whether submission of the current JBA-NAF Transportation Management Plan (TMP) will be required in the future project submission to NCPC.<sup>4</sup> In particular, the TMP should adhere to the following applicable policies, and the EA should adequately demonstrate project conformance.

- Encourage ridesharing, biking, walking, and other non-single-occupant vehicle modes of transportation for federal commuters;
- Employ compressed and variable work schedules for employees, consistent with agency missions;
- Support pedestrian and transit commuting through Live-Near-Work programs;
- Steadily increase transit subsidy rates, and consider applying subsidies and incentives to other modes, such as biking, walking, carpooling, and vanpooling.

#### Transportation Element – Bicycle Facilities

The proposed expansion project should adhere to the following applicable bicycle-related policies, and the EA should adequately demonstrate project conformance.

- Provide bicycle travel lanes, paths, or trails between campus entrance points and all buildings on the campus;
- Provide secure and sheltered bicycle parking spaces or bicycle lockers in close proximity to building entrances at federal buildings and on federal campuses. The number of spaces provided should be in accordance with the requirements of the local jurisdiction in which the federal facility resides, if such requirements exist. In the absence of such requirements, federal facilities should provide an abundant supply of bicycle lockers or parking spaces to meet current employee needs and to promote bicycle commuting;
- Provide employee clothes lockers and showers at federal buildings and on federal campuses to support bicycle commuters. Space should be reserved in new facilities to allow for the provision of showers and lockers to support the bicycle commuting population.

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<sup>4</sup> Comprehensive Plan for the National Capital, Transportation Element (page 87): “Federal agencies should submit their most recent TMP with all master plans and will all projects that increase employment on site by 100 or more.”

### Open Space and Federal Environment Elements

The project should adhere to the following applicable Open Space and Federal Environment policies, and the EA should analyze project impacts to demonstrate conformance with these federal planning policies using meaningful performance measures. Please work with Prince George's County and the Maryland Department of the Environment to ensure that the proposed project will comply with their applicable open space and environmental policies and regulations to the maximum extent possible.<sup>5</sup>

#### Open Space

- Protect and enhance the green landscape and park-like character provided by trees, grass, and other native plant materials in the National Capital Region by removing invasive species and replanting with native species;
- ...where large paved areas are required, preference should be given to using pervious surfaces. Existing large parking areas,..., should be removed as soon as feasible and restored to a landscaped condition with active or passive recreational uses.

#### Federal Environment - Water Quality

- Avoid thermal pollution of waterways, and provide and maintain adequate vegetated buffers adjacent to bodies of water, to protect fish and other aquatic life and to reduce sedimentation and pollutants;
- Minimize tree cutting and other vegetation removal to reduce soil disturbance and erosion, particularly in the vicinity of waterways. When tree removal is necessary, trees should be replaced to prevent a net tree loss;
- Use pervious surfaces and retention ponds to reduce storm-water runoff and impacts on off-site water quality;
- Encourage the use of innovative and environmentally friendly "Best Management Practices" in site and building design and construction practice, such as green roofs, rain gardens, and permeable surface walkways, to reduce erosion and avoid pollution of surface waters;
- Encourage the implementation of water reclamation programs at federal facilities for landscape irrigation purposes and other appropriate uses.

#### Federal Environment - Land Resources

- Avoid destruction of or damage to wetlands;
- Encourage only compatible land uses adjacent to wetlands;

---

<sup>5</sup> Comprehensive Plan for the National Capital, Federal Workplace Element (page 52): "Develop sites and buildings consistent with local agencies' zoning and land use policies and development, redevelopment, or conservation objectives, to the maximum extent feasible."

- Discourage development in areas of identified high erosion potential, on slopes with a gradient of 15 percent and above, and on severely eroded soils. Excessive slopes (25 percent and above) should remain undeveloped;
- Locate and design buildings to be sensitive to the natural groundwater flows;
- Preserve existing vegetation, especially large stands of trees;
- Incorporate new trees and vegetation to moderate temperatures, minimize energy consumption, and mitigate storm-water runoff;
- Encourage facility design and landscaping practices that provide cover and food for native wildlife;
- Consider the impacts, including cumulative impacts, of environmental changes on wildlife habitats and the biodiversity of an ecosystem. Consideration should extend to non-protected areas, as well as areas protected by designations such as parks and wetlands.

In order to ensure that project impacts are minimized, we request that AAFES and the Air Force evaluate multiple alternative building/parking designs to lessen the amount of on-site impervious surface. In addition to structured and below-grade parking as previously mentioned, please evaluate additional expansion space with a second level constructed on top of the existing building (rather than adding on to the ground level as proposed), along with a new “green” roof. We request that these strategies be analyzed through one or more additional Action Alternatives in the draft and final EAs. Please also note the following additional design-related Comprehensive Plan policies that appear to be relevant to the project.

#### Federal Environment – Air Quality

- Encouraging further usage of alternative “clean” fuels (e.g., hybrid, fuel cell, compressed natural gas, and “clean” diesel fuels);
- Minimizing power generation requirements, such as by utilizing best available “green” building systems and technologies;
- Utilizing non-polluting sources of energy (e.g., solar energy);
- Indoor air quality should be promoted by using environmentally friendly (“green”) building materials, construction methods, and building designs.

#### Federal Environment - Human Activities

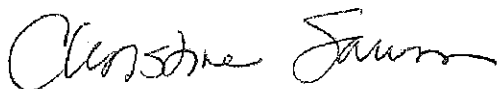
- Avoid locating activities that produce excessive noise near sensitive natural resources, and sensitive human uses such as residential areas, hospitals, and schools;
- Locate, design, and construct improvements to roads, driveways, loading docks, and parking lots for federal facilities in a manner that is sensitive to existing adjacent land uses;
- Ensure that noise-generating activities at federal facilities, such as loading dock operations, festivals, and concerts, are sited and scheduled with sensitivity to the surrounding environment and community.

Page 6 – Ms. Hodges

In addition, please address how the project will adhere to Section 438 of the Energy Independence and Security Act (EISA) and Executive Order 13508 (Chesapeake Bay Protection and Restoration).<sup>6</sup> Specifically, Section 438 instructs federal agencies to use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property for any project with a footprint that exceeds 5,000 square feet. NCPC staff notes that the project will require approximately 55,000 square feet of new construction and as such, must comply with EISA, Section 438.

These comments have been prepared in accordance with NCPC's Environmental and Historic Preservation Policies and Procedures. NCPC appreciates the opportunity to provide scoping comments, and looks forward to our continued involvement with this AAFES expansion project. If you have any questions about these comments, please contact Michael Weil at (202) 482-7253 or [michael.weil@ncpc.gov](mailto:michael.weil@ncpc.gov), or please consult the NCPC website ([www.ncpc.gov/](http://www.ncpc.gov/)) for further information on the Comprehensive Plan or our project submission guidelines.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine Saum".

Christine Saum, AIA  
Acting Director, Urban Design and Plan Review

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<sup>6</sup> Executive Order 13508 establishes an action plan that includes efforts undertaken by all federal agencies, designed to increase the overall health of the Chesapeake Bay, and sets forth related program goals.



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

Prince George's County Planning Department  
Office of the Planning Director

14741 Governor Oden Bowie Drive  
Upper Marlboro, Maryland 20772  
TTY: (301) 952-4366  
www.mncppc.org/pgco  
(301) 952-3595  
Re: D12-031301

April 6, 2012

Ms. Anne Hodges  
Environmental Planner  
Joint Base Andrews Naval Air Facility  
11 CES/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

Dear Ms. Hodges:

The Environmental Planning Section has reviewed your request for comments regarding the potential impacts associated with the expansion of the Army and Air Force Exchange Services Base Exchange at the Joint Base Andrews Naval Air Facility. The project proposes to expand an existing building and provide additional parking to accommodate the proposed expansion. According to the project description, the preferred alternative (Alternative 1) would impact non-tidal wetlands and Waters of the U.S. The subject site is located on land owned and operated by the United States of America and as such is not subject to the Prince George's County Woodland and Wildlife Habitat Conservation Ordinance (Subtitle 25, Division 3) or the environmental regulations in Subtitles 24 and 27 of the Prince George's County Code. The site is subject to the Clean Water Act and will be required to address the proposed impacts to wetlands and Waters of the U. S. under the jurisdiction of the Maryland Department of Environment and The Army Corps of Engineers. The Environmental Planning Section has no further comments.

If you have any further questions, please contact Katina Shoulars of the Environmental Planning Section at 301-952-5404.

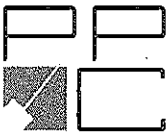
Sincerely,

Fern Piret  
Planning Director

c: Derick Berlage, Chief, Countywide Planning  
Katina Shoulars, Acting Supervisor, Environmental Planning Section

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**MN**  
**THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION**



Prince George's County Planning Department  
Office of the Planning Director

14741 Governor Oden Bowie Drive  
Upper Marlboro, Maryland 20772  
TTY: (301) 952-4366  
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(301) 952-3595  
**D12-031301**

April 12, 2012

Ms. Anne Hodges  
Environmental Planner  
Joint Base Andrews Naval Air Facility  
11 CES/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, Maryland 20762

**RE: Expansion of Base Exchange at Building 1811**

Dear Ms. Hodges:

The Prince George's County Planning Department appreciates the opportunity to comment on the proposed consolidation of the Base Exchange into one expanded location in Building 1811 on Joint Base Andrews-Naval Air Facility, Washington (JBA). The Planning Department analyzed the potential impacts of the proposed consolidation and expansion that is intended to provide consolidated and centralized retail facilities on JBA where authorized customers could obtain multiple services at a single location thus reducing costs, increasing operational efficiency, and providing a more viable service to customers. The proposed action would specifically relocate the retail services provided by Buildings 1683 and 1805 through an expansion of Building 1811.

The proposed project does not include any impacts to any cultural or historic resources within Prince George's County. JBA includes two properties designated as Prince George's County historic sites: 77-001-Forest Grove Methodist Church and Cemetery (Chapel 2), and 77-014-Belle Chance and Cemetery. Neither of these properties will be affected by the proposed relocation and expansion of the Army and Air Force Exchange Service (AAFES) Base Exchange (BX).

The transportation impact of this construction and subsequent operation will have very little effect on traffic flow particularly along the MD 4 and MD 337 corridors. Any new traffic to be generated by the expanded retail operation is likely to be contained on base and thus have only a marginal impact on the off-base transportation facilities.

Thank you again for allowing us the opportunity to comment on this Description of Proposed Action and Alternatives. If you should have any additional questions or need additional information, please contact Maria Martin, Supervisor, Special Projects, Countywide Planning Division, at 301-952-3472 or at Maria.Martin@ppd.mncppc.org.

Sincerely,

Fern Piret  
Planning Director

cc: Derick Berlage, Chief, Countywide Planning Division  
Maria Martin, Supervisor, Special Projects Section, Countywide Planning Division  
Eric Foster, Supervisor, Transportation Planning Section, Countywide Planning Division  
Howard Berger, Supervisor, Historic Preservation Section, Countywide Planning Division



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## **Comments on the Draft EA**

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IN REPLY REFER TO:  
NCPC File No. 7363

June 6, 2013

Ms. Anne Hodges  
11 CES/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

Re: Proposed Army and Air Force Exchange Service (AAFES) Building # 1811 Expansion Joint Base Andrews-Naval Air Facility Washington (JBA-NAFW) - Draft Environmental Assessment

Dear Ms. Hodges:

Thank you for the opportunity to provide comments on the draft Environmental Assessment (EA) for the proposed refurbishment/expansion of the AAFES Building # 1811 at JBA-NAFW on behalf of the National Capital Planning Commission (NCPC). As the central planning agency for the federal government in the National Capital Region, NCPC has review authority over this project under the National Capital Planning Act (40 USC § 8722 (b) (1)).<sup>1</sup> We have reviewed the project for consistency with policies in the Comprehensive Plan for the National Capital and our review provides the basis for the following comments. These comments should be addressed in the final EA document or in future project submissions to NCPC.

#### 2010 General Plan Update

The draft EA references a 2010 General Plan Update for the JBA-NAFW installation; however, our records show the 1990 General Plan for Andrews Air Force Base as the most recent Commission-approved plan for the JBA-NAFW installation. NCPC master plan guidelines recommend Commission review of federal master plans on a periodic basis of no longer than every five years to insure that both inventory material and development proposals are current. Please submit the 2010 General Plan Update for Commission review as soon as possible, preferably in advance of any future project submissions to ensure that NCPC has up-to-date information with which to review project proposals.

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<sup>1</sup> The Planning Act requires federal and District of Columbia agencies to advise and consult with NCPC in the preparation of agency plans prior to preparation of construction plans.

## Project Design

The draft EA includes one “action” alternative with a concept design for a single-level refurbished/expanded building and expanded surface parking lot. As noted in our previous scoping comment letter (dated April 10, 2012), we recommend the addition of at least one “action” alternative to the EA with a multi-level building expansion and/or structured parking to minimize the project’s impervious area. The Comprehensive Plan encourages both multiple-level buildings and garages<sup>2</sup> to minimize developmental impacts related to stormwater, air quality, and trees/vegetation.<sup>3</sup> When tree removal is necessary, trees should be replaced to prevent a net tree loss. If a multi-level building or garage is not feasible, please explain why within the *Alternatives Eliminated from Further Analysis* section of the final EA document.

## Memorandum of Agreement

The draft EA references a Memorandum of Agreement (MOA) between JBA-NAFW and AAFES, but does not include the MOA or its specific terms. In particular, the draft EA states that the MOA “allows for the expansion of the existing BX and the new construction of a BX as part of the Town Center development sometime after 2025”. If a valid MOA which assumes development of a new town center is currently “in force”, the EA should analyze the town center as a “reasonably foreseeable future” project (pages 2-8 and 2-9) in the cumulative impact analysis. Please include the MOA in the final EA and revise the document accordingly.

## Parking

The draft EA describes the need to expand existing AAFES parking, but does not provide an existing/future parking demand analysis to justify the proposed expansion. Based on the aerial photo provided in Figure 1-2 (Existing AAFES Facilities), we note other parking lots near the AAFES lot that could potentially be used for shared parking. The final EA should include information on the project’s existing/future parking demand and an analysis related to the feasibility of utilizing other lots for shared parking.

As described in NCPD’s previous scoping letter, JBA-NAFW should adhere to an overall goal of 1:1.5 – 1:2.0 for employee parking.<sup>4</sup> If the installation does not currently meet this goal, this project should provide fewer spaces to reduce overall employee parking as a “phased approach linked to planned improvements” approach. The final EA should include specific information for current/future employee populations and current/future parking numbers. While the Comprehensive Plan does not regulate visitor/customer parking, we encourage AAFES and JBA-

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<sup>2</sup> Transportation Element (page 83): “Place parking in structures, preferably below ground, in the interest of efficient land use and good urban design.”

<sup>3</sup> Federal Environment Element (page 138): “Minimize tree cutting and other vegetation removal to reduce soil disturbance and erosion, particularly in the vicinity of waterways.”

<sup>4</sup> Transportation Element (page 85): “Suburban areas beyond 2,000 feet of Metrorail” – Phased approach linked to planned improvements over time (1:1.5-1:2)”

NAFW to minimize customer parking to the maximum extent practicable, and to provide parking in conformance with Prince George's County's parking standards.<sup>5</sup>

### Stormwater Management

The final EA should specify how the project will comply with Section 438 of the Energy Independence and Security Act (EISA), as well as Maryland stormwater regulations related to runoff volumes and nutrient loading. Specifically, Section 438 instructs federal agencies to use site planning, design, construction, and maintenance strategies to restore the pre-development ("greenfield") hydrology of the property for any project footprint that exceeds 5,000 square feet. The draft EA does not mention Section 438 or provide any information related to the project's Section 438 compliance, which will be important for the Commission's review. Please reference the United States Environmental Protection Agency's technical guidance on implementing these requirements at: <http://www.epa.gov/oaintntr/stormwater/requirements.htm#guidance>.

The draft EA states that the AAFES project would construct new impervious area and remove approximately 90 trees, but does not include detailed information on the net change in trees (trees removed plus new trees), the size of the new trees to be planted as mitigation, or the amount of pervious surface increase. The NCPC Comprehensive Plan includes a "no net" tree loss policy<sup>6</sup> and detailed information on stormwater management, impact to trees, and water quality should be provided for Commission review, either in the final EA or future project submissions.

We note that NCPC recently approved an AAFES expansion at Fort Belvoir (Fairfax County, Virginia) with a parking lot that utilizes permeable pavement (resulting in a 60% reduction in the lot's impervious area), with fewer spaces than required by Fairfax County. The final building design has a "cool" roof, and the trees were replaced at a one-to-one ratio. The Commission will have a particular interest in the proposed AAFES expansion at JBA-NAFW, and the project should be submitted for separate Preliminary and Final reviews by the Commission.

### Bicycle Facilities

As previously requested in our scoping letter, the project design should conform to the following applicable Comprehensive Plan policies:

- Provide secure and sheltered bicycle parking spaces or bicycle lockers in close proximity to building entrances at federal buildings and on federal campuses. The number of spaces provided should be in accordance with the requirements of the local jurisdiction in which the federal facility resides, if such requirements exist. In the absence of such

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<sup>5</sup> Federal Workplace Element (page 52): "Develop sites and buildings consistent with local agencies' zoning and land use policies and development, redevelopment, or conservation objectives, to the maximum extent feasible."

<sup>6</sup> Comprehensive Plan for the National Capital, Transportation Element (page 85): "Suburban areas beyond 2,000 feet of Metrorail" – Phased approach linked to planned improvements over time (1:1.5-1:2)"

requirements, federal facilities should provide an abundant supply of bicycle lockers or parking spaces to meet current employee needs and to promote bicycle commuting.

- Provide employee clothes lockers and showers at federal buildings and on federal campuses to support bicycle commuters. Space should be reserved in new facilities to allow for the provision of showers and lockers to support the bicycle commuting population.

We appreciate the opportunity to provide these comments and look forward to our continued involvement with this project. We strongly encourage a consultation meeting in advance of the initial project submission for NCPC review and, as noted previously, separate submissions for Preliminary and Final actions by the Commission. If you have any questions, please contact Michael Weil at (202) 482-7253 or [michael.weil@ncpc.gov](mailto:michael.weil@ncpc.gov). You may also consult NCPC's website ([www.ncpc.gov/](http://www.ncpc.gov/)) for further information on the Comprehensive Plan and/or project submission guidelines.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Saum". The signature is fluid and cursive, with the first name "Christine" written in a larger, more prominent script than the last name "Saum".

Christine Saum, AIA  
Director, Urban Design and Plan Review Division



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 11TH WING (AFDW)  
ANDREWS AIR FORCE BASE, MARYLAND 20762

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BY: \_\_\_\_\_

201302132

7 May 2013

MEMORANDUM FOR SEE DISTRIBUTION

FROM: 11 CES/CEAN  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

SUBJECT: 30-Day Comment Period, Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

1. Joint Base Andrews (JBA) has prepared an Environmental Assessment (EA) for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Maryland. Pursuant to the National Environmental Policy Act (NEPA) of 1969 (42 United States Code 4321-4347), Council on Environmental Quality Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Sections 1500-1508), and 32 CFR Part 989, et seq., the EA considers the potential consequences to human health and the natural environment. The EA examines the effects of the Proposed Action and alternatives, including the No Action Alternative.
2. In accordance with Executive Order 12372, *Intergovernmental Review of Federal Programs*, we invite your agency to participate in the 30-day comment period for the draft EA and draft Finding of No Significant Impact (FONSI). Please distribute the draft EA and FONSI as appropriate for review. A Notice of Availability of the draft EA and draft FONSI will be published on 9 May 2013 in the Upper Marlboro/Canton/Ft. Washington Gazette newspaper. The draft EA and FONSI are available online at <http://www.andrews.af.mil/library/environmental/index.asp>.
3. Written comments should be sent to Ms. Anne Hodges, 11th Civil Engineer Squadron, 3466 North Carolina Ave, Joint Base Andrews, MD 20762 or via email to [anne.hodges@afncr.af.mil](mailto:anne.hodges@afncr.af.mil). All comments must be received by 10 June 2013. If you need further information please contact Ms. Hodges at 301-981-1426.

The Maryland Historical Trust has determined that there are no historic properties affected by this undertaking.

Both Case Date 6/7/2013

STEVE RICHARDS  
Chief of Environmental Management

201201220  
↑  
Prior reviews

Vigilance - Precision - Global Impact

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-ADA  
5/22/13



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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

June 10, 2013

Ms. Anne Hodges  
11<sup>th</sup> Civil Engineer Squadron  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

Re: Environmental Assessment for the Expansion and Consolidation of the Base Exchange Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Dear Ms. Hodges:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency has reviewed the Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County in Maryland.

The purpose of the Proposed Action is to provide consolidated and centralized retail facilities on Joint Base Andrews-Naval Air Facility (JBA-NAFW) where authorized customers could obtain multiple services at a single location. The need for the Proposed Action is to upgrade retail facilities on-installation to comply with new building and industry standards and to provide adequate space to meet the current and future retail demand for JBA-NAFW.

Army and Air Force Exchange Services (AAFES) Preferred Alternative (Alternative 1) is to renovate and expand the existing AAFES Main Exchange Building 1811 at JBA-NAFW. Key features associated with the construction of the Proposed Action include the addition of a food court, loading dock, food service dock, and an employee parking area. The Proposed Action construction activity would total approximately 166,864 square feet or an estimated 55,282 square feet of new construction and 111,582 square feet of renovation to Building 1811 Base Exchange (BX).

EPA has provided comments and questions for your consideration in the Technical Comments document which is enclosed. EPA requests additional information to assess the impacts to the environment and natural resources. Specific comments address concerns with wetlands, water resources, biological resources, land use, and cumulative impacts.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



Barbara Rudnick  
NEPA Team Leader  
Office of Environmental Programs

Enclosure (1)

## Technical Comments

### Land Use

Page 2-4 states, "Alternative 1 would not be consistent with the future land use in the 2010 General Plan Update. That is, the site of the existing BX is zoned as Industrial, precluding its long-term future use for other purposes. However, this alternative is consistent with the terms of the MOA which allows for the expansion of the existing BX and the new construction of a BX as part of the Town Center development (Alternative 3) sometime after 2025." Page 4-1 states, "The existing BX is currently part of the "Community" land use designation, while the future land use is identified as "Industrial." There appears to be a discrepancy in the existing BX land use designation. Please clarify if the existing BX land use is zoned "Community" or "Industrial" and identify the future land use designation. Also, please explain if the MOA supersedes the 2010 General Plan Update. Zoning and the MOA terms allowing for expansion and construction of a BX as part of the Town Center development seem to be two different issues. What is the protocol for zoning changes? It may have been helpful to have included the MOA as an Appendix.

As noted on Figure 2-2, a surface parking area is proposed. The parking lot south of the proposed expansion appears to be large. What is the projected use of the existing parking lot? Has there been a study conducted to determine if there is a need for the proposed employee parking lot? Can a portion of the existing parking lot be designated employee parking only? If there is a need for additional parking, has consideration been made to providing an elevated parking structure on at least a portion of the existing parking lot in an effort to preserve natural resources? EPA is concerned with an increase in impervious surface and runoff. Please discuss how runoff will be controlled to allow for infiltration.

Since the need for the Proposed Action is to provide adequate space to meet current and future retail demand for JBA-NAFW, the EA should explain the current use and anticipated future use of the proposed BX to justify the need for the Proposed Action.

### Wetlands

Page 2-4 states, "Alternative 1 would not directly impact any wetlands or involve construction in a wetland; however, two delineated wetlands exist in the vicinity: a 5,618-square-foot (0.13-acre) forested wetland immediately north of the project site and a 6,590-square-foot (0.15-acre) wetland mosaic to the northwest of the project site (see Figure 2-2). Utilities for Alternative 1 would have a short-term impact during construction to the buffer zone around the forested wetland to the north of the BX." Please quantify the impact to the buffer zone as well as identify and describe potential indirect impacts to the forested wetlands. It would be helpful if Figure 2-2 showed the buffer zone in relation to the Proposed Action.

EPA understands that the Baltimore District USACE concurred with the Wetland Delineation Report determination that the wetland areas referenced above were isolated wetlands regulated under Maryland State Laws. Although compensatory mitigation is often not required for buffers which are lost, consideration of voluntary preservation of buffers could be evaluated and is strongly encouraged.

Page 4-17 states, "Long-term irreversible and irretrievable commitments of resources would result from the implementation of the Proposed Action and would include the loss of wetlands (approximately 0.25 acre)..." As stated on page 2-4, "Alternative 1 would not directly impact any wetlands..." Please explain this discrepancy. Also, identify and describe the 0.25 acre of wetland loss including the functional value of the impacted wetlands.

### **Water Resources**

Page 3-7 states, "...groundwater is generally encountered at the Base from approximately 4 to 9 feet below ground surface." The unconfined water table on the Base can typically be found at depths less than 20 feet and the majority of the water table on the Base drains south toward to Piscataway Creek (Andrews AFB 2005)." Page 3-4 states, "The use of groundwater as a potable source of water is prohibited on the base and all such wells are used for monitoring purposes only (JBA-NAFW 2010)." What construction safeguards will be in place to ensure that groundwater is not impacted during construction? EPA is concerned with worker exposure to contaminated groundwater. Please discuss.

Page 4-5 states, "Alternative 1 also would include the implementation of various BMPs to control surface drainage and reduce the potential for construction site runoff to impact local surface waters, such as Henson Creek." Where is Henson Creek in relation to the Proposed Action as well as other tributaries relatively close to the Base perimeter including Meetinghouse Branch, Paynes Branch Creeks, Piscataway Creek, Tinkers Creek and Broad Creek? What is the condition of these tributaries? What (if any) aquatic resources inhabit these tributaries? What BMPs would be used to control surface drainage from construction of the Proposed Action? What is the indirect impact to surface water/groundwater that could result from the proposed tree removal?

### **Biological Resources**

Page 4-7 states, "Implementation of Alternative 1 would involve the removal of approximately 90 trees. Please identify/describe the trees to be removed and specify the acreage impacted. Base regulations state, "For removal of canopy cover of less than 1 acre, one tree shall be planted for each removed according to a 1:1 ratio; and more than 1-acre, 60 percent of canopy cover must be reforested." Please specify which of the mitigation options applies to the Proposed Action.

The EA states, "Replacement trees for those removed under Alternative 1 would be selected native species arranged in stands similar to those removed and would be replaced prior to tree removal, to the extent practicable." Identify the location proposed for tree replacement.

The EA did not identify wildlife that may inhabit the forested wetlands. It is stated on page 3-11 that the JBA-NAFW is located within the Atlantic migratory bird flyway and is therefore subject to seasonal populations of migrating birds. Please discuss the long-term impact that the Proposed Action may have on the forested wetlands and possibility migratory birds and identify wildlife that may be impacted by the Proposed Action.

Page 4-7 states, "Alternative 1 would comply with the management plan for the ESA-listed plant species sandplain gerardia (*Agalinis acuta*). Where is this plant located in relation to the Proposed Action? How will it be protected?"

### **Cumulative Impacts**

Page 2-8, lists actions/projects planned for fiscal year 2013 to 2018. However, the list of projects presented in Section 2.3 and the Cumulative Impacts analysis in Section 4.13 failed to describe how the projects could interface with the Proposed Action and how these projects could have a cumulative impact on natural resources. At a minimum, the EA should include a map depicting the Proposed Action in proximity to the proposed future projects. The proposed Town Center development was not included in the list or discussed in the Cumulative Impacts analysis. Where is the proposed Town Center development to be located in relation to the Proposed Action?

### **Miscellaneous**

Page 4-6 states, "Beyond the wetland areas at the site of the Proposed Action (analyzed in Section 4.2), there is limited vegetation due to past development of the Base." The correct section referred to is Section 4.5 (Water Resources) not Section 4.2 (Transportation).

### **Low Impact Development**

Federal agencies are required to reduce the impacts on watershed hydrology and aquatic resources. This effort commonly referred to as low impact development (LID), implements environmentally and economically beneficial landscape practices into landscape programs, policies and practices by using a natural approach to land development and stormwater management. Federal agencies are required by Executive Order 13148 to incorporate the principles put forth in a Guidance dated August 10, 1995. This Guidance is intended to promote principles of "sustainable landscape design and management" which recognizes the interconnection of natural resources, human resources, site design, building design, energy management, water supply, waste prevention, and facility maintenance and operation.

It is important to incorporate LID efforts to mitigate the effects of development through traditional stormwater management practices which have proven to not be entirely successful. Traditional collection and conveyance systems, stormwater ponds and other stormwater facilities do not replicate natural systems, which greatly slow water before it reaches streams, wetlands and other waters. Development often times results in the loss of trees and other vegetation, the compaction of soils by heavy equipment, and the creation of vast stretches of connected impervious areas. These combined factors are extremely difficult to compensate for using traditional practices. As a result, the following site design (goals) and planning practices can be used to minimize stormwater impacts.

**Goal:** Minimize direct stormwater impacts to streams and wetlands to the maximum extent practicable.

**Practices:**

1. Locate stormwater facilities outside of streams and wetlands;
2. maintain natural drainage routes on site;
3. preserve riparian buffers; and
4. distribute "Integrated Management Practices" (IMP) used in lieu of centralized ponds.

**Goal:** Preserve the natural cover on as much of the site as possible, especially for areas located on hydrologic soil groups (HSG) A and B.

**Practices:**

1. Utilize clustered development designs and preserve a significant portion of the site in a natural state;
2. utilize "fingerprint" clearing by limiting the clearing and grading of forests and native vegetation to the minimum area needed for the construction of the lots, the provision of necessary access, and fire protection;
3. avoid impacts to wetlands to vegetated riparian buffers; and
4. preserve A and B Soils in natural cover.

**Goal:** Minimize the overall impervious cover.

**Practices:**

1. Utilize the minimum required width for streets and roads;
2. utilize street layouts that reduce the number of homes per unit length;
3. minimize cul-de-sac diameters, use doughnut cul-de-sacs, or use alternative turnarounds;
4. minimize excess parking space construction, utilize pervious pavers in low-use parking areas;
5. utilize structured or shared parking;
6. reduce home setbacks and frontages;
7. where permitted, minimize sidewalk construction by utilizing sidewalks on one side only, utilizing "Skinny" sidewalks, or substituting sidewalks with pervious trails through common green space;
8. substitute pervious surfaces for impervious wherever possible;

9. where permitted, avoid the use of curb and gutter and utilize vegetated open swales, preferably “engineered swales” with a permeable soil base; and
10. minimize compaction of the landscape and in areas where soils will be “disked” prior to seeding, and amended with loam or sand to increase absorption capacity.

**Goal:** Locate infiltration practices on HSG A and B soils wherever possible. Thus, every effort should be made to utilize areas with these soils for IMP that promotes infiltration.

**Goal:** Locate impervious areas on less permeable soils (HSG C and D). Placement of impervious areas on lower permeability soils minimizes the potential loss of infiltration/recharge capacity on the site.

**Goal:** “Disconnect” impervious areas. “Disconnecting” means having impervious cover drain to pervious cover (i.e. downspouts draining to the yard, not the driveway). This decreases both the runoff volume and Time of Concentration.

**Goal:** Increase the travel time of water off of the site (Time of Concentration).

**Practices:**

1. Flatten grades for stormwater conveyance to the minimum sufficient to allow positive drainage;
2. increase the travel time in vegetated swales by using more circuitous flow routes, rougher vegetation in swales, and check dams; and
3. utilize “engineered” swales in lieu of pipes or hardened channels.

**Goal:** Utilize soil management/enhancement techniques to increase soil absorption.

**Practices:**

1. Delineate soils on site for the preservation of infiltration capacity; and
2. require compacted soils in areas receiving sheetflow runoff (such as yards, downslope of downspouts).

**Goal:** Revegetate all cleared and graded areas.

**Goal:** Use “engineered swales” for conveyance in lieu of curb and gutter wherever possible.

**Goal:** Utilize level spreading of flow into natural open space.



For additional and more comprehensive LID information, please refer to the following web sites.

**LID Manuals:**

- [http://www.epa.gov/owow/nps/lid\\_hydr.pdf](http://www.epa.gov/owow/nps/lid_hydr.pdf)
  - <http://www.epa.gov/owow/nps/lid/lidnatl.pdf>
  - <http://www.bmpdatabase.org>
  - <http://www.epa.gov/ednnrmrl/>
- Combined Sewer Overflows Guidance for Monitoring and Modeling Document Type,  
Published: 1/1/99 <http://www.epa.gov/npdes/pubs/chap05-sco.pdf>

**Pollution Prevention**

In October, 1990, Congress passed the Pollution Prevention Act which calls for a stepwise approach to addressing pollution: 1. Prevention or source reduction; 2. Recycling of material in an environmentally safe manner; 3. Treatment in an environmentally safe manner; and as a last resort; 4. Disposal or other release of pollution into the environment. The following principles are applicable with the proposed construction and renovation projects.

- Paved Surfaces/Parking Areas. To prevent runoff from newly developed areas from eroding steep areas, good environmental design should be employed to minimize and control runoff. Detention basins or paving with permeable asphalt or crushed stone may be appropriate where applicable.

- Landscaping. EPA suggests (where appropriate) that the grounds be landscaped with hardy native plant species to cut down on watering and lessen the need for pesticides and fertilizers. Liberal and judicious use of trees can help to reduce heating and cooling costs and act as air purifiers.

- Recycling. To promote the recycling of refuse generated by employees, recycling receptacles should be provided on the grounds and within office buildings. Procurement of recycled goods is also necessary and helps to stimulate markets. As a consumer and purchaser of goods and services, JBA-NAFW is encouraged to make purchasing decisions with this in mind.

- Painting/Carpeting. All painting projects should make use of non-toxic paints, stains, exterior preservatives, and chemical-free carpeting. This can reduce long-term costs for removal of potential hazardous materials and provide better air quality.

- Water Conservation. In an effort to conserve water consumption, low-flow toilets should be installed in new and renovated buildings. To ensure adequate supply and quality of water, monitoring of the water table and chemical testing of the water should be conducted.

- Energy Conservation. Energy-efficient heating and cooling systems, proper building insulation, and the use of energy-efficient lighting can be incorporated in the design of renovated facilities to reduce cumulative impacts of energy consumption and encourage energy conservation. For example, take advantage of natural ventilation as well as using compact fluorescent lamps which consume considerably less electricity than do incandescent ones and last much longer. Install energy efficient windows and doors (for example, reflective glass).

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THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

Office of the Planning Director  
Prince George's County Planning Department

14741 Governor Oden Bowie Drive  
Upper Marlboro, Maryland 20772  
TTY: (301) 952-4366  
[www.mncppc.org/pgco](http://www.mncppc.org/pgco)  
301-952-3595  
**D13-050802**

June 12, 2013

Ms. Anne Hodges  
Environmental Planner  
Joint Base Andrews Naval Air Facility  
11 CES/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

**RE: Environmental Assessment for the Expansion  
and Consolidation of Base Exchange at Joint Base  
Andrews-Naval Air Facility (MR-13013A)**

Dear Ms. Hodges:

The Prince George's County Planning Department appreciates the opportunity to comment on the proposed consolidation of the Base Exchange services into one expanded location at Joint Base Andrews-Naval Air Facility, Washington (JBA). The proposed action would result in a consolidated facility with a total of approximately 166,864 square feet, 55,282 square feet of which would be new construction, and 111,582 square feet of which would be renovation. The Planning Department analyzed the potential impacts of the proposed consolidation and expansion that is intended to provide more centralized retail facilities at JBA where authorized customers could obtain multiple services at a single location, thus reducing costs, increasing operational efficiency, and providing a more viable service to customers. The proposed action would specifically relocate the retail and food services provided by Buildings 1683 and 1805 (which would be vacated) and expand Building 1811.

The proposed project does not include any impacts to any significant historic resources and no further information is requested. In addition, the probability of archeological sites is low; therefore, the proposed action will not impact any known archeological or historical resources. JBA includes two properties designated as Prince George's County historic sites: 77-001-Forest Grove Methodist Church and Cemetery (Chapel 2), and 77-014-Belle Chance and Cemetery. Neither of these properties will be affected by the proposed relocation and expansion of the Army and Air Force Exchange Service (AAFES) Base Exchange (BX).

The transportation impact of this construction and subsequent operation will have very little effect on traffic flow particularly along the MD 4 and MD 337 corridors. Any new traffic to be generated by the expanded retail operation is likely to be contained on base and thus have only a marginal impact on the off-base transportation facilities.

The proposed action is consistent with the 2002 *Prince George's County Approved General Plan* Development Pattern policies for the Developing Tier, and it conforms to area master plan land use recommendations for industrial land use.

Ms. Anne Hodges  
Page Two  
June 12, 2013

Environmental Planning staff notes that environmental impacts may include short-term impacts on noise, soils, wetlands, and buffer areas as a result of construction; and approximately 1.5 acres of woodland would be removed during the construction process. Due to the building expansion and parking lot being proposed in areas with existing vegetation, Urban Design staff recommends that tree plantings in the remaining green areas be included to mitigate for the loss of tree canopy on-site.

Enclosed are four memoranda that include the full evaluations and comments summarized above from the Historic Preservation and Environmental Planning Sections of Countywide Planning Division, the Community Planning Division, and the Urban Design Section of the Development Review Division.

Thank you again for allowing us the opportunity to comment on this description of proposed action at Joint Base Andrews. If you should have any additional questions or need additional information, please contact Fatimah Hasan, Planner Coordinator, Special Projects Section, Countywide Planning Division, at 301-952-3580 or at [Fatimah.Hasan@ppd.mncppc.org](mailto:Fatimah.Hasan@ppd.mncppc.org).

Sincerely,



Fern V. Piret  
Planning Director

Enclosures

c: Derick Berlage, Chief, Countywide Planning Division  
Maria Martin, Planning Supervisor, Special Projects Section, Countywide Planning Division  
Fatimah Hasan, Planner Coordinator, Special Projects Section, Countywide Planning Division  
Eric Foster, Planning Supervisor, Transportation Planning Section, Countywide Planning Division  
Howard Berger, Planning Supervisor, Historic Preservation Section, Countywide Planning Division  
Katina Shoulars, Planning Supervisor, Environmental Planning Section, Countywide Planning Division  
Cynthia Fenton, Acting Planning Supervisor, Community Planning Division  
Ruth Grover, Planner Coordinator, Urban Design Section, Development Review Division



Countywide Planning Division  
Environmental Planning Section

June 3, 2013

TO: Fatimah Hasan, Planner Coordinator, Special Projects Section  
VIA: Katina Shoulars, Supervisor, Environmental Planning Section  
FROM: Chuck Schneider, Senior Planner, Environmental Planning Section  
SUBJECT: MR-13013A Expansion / Consolidation of Base Exchange  
Environmental Assessment (May 2013 Draft)  
Joint Base Andrews - Naval Air Facility (JBA)

The Environmental Planning Section has reviewed the Environmental Assessment for Expansion / Consolidation of Base Exchange at Joint Base Andrews (JBA) dated May 2013 draft. The proposed action was evaluated to determine the potential for significant adverse impacts on environmental resources, including but not limited to air quality, noise, geology and soils, water resources, and biological resources. The following commentary is based on a review of the EA and an interpretation of aerial photographs and maps. A site visit was not conducted. The following comments are provided for your consideration.

#### **Proposed Activity or Action**

The proposed action is for the expansion construction to an existing building, which houses the JBA Base Exchange facility (Base Exchange Building 1811), and combines commercial operations at the base at one location. There are currently three existing commercial facilities that house similar operations in close proximity to each other. The remaining two commercial facilities (Home Traditions-Building 1683 and Four Seasons Building 1805) will remain and the use will be changed.

The Base Exchange building has maintained lawn, individual trees and one wooded area. The proposed development will impact the surrounding wooded and maintained lawn areas. Impacts will be minimized to the two on-site isolated forested and emergent wetlands and their buffer systems. The provided material does not provide what the impacts will be to the wetlands, buffers and tree clearing.

#### **Existing Conditions**

The land area of the Joint Base Andrews (JBA)-Naval Air Facility Washington (formerly Andrews Air Force Base) is approximately 4,346 acres. JBA is bounded on the west by Branch Avenue, on the northwest by Allentown Road, on the north by Suitland Parkway, and on the northeast by Pennsylvania Avenue, and is surrounded by various types of development.

The Base Exchange building is the project area which is bounded to the north by Westover Avenue, the east by Arnold Avenue, the south by G Street, and the west by Brookley Avenue. This building is adjacent to parking areas, offices, and woodlands.

**Noise:** The military noise environment consists primarily of three types of noise zones: Low, moderate and high. Air Force Manual 32-1123(l) defines recommended noise limits from Air Force activities for established uses of land with respect to environmental noise. The noise environment at all three proposed sites are classed as a Noise Zone 1 under Air Force Manual recommended noise limits, which indicates a relatively low noise environment that is acceptable for housing, schools, medical facilities, and other noise sensitive land uses. No noise sensitive areas are located within 2,000 feet of the proposed locations.

**Air Quality:** The Clean Air Act, as amended, gives EPA responsibility to establish the primary and secondary National Ambient Air Quality Standards (NAAQS) that set acceptable concentration levels for six criteria pollutants; Particulate Matter (measured as both particulate matter and fine particulate matter), sulfur dioxide, carbon monoxide, nitrogen oxides, ozone, and lead. While each state has the authority to adopt standards stricter than those established under the federal program, Maryland accepts the federal standards.

Federal regulations designate Air Quality Control Regions (AQRs) in violation of the NAAQS as nonattainment areas. Federal regulations designate AQRs with levels below the NAAQS as attainment areas. According to the severity of the pollution problem, ozone nonattainment areas can be categorized as marginal, moderate, serious, severe or extreme.

Prince George's County, and JBA, is within the National Capital Interstate Air Quality Control Region (AQCR 47). AQCR 47 is in the ozone transport region that includes 12 states and the District of Columbia. EPA has designated Prince George's County as follows: Moderate nonattainment for the 1997 8-hour ozone (O<sub>3</sub>); nonattainment for the 1997 fine particulate matter (PM 2.5); and attainment for all other criteria pollutants.

**Earth/Geological Resources:** Joint Base Andrews is located on a plateau between the Anacostia and Potomac River. The review area has elevations between 262 to 270 feet above mean sea level.

Because of the considerable amount of development over the years, the project area contains Urban land and Udisturbed, which is land that is altered by disturbance to the extent that the original soil series cannot be identified. The remaining areas of the site are underlain with the soil types Aquasco silt loam, Hoghole-Grosstown, and Woodstown sandy loam. The area located at the corner of Westover and Brookley Avenues and the southwestern portion of the existing building is comprised of Aquasco silt loam. This soil drains poorly and has a high water table 10 to 16 inches from the surface.

**Water Resources:** The site is located within the Washington Metro Watershed and drains north to Henson Creek which flows into the Potomac River basin. The on-site waters are not Tier II waterways or within a Stronghold Watershed.

Regional water-supply aquifers are several hundred feet below ground surface, and no recharge areas are located on JBA. No groundwater is used for human consumption on the base.



In 2005 JBA completed a study of the 100-year floodplains on the base. Floodplains are generally limited to small streams and the area immediately adjacent to the streams. No floodplains are located on the Base Exchange site.

In accordance with the Clean Water Act, projects at JBA that involve the filling of wetlands would require Section 404 permits from the U.S. Army Corps of Engineers (COE) and Nontidal Wetland Permit from the Maryland Department of the Environment (MDE). A Jurisdictional Determination (JD) with a file name of CENAB-OP-RMS (AAFB EXCHANGE) 2010-03339 was performed on the subject site by the COE to assess if wetlands or streams are present. Two isolated non-tidal wetland systems were identified on the north side of the existing building and between the building and Westover Avenue. No other regulated features were identified within the Base Exchange investigation.

**Biological Resources:** Nearly 80 percent of JBA is developed or intensely managed. The remaining patches of vegetation on unimproved areas consist of a mixed hardwood forest. The plants and animals found on JBA are typical of those found in the Atlantic Coastal Plain area. A small area of woodlands and maintained lawn are found to the north of the existing Base Exchange Building.

Rare, Threatened or Endangered (**RTE**) species surveys have been performed on the site periodically. A federal endangered species, sandplain gerardia (*Agalinis acuta*), was identified during a 1994 field survey, but has not been found in subsequent surveys. The Updated 2007 Base Natural Resource Management Plan does not identify any RTE species within the Base Exchange Building vicinity area.

### **Environmental Consequences**

**Noise:** Short-term increases in noise would result from the use of construction and demolition equipment. No long-term increases in the overall noise environment would be expected from implementing the proposed action.

**Air Quality:** The proposed action could affect air quality through airborne dust and other pollutants and temporary generated during construction and demolition. Air quality impacts would be considered minor unless the emissions would contribute to a violation of any federal, state or local air regulations.

**Earth/Geological Resources:** Short-term impacts on soils would be expected from construction activities. No long-term effect on soils would be expected.

**Water Resources:** No adverse effects on water resources would be expected from implementing the proposed action. Minor impacts to the two on-site isolated wetlands and buffers areas are expected due to their location to the construction footprint of the expansion project. A Joint Federal and State Wetlands Disturbance Application will need to be applied for prior to construction. A Nontidal Wetland Permit from the Maryland Department of the Environment (MDE) is required for this activity. If wetlands impacts are not avoidable, mitigation then be applied in accordance with state requirements.

All construction will be conducted in accordance with erosion control and stormwater runoff laws and regulations to prevent any adverse effects on water quality. NPDES Permits for Stormwater Associated with Construction Activities would be obtained as well as the approval from MDE of a Stormwater Management Plan before any construction activity would begin.



**Biological Resources:** The Base Exchange expansion project shows proposed development within the on-site woodland area. The documents provided do not identify how much woodlands are being removed as part of this process. Using PGAtlas.com as a tool to determine how much woodland would be cleared as part of the project indicates that approximately 1.5 acres of woodlands would be removed for this development. Federal facilities are not subject to local application of the Woodland and Wildlife Habitat Conservation Ordinance, but will be reviewed by the Maryland Department of Natural Resources for adherence to the Clean Water Act. The habitat on the wooded site provides a diverse habitat for plants and animals, but does not support federally or state-listed species.

Thank you for the opportunity to comment on the Environmental Assessment for the construction and Operation of a Battalion Headquarters for the U.S. Army Priority Air Transport at Joint Base Andrews-Naval Air Facility. If you have questions regarding these comments, please contact the Environmental Planning Section at 301-952-3650.

Prince George's County Planning Department  
Community Planning South Division

301-952-3972

June 3, 2013

MEMORANDUM

TO: Fatimah Hasan, Planner Coordinator, Countywide Planning Division  
VIA: Ivy Lewis, Chief, Community Planning Division  
FROM: Cynthia Fenton, Acting Supervisor, Community Planning Division  
SUBJECT: MR-13013A: Joint Base Andrews Expansion and Consolidation of Base Exchange

DETERMINATIONS

General Plan: This application is consistent with the 2002 General Plan Development Pattern policies for the Developing Tier.

Master Plan: This application conforms to master plan land use recommendations for industrial land use.

BACKGROUND

**Location:** Joint Base Andrews

**Size:** 166,864 square feet

**Existing Use:** Federal facility

**Proposal:** Expansion and consolidation of the Base Exchange including 55,282 square feet of new construction and 111,582 square feet of renovation for:

- Construction of a food court retail space and merchandise processing area (MPA);
- Construction of the administrative offices and the military clothing sales store (MCSS); and,
- Interior renovations to the sales "check-out" area and the Base Exchange (BX), including parking modifications.

GENERAL PLAN, MASTER PLAN AND SMA

**2002 General Plan:** As a federal facility, Joint Base Andrews is not specifically governed by the 2002 Prince George's County General Plan, which recommends development patterns based on tiers and focused growth at transit oriented centers and corridors. Joint Base Andrews operates under its own 2010 General Plan Update which proposes developing a Town Center as a pedestrian oriented central hub for base activities. The JBA General Plan also creates an Operations Quadrant that clusters operations related facilities.

**Master Plan:** Joint Base Andrews is included in several master plans, including the 2013 *Approved Central Branch Avenue Corridor Revitalization Sector Plan*, the 2009 *Approved Marlboro Pike Sector Plan*, the 2007 *Approved Westphalia Sector Plan and Sectional Map Amendment* and the 2004 Mellwood/Westphalia Approved Master Plan and Sectional Map Amendment. These plans identify Joint Base Andrews as a continuing industrial use, with impacts including noise and accident potential.

**Planning Area/**

**Community:** P.A. 77 - Melwood

**Land Use:** Federal facility/industrial

**Environmental:** See the Environmental Planning Section referral for comments from the 2005 Approved Countywide Green Infrastructure Plan.

**Historic Resources:** There are multiple historic resources on the property, none of which appear to be impacted by this proposal.

**Transportation:** The property has direct access to Allentown Road, Branch Avenue (MD 5) and Dower House Road.

**Public Facilities:** No public facilities have been designated on the subject property.

**Parks & Trails:** There are no trails or parks

**SMA/Zoning:** The 2004 Mellwood/Westphalia Approved Master Plan and Sectional Map Amendment retained the property in the I-1 zone.

## PLANNING ISSUES

The 2009 Joint Base Andrews Joint Land Use Study (JLUS) identifies economic development recommendations as priorities for implementation. Recommendations include attracting uses “in the base vicinity that would better serve base personnel and the local community.” Master plans including the Central Branch Avenue Corridor Revitalization Sector Plan and initiatives such as the Andrews Working Group seek to have the base work collaboratively with the County to promote and facilitate redevelopment and revitalization adjacent to the base to provide greater opportunities for the local community and base personnel to patronize local businesses.

Growth and expansion of commercial service and retail uses off-base to serve the base community is a County objective though outside the scope of this referral. The Base Exchange includes a barber shop, beauty salon, retail stores and food court. Providing these and other uses off-base would help to redevelop the surrounding communities to better serve the base, where the uses could benefit both communities. JBA has expressed an interest in having wider retail and service options available to base personnel in proximity to the base; however, the amount of retail and commercial services that can be supported by the existing market (most of which is concentrated on the base) is limited, so further expansion of retail and commercial services on the base should be reconsidered.

c: Ivy A. Lewis, Chief, Community Planning Division  
Long-range Agenda Notebook

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May 30, 2013

**MEMORANDUM**

**TO:** Fatimah Hasan, Planner Coordinator,  
Special Projects Section, Countywide Planning

**VIA:** *RG by MRF* Ruth Grover, Planner Coordinator, Urban Design Section

**FROM:** *MRF* Meika Fields, Senior Planner, Urban Design Section

**SUBJECT:** Mandatory Referral MR-13013A  
Expansion/Consolidation of Base Exchange at Joint Base Andrews-Naval Air Facility

The Urban Design Section is in receipt of information provided in support of Mandatory Referral MR-13013A, Expansion/Consolidation of Base Exchange at Joint Base Andrews-Naval Air Facility Center, which is being reviewed as part of the Mandatory Referral Review Process pursuant to Maryland Annotated Code, Article 28, Section 7-112 and Section 27-294 of the Prince George's County Zoning Ordinance. The proposal includes a 111,582-square-foot building renovation, and a 55,282-square-foot expansion of the existing building for a total 166,864-square-foot building; and a new employee parking lot.

An environmental assessment was provided with the information submitted, and includes a general layout of the proposed site design. No architectural elevations or landscape plans were provided for evaluation, so the Urban Design Section is unable to comment on those aspects of the proposal. If the applicant were to submit architecture or landscape plans for the proposal, the Urban Design Section would evaluate this information. The building expansion and parking lot are proposed in areas with existing vegetation. Staff recommends that the proposal include additional tree plantings in green areas that are to remain to make up for the loss of tree canopy on-site for the proposed building addition and new surface parking lot.

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Maryland Department of Planning

Sustainable\_\_\_\_\_Attainable\_\_\_\_\_

June 17, 2013

Ms. Anne Hodges  
Asset Optimization  
Department of the Air Force  
11 CES/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

**STATE CLEARINGHOUSE RECOMMENDATION**

**State Application Identifier:** MD20130514-0306

**Applicant:** Department of the Air Force

**Project Description:** Environmental Assessment (EA); Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

**Project Location:** Prince George's County

**Approving Authority:** U.S. Department of Defense DOD/USAF

**Recommendation:** Consistent with Qualifying Comment(s)

Dear Ms. Hodges:

In accordance with Presidential Executive Order 12372 and Code of Maryland Regulation 34.02.01.04-.06, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter constitutes the State process review and recommendation. This recommendation is valid for a period of three years from the date of this letter.

Review comments were requested from the Maryland Department(s) of Natural Resources, Transportation, the Environment; Maryland Military Department; Prince George's County; Maryland National Capital Parks and Planning Commission - Prince George's County; and the Maryland Department of Planning, including Maryland Historical Trust. As of this date, Maryland Military Department; Prince George's County; have not submitted comments.

The Maryland Department(s) of Transportation; Maryland-National Capital Park and Planning Commission and the Maryland Department of Planning; Maryland Historical Trust found this project to be consistent with their plans, programs, and objectives.

The Maryland Department of Transportation has noted, as far as can be determined at this time, the subject has no unacceptable impacts on the plans or programs of the Department of Transportation.

Maryland-National Capital Park and Planning Commission stated, the site is subject to Federal wetland regulations and will be reviewed by the Army Corps of Engineers for any wetland and wetland buffer impacts. Staff has no additional comments at this time. Further comments will be provided at the time of mandatory referral review.

Martin O'Malley, Governor  
Anthony G. Brown, Lt. Governor

Richard Eberhart Hall, AICP, Secretary  
Matthew J. Power, Deputy Secretary

**The Maryland Historical Trust** has determined that the project will have "no effect" on historic properties and that the federal and/or State historic preservation requirements have been met.

The Maryland Department(s) of Natural Resources, and Environment found this project to be generally consistent with their plans, programs, and objectives, but included certain qualifying comments summarized below.

**The Maryland Department of Natural Resources** provided the following comments for consideration:

The Army and Air Force Exchange Service (AAFES) proposes to renovate and expand the existing Base Exchange at Joint Base Andrews – Naval Air Facility Washington (JBA-NAFW). The proposed construction/renovation activities to replace existing retail and wellness/fitness facilities for military personnel and their families would total approximately 166, 864 square feet or an estimated 55,282 square feet of new construction and 111,552 square feet of renovation. This significant JBA-NAFW project includes demolition, construction and renovation of numerous facilities, and the construction of new parking spaces for employees. It is important to note a Federal Consistency Determination is included as an appendix to the EA, which details how this project will be consistent with the policies of the Maryland Coastal Program.

**Purpose and Need:** The EA, while stating that the existing Base Exchange facilities are not up to standards and inadequate to meet current customer needs, it does not provide reasonable supporting documentation to support these assertions or justify the urgent need for this project (This same conclusion was offered by U.S. EPA Region III). This request for supporting information is reasonable since the EA also states that this proposed new facility will be replaced by a new Base Exchange located near the planned Community Center in 2025, as discussed in the JBA-NAFW General Plan. Further, there are additional military and commercial retail complexes and wellness facilities already available in the Metro D.C region.

**Sustainable Transportation:** As also noted by U.S. EPA Region III, the proposed project does not address alternate parking structures and why the additional parking spaces are need for employees. And, as noted by the Maryland National Planning Commission, the proposal does not adequately address sustainable transportation principles such as providing alternatives to automobiles (pedestrian, bicycles, mass transit) as well minimizing impermeable parking surfaces.

**Support of Executive Order 13508-Chesapeake Bay Protection and Restoration:** The EA does not address how this project will address this mandate to federal agencies to do their part to clean up and restore the Chesapeake Bay, including how the project will address climate change.

**Sustainable Design, Technologies and Practices:** A stated goal of the project is the use of sustainable design principles and adaptive reuse of facilities. To the extent possible, green and sustainable choices should be deployed. These include recycling and reusing materials, maximizing energy efficiency, conservation and renewable energy and supporting local and regional agriculture. Ground-source heat pumps, energy efficient appliances, doors and windows, combined heating/cooling and power systems, solar panels and passive solar gain should also be considered in building design in combination with the above to provide reliable comfort to customers and employees with minimum ecological impact. Green roofs, permeable pavement, planting of trees and other vegetation proximate to the building (such as rain gardens and community vegetable gardens) could help reduce both "heat island effect" and help with onsite stormwater management. All of the above also provide opportunities for green jobs and training and improve the livability of the Base community and economic vitality of the proposed project.

**The Maryland Department of the Environment** provided the following comments for consideration:

1. If the applicant suspects that asbestos is present in any portion of the structure that will be renovated/demolished, then the applicant should contact the Community Environmental Services Program, Air and Radiation Management Administration at (410) 537-3215 to learn about the State's requirements for asbestos handling.
2. Construction, renovation and/or demolition of buildings and roadways must be performed in conformance with State regulations pertaining to "Particulate Matter from Materials Handling and Construction" (COMAR 26.11.06.03D), requiring that during any construction and/or demolition work, reasonable precaution must be taken to prevent particulate matter, such as fugitive dust, from becoming airborne.
3. If boilers or other equipment capable of producing emissions are installed as a result of this project, the applicant is requested to obtain a permit to construct from MDE's Air and Radiation Management Administration for this equipment, unless the applicant determines that a permit for this equipment is not required under State regulations pertaining to "Permits, Approvals, and Registration" (COMAR 26.11.02.). A review for toxic air pollutants should be performed. Please contact the New Source Permits Division, Air and Radiation Management Administration at (410) 537-3230 to learn about the State's requirements and the permitting processes for such devices.
4. If soil contamination is present, a permit for soil remediation is required from MDE's Air and Radiation Management Administration. Please contact the New Source Permits Division, Air and Radiation Management Administration at (410) 537-3230 to learn about the State's requirements for these permits.
5. If any project can be considered regionally significant, such as a shopping mall, a sports arena, industrial complex, or an office complex, the project may need to be identified to the regional Metropolitan Planning Organization (MPO). Project managers who need a permit to connect their projects to a State or federal highway should contact the Planning Division of the Planning and Monitoring Program, Air and Radiation Management Administration, at (410) 537-3240 for further guidance.
6. If a project receives federal funding, approvals and/or permits, and will be located in a nonattainment area or maintenance area for ozone or carbon monoxide, the applicant should determine whether emissions from the project will exceed the thresholds identified in the federal rule on general conformity. If the project emissions will be greater than 25 tons per year, contact Brian Hug, Air and Radiation Management Administration, at (410) 537-4125 for further information regarding threshold limits.
7. Fossil fuel fired power plants emit large quantities of sulfur oxide and nitrogen oxides, which cause acid rain. In addition, nitrogen oxide emissions contribute to the problem of global warming and also combine with volatile organic compounds to form smog. The MDE supports energy conservation, which reduces the demand for electricity and therefore, reduces overall emissions of harmful air pollutants. For these reasons, MDE recommends that the builders use energy efficient lighting, computers, insulation and any other energy efficient equipment. Contact the U.S. EPA at (202) 233-9120 to learn more about the voluntary Green Lights Program which encourages businesses to install energy-efficient lighting systems.
8. The applicant should be advised that no cutback asphalt should be used during the months of June, July and August.



10. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537 3442 for additional information.

11. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.

12. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Waste Diversion and Utilization Program at (410) 537-3314 for additional information regarding recycling activities.

13. Any contract specifying “lead paint abatement” must comply with Code of Maryland Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1950 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.

**Any statement of consideration given to the comments(s) should be submitted to the approving authority, with a copy to the State Clearinghouse.** The State Application Identifier Number must be placed on any correspondence pertaining to this project. The State Clearinghouse must be kept informed if the approving authority cannot accommodate the recommendation.

Please remember, you must comply with all applicable state and local laws and regulations. If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4490 or through e-mail at srichardson@mdp.state.md.us. **Also please complete the attached form and return it to the State Clearinghouse as soon as the status of the project is known. Any substitutions of this form must include the State Application Identifier Number. This will ensure that our files are complete.**

Thank you for your cooperation with the MIRC process.

Sincerely,



Linda C. Janey, J.D., Assistant Secretary

LCJ:SR

Enclosure(s)

cc: Greg Golden – DNR  
Beverly Warfield -  
PGEO

Amanda Degen – MDE  
Jay Mangalvedhe -  
MNCPPCP

Melinda Gretsinger – MDOT Lawrence Leone - MILT  
Peter Conrad - MDPL  
Beth Cole - MHT

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Maryland Department of Planning

Sustainable \_\_\_\_\_ Attainable \_\_\_\_\_

## PROJECT STATUS FORM

Please complete this form and return it to the State Clearinghouse upon receipt of notification that the project has been approved or not approved by the approving authority.

**TO:** Maryland State Clearinghouse  
Maryland Department of Planning  
301 West Preston Street  
Room 1104  
Baltimore, MD 21201-2305

**DATE:** \_\_\_\_\_  
(Please fill in the date form completed)

**FROM:** \_\_\_\_\_  
(Name of person completing this form.)

**PHONE:** \_\_\_\_\_  
(Area Code & Phone number)

**RE:** State Application Identifier: MD20130514-0306  
Project Description: Environmental Assessment (EA): Expansion and Consolidation of the Base  
Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County,  
Maryland

### PROJECT APPROVAL

This project/plan was: ☐ Approved ☐ Approved with Modification ☐ Disapproved

Name of Approving Authority: \_\_\_\_\_

Date Approved: \_\_\_\_\_

### FUNDING APPROVAL

The funding (if applicable) has been approved for the period of:

\_\_\_\_\_, 201\_\_ to \_\_\_\_\_, 201\_\_ as follows:

Federal \$: \_\_\_\_\_

Local \$: \_\_\_\_\_

State \$: \_\_\_\_\_

Other \$: \_\_\_\_\_

### OTHER



Further comment or explanation is attached

Martin O'Malley, Governor  
Anthony G. Brown, Lt. Governor

Richard Eberhart Hall, AICP, Secretary  
Matthew J. Power, Deputy Secretary

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## **Responses to Comments on the Draft EA**

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## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
USEPA Region III	2.2.4 and 4.1.1	2-4 and 4-1	<p><b>Land Use:</b></p> <p>Page 2-4 states, “Alternative 1 would not be consistent with the future land use in the 2010 General Plan Update. That is, the site of the existing BX is zoned as Industrial, precluding its long-term future use for other purposes. However, this alternative is consistent with the terms of the MOA which allows for the expansion of the existing BX and the new construction of a BX as part of the Town Center development (Alternative 3) sometime after 2025.”</p> <p>Page 4-1 states, “The existing BX is currently part of the ‘Community’ land use designation, while the future land use is identified as ‘Industrial.’ There appears to be a discrepancy in the existing BX land use designation. Please clarify if the existing BX land use is zoned ‘Community’ or ‘Industrial’ and identify the future land use designation. Also, please explain if the MOA supersedes the 2010 General Plan Update. Zoning and the MOA terms allowing for expansion and construction of a BX as part of the Town Center development seem to be two different issues.</p> <p>What is the protocol for zoning changes?</p> <p>It may have been helpful to have included the MOA as an Appendix.</p>	<p>The MOA is provided as an appendix to the EA.</p> <p>The existing land use for the BX is community; however, the future land use is zoned as industrial. Section 2.2.4 has been updated to clarify the existing and future land use.</p>
	Figures 2-1 and 2-2	2-5	<p><b>Land Use:</b></p> <p>As noted on Figure 2-2, a surface parking area is proposed. The parking lot south of the proposed expansion appears to be large.</p> <p>What is the projected use of the existing parking lot?</p>	<p>The project design and final project will result in meeting the requirement of one employee parking space for every 1.5 employees. Currently, employee parking is co-located with customer parking on the south side of the store; there is no controlling limit on the availability of parking for staff. The proposed project will relocate approximately 60 parking</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
			<p>Has there been a study conducted to determine if there is a need for the proposed employee parking lot?</p> <p>Can a portion of the existing parking lot be designated employee parking only?</p> <p>If there is a need for additional parking, has consideration been made to providing an elevated parking structure on at least a portion of the existing parking lot in an effort to preserve natural resources?</p>	<p>spaces near the NW side of the building at the employee entrance to be used exclusively for the employees. The number of employees will vary during the work day, however, the anticipated peak number of employees that will be on location utilizing employee parking at the Exchange would be 92 meeting the 1:1.5 ratio.</p> <p>The BX renovation / expansion project will consolidate the Home Traditions, and Four Seasons operations, located in separate buildings away from the main store, into the expanded main store. Customer and employee parking from these two off-site operations will be consolidated into the main store, thereby reducing the overall parking counts by approximately 282 spaces. Van / car pool parking will be provided, as will accessible parking to comply with accessible parking requirements throughout the site. All along the south side of the Exchange at the front entrances parking spaces are being replaced to accommodate for a safer / wider traffic flow that will also enhance pedestrian and bicycle access to the building.</p> <p>Thus, with the consolidation and expansion of the store there will be a reduction in the overall parking count. The project intent is to re-use the existing parking areas and any adaptation to the south side parking area will be minimal. The net result in the customer parking will meet the Comprehensive Plan for the National Capital and Prince George's County requirements and recommendations of re-using existing hardscape areas, reducing the number of parking spaces, segregating employee parking, and providing van / car pool parking. This can be accomplished without</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
				<p>constructing a parking structure. Relocating employee parking to an area behind the store and adjacent to the employee entrance will facilitate management of employee parking usage. The project retains, and in fact reduces, the size of the surface parking area on the south side of the building resulting in no increased site disturbance or environmental impact associated with the construction of a parking structure.</p> <p>The expansion/consolidation is an interim step until the Exchange is ready to move into the JB Andrews Town Center in 2030, per a Memorandum of Agreement with the installation. A permanent parking structure is not practical and will not meet the planned follow on redevelopment of this area as an industrial support area.</p>
	General		<p><b>Land Use:</b></p> <p>EPA is concerned with an increase in impervious surface and runoff. Please discuss how runoff will be controlled to allow for infiltration</p>	<p>Environmental Site Design (ESD) measures will be used to the maximum extent practicable to provide water quality treatment for stormwater runoff. ESD measures to be used are anticipated to include, but are not limited to: bioswales and micro-bioretenement facilities. Permeable pavement was also considered, but was ruled out due to the poor permeability of the existing soils.</p>
	1.2	1-3	<p><b>Land Use:</b></p> <p>Since the need for the Proposed Action is to provide adequate space to meet current and future retail demand for JBA-NAFW, the EA should explain the current use and anticipated future use of the proposed BX to justify the need for the Proposed Action.</p>	<p>The existing BX at JNA-NAFW needs to be expanded for several reasons including:</p> <ul style="list-style-type: none"> <li>This project consolidates the Main Store departments, Military Clothing and satellite pharmacy located in the Home Traditions (Bldg 1683) and Outdoor Living (Bldg 1805) into the expanded shopping center. Combining these activities into a single</li> </ul>



## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
				<p>operation improves convenience to the customers;</p> <ul style="list-style-type: none"> <li>• An expanded shopping center corrects operational deficiencies inherent with multiple store fronts. Economies of scale in a consolidated space reduce personnel costs and expenses. The new sustainable construction will improve building efficiencies;</li> <li>• The expanded shopping center allows the Exchange to vacate buildings over 30 years old. Buildings 1683 and 1805 will be turned over to JBA-NAFW for final disposition consistent with the Base General Plan.</li> <li>• The shopping center is stressed and requires additional space to meet customer demand</li> <li>• Project supports the Base Master Plan</li> </ul> <p>The MOA between AAFES and JBA-NAFW states that the new BX in the proposed Town Center will not open until FY2030. Further, the MOA states that AAFES will use the expanded BX for at least 15-years. Additionally, the proposed Town Center is an unfunded notional plan, whereas there is an immediate need for better retail services for servicemen at JBA-NAFW.</p>
	2.2.4	2-4	<p><b>Wetlands:</b></p> <p>Page 2-4 states, "Alternative 1 would not directly impact any wetlands or involve construction in a wetland; however, two delineated wetlands exist in the vicinity: a 5,618-square-foot (0.13-acre) forested wetland</p>	<p>Figure 2-2 has been updated to show the 25-foot buffer zone.</p> <p>The expansion of the BX will not have any direct impacts to the wetlands adjacent to the BX. However, the expansion of the building and</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
			<p>immediately north of the project site and a 6,590-square-foot (0.15-acre) wetland mosaic to the northwest of the project site (see Figure 2-2). Utilities for Alternative 1 would have a short-term impact during construction to the buffer zone around the forested wetland to the north of the BX."</p> <p>Please quantify the impact to the buffer zone as well as identify and describe potential indirect impacts to the forested wetlands. It would be helpful if Figure 2-2 showed the buffer zone in relation to the Proposed Action.</p>	associated infrastructure have a permanent impact to 4,326 square feet of the MDE regulated buffer, requiring a non-tidal wetland permit.
	4.16	4-17	<p><b>Wetlands:</b></p> <p>Page 4-17 states, "Long-term irreversible and irretrievable commitments of resources would result from the implementation of the Proposed Action and would include the loss of wetlands (approximately 0.25 acre)..."</p> <p>As stated on page 2-4, "Alternative 1 would not directly impact any wetlands..." Please explain this discrepancy. Also, identify and describe the 0.25 acre of wetland loss including the functional value of the impacted wetlands.</p>	The wetlands sections of the EA have been updated to present the most recent information provided by the Architects.
	3.3.2 and 3.5.1	3-4 and 3-7	<p><b>Water Resources:</b></p> <p>Page 3-7 states, "...groundwater is generally encountered at the Base from approximately 4 to 9 feet below ground surface." The unconfined water table on the Base can typically be found at depths less than 20 feet and the majority of the water table on the Base drains south toward to Piscataway Creek (Andrews AFB 2005)." Page 3-4 states, "The use of groundwater as a potable source of water is prohibited on the base and all such wells are used for monitoring purposes only (JBA-NAFW 2010)."</p>	<p>All construction activities will follow appropriate BMPs for the protection of groundwater and will be conducted in accordance with The Andrews Environmental Protection Standards for Contracts.</p> <p>The basic contracting requirements are as follows:</p> <ol style="list-style-type: none"> <li>1) Provide and maintain environmental protection as required, during the life of the contract,</li> </ol>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
			<p>What Construction Safeguards will be in place to ensure that groundwater is not impacted during construction?</p> <p>EPA is concerned with worker exposure to contaminated groundwater.</p>	<p>2) Plan for and provide environmental protective measures to control pollution that develops during normal construction activities or project execution,</p> <p>3) Plan for and provide environmental protective measures required to correct conditions that develop during the construction of permanent or temporary features associated with the project, and</p> <p>4) Comply with federal, state and local regulations pertaining to the environment including, but not limited to, water, air and ground pollution</p> <p>JBA-NAFW's Environmental Restoration Program (ERP), formerly known as the Installation Restoration Program (IRP), is part of a DoD effort to identify and correct environmental contamination resulting from past practices. Joint Base Andrews was listed on the National Priorities List in 1999. There are no known ERP sites on the proposed site, or in the immediate vicinity of the project site, therefore potential worker exposure to contaminated groundwater is minimal.</p>
	3.5.2 and 4.5.1	3-7 and 4-5	<p><b>Water Resources:</b></p> <p>Page 4-5 states, "Alternative 1 also would include the implementation of various BMPs to control surface drainage and reduce the potential for construction site runoff to impact local surface waters, such as Henson Creek."</p> <p>Where is Henson Creek in relation to the Proposed Action as well as other tributaries relatively close to the</p>	<p>Surface water drainage from the existing BX and proposed BX expansion drains to the storm sewer system along Arnold Avenue and then toward Henson Creek.</p> <p>Runoff from the project site would have no impact on other base tributaries. Section 3.5.2 has been updated to provide more information of the location of the tributaries relative to the project site.</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
			<p>Base perimeter including Meetinghouse Branch, Paynes Branch Creeks, Piscataway Creek, Tinkers Creek and Broad Creek?</p> <p>What is the condition of these tributaries?</p> <p>What (if any) aquatic resources inhabit these tributaries? What BMPs would be used to control surface drainage from construction of the Proposed Action?</p> <p>What is the indirect impact to surface water/groundwater that could result from the proposed tree removal?</p>	<p>During construction appropriate BMPs will be utilized to minimize erosion and runoff and erosion from the project site. Additionally AAFES design for the expansion of the BX incorporates BMPs to reduce runoff from the facility.</p>
	4.6.1	4-7	<p><b>Biological Resources:</b></p> <p>Page 4-7 states, "Implementation of Alternative 1 would involve the removal of approximately 90 trees".</p> <p>Please identify/describe the trees to be removed and specify the acreage impacted.</p> <p>Base regulations state, "For removal of canopy cover of less than 1 acre, one tree shall be planted for each removed according to a 1:1 ratio; and more than 1-acre, 60 percent of canopy cover must be reforested."</p> <p>Please specify which of the mitigation options applies to the Proposed Action.</p> <p>The EA states, "Replacement trees for those removed under Alternative 1 would be selected native species arranged in stands similar to those removed and would be replaced prior to tree removal, to the extent practicable."</p> <p>Identify the location proposed for tree replacement.</p>	<p>In total, 90 trees will be removed from the forested area and 103 individual trees outside of the forest area. However, a final tree survey will be conducted prior to construction. Tree removal and replacement will be conducted in accordance with the Andrews Arbor Plan which identifies possible reforestation locations, such as Reforestation Area C-2 to the northeast of the BX on the corner of Westover Drive and Arnold Avenue.</p> <p>Typical plant materials for reforestation are:</p> <p><b>Pioneer Canopy Plant Material</b></p> <p><i>Carya</i> Species – Hickory</p> <p><i>Franxinus pennsylvanica</i> - Green Ash</p> <p><i>Liquidambar styracifula</i> - Sweetgum</p> <p><i>Liriodendron tulipifera</i> – Tuliptree</p> <p><i>Oxydendron arboretum</i> – Sourwood</p> <p><i>Pinus strobus</i> – White Pine</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
				<i>Platanus occidentalis</i> - Sycamore <b>Climax Hardwood Canopy Plant Material</b> <i>Acer rubrum</i> – Red Maple <i>Fagus grandifolia</i> – American Beech <i>Quercus alba</i> – White Oak <i>Quercus lyrata</i> – Overcup Oak <i>Quercus nigra</i> – Water Oak <i>Quercus shumardii</i> – Shumard Oak <i>Quercus rubra</i> – Red Oak <b>Understory Plant Material</b> <i>Cercis canadensis</i> – Eastern Redbud <i>Cornus florida</i> – Flowering Dogwood <i>Cotinus coggygria</i> – Smoketree <i>Craetagus phaenopyrum</i> – Washington Hawthorne <i>Halesia Carolina</i> – Carolina Silverbell <b>Evergreen Plant Material</b> <i>Ilex opaca</i> – American Holly <i>Juniperus virginiana</i> – Eastern Redcedar <i>Pinus strobus</i> – White Pine <i>Pinus Taeda</i> – Loblolly Pine

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
	3.6	3-11	<p><b>Biological Resources:</b></p> <p>The EA did not identify wildlife that may inhabit the forested wetlands. It is stated on page 3-11 that the JBA-NAFW is located within the Atlantic migratory bird flyway and is therefore subject to seasonal populations of migrating birds.</p> <p>Please discuss the long-term impact that the Proposed Action may have on the forested wetlands and possibility migratory birds and identify wildlife that may be impacted by the Proposed Action.</p>	<p>JBA-NAFW does not have avian studies for the project area, and with the proximity to the flight line will not plant bird attracting species in accordance with The Andrews AFB 91-212 Bird/Wildlife Aircraft Strike Hazard (BASH) Plan</p>
	4.6.1	4-7	<p><b>Biological Resources:</b></p> <p>Page 4-7 states, "Alternative 1 would comply with the management plan for the ESA-listed plant species sandplain gerardia (<i>Agalinis acuta</i>)."</p> <p>Where is this plant located in relation to the Proposed Action?</p> <p>How will it be protected?</p>	<p>The only known population of the Sandplain Gerardia is south of the flightline near the 13th tee of the golf course (USACE Baltimore District 2007). The habitat is protected by fencing and signage that warns of the presence of a protected species. Additionally, JBA-NAFW maintains a management action plan for the Sandplain Gerardia which includes: the overall management situation; a discussion of specific management issues and concerns; management goals and objectives to address issues and concerns; and a five-year work plan</p> <p>Section 4.6.1 has been updated to clarify the location and protection of the of the Sandplain Gerardia.</p>
	2.3 and 4.13	2-8	<p><b>Cumulative Impacts</b></p> <p>Page 2-8, lists actions/projects planned for fiscal year 2013 to 2018. However, the list of projects presented in Section 2.3 and the Cumulative Impacts analysis in Section 4.13 failed to describe how the projects could</p>	<p>Figure 4-1 has been added to show the projects.</p> <p>The Town Center is proposed to be the central hub for community activities, with pedestrian-oriented activities creating a "live, work, play"</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
			<p>interface with the Proposed Action and how these projects could have a cumulative impact on natural resources.</p> <p>At a minimum, the EA should include a map depicting the Proposed Action in proximity to the proposed future projects.</p> <p>The proposed Town Center development was not included in the list or discussed in the Cumulative Impacts analysis. Where is the proposed Town Center development to be located in relation to the Proposed Action?</p>	<p>atmosphere. The proposed Andrews Town Center would be constructed in part of the former Military Family Housing on the western side of the base. The town center was not listed or discussed in the Cumulative Impacts Analysis as this future development is not a funded program; it is a notional plan.</p>
	4.6.1	4-6	<p><b>Miscellaneous</b></p> <p>Page 4-6 states, "Beyond the wetland areas at the site of the Proposed Action (analyzed in Section 4.2), there is limited vegetation due to past development of the Base." The correct section referred to is Section 4.5 (Water Resources) not Section 4.2 (Transportation).</p>	<p>The section reference change has been corrected as requested.</p>
	General		<p><b>Low Impact Development</b></p>	<p>Stormwater management measures have been designed in accordance with Maryland Department of the Environment (MDE) standards. MDE requires that "Environmental Site Design" (ESD) practices be used to the "maximum extent practicable". ESD practices and Low Impact Development (LID) practices are for all intents and purposes the same. The MDE approved stormwater management plan, as implemented, will meet LID / ESD standards</p>
National Capital Planning Commission	General		<p><b>2010 General Plan Update</b></p> <p>NCPC master plan guidelines recommend Commission review of federal master plans on a periodic basis of no longer than every five years to insure that both</p>	<p>The 2010 Joint Base Andrews General Plan must be redacted to remove sensitive information that is not appropriate for posting on the National Capital Planning Commission website or distribution to the public. That review and redaction process is</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
			inventory material and development proposals are current. Please submit the 2010 General Plan Update for Commission review as soon as possible, preferably in advance of any future project submissions to ensure that NCPC has up-to-date information with which to review project proposals.	nearing completion and it is expected that the plan will be submitted for NCPC review within in the next few months
	General		<p><b>Project Design</b></p> <p>The draft EA includes one “action” alternative with a concept design for a single-level refurbished/expanded building and expanded surface parking lot. As noted in our previous scoping comment letter (dated April 10, 2012), we recommend the addition of at least one “action” alternative to the EA with a multi-level building expansion and/or structured parking to minimize the project's impervious area. The Comprehensive Plan encourages both multiple-level buildings and garages to minimize developmental impacts related to stormwater, air quality, and trees/vegetation. When tree removal is necessary, trees should be replaced to prevent a net tree loss. If a multi-level building or garage is not feasible, please explain why within the Alternatives Eliminated from Further Analysis section of the final EA document.</p>	<p>The JB Andrews main store renovation / expansion project will consolidate the Home Traditions, and Four Seasons operations, located in separate buildings away from the main store, into the expanded main store. Customer and employee parking from these two off-site operations will be consolidated into the main store, thereby reducing the overall parking counts by approximately 282 spaces. Van / car pool parking will be provided, as will accessible parking to comply with accessible parking requirements throughout the site. All along the south side of the Exchange at the front entrances parking spaces are being replaced to accommodate for a safer / wider traffic flow that will also enhance pedestrian and bicycle access to the building.</p> <p>Thus, with the consolidation and expansion of the store there will be a reduction in the overall parking count. The project intent is to re-use the existing parking areas and any adaptation to the south side parking area will be minimal. The net result in the customer parking will meet the Comprehensive Plan for the National Capital and Prince George's County requirements and recommendations of re-using existing hardscape areas, reducing the number of parking spaces, segregating employee parking, and providing van / car pool parking. This can be accomplished without</p>



## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
				<p>constructing an underground parking structure. Relocating employee parking to an area behind the store and adjacent to the employee entrance will facilitate management of employee parking usage. The project retains, and in fact reduces, the size of the surface parking area on the south side of the building resulting in no increased site disturbance or environmental impact associated with the construction of a parking structure. In addition, the construction of a parking structure below ground would not provide a favorable option given it is not permitted per current DoD Antiterrorism Standards and Force Protection concerns requirements.</p> <p>The expansion/consolidation is an interim step until the Exchange is ready to move into the JB Andrews Town Center in 2030, per a Memorandum of Agreement with the installation. A permanent parking structure is not practical and will not meet the planned follow on redevelopment of this area as an industrial support area.</p>
	General		<p><b>Memorandum of Agreement</b></p> <p>The draft EA references a Memorandum of Agreement (MOA) between JBA-NAFW and AAFES, but does not include the MOA or its specific terms. In particular, the draft EA states that the MOA “allows for the expansion of the existing BX and the new construction of a BX as part of the Town Center development sometime after 2025.” If a valid MOA which assumes development of a new town center is currently “in force,” the EA should analyze the town center as a “reasonably foreseeable future” project (pages 2-8 and 2-9) in the cumulative impact analysis. Please include the MOA in</p>	<p>The MOA has been provided as an Appendix to the EA.</p> <p>The Town Center is proposed to be the central hub for community activities, with pedestrian-oriented activities creating a “live, work, play” atmosphere. The proposed Andrews Town Center would be constructed in part of the former Military Family Housing on the western side of the base. The town center was not listed or discussed in the Cumulative Impacts Analysis as this future development is not a funded program; it is a notional plan.</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
			the final EA and revise the document accordingly.	
	General		<p><b>Parking</b></p> <p>The draft EA describes the need to expand existing AAFES parking, but does not provide an existing/future parking demand analysis to justify the proposed expansion. Based on the aerial photo provided in Figure 1-2 (Existing AAFES Facilities), we note other parking lots near the AAFES lot that could potentially be used for shared parking. The final EA should include information on the project's existing/future parking demand and an analysis related to the feasibility of utilizing other lots for shared parking.</p> <p>As described in NCPC's previous scoping letter, JBA-NAFW should adhere to an overall goal of 1:1.5 — 1:2.0 for employee parking.<sup>4</sup> If the installation does not currently meet this goal, this project should provide fewer spaces to reduce overall employee parking as a “phased approach linked to planned improvements” approach. The final EA should include specific information for current/future employee populations and current/future parking numbers. While the Comprehensive Plan does not regulate visitor/customer parking, we encourage AAFES and JBA-NAFW to minimize customer parking to the maximum extent practicable, and to provide parking in conformance with Prince George's County's parking standards.</p>	<p>This project design and final project will result in meeting the requirement of one employee parking space for every 1.5 employees per the NCPC Comprehensive Plan. Currently, employee parking is co-located with customer parking on the south side of the store; there is no controlling limit on the availability of parking for staff. The proposed project will relocate approximately 60 parking spaces near the NW side of the building at the employee entrance to be used exclusively for the employees. The number of employees will vary during the work day, however, the anticipated peak number of employees that will be on location utilizing employee parking at the Exchange would be 92 meeting the 1:1.5 preferred NCPC ratio.</p> <p>The JB Andrews main store renovation / expansion project will consolidate the Home Traditions, and Four Seasons operations, located in separate buildings away from the main store, into the expanded main store. Customer and employee parking from these two off-site operations will be consolidated into the main store, thereby reducing the overall parking counts by approximately 282 spaces. Van / car pool parking will be provided, as will accessible parking to comply with accessible parking requirements throughout the site. All along the south side of the Exchange at the front entrances parking spaces are being replaced to accommodate for a safer / wider traffic flow that will also enhance pedestrian and bicycle access to the building.</p> <p>The proposed shopping center expansion will meet the general requirements for the</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
				Comprehensive Plan for the National Capital permitted use of parking lots and loading areas and will improve the current loading concerns set forth regarding the requirement that "parking lots shall not be used for loading purposes". The proposed design provides loading /offloading areas on the east side of the building near the Food Court receiving and Mechanical Yard, the Outdoor Living Area (NW side) and the merchandise processing area (MPA) area on the north side of the Exchange. These proposed additions are intended to relieve congestion and assist with traffic flow at the front entrances of the Exchange and to and from the Main Gate.
				Thus, with the consolidation and expansion of the store there will be a reduction in the overall parking count. The project intent is to re-use the existing parking areas and any adaptation to the south side parking area will be minimal. The net result in the customer parking will meet the Comprehensive Plan for the National Capital and Prince George's County requirements and recommendations of re-using existing hardscape areas, reducing the number of parking spaces, segregating employee parking, and providing van / car pool parking. This can be accomplished without constructing an underground parking structure. Relocating employee parking to an area behind the store and adjacent to the employee entrance will facilitate management of employee parking usage. The project retains, and in fact reduces, the size of the surface parking area on the south side of the building resulting in no increased site disturbance or environmental impact associated with the construction of a parking structure. In addition, the

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
				<p>construction of a parking structure below ground is not permitted per current DoD Antiterrorism Standards and Force Protection requirements. The expansion/consolidation is an interim step until the Exchange is ready to move into the JB Andrews Town Center in 2030, per a Memorandum of Agreement with the installation. A permanent parking structure is not practical and will not meet the planned follow on redevelopment of this area as an industrial support area.</p> <p>The local parking zoning requirements for Prince George's County under section 27-568 stipulates a minimum off-street parking requirement for retail shopping centers at 1 space per 250 GLA. The Gross Leasable Area of the proposed Andrews Exchange will be approximately 173,641 sf. The corresponding parking standard requirement would be 694 spaces; the proposed design is well below the minimum local standard.</p>
	General		<p><b>Bicycle Facilities</b></p> <p>As previously requested in our scoping letter, the project design should conform to the following applicable Comprehensive Plan policies:</p> <ul style="list-style-type: none"> <li>Provide secure and sheltered bicycle parking spaces or bicycle lockers in close proximity to building entrances at federal buildings and on federal campuses. The number of spaces provided should be in accordance with the requirements of the local jurisdiction in which the federal facility resides, if such requirements exist. In the absence of such requirements, federal facilities should provide an abundant supply of bicycle lockers or</li> </ul>	<p>The new design for the expansion of the Exchange will provide for 16 bicycle parking spaces. The widening of the road on the south side of the Exchange at the front entrances and additions of roadways on all sides of the structure should increase the travel lanes and encourage bicycle use due to the reduction of vehicle congestion around the site.</p> <p>The design will provide employee lockers, but no showers at the facility.</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
			<p>parking spaces to meet current employee needs and to promote bicycle commuting.</p> <ul style="list-style-type: none"> <li>Provide employee clothes lockers and showers at federal buildings and on federal campuses to support bicycle commuters. Space should be reserved in new facilities to allow for the provision of showers and lockers to support the bicycle commuting population.</li> </ul>	
	1.7 and 3.5.2	1-6 and 3-7	<p><b>Stormwater Management</b></p> <p>The final EA should specify how the project will comply with Section 438 of the Energy Independence and Security Act (EISA), as well as Maryland stormwater regulations related to runoff volumes and nutrient loading. Specifically, Section 438 instructs federal agencies to use site planning, design, construction, and maintenance strategies to restore the pre-development ("greenfield") hydrology of the property for any project footprint that exceeds 5,000 square feet. The draft EA does not mention Section 438 or provide any information related to the project's Section 438 compliance, which will be important for the Commission's review. Please reference the United States Environmental Protection Agency's technical guidance on implementing these requirements at: <a href="http://www.epa.gov/oaintrnt/stormwater/requirements.htm#guidance">http://www.epa.gov/oaintrnt/stormwater/requirements.htm#guidance</a>.</p>	<p>Sections 1.7 and 3.52 have been updated to include more detailed information pertaining to the applicable regulatory criteria for stormwater management.</p>
	4.6	4-7	<p>The draft EA states that the AAFES project would construct new impervious area and remove approximately 90 trees, but does not include detailed information on the net change in trees (trees removed plus new trees), the size of the new trees to be planted as mitigation, or the amount of pervious surface increase. The NCPC Comprehensive Plan includes a "no net" tree loss policy and detailed</p>	<p>Tree removal and replanting will be completed in accordance with the JBA-NAFW Arbor Plan.</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
			information on stormwater management, impact to trees, and water quality should be provided for Commission review, either in the final EA or future project submissions.	
Prince George's County Planning Department	General		<p><b>Planning Issues:</b></p> <p>The 2005 Joint Base Andrews Joint Land Use Study (JLUS) identifies economic development recommendations as priorities for implementation. Recommendations include attracting uses "in the base vicinity that would vicinity and would better serve base, personnel and the local community." Master plans including the Central Branch Avenue Corridor Revitalization Sector Plan: and initiatives such as the Andrews Working Group seek to have the base work collaboratively with the County to promote and facilitate redevelopment and revitalization adjacent to the base and to provide greater opportunities for the local community and base personnel to patronize local businesses.</p> <p>Growth and expansion of commercial service and retail uses off-base to serve the community is a County objective though outside the scope of this referral The Base Exchange includes a barber shop, beauty salon, retails stores and food court. Providing these and other uses off-base would help to redevelop the surrounding communities to better serve the base, where the uses could benefit both communities. JBA has expressed an interest in having wider retail and service options available to base personnel in proximity to the base; however, the amount of retail and commercial services that can be supported by the market (most of which is concentrated on the base) is limited, so further expansion of retail and commercial services on the base should be reconsidered.</p>	<p>The Exchange is an integral part of the consistent culture for the military and their families. The Exchange is a joint non-appropriated fund instrumentality of the Department of Defense (DoD) and has an enduring mission to provide quality merchandise and services to its authorized customers at competitively low prices and generate earnings which provide dividends to support morale, welfare and recreation programs. In the past ten years, the Exchange has contributed more than \$2.4 billion to quality-of-life improvements including youth services, Armed Forces Recreation Centers, arts and crafts, aquatic centers, golf courses and more.</p> <p>When military members deploy to remote locations around the world, the Exchange is with them, offering products and services to bring troops a taste of home.</p> <p>The Exchange is a major source of employment for military families. Approximately 23 percent of the more than 42,000 Exchange Associates are military family members; 10 percent are veterans; two percent are active-duty or Reserve personnel working part-time in Exchanges during their off-duty hours.</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
Maryland Department of Natural Resources	1.2	1-3	<p><b>Purpose and Need:</b></p> <p>The EA, while stating that the existing Base Exchange facilities are not up to standards and inadequate to meet current customer needs, it does not provide reasonable supporting documentation to support these assertions or justify the urgent need for this project (This same conclusion was offered by U.S. EPA Region III). This request for supporting information is reasonable since the EA also states that this proposed new facility will be replaced by a new Base Exchange located near the planned Community Center in 2025, as discussed in the JBA-NAFW General Plan. Further, there are additional military and commercial retail complexes and wellness facilities already available in the Metro D.C region.</p>	<p>The existing BX at JNA-NAFW needs to be expanded for several reasons including:</p> <ul style="list-style-type: none"> <li>• This project consolidates the Main Store departments, Military Clothing and satellite pharmacy located in the Home Traditions (Bldg 1683) and Outdoor Living (Bldg 1805) into the expanded shopping center. Combining these activities into a single operation improves convenience to the customers;</li> <li>• An expanded shopping center corrects operational deficiencies inherent with multiple store fronts. Economies of scale in a consolidated space reduces personnel costs and expenses. The new sustainable construction will improve building efficiencies;</li> <li>• The expanded shopping center allows the Exchange to vacate buildings over 30 years old. Buildings 1683 and 1805 will be turned over to JBA-NAFW for final disposition consistent with the Base General Plan.</li> <li>• The shopping center is stressed and requires additional space to meet customer demand</li> <li>• Project supports the Base Master Plan</li> </ul> <p>The MOA between AAFES and JBA-NAFW states that the new BX in the proposed Town Center will not open until FY2030. The MOA states that AAFES will use the expanded BX for at least 15-years. Additionally, the proposed Town Center is an unfunded notional plan, whereas there is an</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
				immediate need for better retail services for servicemen at JBA-NAFW.
	General		<p><b>Sustainable Transportation:</b></p> <p>As also noted by U.S. EPA Region III, the proposed project does not address alternate parking structures and why the additional parking spaces are need for employees. And, as noted by the Maryland National Planning Commission, the proposal does not adequately address sustainable transportation principles such as providing alternatives to automobiles (pedestrian, bicycles, mass transit) as well minimizing impermeable parking surfaces</p>	<p>The project design and final project will result in meeting the requirement of one employee parking space for every 1.5 employees. Currently, employee parking is co-located with customer parking on the south side of the store; there is no controlling limit on the availability of parking for staff. The proposed project will relocate approximately 60 parking spaces near the NW side of the building at the employee entrance to be used exclusively for the employees. The number of employees will vary during the work day, however, the anticipated peak number of employees that will be on location utilizing employee parking at the Exchange would be 92 meeting the 1:1.5 ratio.</p> <p>The BX renovation / expansion project will consolidate the Home Traditions, and Four Seasons operations, currently located in separate buildings away from the main store, into the expanded main store. Customer and employee parking from these two off-site operations will be consolidated into the main store, thereby reducing the overall parking counts by approximately 282 spaces. Van / car pool parking will be provided, as will accessible parking to comply with accessible parking requirements throughout the site. All along the south side of the Exchange at the front entrances parking spaces are being replaced to accommodate for a safer / wider traffic flow that will also enhance pedestrian and bicycle access to the building.</p> <p>Thus, with the consolidation and expansion of the store there will be a reduction in the overall</p>



## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
				<p>parking count. The project intent is to re-use the existing parking areas and any adaptation to the south side parking area will be minimal. The net result in the customer parking will meet the Comprehensive Plan for the National Capital and Prince George's County requirements and recommendations of re-using existing hardscape areas, reducing the number of parking spaces, segregating employee parking, and providing van / car pool parking. This can be accomplished without constructing a parking structure. Relocating employee parking to an area behind the store and adjacent to the employee entrance will facilitate management of employee parking usage. The project retains, and in fact reduces, the size of the surface parking area on the south side of the building resulting in no increased site disturbance or environmental impact associated with the construction of a parking structure.</p> <p>The expansion/consolidation is an interim step until the Exchange is ready to move into the JB Andrews Town Center in 2030, per a Memorandum of Agreement with the installation. A permanent parking structure is not practical and will not meet the planned follow on redevelopment of this area as an industrial support area.</p> <p>The new design for the expansion of the Exchange will provide for 16 bicycle parking spaces. The widening of the road on the south side of the Exchange at the front entrances and additions of roadways on all sides of the structure should increase the travel lanes and encourage bicycle use due to the reduction of vehicle congestion around the site.</p>

## COMMENT MATRIX

### Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Prince George's County, Maryland

Name	EA Section	EA Page #	Comment	Response
	3.5.1 and 4.5.1  3.9 and 4.9	3-7 and 4-5  3-14 to 3-19, and 4-9 to 4-12	<p><b>Support of Executive Order 13508-Chesapeake Bay Protection and Restoration:</b></p> <p>The EA does not address how this project will address this mandate to federal agencies to do their part to clean up and restore the Chesapeake Bay, including how the project will address climate change.</p>	<p>Surface water and drainage is discussed in sections 3.5.1 and 4.5.1. Environmental Site Design (ESD) measures will be used to the maximum extent practicable to provide water quality treatment for stormwater runoff. ESD measures to be used are anticipated to include, but are not limited to: bioswales, gravel wetlands, and micro-bioretenion facilities. All stormwater management will be conducted in accordance with applicable regulatory requirements including EO 13508, Chesapeake Bay Protection and Restoration.</p> <p>Additionally, the air, including GHG, analysis are presented in sections 3.9 (Affected Environment) and 4.9 (Environmental Consequences) of the EA.</p>

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## **Appendix B**

# **Notice of Availability**

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# The Gazette

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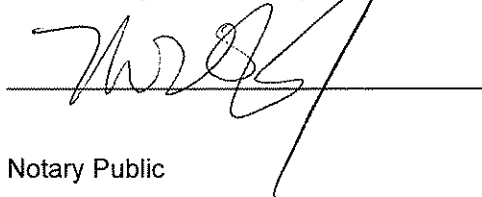
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## PUBLIC NOTICE

### Notice of Availability Draft Environmental Assessment and Finding of No Significant Impact

Joint Base Andrews-Naval Air Facility Washington, Maryland (JBA) has prepared an Environmental Assessment (EA) for the expansion and consolidation of the Army and Air Force Exchange Service (AAFES) Base Exchange (BX) at building 1811. The Proposed Action would provide consolidated, centrally located facilities on JBA where authorized customers can obtain multiple services at a single location. This would reduce the traffic congestion in some areas of JBA and allow customers to make a single stop for multiple services. This EA has been prepared to evaluate the Proposed Action and alternatives, including the No Action Alternative. The results, as found in the EA, show that the Proposed Action would not have a significant adverse impact on the environment, indicating that a Finding of No Significant Impact (FONSI) would be appropriate. An Environmental Impact Statement should not be necessary to implement the Proposed Action.

Copies of the Draft EA and Draft FONSI are available for review until June 8, 2013 at the Upper Marlboro Branch Library of the Prince George's County Memorial Library System. Copies are also available at the JBA Library at 1642 Brookley Ave. or online at <http://www.andrews.af.mil/library/environmental/index.asp>.

Written comments should be sent to Anne Hodges, 11th Civil Engineer Squadron, 3466 North Carolina Ave, Joint Base Andrews, MD 20762 by no later than 30 days from the publication of this notice.

(5-9-13)

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# **Appendix C**

## **Finding of**

### **No Significant Impact (FONSI)**



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## **Finding of No Significant Impact**

### **Environmental Assessment for the Expansion and Consolidation of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington,**

#### **Introduction**

The Environmental Assessment (EA) for the expansion and renovation of the Base Exchange (BX) facility at Joint Base Andrews-Naval Air Facility Washington (JBA-NAFW) was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations (CFR) §1500-1508), and the Air Force Environmental Impact Analysis Process (32 CFR §989). The EA (attached herein) analyzes potential environmental consequences from the expansion and renovation of the existing Base Exchange (BX).

#### **Purpose and Need for the Proposed Action**

The purpose of the Proposed Action is to provide consolidated and centralized retail facilities on JBA-NAFW where authorized customers could obtain multiple services at a single Army and Air Force Exchange Service (AAFES) location. The need for the Proposed Action is to upgrade retail facilities on-installation to comply with new building and industry standards and to provide adequate space to meet the current and future retail demand for JBA-NAFW.

The construction of new facilities would provide AAFES and the JBA-NAFW Morale, Welfare, and Recreation program with additional revenue. In addition, the building and infrastructure design improvements of the AAFES facility would increase energy efficiency and reduce overall operational and maintenance costs.

#### **Description of the Proposed Action**

The 11th Wing and AAFES propose to renovate and expand the existing BX facility starting in fiscal year 2013.

#### **Proposed Action**

AAFES proposes to renovate and expand the existing BX at JBA-NAFW. The scope of the proposed expansion would total approximately 166,864 square feet or an estimated 55,282 square feet of new construction and 111,582 square feet of renovation. The scope would include the renovation and build-out of the existing foundation, structure/frame, and roof consistent with Base design standards. Key features associated with the construction of the Proposed Action include the addition of a food court, a loading dock, a food service dock, and an employee parking area. The Proposed Action would connect to existing utility and communication services and would include new and upgraded interior walls; lighting, mechanical, electrical, and safety systems; exterior surfaces such as sidewalks, curbs, and parking spaces; and other site improvements, as necessary. Construction of the Proposed Action would occur in phases over an estimated two-year period. The construction phases would occur in the following order:

1. Construction of a food court retail space and portions of the merchandise processing area (MPA);
2. Construction of the administrative offices and the military clothing sales store (MCSS), and completion of the MPA;
3. Interior renovations to the eastern sales or "check-out" area and the eastern half of the BX; and
4. Interior renovations to the western side of the sales or "check-out" area and the western half of the BX (to include parking modifications).

## **Environmental Assessment**

In addition, the Proposed Action would be carried out in accordance with all applicable United States Department of Defense Unified Facilities Criteria and, where feasible and cost-effective, would be designed and constructed to meet Leadership in Energy and Environmental Design construction standards.

### **Summary of Environmental Effects**

Resources evaluated in the EA include: land use; transportation; infrastructure and utilities; geology and soils; water resources; biological resources; socioeconomics, environmental justice and protection of children; air quality; cultural resources; noise; hazardous materials and waste management; and safety and occupational health.

No beneficial or adverse effects on land use, cultural resources, or environmental justice would be expected. Short-term minor adverse effects on infrastructure and utilities, geology and soils, biological resources, air quality, noise, hazardous materials and wastes, and safety and occupational health would be expected. These effects would be attributable primarily to construction activities, which would involve the disturbance of soils, potential accidental spills of petroleum and lubricants, increased impervious surfaces and energy usage, use of heavy equipment, and construction noise and emissions from equipment and fugitive dust. All of these effects are controllable through the use of appropriate best management practices (BMPs), and they would last no longer than the period of construction.

Short- and long-term minor beneficial effects on transportation and socioeconomics would be expected. Construction and demolition projects would have an overall beneficial effect on local employment and income. Additionally, consolidation of separate services on-installation would have a long-term benefit to transportation.

Long-term minor beneficial effects on water resources would be expected from implementation of stormwater management BMPs to reduce nitrogen, phosphorus, and sediment runoff to assist in achieving Total Maximum Daily Load reduction goals. Additionally, replacing outdated, inefficient facilities with new, energy-efficient ones would improve the long-term operational efficiency of facilities at JBA-NAFW.

### **Public Review and Interagency and Intergovernmental Coordination**

In accordance with Air Force policy, the interagency and intergovernmental coordination for environmental planning (IICEP) was initiated on March 8, 2012. Public and IICEP review of the draft EA was conducted from May 9 to June 10, 2013. Responses received are in Appendix A of the EA.

### **Finding of No Significant Impact**

I conclude that the environmental effects of the proposed installation development at JBA-NAFW are not significant, that preparation of an environmental impact statement is unnecessary, and that a finding of no significant impact is appropriate. The preparation of the EA is in accordance with the National Environmental Policy Act, the regulations of the Council on Environmental Quality, and Title 32 Code of Federal Regulations Part 989, as amended.



DANIEL L. WATERS, Colonel, USAF  
Vice Commander, 11th Wing

1 Aug 2013

Date

**Appendix D**  
**Memorandum of Agreement,**  
**January 2011**

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**MEMORANDUM OF AGREEMENT (MOA)**  
**Between**  
**ARMY AND AIR FORCE EXCHANGE SERVICE (AAFES)**  
**and**  
**11<sup>TH</sup> WING**  
**And**  
**779<sup>th</sup> Medical Group (779 MDG)**  
**for**  
**EXPANSION OF THE SHOPPING CENTER**  
**JOINT BASE ANDREWS NAVAL AIR FACILITY WASHINGTON**  
**AAFES PROJECT NUMBER 0203-09-003**

**1. PURPOSE:** This Memorandum of Agreement (MOA) between the 11<sup>th</sup> Wing, the 779<sup>th</sup> Medical Group and the Army and Air Force Exchange Service (AAFES) defines responsibilities and establishes support relationships between the parties.

**2. APPLICABILITY:** The provisions in this MOA apply to Expansion of the Shopping Center at Joint Base Andrews Naval Air Facility Washington (JBANAF), Maryland.

**3. EFFECTIVE PERIOD:** The effective period of this MOA will commence on the date of mutual acceptance as indicated by the latest signature date contained in this MOA, and will remain in effect until acceptance of the DD Form 1354, Transfer and Acceptance of Military Real Property.

**4. REFERENCES:** The authorities for this MOA include:

a. DoDI Instruction 1015.15, Procedures for Establishment, Management, and Control of Nonappropriated Fund Instrumentalities and Financial Management of Supporting Resources, dated 31 Oct 07, including Change 1, dated 20 Mar 08.

b. DoD Instruction 4000.19, Interservice and Intragovernmental Support, dated 9 Aug 95.

c. UFC 4-010-01, DoD Minimum Antiterrorism Standards for Buildings dated 22 Jan 07, and UFC 4-010-02, DoD Minimum Standoff Distances for Buildings dated 19 Jan 07.

d. UFC 1-300-08, Criteria for Transfer and Acceptance of Military Real Property, dated 16 Apr 09.

e. AR 215-8/AFI 34-211 Army and Air Force Exchange Operations, dated 30 Jul 08.



f. AFI 65-106, Appropriated Fund Support of Morale, Welfare, and Recreation (MWR) and Non-appropriated Fund Instrumentalities (NAFIs), dated 6 May 09.

g. AFI 32-1022, Planning and Programming Nonappropriated Fund Facilities Construction Projects, dated 20 May 09.

h. MOA between AAFES and DAF for operation of the AFMCSS, dated 21 Sep 99.

i. Nothing contained in this paragraph is intended to limit responsibilities of the parties in reference to other Air Force instructions, DoD directives or instructions, or other applicable guidance.

**5. SCOPE/CONCEPT OF OPERATION:** This project will be designed and constructed to the estimated costs as defined in the approved DD Form 1391, Military Construction Project Data, and/or other applicable programming documents, and will incorporate the provisions of all applicable parties' design criteria. Criteria conflicts will be reviewed by affected parties and resolved on a case-by-case basis in a timely manner. The Shopping Center is programmed to include retail space, a merchandise processing area, and food/concession mall. The Shopping Center will expand from a 110,460 SF module Shopping Center (SC) to a 4.0 module 166,869 SF (15,503 SM) facility at the current location. Two functions, an 8,500 SF (790 SM) Military Clothing Sales Store (MCSS) and 3000 SF (280 SM) satellite Pharmacy are also programmed and included in this facility. (Site plan enclosed.)

## **6. DUTIES AND RESPONSIBILITIES:**

### **a. AAFES RESPONSIBILITIES:**

(1) Serve as the user of the AAFES facilities identified in this plan; and, as the primary funding agency of such, assume overall responsibility for functionality, schedule, and cost management of the project.

(2) Provide all necessary actions to design and construct the project identified in the plan, and take actions to purchase and install equipment scheduled for the exchange portion of the project.

(3) AAFES to provide hard copies of design information (drawings, specs, analysis) to the Base Civil Engineer (BCE) for each of the design milestones allowing BCE 15 days to provide comments to design.

(4) Provide pre-final DD 1354 document 30 days in advance of final inspection and the construction agent shall submit the completed DD Form 1354 document to the BCE for all capital improvements within 3 days of accepting any portion of a facility.

(5) Monitor general contractor's performance on one-year building warranty.

(6) Provide as-built drawings, equipment brochures, and warranty information on building systems to the Base Civil Engineer.

(7) Provide 779<sup>th</sup> MDG space in the Exchange Shopping Center for the sole purpose of operating a satellite pharmacy.

(8) Construct multiple rooms and provide painted walls, drop ceiling, lighting, floor covering, and heating and air conditioning system within said space. Install main entrance and overhead rolling shutters to said space, as well as electrical meter, communication/data jacks, and empty conduits for the intrusion detection system (IDS). Pharmacy-specific equipment, IDS, and furniture will not be an AAFES responsibility.

b. 11th WING RESPONSIBILITIES:

(1) Provide a project site, free of contamination, environmental hazards and existing construction, and in accordance with the installation master plan. Provide any funding actions required to free the site of these encumbrances or to study project integration into overall installation development. If unforeseen environmental contamination, environmental hazards, existing construction or cultural assets are found on site during construction, host installation will program and fund projects to correct these deficiencies. If project integration studies identify concerns to overall installation development, program and provide funds to correct deficient areas.

(2) Advise on support of environmental issues related to the project. This includes identifying all required construction and operating permits, site-specific spill plans and unique local requirements. If applicable, prepare all necessary amendments to installation-wide environmental permits, spill plans or new applications for operating permits. Required new operating permits will be registered showing host installation as legal owner and AAFES as operator.

(3) AAFES is responsible for the completion of the Environmental Assessment. The 11th WG will provide in-house resources to accomplish the Environmental Impact Analysis Process (EIAP). This includes processing the initial request for environmental assessment, reviewing and commenting on the draft environmental assessments (if done by contract), and assuring environmental decision documents are published, signed and completed.



(4) Review and comment on designs and specifications during the design review process. Identify all available and underlying utilities, pipelines, and similar items under the project site pertinent to the design.

(5) Provide utilities to the project site, and install executive command and control system (ECCS) communication lines into the facility.

(6) Assure completion and approval of all necessary, installation-specific, programming documents, and provide coordination with other service organizations, as necessary.

(7) Complete DD Form 1354 within 90 days of receipt of complete project close out documents from AAFES.

(8) Provide for maintenance and repair of all installed real property components upon the final inspection and acceptance of the facility.

(9) Provide for force protection measures the installation requires that exceed minimum DoD standards.

(10) Provide for necessary duress alarms and intrusion detection system monitoring required by the installation or Air Force higher headquarters.

(11) The Air Force District of Washington (AFDW) shall approve a companion project to support this project. The following overview of APF responsibilities include:

(a) Fund 3,000 SF (290 Square Meters (SM)) of Pharmacy space in the Mall of the new Shopping Center.

(b) Fund 8,500 SF (790 SM) (50%) of the total Air Force Military Clothing Sales Store (AFMCSS) space in the new Shopping Center.

(c) Fund duress and intrusion systems for the facility to include the Pharmacy.

(d) Funds budgeted to include prorated AE design fees and Supervision, Inspection and Over head (SIOH), as well as 5% for contingencies.

c. 779<sup>th</sup> MDG Responsibilities:

(1) Provide a specific list of intrusion detection equipment (IDE), and other physical security equipment requirements for said space, to AAFES for design and installation of properly sized and placed empty conduits required for future installation of the security system by 779<sup>th</sup> MDG or their contractor.

(2) Obtain all necessary base approvals and requirements for the operation of said space as a Satellite Pharmacy.

(3) Arrange with the Base for the maintenance and repair of said space as an appropriated fund expense, including the exterior doorway leading into said space, the overhead rolling shutters at windows, the electrical meter, the communications/data jacks, and intrusion detection system.

(4) Assist AAFES in monitoring general contractor's performance on one-year building warranty for space occupied by 779<sup>th</sup> MDG Satellite Pharmacy operations. Inform the AAFES facility manager of identified deficiencies.

(6) Provide appropriated funds to accomplish any and all future renovation and/or modification work requested by the 779<sup>th</sup> MG for said space.

(7) Follow applicable guidelines for disposal and/or destruction of hazardous waste materials.

**7. FINANCIAL RESPONSIBILITIES:**

a. AAFES FUNDING:

(1) All design, construction, and equipment specific to the AAFES assigned facilities identified in this project.

(2) All related planning, supervision, administration and overhead incidental to AAFES portions of specific projects.

(3) All contracted environmental assessments required to comply with the EIAP, if host installation is unable to accomplish this work in-house.

(4) AAFES will, after work is complete and after receipt of the obligation document referenced in 7.b (1), forward detailed invoice totaling approximately \$1,200,000 (\$0.749 M for the MCSS and Pharmacy for new construction and \$0.45 M for the MCSS for Maintenance and Repair). The invoice will be for work identified in

paragraphs 6.b.12 (a) thru (d) of this MOA. Any additional work beyond the estimate will be reflected in an amended funding document to cover this additional cost.

a. AAFES will forward the invoice to:

**Joint Base Andrews Naval Air Facility  
Colonel Kenneth R. Rizer, USAF  
Commander, 11th Wing  
1535 Command Drive, Suite AB-203  
Andrews AFB, MD 20762**

b. AAFES will forward the invoice to:

**Medical DHP Invoice  
Rudolph Cachuela, Col, USAF, MC, SFS  
Commander, 779th Medical Group  
1050 West Perimeter Road  
Andrews AFB, MD 20762**

(5) The MIPR obligates the funds. AAFES will submit detailed invoices at the completion of the project when actual costs are known.

b. 11th WING FUNDING:

(1) Using a Reimbursement (Category I), Military Interdepartmental Purchase Request (MIPR), DD Form 448, obligate funding in the amount of \$1,200,000 for the design and construction of the Installation's portion of the MCSS and Pharmacy. The reimbursement MIPR must be completed and forwarded to AAFES during the construction portion of the project and prior to project completion. The DD Form 448 will be forwarded to:

**Army and Air Force Exchange Service  
HQ AAFES RE-F/A  
Attn: Charlotte Stadler  
P.O. Box 660202  
Dallas, TX 75266-0202**

(2) Within 30 days of receipt of the AAFES invoice described in Para 7.a (4), prepare a check payable to AAFES and forward to:

**Army and Air Force Exchange Service  
HQ AAFES FA-C/A  
P.O. BOX 660792  
DALLAS, TX 75266-0792**



(3) Removal of encumbrances related to providing a clean site.

(4) Accomplishment of the EIAP.

(5) The acquisition and installation of supporting requirements, including needed utility extensions up to the site boundary, ECCS communication lines, added force protection measures and duress/intrusion detection systems, if applicable.

c. 779<sup>th</sup> MDG FUNDING:

(1) Contingent on availability of funds, reimburse AAFES in an amount not to exceed \$750,000 for (if funds are not available then 779<sup>th</sup> MDG understands that the space will not be turned over to the 779<sup>th</sup> MDG):

(a) Design and specifications to insert said space for the Satellite Pharmacy into the AAFES Shopping Center project, based on the contractor's cost estimate.

(b) Finish-out of AAFES space to be used for the 779<sup>th</sup> MDG Satellite Pharmacy, based on the contractor's cost estimate.

(2) Contingent on availability of funds, initial outfitting of the Satellite Pharmacy to include shelving, equipment, vaults, storage bins, etc.

(3) The cost of utilities used in the operation of the Satellite Pharmacy upon occupancy of said space.

**8. CHANGES/TERMINATION OF PROJECT:**

a. This MOA may be changed by written amendment upon mutual agreement of both parties.

b. This MOA and project may be terminated by either party under the following conditions:

(1) Withdrawal of the approved site, if applicable.

(2) Changes to the building orientation or project scope.

(3) Failure to provide a project site as defined in Paragraph 6.b.(1).

(4) By written notice, upon mutual agreement of both parties.

(5) Disapproval by Congress, OSD, or the AAFES Board of Directors.

(6) Non-availability of funding.

**9. WARRANTIES AND REPRESENTATION:** The parties certify that the signatories to this MOA have authority to obligate their respective organizations to the responsibilities contained herein.

**10. ACCEPTANCE AND RATIFICATION:** The provisions of this MOA are effective upon signature and date as indicated below.

**FOR AAFES:**



**MICHAEL A. GIVIDEN**  
Senior Vice President  
Real Estate Directorate

Date: 7 Jan 2011

**FOR 11<sup>th</sup> Wing:**



**KENNETH R. RIZER**  
Colonel, USAF  
Commander

Date: 11 Jan 11

**FOR 779<sup>th</sup> MEDICALGROUP:**



**RUDOLPH CACHUELA**  
Colonel, USAF, MC, SFS  
Commander

## **Appendix E**

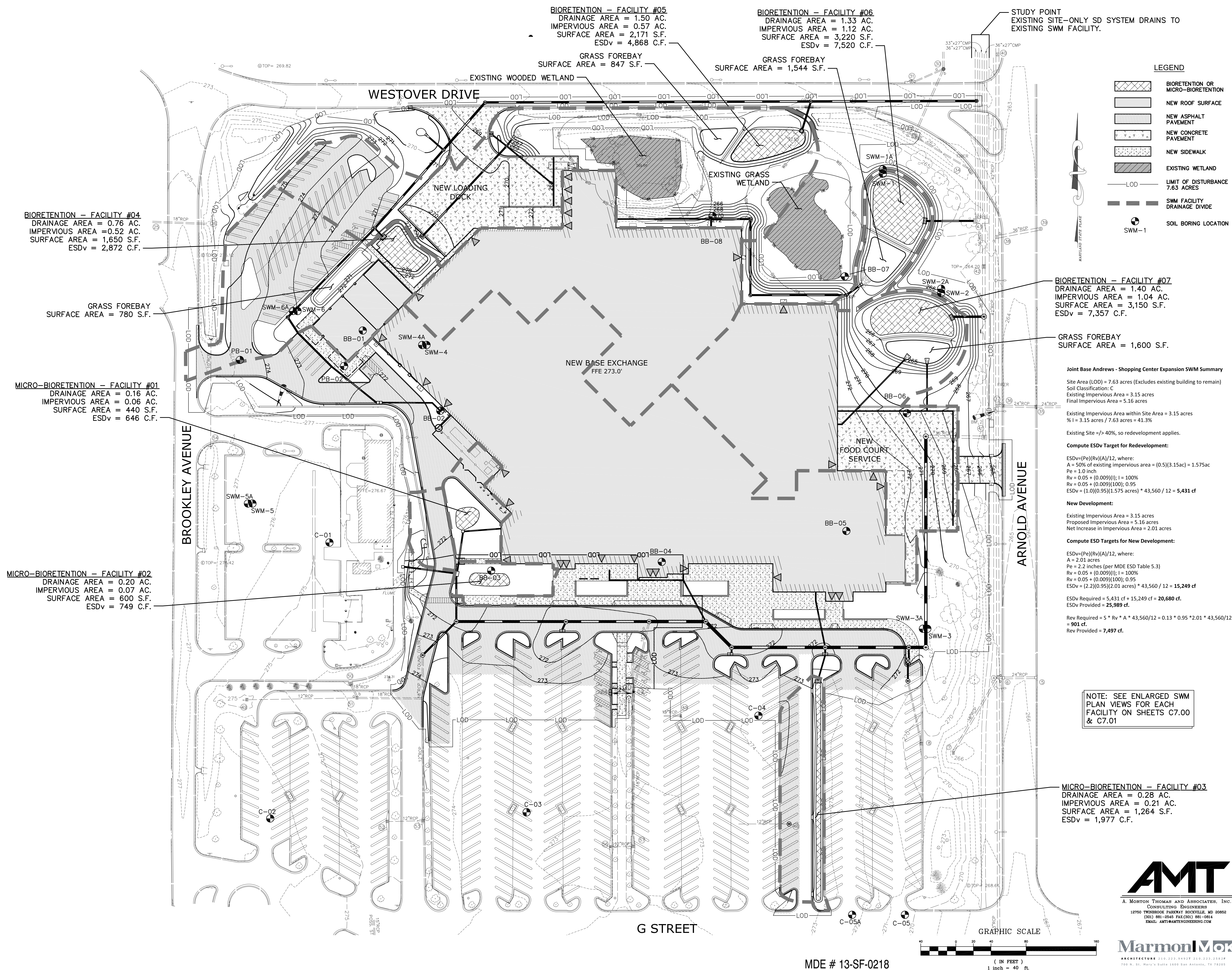
# **Construction Drawing**

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MDE # 13-SF-0218

**AMT**

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A. MORTON THOMAS AND ASSOCIATES, INC.  
CONSULTING ENGINEERS  
12750 TWINBROOK PARKWAY ROCKVILLE, MD 20850  
(301) 881-2545 FAX (301) 881-0814  
E-MAIL: [AMT@AMTENGINEERING.COM](mailto:AMT@AMTENGINEERING.COM)

**Marmon** 

**ARCHITECTURE** 210.223.9492T 210.223.2582F  
200 N. St. Mary's Suite 1600 San Antonio, TX 78205

SHEET TITLE	SHEET
STORMWATER MANAGEMENT PLAN	C1.07

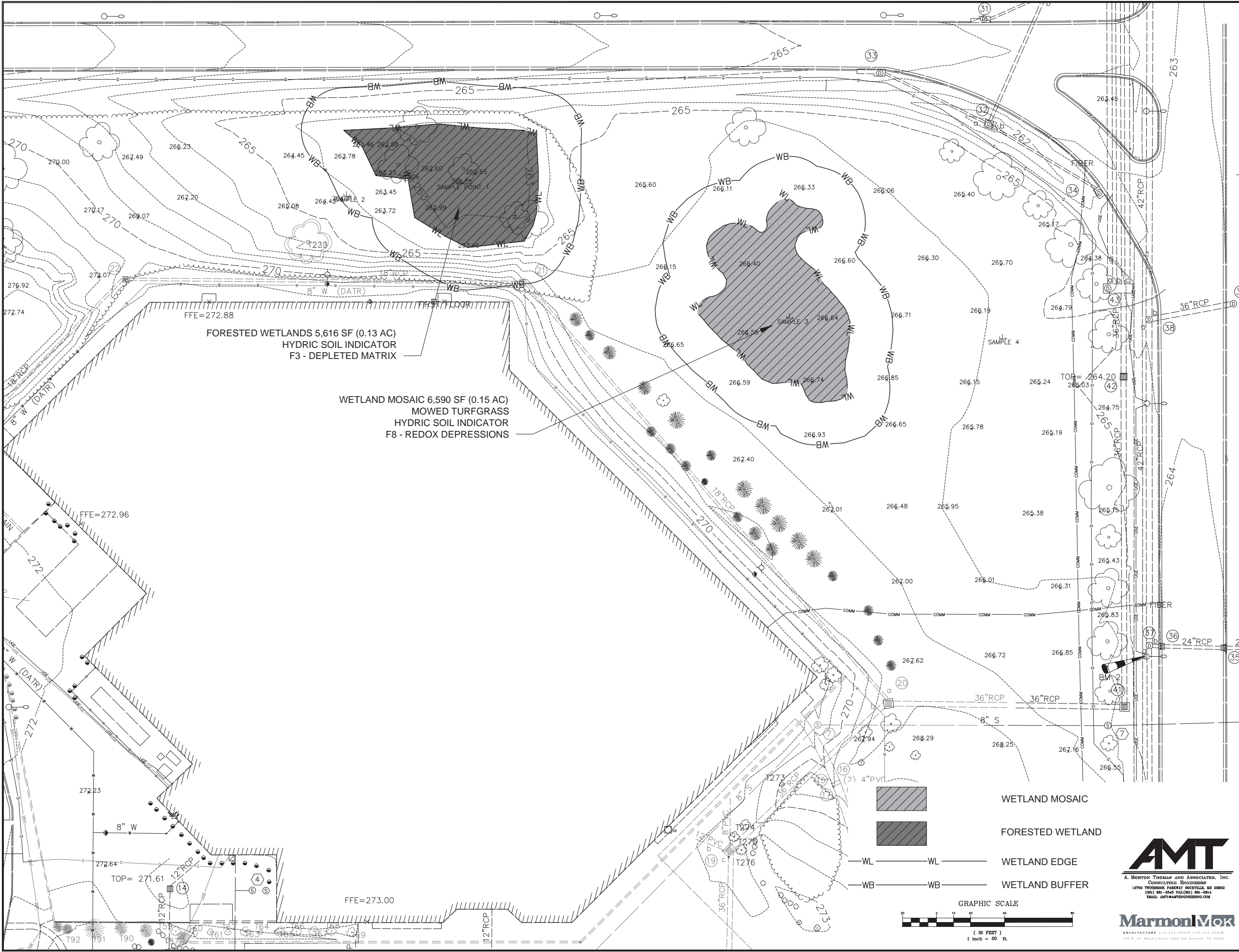



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## **Appendix F**

# **Wetland Map and Agency Correspondence**

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**EXCHANGE**

DATE	NOTES	DESIGNER

PROJECT TYPE
ADDITION/RENOVATION
DESIGN PHASE
MASTER PLAN
DESIGN TYPE
SHOPPING CENTER
DESIGN SIZE / SEASON
MODULE 4.0 P/W 10/1
DATE SUBMITTED FOR SD VALIDATION
01 / APRIL / 2011
PROJECT DATA
SHOPPING CENTER EXPANSION
JOINT BASE ANDREWS MARYLAND
PROJECT #0109-09-00009
SHEET TITLE
SHEET



**AMT**  
A. MORTON THOMAS AND ASSOCIATES, INC.  
CONSULTING ENGINEERS  
12750 TREBLOCK PARKWAY BOISTELLE, MD 20606  
(301) 881-2545 FAX (301) 881-0814  
EMAIL: AMT@AMTENGINEERING.COM



**MarmonMok**  
ARCHITECTURE 210.222.9492/210.222.2582/210.222.2583  
700 N. St. Mary's Suite 1400 San Antonio, TX 78205

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REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
BALTIMORE DISTRICT, U.S. ARMY CORPS OF ENGINEERS  
P.O. BOX 1715  
BALTIMORE, MD 21203-1715

AUG 01 2012

Operations Division

Mr. Steve Richards  
Chief, Asset Management Flight  
Joint Base Andrews  
3466 North Carolina Avenue  
Joint Base Andrews, Maryland 20762

Dear Mr. Richards:

This is in response to a transmittal dated March 8, 2012, sent on your behalf from A. Morton Thomas and Associates, Inc. requesting a jurisdictional determination (JD) and verification of the delineation of waters of the United States, including jurisdictional wetlands, on the Andrews Airforce Base (AAFB) Exchange property bordered by Westover Drive, Arnold Avenue, Brookley Avenue, and G Street on AAFB in Prince George's County, Maryland. Your project has been assigned the file name, CENAB-OP-RMS (AAFB EXCHANGE) 2010-03339.

We have reviewed and concur with the Wetland Delineation Report of Andrews Air Force Base Exchange Shopping Center Expansion, dated December 2010, prepared by A. Morton Thomas and Associates, Inc. for the approximately 19-acre site. Field inspections were conducted on December 02, 2010 and May 31, 2012 by Ms. Vera Jaffe of this office. These inspections indicated that the delineation of waters of the United States, including non-jurisdictional wetlands within the "Area of Review" on the drawing dated December 2010, is accurate. The two wetland areas are indicated as 'isolated wetlands' on the plan and are not regulated by this office because they have no observed connection to Waters of the United States. You should be aware, however, that the 'isolated wetlands' fall under the jurisdiction of the State of Maryland. The State of Maryland regulates isolated wetlands and any work proposed in these areas requires a permit from the Maryland Department of the Environment. Enclosed is a document that outlines the basis of our determination of jurisdiction over these areas.

This letter contains an approved jurisdictional determination for your subject site. This approved jurisdictional determination is valid for five years from the date of this letter unless new information warrants revision of the determination before the expiration date, or a District Engineer has identified, after public notice and comment, that specific geographic areas with rapidly changing environmental conditions merit re-verification on a more frequent basis. If you object to this determination, you may request an administrative appeal under Corps regulations at 33 CFR Part 331. Enclosed you will find a Notification of Appeal Process (NAP) fact sheet and request for Appeal (RFA) form. If you request to appeal this determination you must submit a completed RFA form to the North Atlantic Division Office at the following address:

Mr. Michael G. Vissichelli  
Administrative Appeals Review Officer  
North Atlantic Division, Corps of Engineers



Fort Hamilton Military Community  
General Lee Avenue Building 301  
Brooklyn, NY 11252-6700

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR part 331.5, and that it has been received by the Division Office within 60 days of the date of the NAP. Should you decide to submit a RFA form, it must be received at the above address by SEP 30 2012

It is not necessary to submit an RFA form to the Division office if you do not object to the determination in this letter.

Please be advised that various development activities, within waters of the United States, including jurisdictional wetlands may be regulated by the Corps. Wetlands and other waters under the jurisdiction of the Maryland Department of the Environment (MDE) may also be located on the parcel. You may contact the MDE at (410) 537-3768 for information regarding jurisdiction and permitting requirements.

You are reminded that any grading or filling of waters of the United States, including jurisdictional wetlands, is subject to Department of the Army authorization. State and local authorizations may also be required to conduct activities in these locations. In addition, the Interstate Land Sales Full Disclosure Act may require that prospective buyers be made aware, by the seller, of the Federal authority over any waters of the United States, including wetlands, being purchased.

In future correspondence and permit applications regarding this parcel, please include the file number located in the first paragraph of this letter.

A copy of this letter is being furnished to the Maryland Department of the Environment for informational purposes. If you have any questions concerning this matter, please call Ms. Vera Jaffe of this office at (410) 962-6144.

Sincerely,



Kathy B. Anderson  
Chief, Maryland Section Southern

Enclosures

**APPROVED JURISDICTIONAL DETERMINATION FORM**  
**U.S. Army Corps of Engineers**

This form should be completed by following the instructions provided in Section IV of the JD Form Instructional Guidebook.

**SECTION I: BACKGROUND INFORMATION**

**A. REPORT COMPLETION DATE FOR APPROVED JURISDICTIONAL DETERMINATION (JD):** **AUG 01 2012**

**B. DISTRICT OFFICE, FILE NAME, AND NUMBER:** **CENAB-OP-RMS (AAFB EXCHANGE)**

**2010-03339-M32**

**PROJECT LOCATION AND BACKGROUND INFORMATION:** **Reaches: the 0.19 acre wetland in the forested portion of the site and a 1.19 acre wetland in the mowed portion of the 19-acre property referred to as AAFB Exchange.**

State: **Maryland** County/parish/borough: **Prince George's** City: **Joint Base Andrews Naval Air Facility**

Center coordinates of site (lat/long in degree decimal format): **Lat. N 38.819327°, Long. W -76.882027°**

Name of nearest water body: **Potomac River**

Name of nearest Traditional Navigable Water (TNW) into which the aquatic resource flows: **Potomac River**

The site is located south of Westover Drive, west of Arnold Avenue, north of G Street, and east of Brookley Avenue, on the Joint Base Andrews Naval Air Facility (AAFB) in Prince George's County, Maryland. The site drains to the Potomac River, a tidal, navigable, interstate tributary of the Chesapeake Bay, a traditional navigable waterway.

Name of watershed or Hydrologic Unit Code (HUC): **Henson Creek - 02070010**

☒ Check if map/diagram of review area and/or potential jurisdictional areas is/are available upon request.

☐ Check if other sites (e.g., offsite mitigation sites, disposal sites, etc...) are associated with this action and are recorded on a different JD form.

**D. REVIEW PERFORMED FOR SITE EVALUATION (CHECK ALL THAT APPLY):**

☒ Office (Desk) Determination. Date: **11 May 2012**

☒ Field Determination. Date(s): **02 December 2010 and 31 May 2012**

**SECTION II: SUMMARY OF FINDINGS**

**A. RHA SECTION 10 DETERMINATION OF JURISDICTION.**

There are not "navigable waters of the U.S." within Rivers and Harbors Act (RHA) jurisdiction (as defined by 33 CFR part 329) in the review area. [Required]

☐ Waters subject to the ebb and flow of the tide.

☐ Waters are presently used, or have been used in the past, or may be susceptible for use to transport interstate or foreign commerce.  
Explain:

**B. CWA SECTION 404 DETERMINATION OF JURISDICTION.**

There are and are not "waters of the U.S." within Clean Water Act (CWA) jurisdiction (as defined by 33 CFR part 328) in the review area. [Required]

**1. Waters of the U.S.**

**a. Indicate presence of waters of U.S. in review area (check all that apply):<sup>1</sup>**

☐ TNWs, including territorial seas

☐ Wetlands adjacent to TNWs

☐ Relatively permanent waters<sup>2</sup> (RPWs) that flow directly or indirectly into TNWs

☐ Non-RPWs that flow directly or indirectly into TNWs

☐ Wetlands directly abutting RPWs that flow directly or indirectly into TNWs

☐ Wetlands adjacent to but not directly abutting RPWs that flow directly or indirectly into TNWs

☐ Wetlands adjacent to non-RPWs that flow directly or indirectly into TNWs

☐ Impoundments of jurisdictional waters

☐ Isolated (interstate or intrastate) waters, including isolated wetlands

**b. Identify (estimate) size of waters of the U.S. in the review area:**

**c. Limits (boundaries) of jurisdiction based on: 1987 U.S. Army Corps of Engineers Wetlands Delineation Manual**  
Elevation of established OHWM (if known): **The OHWM is highly variable, and thus is unknown.**

**2. Non-regulated waters/wetlands (check if applicable):<sup>3</sup>**

☒ Potentially jurisdictional waters and/or wetlands were assessed within the review area and determined not to be jurisdictional.

Explain: **At one time this area of AAFB, including the site, was a broad, gently sloping swale that drained to the southeast. Arnold**

<sup>1</sup> Boxes checked below shall be supported by completing the appropriate sections in Section III below.

<sup>2</sup> For purposes of this form, an RPW is defined as a tributary that is not a TNW and that typically flows year-round or has continuous flow at least "seasonally" (e.g., typically 3 months).

<sup>3</sup> Supporting documentation is presented in Section III.F.



Avenue is a north/south road to the east of the site that was part of the early development of AAFB. Westover Drive was built on the north side of the site in the early 1960's. The AAFB Exchange building was constructed in the early to mid 90's, covering over half of the remaining pervious area on the site. Area drain inlets installed on the north side of the building are higher than the lowest part of the swale, so the area can no longer drain by overland flow. This combination of land use changes contributed to the formation of wetlands in the swale.

During the 02 December 2010 and 31 May 2012 Corps site visits, the circumference of the isolated wetlands were walked. No culvert or other drainage was visible connecting the wetland areas in the forested and mowed portions of the site with the upland drainage located along the north border of the site. The upland drainage exhibited bed and bank, but no evidence of an ordinary high water mark (OHWM) was observed in the mowed upland swale. Extensive manipulation of the site and a lack of change in elevation result in not enough discrete flow in the upland swale to establish an OHWM. While the site may have had a hydrological connection to a stream system at one point, the site has been heavily manipulated and there is no evidence of a current hydrologic connection between the wetlands and the upland drainage. For both wetlands, there is a clear upland break between the wetlands and the upland drainage that may eventually enter a RPW. The 0.19-acre isolated wetland in the forested portion of the site occurs in a depression in the topography between the slope down from the AAFB Exchange building and an approximately 6-inch tall berm next to the upland drainage. The 1.19-acre isolated wetland in the mowed portion of the site occurs in a slight depression in the center of the mowed portion with an upland area located between the wetland and the upland drainage. The mowed portion of the site is flat with an approximately 0% slope and there are no topographic features to indicate a regular path of overland from either wetland area to the upland drainage. Only under conditions of a heavy storm event, such as a 100-year storm, would the wetlands fill with water and spill over into the upland drainage. Therefore, based on US vs James Wilson 4<sup>th</sup> circuit case/CFR 328.3 (a)(3), the Baltimore District does not regulate these isolated wetlands.

### SECTION III: CWA ANALYSIS

#### A. TNWs AND WETLANDS ADJACENT TO TNWs

The agencies will assert jurisdiction over TNWs and wetlands adjacent to TNWs. If the aquatic resource is a TNW, complete Section III.A.1 and Section III.D.1. only; if the aquatic resource is a wetland adjacent to a TNW, complete Sections III.A.1 and 2 and Section III.D.1.; otherwise, see Section III.B below.

##### 1. TNW

Identify TNW:

Summarize rationale supporting determination:

##### 2. Wetland adjacent to TNW

Summarize rationale supporting conclusion that wetland is "adjacent":

#### B. CHARACTERISTICS OF TRIBUTARY (THAT IS NOT A TNW) AND ITS ADJACENT WETLANDS (IF ANY):

This section summarizes information regarding characteristics of the tributary and its adjacent wetlands, if any, and it helps determine whether or not the standards for jurisdiction established under *Rapanos* have been met.

The agencies will assert jurisdiction over non-navigable tributaries of TNWs where the tributaries are "relatively permanent waters" (RPWs), i.e. tributaries that typically flow year-round or have continuous flow at least seasonally (e.g., typically 3 months). A wetland that directly abuts an RPW is also jurisdictional. If the aquatic resource is not a TNW, but has year-round (perennial) flow, skip to Section III.D.2. If the aquatic resource is a wetland directly abutting a tributary with perennial flow, skip to Section III.D.4.

A wetland that is adjacent to but that does not directly abut an RPW requires a significant nexus evaluation. Corps districts and EPA regions will include in the record any available information that documents the existence of a significant nexus between a relatively permanent tributary that is not perennial (and its adjacent wetlands if any) and a traditional navigable water, even though a significant nexus finding is not required as a matter of law.

If the waterbody<sup>4</sup> is not an RPW, or a wetland directly abutting an RPW, a JD will require additional data to determine if the waterbody has a significant nexus with a TNW. If the tributary has adjacent wetlands, the significant nexus evaluation must consider the tributary in combination with all of its adjacent wetlands. This significant nexus evaluation that combines, for analytical purposes, the tributary and all of its adjacent wetlands is used whether the review area identified in the JD request is the tributary, or its adjacent wetlands, or both. If the JD covers a tributary with adjacent wetlands, complete Section III.B.1 for the tributary, Section III.B.2 for any onsite wetlands, and Section III.B.3 for all wetlands adjacent to that tributary, both onsite and offsite. The determination whether a significant nexus exists is determined in Section III.C below.

##### 1. Characteristics of non-TNWs that flow directly or indirectly into TNW

<sup>4</sup> Note that the Instructional Guidebook contains additional information regarding swales, ditches, washes, and erosional features generally and in the arid West.

(i) **General Area Conditions:**

Watershed size:

Drainage area:

Average annual rainfall:

Average annual snowfall:

(ii) **Physical Characteristics:**

(a) Relationship with TNW:

☐ Tributary flows directly into TNW.

☐ Tributary flows through **Pick List** tributaries before entering TNW.

Project waters are river miles from TNW.

Project waters are river miles from RPW.

Project waters are aerial (straight) miles from TNW.

Project waters are aerial (straight) miles from RPW.

Project waters cross or serve as state boundaries. Explain:

Identify flow route to TNW<sup>5</sup>:

Tributary stream order, if known:

(b) General Tributary Characteristics (check all that apply):

Tributary is: ☐ Natural

☐ Artificial (man-made). Explain:

☐ Manipulated (man-altered). Explain:

Tributary properties with respect to top of bank (estimate):

Average width:

Average depth:

Average side slopes:

Primary tributary substrate composition (check all that apply):

☐ Silts

☐ Sands

☐ Concrete

☐ Cobbles

☐ Gravel

☐ Muck

☐ Bedrock

☐ Vegetation. Type/% cover:

☐ Other. Explain:

Tributary condition/stability [e.g., highly eroding, sloughing banks]. Explain:

Tributary geometry:

Tributary gradient (approximate average slope):

(c) Flow:

Tributary provides for:

Estimate average number of flow events in review area/year:

Describe flow regime:

Other information on duration and volume:

Surface flow is: Characteristics:

Subsurface flow:

☐ Dye (or other) test performed: N/A.

Tributary has (check all that apply):

☐ Bed and banks

☐ OHWM<sup>6</sup> (check all indicators that apply):

☐ clear, natural line impressed on the bank

☐ the presence of litter and debris

☐ changes in the character of soil

☐ destruction of terrestrial vegetation

☐ shelving

☐ the presence of wrack line

<sup>5</sup> Flow route can be described by identifying, e.g., tributary a, which flows through the review area, to flow into tributary b, which then flows into TNW.

<sup>6</sup> A natural or man-made discontinuity in the OHWM does not necessarily sever jurisdiction (e.g., where the stream temporarily flows underground, or where the OHWM has been removed by development or agricultural practices). Where there is a break in the OHWM that is unrelated to the waterbody's flow regime (e.g., flow over a rock outcrop or through a culvert), the agencies will look for indicators of flow above and below the break

- |  |   |
|--|---|
| <input type="checkbox"/> vegetation matted down, bent, or absent | <input type="checkbox"/> sediment sorting                           |
| <input type="checkbox"/> leaf litter disturbed or washed away    | <input type="checkbox"/> scour                                      |
| <input type="checkbox"/> sediment deposition                     | <input type="checkbox"/> multiple observed or predicted flow events |
| <input type="checkbox"/> water staining                          | <input type="checkbox"/> abrupt change in plant community           |
| <input type="checkbox"/> other (list):                           |   |
- ☐ Discontinuous OHWM.<sup>7</sup> Explain: N/A.

If factors other than the OHWM were used to determine lateral extent of CWA jurisdiction (check all that apply):

- |  |  |
|--|--|
| <input type="checkbox"/> High Tide Line indicated by:              | <input type="checkbox"/> Mean High Water Mark indicated by:            |
| <input type="checkbox"/> oil or scum line along shore objects      | <input type="checkbox"/> survey to available datum;                    |
| <input type="checkbox"/> fine shell or debris deposits (foreshore) | <input type="checkbox"/> physical markings;                            |
| <input type="checkbox"/> physical markings/characteristics         | <input type="checkbox"/> vegetation lines/changes in vegetation types. |
| <input type="checkbox"/> tidal gauges                              |  |
| <input type="checkbox"/> other (list):                             |  |

(iii) **Chemical Characteristics:**

Characterize tributary (e.g., water color is clear, discolored, oily film; water quality; general watershed characteristics, etc.).

Explain:

Identify specific pollutants, if known:

(iv) **Biological Characteristics. Channel supports (check all that apply):**

- ☐ Riparian corridor. Characteristics (type, average width):
- ☐ Wetland fringe. Characteristics:
- ☐ Habitat for:
  - ☐ Federally Listed species. Explain findings:
  - ☐ Fish/spawn areas. Explain findings:
  - ☐ Other environmentally-sensitive species. Explain findings:
  - ☐ Aquatic/wildlife diversity. Explain findings:

2. **Characteristics of wetlands adjacent to non-TNW that flow directly or indirectly into TNW**

(i) **Physical Characteristics:**

(a) General Wetland Characteristics:

Properties:

Wetland size:

Wetland type.

Wetland quality. Explain: **Refer to Section IV.B.**

Project wetlands cross or serve as state boundaries. Explain: N/A.

(b) General Flow Relationship with Non-TNW:

Flow is: Explain:

Surface flow is:

Characteristics:

Subsurface flow: Explain findings:

☐ Dye (or other) test performed:

(c) Wetland Adjacency Determination with Non-TNW:

- ☐ Directly abutting
- ☐ Not directly abutting
  - ☐ Discrete wetland hydrologic connection. Explain:
  - ☐ Ecological connection. Explain:
  - ☐ Separated by berm/barrier. Explain:

(d) Proximity (Relationship) to TNW

Project wetlands are river miles from TNW.

Project waters are aerial (straight) miles from TNW.

Flow is from:

Estimate approximate location of wetland as within the floodplain.

(ii) **Chemical Characteristics:**

Characterize wetland system (e.g., water color is clear, brown, oil film on surface; water quality; general watershed characteristics; etc.). Explain:

<sup>7</sup>Ibid.

Identify specific pollutants, if known:

(iii) **Biological Characteristics. Wetland supports (check all that apply):**

- ☐ Riparian buffer. Characteristics (type, average width):
- ☐ Vegetation type/percent cover. Explain:
  - ☐ Habitat for:
  - ☐ Federally Listed species. Explain findings:
  - ☐ Fish/spawn areas. Explain findings:
  - ☐ Other environmentally-sensitive species. Explain findings:
  - ☐ Aquatic/wildlife diversity. Explain findings:

3. **Characteristics of all wetlands adjacent to the tributary (if any)**

All wetland(s) being considered in the cumulative analysis:

Approximately \_\_\_\_\_ acres in total are being considered in the cumulative analysis.

For each wetland, specify the following:

Directly abuts? (Y/N)

Size (in acres)

Directly abuts? (Y/N)

Size (in acres)

Summarize overall biological, chemical and physical functions being performed: **Refer to Section IV.B.**

**C. SIGNIFICANT NEXUS DETERMINATION**

A significant nexus analysis will assess the flow characteristics and functions of the tributary itself and the functions performed by any wetlands adjacent to the tributary to determine if they significantly affect the chemical, physical, and biological integrity of a TNW. For each of the following situations, a significant nexus exists if the tributary, in combination with all of its adjacent wetlands, has more than a speculative or insubstantial effect on the chemical, physical and/or biological integrity of a TNW.

Considerations when evaluating significant nexus include, but are not limited to the volume, duration, and frequency of the flow of water in the tributary and its proximity to a TNW, and the functions performed by the tributary and all its adjacent wetlands. It is not appropriate to determine significant nexus based solely on any specific threshold of distance (e.g. between a tributary and its adjacent wetland or between a tributary and the TNW). Similarly, the fact an adjacent wetland lies within or outside of a floodplain is not solely determinative of significant nexus.

Draw connections between the features documented and the effects on the TNW, as identified in the *Rapanos* Guidance and discussed in the Instructional Guidebook. Factors to consider include, for example:

- Does the tributary, in combination with its adjacent wetlands (if any), have the capacity to carry pollutants or flood waters to TNWs, or to reduce the amount of pollutants or flood waters reaching a TNW?
- Does the tributary, in combination with its adjacent wetlands (if any), provide habitat and lifecycle support functions for fish and other species, such as feeding, nesting, spawning, or rearing young for species that are present in the TNW?
- Does the tributary, in combination with its adjacent wetlands (if any), have the capacity to transfer nutrients and organic carbon that support downstream foodwebs?
- Does the tributary, in combination with its adjacent wetlands (if any), have other relationships to the physical, chemical, or biological integrity of the TNW?

**Note:** the above list of considerations is not inclusive and other functions observed or known to occur should be documented below:

1. **Significant nexus findings for non-RPW that has no adjacent wetlands and flows directly or indirectly into TNWs.** Explain findings of presence or absence of significant nexus below, based on the tributary itself, then go to Section III.D:
2. **Significant nexus findings for non-RPW and its adjacent wetlands, where the non-RPW flows directly or indirectly into TNWs.** Explain findings of presence or absence of significant nexus below, based on the tributary in combination with all of its adjacent wetlands, then go to Section III.D:
3. **Significant nexus findings for wetlands adjacent to an RPW but that do not directly abut the RPW.** Explain findings of presence or absence of significant nexus below, based on the tributary in combination with all of its adjacent wetlands, then go to Section III.D:

**D. DETERMINATIONS OF JURISDICTIONAL FINDINGS. THE SUBJECT WATERS/WETLANDS ARE (CHECK ALL THAT APPLY):**

1. **TNWs and Adjacent Wetlands.** Check all that apply and provide size estimates in review area:

- ☐ TNWs:
- ☐ Wetlands adjacent to TNWs:



**2. RPWs that flow directly or indirectly into TNWs.**

- ☐ Tributaries of TNWs where tributaries typically flow year-round are jurisdictional. Provide data and rationale indicating that tributary is perennial:
- ☐ Tributaries of TNW where tributaries have continuous flow "seasonally" (e.g., typically three months each year) are jurisdictional. Data supporting this conclusion is provided at Section III.B. Provide rationale indicating that tributary flows seasonally:

Provide estimates for jurisdictional waters in the review area (check all that apply):

- ☐ Tributary waters:
- ☐ Other non-wetland waters:          acres.
- Identify type(s) of waters:

**3. Non-RPWs<sup>8</sup> that flow directly or indirectly into TNWs.**

- ☐ Waterbody that is not a TNW or an RPW, but flows directly or indirectly into a TNW, and it has a significant nexus with a TNW is jurisdictional. Data supporting this conclusion is provided at Section III.C.

Provide estimates for jurisdictional waters within the review area (check all that apply):

- ☐ Tributary waters:
- ☐ Other non-wetland waters:
- Identify type(s) of waters:

**4. Wetlands directly abutting an RPW that flow directly or indirectly into TNWs.**

- ☐ Wetlands directly abut RPW and thus are jurisdictional as adjacent wetlands.
- ☐ Wetlands directly abutting an RPW where tributaries typically flow year-round. Provide data and rationale indicating that tributary is perennial in Section III.D.2, above.

Provide rationale indicating that wetland is directly abutting an RPW:

- ☐ Wetlands directly abutting an RPW where tributaries typically flow "seasonally." Provide data indicating that tributary is seasonal in Section III.B and rationale in Section III.D.2, above. Provide rationale indicating that wetland is directly abutting an RPW:

Provide acreage estimates for jurisdictional wetlands in the review area:

**5. Wetlands adjacent to but not directly abutting an RPW that flow directly or indirectly into TNWs.**

- ☐ Wetlands that do not directly abut an RPW, but when considered in combination with the tributary to which they are adjacent and with similarly situated adjacent wetlands, have a significant nexus with a TNW are jurisdictional. Data supporting this conclusion is provided at Section III.C.

Provide acreage estimates for jurisdictional wetlands in the review area:

**6. Wetlands adjacent to non-RPWs that flow directly or indirectly into TNWs.**

- ☐ Wetlands adjacent to such waters, and have when considered in combination with the tributary to which they are adjacent and with similarly situated adjacent wetlands, have a significant nexus with a TNW are jurisdictional. Data supporting this conclusion is provided at Section III.C.

Provide estimates for jurisdictional wetlands in the review area:

**7. Impoundments of jurisdictional waters.<sup>9</sup>**

As a general rule, the impoundment of a jurisdictional tributary remains jurisdictional.

- ☐ Demonstrate that impoundment was created from "waters of the U.S.," or
- ☐ Demonstrate that water meets the criteria for one of the categories presented above (1-6), or
- ☐ Demonstrate that water is isolated with a nexus to commerce (see E below).

**E. ISOLATED [INTERSTATE OR INTRA-STATE] WATERS, INCLUDING ISOLATED WETLANDS, THE USE, DEGRADATION OR DESTRUCTION OF WHICH COULD AFFECT INTERSTATE COMMERCE, INCLUDING ANY SUCH WATERS (CHECK ALL THAT APPLY):<sup>10</sup>**

- ☐ which are or could be used by interstate or foreign travelers for recreational or other purposes.
- ☐ from which fish or shellfish are or could be taken and sold in interstate or foreign commerce.
- ☐ which are or could be used for industrial purposes by industries in interstate commerce.
- ☐ Interstate isolated waters. Explain:

<sup>8</sup>See Footnote # 3.

<sup>9</sup>To complete the analysis refer to the key in Section III.D.6 of the Instructional Guidebook.

<sup>10</sup>Prior to asserting or declining CWA jurisdiction based solely on this category, Corps Districts will elevate the action to Corps and EPA HQ for review consistent with the process described in the Corps/EPA Memorandum Regarding CWA Act Jurisdiction Following Rapanos.

☐ Other factors. Explain:

**Identify water body and summarize rationale supporting determination:**

Provide estimates for jurisdictional waters in the review area (check all that apply):

☐ Tributary waters:

☐ Other non-wetland waters:

Identify type(s) of waters:

☐ Wetlands:

**F. NON-JURISDICTIONAL WATERS, INCLUDING WETLANDS (CHECK ALL THAT APPLY):**

☐ If potential wetlands were assessed within the review area, these areas did not meet the criteria in the 1987 Corps of Engineers Wetland Delineation Manual and/or appropriate Regional Supplements.

☐ Review area included isolated waters with no substantial nexus to interstate (or foreign) commerce.

☐ Prior to the Jan 2001 Supreme Court decision in "*SWANCC*," the review area would have been regulated based solely on the "Migratory Bird Rule" (MBR).

☐ Waters do not meet the "Significant Nexus" standard, where such a finding is required for jurisdiction.

Explain:

☒ **Other:** (explain, if not covered above): During the 02 December 2010 and 31 May 2012 Corps site visits, the circumference of the isolated wetlands were walked. No culvert or other drainage was visible connecting the wetland areas in the forested and mowed portions of the site with the upland drainage located along the north border of the site. The upland drainage exhibited bed and bank, but no evidence of an ordinary high water mark (OHWM) was observed in the mowed upland swale. Extensive manipulation of the site and a lack of change in elevation result in not enough discrete flow in the upland swale to establish an OHWM. While the site may have had a hydrological connection to a stream system at one point, the site has been heavily manipulated and there is no evidence of a current hydrologic connection between the wetlands and the upland drainage. For both wetlands, there is a clear upland break between the wetlands and the upland drainage that may eventually enter a RPW. The 0.19-acre isolated wetland in the forested portion of the site occurs in a depression in the topography between the slope down from the AAFB Exchange building and an approximately 6-inch tall berm next to the upland drainage. The 1.19-acre isolated wetland in the mowed portion of the site occurs in a slight depression in the center of the mowed portion with an upland area located between the wetland and the upland drainage. The mowed portion of the site is flat with an approximately 0% slope and there are no topographic features to indicate a regular path of overland from either wetland area to the upland drainage. Only under conditions of a heavy storm event, such as a 100-year storm, would the wetlands fill with water and spill over into the upland drainage. Therefore, based on *US vs James Wilson* 4<sup>th</sup> circuit case/CFR 328.3 (a)(3), the Baltimore District does not regulate these isolated wetlands.

Provide acreage estimates for non-jurisdictional waters in the review area, where the sole potential basis of jurisdiction is the MBR factors (i.e., presence of migratory birds, presence of endangered species, use of water for irrigated agriculture), using best professional judgment (check all that apply):

☐ Non-wetland waters (i.e., rivers, streams):

☐ Lakes/ponds:

☐ Other non-wetland waters: List type of aquatic resource:

☐ Wetlands:

Provide acreage estimates for non-jurisdictional waters in the review area that do not meet the "Significant Nexus" standard, where such a finding is required for jurisdiction (check all that apply):

☐ Non-wetland waters (i.e., rivers, streams):

☐ Lakes/ponds:

☐ Other non-wetland waters: acres. List type of aquatic resource:

☐ Wetlands:

**SECTION IV: DATA SOURCES.**

**A. SUPPORTING DATA.** Data reviewed for JD (check all that apply - checked items shall be included in case file and, where checked and requested, appropriately reference sources below):

☒ Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant: **A. Morton Thomas and Associates, Inc., Delineation Report Plan Drawing dated December 2010.**

☒ Data sheets prepared/submitted by or on behalf of the applicant/consultant. **Included in December 2010 Wetland Delineation Report.**

☒ Office concurs with data sheets/delineation report. However, hydric soils in wetland in mowed area meet F8, not S5.

☐ Office does not concur with data sheets/delineation report.

☐ Data sheets prepared by the Corps:

☐ Corps navigable waters' study:

☐ U.S. Geological Survey Hydrologic Atlas:

☐ USGS NHD data.

☐ USGS 8 and 12 digit HUC maps.

☒ U.S. Geological Survey map(s). Cite scale & quad name:

- ☒ USDA Natural Resources Conservation Service Soil Survey. Citation: from online NRCS Web Soil Survey; included in December 2010 Wetland Delineation Report.
- ☒ National wetlands inventory map(s). Cite name: from NWI website; included in December 2010 Wetland Delineation Report
- ☐ State/Local wetland inventory map(s):
- ☒ FEMA/FIRM maps: Prince George's County: Panel 60 of 120 / 245208 0060C; Included in December 2010 Wetland Delineation Report.
- ☐ 100-year Floodplain Elevation is: 205 (National Geodetic Vertical Datum of 1929)
- ☒ Photographs: ☒ Aerial (Name & Date): Included in December 2010 Wetland Delineation Report 2010, 2004, 2001, 1995, 1993, 1989, 1965, 1938; Infrared leaf-on and leaf-off
- or ☒ Other (Name & Date): Photographs included with Delineation Report; photos from 31 May 2012 Corps site visit.
- ☐ Previous determination(s). File no. and date of response letter:
- ☐ Applicable/supporting case law:
- ☐ Applicable/supporting scientific literature:
- ☒ Other information (please specify): stormwater management conveyance system for part of AAFB

**B. ADDITIONAL COMMENTS TO SUPPORT JD:**

**References:**

# NOTIFICATION OF ADMINISTRATIVE APPEAL OPTIONS AND PROCESS AND REQUEST FOR APPEAL (NAO/NAP fact sheet & RFA form)

Applicant: Steve Richards-AAFB Exchange	File Number: 2010-03339	Date: <b>AUG 01 2012</b>
Attached is:		See Section below
<input type="checkbox"/>	INITIAL PROFFERED PERMIT (Standard Permit or Letter of permission)	A
<input type="checkbox"/>	PROFFERED PERMIT (Standard Permit or Letter of permission)	B
<input type="checkbox"/>	PERMIT DENIAL	C
<input checked="" type="checkbox"/>	APPROVED JURISDICTIONAL DETERMINATION	D
<input type="checkbox"/>	PRELIMINARY JURISDICTIONAL DETERMINATION	E

**SECTION I -** The following identifies your rights and options regarding an administrative appeal of the above decision. Additional information may be found at <http://usace.army.mil/inet/functions/cw/cecwo/reg> or Corps regulations at 33 CFR Part 331.

**A: INITIAL PROFFERED PERMIT:** You may accept or object to the permit.

- **ACCEPT:** If you received a Standard Permit, you may sign the permit document and return it to the Baltimore District Engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations (JD) associated with the permit.
- **OBJECT:** If you object to the permit (Standard or LOP) because of certain terms and conditions therein, you may request that the permit be modified accordingly. You must complete Section II of this form and return the form to the Baltimore District Engineer. Your objections must be received by the Baltimore District Engineer within 60 days of the date of this notice, or you will forfeit your right to appeal the permit in the future. Upon receipt of your letter, the Baltimore District Engineer will evaluate your objections and may: (a) modify the permit to address all of your concerns, (b) modify the permit to address some of your objections, or (c) not modify the permit having determined that the permit should be issued as previously written. After evaluating your objections, the Baltimore District Engineer will send you a proffered permit for your reconsideration, as indicated in Section B below.

**B: PROFFERED PERMIT:** You may accept or appeal the permit

- **ACCEPT:** If you received a Standard Permit, you may sign the permit document and return it to the Baltimore District Engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- **APPEAL:** If you choose to decline the proffered permit (Standard or LOP) because of certain terms and conditions therein, you may appeal the declined permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the North Atlantic Division Engineer, ATTN: CENAD-PD-PSD-O, Fort Hamilton Military Community, Building 301, General Lee Avenue, Brooklyn, NY 11252-6700. This form must be received by the North Atlantic Division Engineer within 60 days of the date of this notice with a copy furnished to the Baltimore District Engineer.

**C: PERMIT DENIAL:** You may appeal the denial of a permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the North Atlantic Division Engineer, ATTN: CENAD-PD-PSD-O, Fort Hamilton Military Community, Building 301, General Lee Avenue, Brooklyn, NY 11252-6700. This form must be received by the North Atlantic Division Engineer within 60 days of the date of this notice with a copy furnished to the Baltimore District Engineer.

**D: APPROVED JURISDICTIONAL DETERMINATION:** You may accept or appeal the approved JD or provide new information.

- **ACCEPT:** You do not need to notify the Corps to accept an approved JD. Failure to notify the Corps within 60 days of the date of this notice, means that you accept the approved JD in its entirety, and waive all rights to appeal the approved JD.
- **APPEAL:** If you disagree with the approved JD, you may appeal the approved JD under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the North Atlantic Division Engineer, ATTN: CENAD-PD-PSD-O, Fort Hamilton Military Community, Building 301, General Lee Avenue, Brooklyn, NY 11252-6700. This form must be received by the North Atlantic Division Engineer within 60 days of the date of this notice with a copy furnished to the Baltimore District Engineer.



E: PRELIMINARY JURISDICTIONAL DETERMINATION: You do not need to respond to the Corps regarding the preliminary JD. The Preliminary JD is not appealable. If you wish, you may request an approved JD (which may be appealed), by contacting the Corps district for further instruction. Also you may provide new information for further consideration by the Corps to reevaluate the JD.

## SECTION II - REQUEST FOR APPEAL or OBJECTIONS TO AN INITIAL PROFFERED PERMIT

REASONS FOR APPEAL OR OBJECTIONS: (Describe your reasons for appealing the decision or your objections to an initial proffered permit in clear concise statements. You may attach additional information to this form to clarify where your reasons or objections are addressed in the administrative record.)

ADDITIONAL INFORMATION: The appeal is limited to a review of the administrative record, the Corps memorandum for the record of the appeal conference or meeting, and any supplemental information that the review officer has determined is needed to clarify the administrative record. Neither the appellant nor the Corps may add new information or analyses to the record. However, you may provide additional information to clarify the location of information that is already in the administrative record.

### POINT OF CONTACT FOR QUESTIONS OR INFORMATION:

If you have questions regarding this decision and/or the appeal process you may contact:

Ms. Sandy Zelen  
U.S. Army Corps of Engineers, Baltimore District  
ATTN: CENAB-OP-R  
Regulatory Branch, Baltimore District  
Baltimore, MD 21203-1715  
(410) 962-6028 or 3670

If you only have questions regarding the appeal process you may also contact:

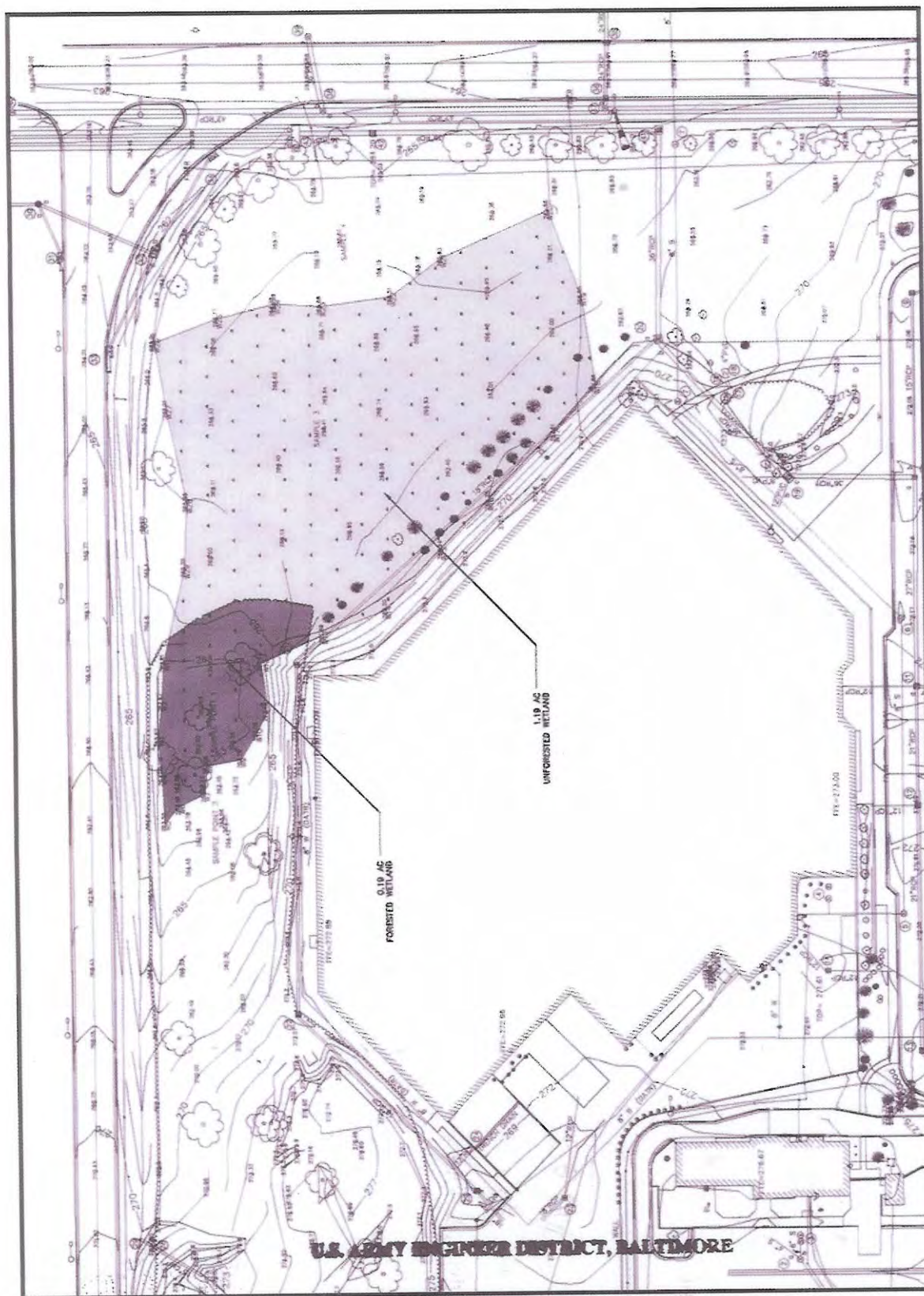
Mr. Michael G. Vissichelli  
Administrative Appeals Review Officer  
North Atlantic Division, Corps of Engineers Fort Hamilton  
General Lee Avenue, Military Community Bldg. 301  
Brooklyn, NY 11252-6700  
Telephone: (718) 765-7163  
Email: Michael.G.Vissichelli2@usace.army.mil

RIGHT OF ENTRY: Your signature below grants the right of entry to Corps of Engineers personnel, and any government consultants, to conduct investigations of the project site during the course of the appeal process. You will be provided a 15 day notice of any site investigation, and will have the opportunity to participate in all site investigations.

\_\_\_\_\_  
Signature of appellant or agent.

Date:

Telephone number:



**JURISDICTIONAL DETERMINATION  
VERIFICATION MAP**

FOR: Mr. Steve Richards - AAFB  
 CENAB-OP-RMS 2010-03339 (AAFB EXCHANGE)  
 COE SIGNATURE *Vera J. Joffe* DATE 7/30/12

**Figure 7 - AAFB Exchange Wetlands Exhibit**

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# **Appendix G**

## **Coastal Zone**

### **Consistency Determination**

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## **Consistency with Maryland Coastal Program Enforceable Coastal Policies**

Joint Base Andrews-Naval Air Facility Washington (JBA-NAFW) is within Maryland's designated coastal zone, and as such is regulated under the federal Coastal Zone Management Act (CZMA) and Maryland's federally approved Coastal Zone Management Program.

The project proposed in the environmental assessment (EA) would be fully consistent with *Maryland's Enforceable Coastal Policies* (effective April 11, 2011), implemented by the Maryland Department of the Environment (MDE). No effects on Maryland's coastal resources would be expected from implementing the project in the EA. All activities would be conducted in accordance with applicable laws, regulations, and policies governing erosion and sediment control and stormwater management, which would ensure that the project would occur in a manner consistent with the applicable Maryland Coastal Program enforceable policies. A synopsis of how the project would be consistent with the enforceable coastal policies is provided below.

*Maryland's Enforceable Coastal Policies* are divided into three general sections: General Policies, Coastal Resources, and Coastal Uses. The General Policies are further divided into Core Policies, Water Quality, and Flood Hazards. Compliance of the project proposed in the EA with each of the applicable enforceable policies is discussed below. Policies not applicable to the proposed project are noted.

### **GENERAL POLICIES**

#### **Core Policies**

*Policy: It is State policy to maintain that degree of purity of air resources which will protect the health, general welfare, and property of the people of the State. MDE (C9) Md. Code Ann., Envir. §§ 2-102 to -103.*

As noted in Section 3.9 of the EA, the Air Force and any contractors would comply with all applicable air pollution control regulations when implementing the project proposed in the EA. Section 4.9 of the EA contains a detailed discussion of the projected air emissions associated with the proposed project. If boilers or other equipment capable of producing emissions are installed as a result of the proposed projects, JBA-NAFW would obtain a permit to construct from MDE's Air and Radiation Management Administration for the equipment.

*Policy: The environment shall be free from noise which may jeopardize health, general welfare, or property, or which degrades the quality of life. MDE (C9) COMAR 26.02.03.02.*

Section 4.10 of the EA provides a discussion of the noise environment and expected noise-related impacts associated with the implementation of the project proposed in the EA. Construction noise associated with the project would cease upon completion of construction and no significant new sources of environmental noise would be introduced.

*Policy: Soil erosion shall be prevented to preserve natural resources and wildlife; control floods; prevent impairment of dams and reservoirs; maintain the navigability of rivers and harbors; protect the tax base, the public lands, and the health, safety and general welfare of the people of the State, and to enhance their living environment. MDA (C4) Md. Code Ann., Agric. § 8- 102(d).*



JBA-NAFW will control pre- and post-construction stormwater runoff, including erosion, sedimentation, and nonpoint source pollution, throughout the duration of the project. JBA-NAFW will comply with the requirements described in the MDE (2010) document *Maryland Stormwater Management Guidelines for State and Federal Projects* and Maryland's Stormwater Management Act of 2007. JBA-NAFW will implement environmental site design to the maximum extent practicable through the use of nonstructural best management practices (BMPs) and other site design techniques.

*Policy: Controlled hazardous substances may not be stored, treated, dumped, discharged, abandoned, or otherwise disposed anywhere other than a permitted controlled hazardous substance facility or a facility that provides an equivalent level of environmental protection. MDE (D4) Md. Code Ann., Envir. § 7-265(a).*

All contractors involved with implementing the proposed actions would be required to comply with JBA-NAFW's Environmental Protection Standards for contracts, which includes managing, storing, transporting, and disposing of hazardous materials and wastes, and taking all necessary precautions to prevent spills of hazardous materials (including oils and hazardous wastes) in accordance with all applicable federal, state, and local laws and regulations.

### **Water Quality Policies**

*Policy: No one may add, introduce, leak, spill, or emit any liquid, gaseous, solid, or other substance that will pollute any waters of the State without State authorization. MDE (A5) Md. Code Ann., Envir. §§ 4-402, 9-101, 9-322.*

The EA discusses compliance with laws, regulations, and policies related to the use, storage, and disposal of hazardous wastes and materials in Section 4.11. All contractors involved with implementing the proposed action would be required to use hazardous materials; manage, store, transport, and dispose of hazardous wastes; and take all necessary precautions to prevent spills of hazardous materials (including oils and hazardous wastes) in accordance with all applicable JBA-NAFW environmental standards and federal, state, and local laws and regulations. This would include any asbestos-containing materials and lead-based paint removed from the facility during renovation.

*Policy: All waters of the State shall be protected for water contact recreation, fish, and other aquatic life and wildlife. Shellfish harvesting and recreational trout waters and waters worthy of protection because of their unspoiled character shall receive additional protection. MDE (A1) COMAR 26.08.02.02.*

JBA-NAFW would protect the water quality of state waters by implementing erosion and sediment control measures on all construction sites and would control pre- and post-construction stormwater runoff, including erosion, sedimentation, and nonpoint source pollution in accordance with *Maryland Stormwater Management Guidelines for State and Federal Projects* (MDE 2010) and Maryland's Stormwater Management Act of 2007. Additionally, all contractors would be required to manage, store, transport, and dispose of hazardous materials and wastes properly.

*Policy: Any development or redevelopment of land for residential, commercial, industrial, or institutional purposes shall use small-scale non-structural stormwater management practices and site planning that mimics natural hydrologic conditions, to the maximum extent practicable. Development or redevelopment will be consistent with this policy when channel stability and 100 percent of the average annual predevelopment groundwater recharge are maintained, nonpoint source pollution is minimized,*

*Environmental Assessment*

*and structural stormwater management practices are used only if determined to be absolutely necessary. MDE (C9) Md. Code Ann., Envir. § 4-203; COMAR 26.17.02.01, .06.*

JBA-NAFW will incorporate Sustainable Design and Development and energy conservation principles into project execution, and all construction will be designed to incorporate low-impact development practices in accordance with Executive Order (EO) 13423 and EO 13514, the Energy Policy Act of 2005, the Energy Independence and Security Act 2007, Army Sustainable Design and Development Policy, and other applicable codes, laws, and EOs.

### **Flood Hazards Policies**

None of the Flood Hazards Policies are applicable to the proposed project in the EA. The proposed project would not occur in a floodplain.

## **COASTAL RESOURCES POLICIES**

### **The Chesapeake and Atlantic Coastal Bays Critical Area**

The Chesapeake and Atlantic Coastal Bays Critical Area Policies are not applicable to the proposed project in the EA. The proposed project would not occur in a Chesapeake and Atlantic Coastal Bays Critical Area.

### **Tidal Wetlands**

The Tidal Wetlands Policies are not applicable to the proposed project in the EA. The proposed project would not occur in a tidal wetland.

### **Non-Tidal Wetlands**

The Non-Tidal Wetlands Policies are not applicable to the proposed projects in the EA. The proposed project would not result in any the loss of non-tidal wetlands.

### **Forests**

*Policy: The Forest Conservation Act and its implementing regulations, as approved by NOAA, are enforceable policies. Generally, before developing an area greater than 40,000 square feet, forested and environmentally sensitive areas must be identified and preserved whenever possible. If these areas cannot be preserved, reforestation or other mitigation is required to replace the values associated with them. This policy does not apply in the Critical Area. DNR (C5) Md. Code Ann., Nat. Res. §§ 5-1601 to -1613; COMAR 08.19.01-.06.*

*Policy: Forestry activities shall provide for adequate restocking, after cutting, of trees of desirable species and condition; provide for reserving, for growth and subsequent cutting, a sufficient growing stock of thrifty trees of desirable species to keep the land reasonably productive; and prevent clear-cutting, or limit the size of a tract to be clear-cut in areas where clear-cutting will seriously interfere with protection of a watershed. DNR (C5) Md. Code Ann., Nat. Res. § 5-606.*

Expansion of the Base Exchange would require removal of up to 90 trees from the proposed site. JBA-NAFW would comply with regulations concerning the conservation and preservation of trees as



*Environmental Assessment*

described in the Maryland Forest Conservation Act of 1991 and the Prince George's County Woodland Conservation and Tree Preservation Ordinance. JBA-NAFW would review the proposed project to determine the need for tree replacement and would replace trees in accordance with the requirements in the JBA-NAFW Arbor Plan.

**Historical and Archaeological Sites**

The Historical and Archaeological Sites Policy is not applicable to the proposed project. The proposed project would not involve a submerged archaeological historic property, a cave feature or archeological site under state control, or a burial site or cemetery. The Living Aquatic Resources Policies are not applicable to the proposed project in the EA. The proposed project would not affect aquatic resources.

**COASTAL USES**

The Coastal Uses Policies listed below are not applicable to the proposed project.

**Mineral Extraction:** The proposed project does not involve mineral extraction.

**Electrical Generation and Transmission:** The proposed project does not involve power plant construction, electrical transmission lines, or cooling water intake structures.

**Tidal Shore Erosion Control:** No tidal shores occur within the proposed project footprint.

**Oil and Natural Gas Facilities:** The proposed project would not involve vessels transporting oil or aboveground oil storage sites.

**Dredging and Disposal of Dredged Material:** The proposed project would not involve dredging or the disposal of dredged material.

**Navigation:** The proposed project would not involve navigation or navigation-related facilities.

**Transportation:** The proposed project is not a transportation development or improvement project.

**Agriculture:** The proposed project is not agriculture related.

**Sewage Treatment:** The proposed project would not involve the discharge of sewage effluent, a sewage treatment facility, or an onsite sewage disposal system.

**Development**

Some development policies are applicable to the proposed project:

*Policy: Any development shall be designed to minimize erosion and keep sediment onsite. MDE (C4) COMAR 26.17.01.08.*

*Policy: Development must avoid and then minimize the alteration or impairment of tidal and non-tidal wetlands; minimize damage to water quality and natural habitats; minimize the cutting or clearing of trees and other woody plants; and preserve sites and structures of historical, archeological, and architectural significance and their appurtenances and environmental settings. MDE/DNR/CAC (D6)*

*Environmental Assessment*

*Md. Code Ann., Envir. §§ 4-402, 5-907(a), 16-102(b); Md. Code Ann., Nat. Res. §§ 5-1606(c), 8-1801(a); Md. Code Ann., Art. 66B § 8.01(b); COMAR 26.24.01.01(A).*

JBA-NAFW would protect the water quality of state waters by implementing erosion and sediment control measures on the construction site and control pre- and post-construction stormwater runoff, including erosion, sedimentation, and nonpoint source pollution in accordance with the MDE (2010) document *Maryland Stormwater Management Guidelines for State and Federal Projects* and Maryland's Stormwater Management Act of 2007. JBA-NAFW will also incorporate Sustainable Design and Development and energy conservation principles into project execution.

*Policy: Any proposed development may only be located where the water supply system, sewerage system, or solid waste acceptance facility is adequate to serve the proposed construction, taking into account all existing and approved developments in the service area and any water supply system, sewerage system, or solid waste acceptance facility described in the application and will not overload any present facility for conveying, pumping, storing, or treating water, sewage, or solid waste. MDE (C9) Md. Code Ann., Envir. § 9-512.*

*Policy: A proposed construction project must have an allocation of water and wastewater from the county whose facilities would be affected or, in the alternative, prove access to an acceptable well and on-site sewage disposal system. The water supply system, sewerage system, and solid waste acceptance facility on which the building or development would rely must be capable of handling the needs of the proposed project in addition to those of existing and approved developments. MDE (D6) Md. Code Ann., Envir. § 9-512.*

*Policy: To meet the needs of existing and future development, communities must identify adequate drinking water and water resources and suitable receiving waters and land areas for stormwater management and wastewater treatment and disposal. MDE (D6) Md. Code Ann., Art. 66B § 3.05.*

All areas of JBA-NAFW are served by adequate utility systems.

Other development policies are not applicable to the proposed project: The project does not involve:

- Grading or building in the Severn River Watershed; or
- Establishment of an industrial facility.

Because the development is on JBA-NAFW property, the following development policies do not apply to the proposed project:

- Local citizens shall be active partners in planning and implementation of development. MDP (D6) Md. Code Ann., St. Fin. & Proc. §§ 5-7A-01 to -02.
- Development shall protect existing community character and be concentrated in existing population and business centers, growth areas adjacent to these centers, or strategically selected new centers. MDP (D6) Md. Code Ann., St. Fin. & Proc. §§ 5-7A-01 to -02.
- Development shall be located near available or planned transit options. MDP (D6) Md. Code Ann., St. Fin. & Proc. §§ 5-7A-01 to -02.

*Environmental Assessment*

- Whenever possible, communities shall be designed to be compact, contain a mixture of land uses, and be walkable. MDP (D6) Md. Code Ann., St. Fin. & Proc. §§ 5-7A-01 to -02.

**Appendix H**

**Notice of Intent for  
Stormwater Discharges Associated  
with Construction Activity**

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# MARYLAND DEPARTMENT OF THE ENVIRONMENT

## NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) APPLICATION FOR INDIVIDUAL OR GENERAL PERMIT FOR STORMWATER ASSOCIATED WITH CONSTRUCTION ACTIVITY

### STATE OF MARYLAND APPLICATION FORM/NOTICE OF INTENT

MDE USE ONLY	Permit Number:	
--------------	----------------	--

Projects that will disturb 150 acres or more and which discharge to a water listed as impaired on Maryland's 303(d) list must apply for an individual permit. All other projects may apply for a general permit. The Maryland Department of the Environment (MDE) may later determine that an individual permit is required for some projects.

Applicant Information	
<b>This application is for (check one):</b>	A General Permit for Stormwater Associated with Construction Activity <input type="checkbox"/> An Individual Permit for Stormwater Associated with Construction Activity <input type="checkbox"/>
<b>Name of site/project:</b>	
<b>Phase (if applicable):</b>	
<b>Name of Owner or Organization Responsible for site/project:</b>	
<b>Street Address of Owner or Organization (not site/project)</b>	Street: City: County: State: Zip Code:
<b>Mailing Address of Owner or Organization (not site/project), if different from street address</b>	Street/P.O. Box: City: County: State: Zip Code:
<b>Required Tax Information</b>	For an organization, Federal Tax Identification Number: For an individual, Social Security Number:

<b>Contact Information for Permit</b>	Principal Contact Person: Title: Telephone No.: Fax No.:
<p>Proof of workers' compensation coverage is required under § 1-202 of the Environment Article. State and Federal agencies have coverage and do not need to provide this information. All other applicants (except individuals) must provide either worker's compensation coverage information or a certificate of compliance. MDE will not begin processing the application until this information is received. If you have a Certificate of Compliance issued by the Maryland Workers' Compensation Commission, you may provide a copy of the Certificate with this application instead of the Workers' Compensation Insurance information above. If you believe you qualify for a Certificate but do not yet have one, contact the Maryland Workers' Compensation Commission Certificate of Compliance Coordinator via telephone, (410) 864-5297, outside Baltimore Metro area toll free (800) 492-0479 selecting extension 5297 when prompted, or via email: <a href="mailto:COC@wcc.state.md.us">COC@wcc.state.md.us</a>.</p>	
<b>Workers' Compensation Coverage Information</b>	Workers' Compensation Insurance Information Workers' Compensation Insurance Policy or Binder Number: Name of Provider:  <b>OR</b> Certificate of Compliance attached <input type="checkbox"/>
<b>Site Information</b>	
<b>Location</b>	Street Address: Other Location Description (if no street address is assigned):  City: County: State: Zip:  Maryland Grid Coordinates: [Use the approximate center of the site. This information may be found on site plans, ADC County Map, or by contacting MDE. Coordinates are based on 1927 origin.] N: E:  Latitude and Longitude of Discharge Point: [Refer to ADC county map. Round to the nearest 15 seconds.] Latitude: Longitude:
<b>Location Contact Information (if different from Applicant information)</b>	Site Contact Name: Telephone No: Fax No.:



<b>Site Area</b>	Total site area (in acres): Total disturbed area (in acres):
<b>Project Description</b>	<p>Briefly describe the construction project, including existing and proposed land uses:</p> <p>Does this project currently have coverage under a General or Individual Permit for Stormwater Associated with Construction Activity?          Yes <input type="checkbox"/> No <input type="checkbox"/>          Permit Number (e.g., 07PGxxxx, 08SFxxxx, 09IPxxxx):</p> <p>Other NPDES Number – If this project/site has an NPDES number for a discharge other than for stormwater associated with construction activities, indicate that number and type of discharge:</p> <p>This project is:</p> <p>Check one of the following:          Private: <input type="checkbox"/>          Local Government: <input type="checkbox"/>          State Government: <input type="checkbox"/>          Federal Government: <input type="checkbox"/></p> <p>Check one of the following:          Residential: <input type="checkbox"/>          Commercial: <input type="checkbox"/>          Industrial: <input type="checkbox"/>          Other: <input type="checkbox"/>          If Other, describe:</p> <p>Indicate the appropriate Standard Industrial Classification (SIC) number that best represents the eventual use of the facility under construction. For residential and commercial facilities (i.e., non-industrial) use the appropriate construction SIC number. SIC information may be obtained from the U.S. Occupational Safety and Health Administration. As of July 2009, a search function is available on the OSHA website at <a href="http://www.osha.gov/pls/imis/sicsearch.html">http://www.osha.gov/pls/imis/sicsearch.html</a>.</p> <p>Standard Industrial Classification:</p>
<b>Erosion and Sediment Control Plan Information</b>	<p>NOTE: Apply for this permit only after you have submitted the Erosion and Sediment Control Plan to the appropriate Approval Authority for review. When MDE is ready to issue the permit, you must provide either documentation from the Approval Authority that the plan is approved or, if the Approval Authority does not provide such documentation, complete a certification that the plan is approved. The certification form is available on MDE's website.</p>

	<p>Has Erosion and Sediment Control Plan been submitted to the appropriate Approval Authority for review? Yes <input type="checkbox"/></p> <p>Name of Approval Authority for Erosion and Sediment Control Plan:</p> <p>Identifying Number for Erosion and Sediment Control Plan (if assigned by Approval Authority):</p> <p>Is this a State or Federal project for which MDE has not yet assigned an SF number to the Erosion and Sediment Control Plan? Yes <input type="checkbox"/></p>
<b>Discharge Information</b>	<p>The runoff from this site goes to: (select one)</p> <p>1. A municipal separate storm sewer system. Give name of that system and its receiving waters:</p> <p>2. Surface waters. Give name of receiving waters (use the <i>closest named waterway</i>, not the ultimate receiving waters):</p> <p>Watershed Basin Code – Eight-digit number that indicates the site’s watershed. This information may be obtained at local plan review offices or MDE.</p> <p>Are the receiving waters listed on the current Maryland 303(d) list as impaired? [NOTE: See MDE’s website for the 303(d) list and search tools.] Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>What is listed as the cause of the impairment (check all that are applicable)? Total Suspended Solids: <input type="checkbox"/> Sedimentation/Siltation: <input type="checkbox"/> Other: <input type="checkbox"/></p> <p>If the impaired waters are different than the waters mentioned above, list them here:</p> <p>Date that the preparer of this form compared the eventual receiving waters with the Maryland 303(d) list:</p>
<b>Impervious Surface and Runoff Curves</b>	<p>Runoff Curve Number:</p> <p>Pre-Development:                      Post-Development:</p> <p>Estimate of Impervious Surface Area in Acres (Post-development, includes rooftops, parking lots, etc.):</p>

<b>Permanent Stormwater Management Facilities (BMPs)</b>	<p>If SWM is waived or exempt, you do not need to complete this section.</p> <p>SWM waived:            Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>SWM exempt:            Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Indicate how many of each type of permanent SWM facility will be implemented. Indicate the total drainage area for each type of these facilities. Example: if two extended detention ponds are installed, each draining 10 acres, indicate there are two extended detention ponds (place "2" in the Number column) with a total drainage area of 20 acres (place "20" in the Total Drainage Area column).</p>	
<b>BMPs</b>	<b>Number</b>	<b>Total Drainage Area</b>
Infiltration trenches		
Infiltration basins		
Offsite SWM Facility		
Retention Ponds		
Detention Ponds		
Extended Detention Ponds – Wet		
Extended Detention Ponds – Dry		
Vegetated Swales		
Wetland/Shallow Marshes		
Oil/Grit Separators		
Drywells		
Other (specify what)		
<b>Signatory Information</b>		
<p align="center"><b>Signatory Authority</b></p> <p>Applications for a State Discharge Permit must be signed by a responsible official in accordance with COMAR 26.08.04.01-1B(5): for a proprietorship, by the proprietor; for partnerships, by a general partner; for corporations, by the principal executive officer, or authorized representative; for municipal, state, or other public facility; by principal executive officer, ranking elected official, or other authorized employee. If the facility is owned by one party and leased to another, please identify both parties and have the appropriate representatives of both parties sign this application. Attach additional sheets as needed. If the facility is owned by a business entity, please identify the resident agent and principal executive officer, with their complete addresses, on this application.</p>		

Please indicate if the facility is owned by one of the following:

Sole Proprietorship ☐  
Partnership ☐  
Corporation ☐  
Public Facility ☐

**RESIDENT AGENT FOR CORPORATION:**

A resident agent is a person or entity that serves as a business organization's point of contact in the state for the purpose of receiving legal notices addressed to the business.

Name:

Street Address:

City:

County:

State:

Zip:

I certify under penalty of law that this document was completed under my supervision and that the information contained herein is accurate and truthful to the best of my knowledge. I certify that the information concerning ownership/control of this site/project is accurate. I am responsible for the construction activities of this site/project, for satisfying the requirements of this discharge permit, and any civil or criminal penalties incurred due to violations of this permit, as set forth in Maryland and/or federal laws and regulations.

Print or type name of person signing:

Title:

---

(Signature of applicant)/(Date signed)

**Notices**

18 U.S.C. Section 1001 provides that:

Whoever, in any matter within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals, or covers up by any trick, scheme, or device a material fact, or makes any false, fictitious, or fraudulent statements or representations; or makes or uses any false writing or document knowing same to contain any false, fictitious, or fraudulent statement or entry, shall be fined not more than \$10,000 or imprisoned not more than 5 years, or both.

Privacy Act Notice: This notice is provided pursuant to the Federal Privacy Act of 1974, U.S.C Section 552a. Disclosure of your organization's Federal Tax Identification number or your personal Social Security number with this application is mandatory pursuant to the Maryland Environment Article, Section 1-203 (2003), which requires MDE to verify that applicants for the renewal of permits or licenses have paid all undisputed taxes and unemployment insurance. This information will not be used for any purposes other than those described in this Notice.

### Application Completion Checklist

**Complete all portions of the application. In addition, ensure the following are included:**

<b>Fee</b>	<p>Enclose a check or money order made payable to <i>Maryland Department of the Environment</i> for the appropriate application fee based on the total disturbed area (in acres) for your project/site. Local and state government projects are exempt from the fees.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="text-align: left;">Total disturbed area (in acres)</th><th style="text-align: left;">Fee</th></tr> <tr> <td>1 to less than 10</td><td>\$100</td></tr> <tr> <td>10 to less than 15</td><td>\$500</td></tr> <tr> <td>15 to less than 20</td><td>\$1500</td></tr> <tr> <td>20 or more acres</td><td>\$2500</td></tr> </table> <p style="margin-top: 10px;">Fee enclosed: <input type="checkbox"/> Exempt from fee: <input type="checkbox"/></p>	Total disturbed area (in acres)	Fee	1 to less than 10	\$100	10 to less than 15	\$500	15 to less than 20	\$1500	20 or more acres	\$2500
Total disturbed area (in acres)	Fee										
1 to less than 10	\$100										
10 to less than 15	\$500										
15 to less than 20	\$1500										
20 or more acres	\$2500										
<b>Map</b>	Vicinity map enclosed: <input type="checkbox"/>										
<b>Workers' Compensation</b>	If the application indicates that a Certificate of Compliance is attached, it is enclosed: <input type="checkbox"/>										
<b>Public Notice Billing Approval Form</b>	<p>If this is an application for an Individual Permit for Stormwater Associated with Construction Activity, a Public Notice Billing Approval Form is attached: <input type="checkbox"/></p> <p>NOTE: For Individual Permits, MDE cannot begin processing the application until the Public Notice Billing Approval Form is received. It is available in the Permit for Stormwater Associated with Construction Activity section of the MDE website.</p>										
<b>Retain a Copy</b>	The applicant has retained a copy of this application: <input type="checkbox"/>										
<b>Contact Information for Questions:</b>	<p><b>DO NOT SUBMIT YOUR APPLICATION TO THIS ADDRESS.</b> Sending your application by overnight delivery to this address <b>WILL NOT</b> expedite your application.</p> <p>Maryland Department of the Environment, Compliance Program 1800 Washington Blvd. Suite 420 Baltimore Maryland 21230 Telephone: (410) 537-3510 Website: <a href="http://www.mde.state.md.us">http://www.mde.state.md.us</a></p>										
<b>Submit one signed original to:</b>	<p><b>Maryland Department of the Environment</b> <b>P.O. Box 2057</b> <b>Baltimore, Maryland 21203-2057</b></p> <p style="text-align: right; margin-top: 20px;">PCA: 13710    OBJ: 5703</p>										

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## MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard  
Baltimore Maryland 21230  
(410) 537-3000  
1-800-633-6101

<http://www.mde.state.md.us>

### NOTICE OF TERMINATION

This Notice of Termination form is to be completed upon final stabilization of the construction area covered by an Individual or General Permit for Stormwater Associated with Construction Activity, in accordance with the Environmental Protection Agency's National Pollutant Discharge Elimination System stormwater program. Upon completion of this form, the permittee should sign and submit it to the Maryland Department of the Environment, WMA - Compliance Program, Montgomery Park Business Center, 1800 Washington Boulevard, Suite 420, Baltimore, Maryland, 21230.

Date:

Permit/NOI Identification Number:

Type of Project: Federal ☐ State ☐ Local ☐ Private ☐

Name of Permittee:

Phone:

Address of Permittee:

Site Location (description, including County and mailing address if available):

Name of Principal Contact (for example, the general contractor):

Phone:

Address of Principal Contact:

### Permittee Certification

I certify under penalty of law that disturbed soils at the identified site have been acceptably stabilized and temporary erosion and sediment controls have been removed or will be removed at an appropriate time and that all stormwater discharges associated with construction activity from this site that are authorized by this permit have been eliminated. I understand that by submitting this Notice of Termination, I am no longer authorized to discharge stormwater associated with construction activity by the permit and that discharging pollutants in stormwater associated with construction activity to the waters of the United States is unlawful under the Clean Water Act where the discharge is not authorized by an NPDES permit. I also understand that the submittal of this Notice of Termination does not release the permittee from liability for any violations of this Permit or the Clean Water Act which may have occurred at this site.

---

(signature of permittee)

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# **Appendix I**

## **Air Conformity Analysis and Record of Non-Applicability**

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Table 1: Proposed Facility		
Activity	Area	
	square feet	acres
New Construction		
Building	73,162	1.68
Sidewalks	14,150	0.32
Roads/Paving	105,409	2.42
Other	16,375	0.38
Demolition		
Building	18,834	0.43
Sidewalks	9,670	0.22
Roads/Paving	100,141	2.30
Final Building Size	166,864	3.83

Table 2 Proposed Action Construction Vehicle Exhaust Emissions 2013														
Activity	Equipment List	Equipment quantity	Days Used	Emission Factors <sup>1</sup> (lb/hr)						Emissions (lbs/year)				
				NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>2.5</sub>		NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>2.5</sub>
Demolition	Loader	1	45	0.58	0.09	0.38	0.0008	0.044		209.38	31.03	137.66	0.29	15.66
	Haul Truck	1	45	2.02	0.22	0.66	0.0027	0.072		725.69	80.68	238.86	0.97	25.74
Land Clearing	Loader	1	60	0.58	0.09	0.38	0.0008	0.044		279.17	41.38	183.55	0.38	20.88
	Haul Truck	1	60	2.69	0.31	1.25	0.0025	0.11		1289.57	149.47	599.57	1.20	54.58
Vehicle Emissions (lb/year)										2,503.80	302.56	1,159.64	2.84	116.86
Vehicle Emissions (tons/year)										1.25	0.15	0.58	0.0014	0.06

Notes:

1. Emission Factors from OFFROAD Model Mobile Source Emission Factors (2012), South Coast Air Quality Management District.

**Table 3**  
**Proposed Action Construction Vehicle Exhaust Emissions 2014**

Activity	Equipment List	Equipment quantity	Days Used	Emission Factors <sup>1</sup> (lb/hr)					Emissions (lbs/year)				
				NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>
Backhoe Excavation	Backhoe Loader	1	180	0.58	0.09	0.38	0.0008	0.044	837.50	124.13	550.66	1.15	62.64
	Haul Truck	1	180	2.02	0.22	0.66	0.0027	0.072	2902.75	322.70	955.44	3.89	102.96
Cut and fill	Scraper	1	180	2.57	0.29	1.10	0.0027	0.11	3697.92	419.90	1581.70	3.89	156.53
	Bulldozer	1	180	2.69	0.31	1.25	0.0025	0.11	3868.70	448.42	1798.70	3.60	163.73
	Water Truck	1	180	2.02	0.22	0.66	0.0027	0.072	2902.75	322.70	955.44	3.89	102.96
Trenching	Trencher	1	180	0.70	0.15	0.47	0.0007	0.058	1007.28	217.01	683.86	1.01	83.81
	Track loader	1	180	0.58	0.09	0.38	0.0008	0.044	837.50	124.13	550.66	1.15	62.64
Grading	Grader	1	200	1.25	0.15	0.61	0.0015	0.06	2000.48	245.28	980.64	2.40	103.84
	Bulldozer	1	200	2.69	0.31	1.25	0.0025	0.11	4298.56	498.24	1998.56	4.00	181.92
	Water Truck	1	200	2.02	0.22	0.66	0.0027	0.072	3225.28	358.56	1061.60	4.32	114.40
Concrete Slab	Cement Truck	1	40	0.056	0.0093	0.043	0.0001	0.003	18.05	2.98	13.60	0.03	0.93
Portable Equipment	Generator	1	200	0.58	0.083	0.31	0.0007	0.035	924.64	133.12	499.36	1.12	56.16
	Air Compressor	1	200	0.65	0.10	0.34	0.0007	0.047	1039.04	157.44	551.20	1.12	75.04
Paving	Paving Machine	1	30	0.90	0.16	0.54	0.0009	0.064	215.52	38.30	130.68	0.22	15.41
	Roller	1	30	0.69	0.10	0.41	0.0008	0.049	166.46	24.91	98.57	0.19	11.71
Vehicle Emissions (lb/year)									27,942.45	3,437.82	12,410.66	31.98	1,294.67
<b>Vehicle Emissions (tons/year)</b>									<b>13.97</b>	<b>1.72</b>	<b>6.21</b>	<b>0.0160</b>	<b>0.65</b>

Notes:

1. Emission Factors from OFFROAD Model Mobile Source Emission Factors (2012), South Coast Air Quality Management District.

Table 4 Proposed Action Construction Vehicle Exhaust Emissions 2015														
Activity	Equipment List	Equipment quantity	Days Used	Emission Factors <sup>1</sup> (lb/hr)						Emissions (lbs/year)				
				NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>		NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>
Painting	Air Compressor	2	40	0.65	0.10	0.34	0.0007	0.047		415.62	62.98	220.48	0.45	30.02
Vehicle Emissions (lb/year)										415.62	62.98	220.48	0.45	30.02
Vehicle Emissions (tons/year)										0.21	0.031	0.11	0.00022	0.015

Notes:

1. Emission Factors from OFFROAD Model Mobile Source Emission Factors (2012), South Coast Air Quality Management District.

Table 5: Construction Worker Trip Emissions 2013						
Building Size (sf)	Trip Generation Factor (Trips/Day) <sup>1</sup>	Pollutant	Emission Factor <sup>2</sup>	Work Days <sup>3</sup>	Annual Emissions	
					Lbs	Tons
166,864	53.40	VOC	0.67	120	4,293	2.15
		NO <sub>x</sub>	0.45	120	2,883	1.44
		PM <sub>2.5</sub>	0.062	120	397.3	0.20
		CO	5.07	120	32,486	16.24

Notes:

1. Trip Factor from Table 4.8 of the El Dorado County APCD-CEQA Guide (Trips/Day = 0.32/1,000 sf \* Building size).
2. Emission Factors interpolated from Table 4.9, Year 2013.
3. 20 Work Days per month for 6 months.

Table 6: Construction Worker Trip Emissions 2014						
Building Size (sf)	Trip Generation Factor (Trips/Day) <sup>1</sup>	Pollutant	Emission Factor <sup>2</sup>	Work Days <sup>3</sup>	Annual Emissions	
					Lbs	Tons
166,864	53.40	VOC	0.67	240	8,586	4.29
		NO <sub>x</sub>	0.45	240	5,767	2.88
		PM <sub>2.5</sub>	0.062	240	794.5	0.40
		CO	5.07	240	64,973	32.49

Notes:

1. Trip Factor from Table 4.8 of the El Dorado County APCD-CEQA Guide (Trips/Day = 0.32/1,000 sf \* Building size).
2. Emission Factors interpolated from Table 4.9, Year 2013.
3. 20 Work Days per month for 12 months.



Table 7: Construction Worker Trip Emissions 2015						
Building Size (sf)	Trip Generation Factor (Trips/Day) <sup>1</sup>	Pollutant	Emission Factor <sup>2</sup>	Work Days <sup>3</sup>	Annual Emissions	
					Lbs	Tons
166,864	53.40	VOC	0.67	80	2,862	1.43
		NO <sub>x</sub>	0.45	80	1,922	0.96
		PM <sub>2.5</sub>	0.062	80	264.8	0.13
		CO	5.07	80	21,658	10.83

Notes:

1. Trip Factor from Table 4.8 of the El Dorado County APCD-CEQA Guide (Trips/Day = 0.32/1,000 sf \* Building size).
2. Emission Factors interpolated from Table 4.9, Year 2013.
3. 20 Work Days per month for 4 months.

Table 8: PM <sub>2.5</sub> from Land Clearing 2013		
Emission Factor	0.22	tons/acre-month
Total area to be cleared	4.80	acres
No. of months	3	months <sup>1</sup>
<b>PM<sub>2.5</sub> Emissions</b>	<b>3.17</b>	<b>tons</b>

Notes:

Emission Factor obtained from Table A-4 of the URBEMIS2007, Version 9.2, User's Guide.

1. One month is considered to include 20 working days with 8 hours of activity each day

Table 9: PM <sub>2.5</sub> from Demolition 2013	
Area to be demolished <sup>1</sup> (SQ FT)	128,645.00
Emission from building, road, and sidewalk removal <sup>2</sup> (LBS)	65.6
Emissions from Debris removal <sup>3</sup> (LBS)	1,209.3
Total PM10 emissions (LBS/YR)	1,274.9
<b>Total PM10 emissions (TPY)</b>	<b>0.64</b>

Notes:

1. Total area to be demolished.

2. PM emission from structure takedown based on sq ft \*EF(0.00051)

3. PM emission from debris removal based on sq ft \*EF(0.0094)

All Emission Factors from EPA-450/2-92-004.

Table 10: VOC Emissions from Paving 2014				
Activity	Area (acres)	Emission Factor (lbs/acre-day)	Emissions	
			lb	tons
Off gas emissions (30 days activity)	2.42	2.62	190.20	0.095
<b>Total VOC Emissions</b>				<b>0.095</b>

Notes:

Asphalt Paving VOC Emission Factor obtained from Table 4.6 of the El Dorado County APCD-CEQA Guide

Table 11: VOC Emissions from Architectural Coatings 2015				
Activity	Area (sqft)	Emission Factor (lbs/day-sqft)	Emissions	
			lb	tons
Coatings (40 days activity)	166,864	1.63	26,633.54	13.32
<b>Total VOC Emissions</b>				<b>13.32</b>

Notes:

Emission Factor obtained from Table 4-7 El Dorado County APCD-CEQA Guide, February 2002.

For non-residential units,

$Em = (EF * \sqrt{Bsize}) * (Td + 3)$ , where EF = 1.63 lb/day/sqft for non residential units, Bsize = Building size sqft and Td = Total Painting days if known, otherwise assumed to be 17

Table 12: Greenhouse Gas Emissions for Construction 2013 (6 Months)						
Pollutant	Emission Factor <sup>1</sup>	Units	Fuel Amount <sup>2</sup>	Units	Total Emissions	Units
CO <sub>2</sub>	10.15	kg CO2/gallons	2412	Gallons	26.962335	tons
CH <sub>4</sub>	0.58	g/gallon	2412	Gallons	0.001541	tons
N <sub>2</sub> O	0.26	g/gallon	2412	Gallons	0.000691	tons
CO <sub>2</sub> EQ					<b>27.20</b>	tons

Table 13: Greenhouse Gas Emissions for Construction 2014 (12 Months)						
Pollutant	Emission Factor <sup>1</sup>	Units	Amount <sup>2</sup>	Units	Total Emissions	Units
CO <sub>2</sub>	10.15	kg CO2/gallons	4824	Gallons	53.924670	tons
CH <sub>4</sub>	0.58	g/gallon	4824	Gallons	0.003081	tons
N <sub>2</sub> O	0.26	g/gallon	4824	Gallons	0.001381	tons
CO <sub>2</sub> EQ					<b>54.40</b>	tons

Table 14: Greenhouse Gas Emissions for Construction 2015 (4 Months)						
Pollutant	Emission Factor <sup>1</sup>	Units	Amount <sup>2</sup>	Units	Total Emissions	Units
CO <sub>2</sub>	10.15	kg CO2/gallons	1608	Gallons	17.974890	tons
CH <sub>4</sub>	0.58	g/gallon	1608	Gallons	0.001027	tons
N <sub>2</sub> O	0.26	g/gallon	1608	Gallons	0.000460	tons
CO <sub>2</sub> EQ					<b>18.13</b>	tons

Notes:

1. Emission factors from *California Climate Action Registry General Reporting Protocol* ([http://www.climateregistry.org/resources/docs/protocols/grp/GRP\\_3.1\\_January\\_2009.pdf](http://www.climateregistry.org/resources/docs/protocols/grp/GRP_3.1_January_2009.pdf)) for diesel fuel, Table C.3 for CO<sub>2</sub> and Table C.6 for N<sub>2</sub>O and CH<sub>4</sub>.
2. Estimate 402 total gallons of fuel/month used by construction equipment (Table 4.1, El Dorado County APCD CEQA Guide).

Table 15: Potential Emissions from Heating			
Total boiler capacity (btu/hr):		4,200,000	
Heat content of Nat. gas (btu/cf):		1020	
Hourly consumption (cf/hr):		4,117.65	
Criteria Pollutants	Emission Factors <sup>1</sup> (lbs/MM cf nat gas)	Annual Emissions	
		Houtly Emissions <sup>2</sup> (lbs/hr)	Emissions <sup>3</sup> (TPY)
NO <sub>x</sub>	50.00	0.2059	<b>0.90</b>
VOC	5.50	0.0226	<b>0.10</b>
CO	84.00	0.3459	<b>1.51</b>
SO <sub>2</sub>	0.60	0.0025	<b>0.01</b>
PM <sub>10</sub>	7.60	0.0313	<b>0.14</b>
CO <sub>2</sub>	120,000.00	494.1176	<b>2,164.24</b>

Notes:

1. Emission factors for natural gas from AP-42, 5th Edition, Section 1.4, Tables 1.4-1 and 1.4-2.
2. Hourly Emissions = Hourly consumption (@100 capacity) x Emission Factor.
3. Potential to emit at 8760 hrs/year.

Key:

btu/cf = British thermal units/cubic foot  
 btu/hr = British thermal units/hour  
 cf/hr = cubic feet/hour  
 lbs/hr = pounds/hour  
 lbs/MM cf = pounds/million cubic feet

Table 16: Total Construction Emissions for the Facility by Year						
Year	Emissions (tons)					
	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	PM <sub>2.5</sub>	CO <sub>2</sub> EQ
Table 2: Construction Vehicle Exhaust	1.25	0.15	0.58	0.0014	0.06	--
Table 5: Construction Worker Trips	1.44	2.15	16.24	--	0.20	--
Table 8: Land Clearing	--	--	--	--	3.17	--
Table 9: Demolition	--	--	--	--	0.64	--
Table 12: GHG from Construction Vehicles	--	--	--	--	--	27.20
<b>Total for 2013 (6 months)</b>	<b>2.69</b>	<b>2.30</b>	<b>16.82</b>	<b>0.0014</b>	<b>4.06</b>	<b>27.20</b>
Table 3: Construction Vehicle Exhaust	13.97	1.72	6.21	0.016	0.65	--
Table 6: Construction Worker Trips	2.88	4.29	32.49	--	0.40	--
Table 10: Paving	--	0.095	--	--	--	--
Table 13: GHG from Construction Vehicles	--	--	--	--	--	54.40
<b>Total for 2014 (12 months)</b>	<b>16.85</b>	<b>6.11</b>	<b>38.69</b>	<b>0.02</b>	<b>1.04</b>	<b>54.40</b>
Table 4: Construction Vehicle Exhaust	0.21	0.031	0.11	0.00022	0.015	--
Table 7: Construction Worker Trips	0.96	1.43	10.83	--	0.13	--
Table 11: Architectural Coatings	--	13.32	--	--	--	--
Table 14: GHG from Construction Vehicles	--	--	--	--	--	18.13
<b>Total for 2015 (4 months)</b>	<b>1.17</b>	<b>14.78</b>	<b>10.94</b>	<b>0.00</b>	<b>0.15</b>	<b>18.13</b>

Table 17: Annual Operating Emissions for the Facility						
Emission Source	Annual Emissions (tons)					
	VOC	NO <sub>x</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	CO	CO <sub>2</sub>
Heating	0.10	0.90	0.14	0.01	1.51	2,164.24
<b>Total Emissions</b>	<b>0.10</b>	<b>0.90</b>	<b>0.14</b>	<b>0.01</b>	<b>1.51</b>	<b>2,164.24</b>

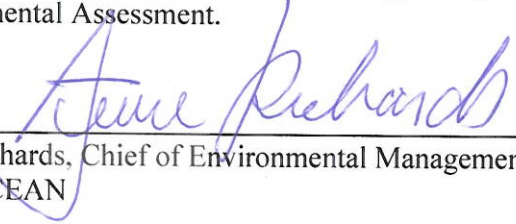
# GENERAL CONFORMITY – RECORD OF NON-APPLICABILITY (RONA)

for

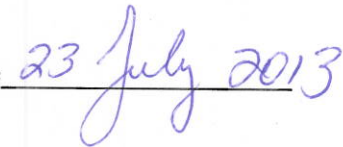
## Expansion of the Base Exchange at Joint Base Andrews-Naval Air Facility Washington, Camp Springs, Prince George's County, Maryland

General Conformity under the Clean Air Act, Section 176 has been evaluated for this project according to the requirements of 40 CFR 93, Subpart B. The requirements of this rule are not applicable to this action because the emissions of PM<sub>2.5</sub>, NO<sub>x</sub>, SO<sub>2</sub> and CO are below the *de minimis* level of 100 tpy and VOC are below the *de minimis* level of 50 tpy, and these emissions do not make up 10% of the region's emission inventory and are not regionally significant. Emission estimates and supporting documentation are included in the Final Environmental Assessment.

SIGNED

  
Steve Richards, Chief of Environmental Management  
11 CES/CEAN

Date



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