FINAL

ENVIRONMENTAL ASSESSMENT

FOR

PROPOSED CONSTRUCTION AND OPERATION OF A NATIONAL GUARD READINESS CENTER AND ASSOCIATED UNIT RE-STATIONING

Ardmore and Poteau, Carter and Le Flore Counties, OK

Oklahoma Military Department

Directorate of Facility Management
Environmental Branch
3515 Military Circle
Oklahoma City, Oklahoma 73111-4398

Under Purchase Order No.: #0259005133

MILCON Project No: #400601

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ENVIRONMENTAL ASSESSMENT ORGANIZATION

This Environmental Assessment (EA) evaluates the potential environmental, socioeconomic, and cultural effects of the proposed construction and operation of a Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, Carter and Le Flore Counties, OK.

As required by the National Environmental Policy Act of 1969 (NEPA; 42 United States Code [USC] §4321 *et seq*.), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651 (Environmental Analysis of Army Actions, Final Rule), the potential effects of the Proposed Action and Alternatives are analyzed. This EA will facilitate the decision process regarding the Proposed Action and its alternatives, and is organized as follows:

EXECUTIVE SUMMARY: Describes the Proposed Action and its considered alternatives; summarizes environmental, cultural, and socioeconomic consequences; and compares potential effects associated with the two considered alternatives, including the No Action Alternative.

SECTION 1 PURPOSE OF AND NEED FOR THE PROPOSED ACTION: Summarizes the purpose of and need for the Proposed Action, provides relevant background information, and describes the scope of the EA.

SECTION 2 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES: Describes the Proposed Action and presents alternatives for implementing the Proposed Action, including applied screening criteria, alternatives retained for further analysis, and alternatives eliminated.

SECTION 3 AFFECTED ENVIRONMENT: Describes the existing environmental, cultural, and socioeconomic setting of the considered alternatives within Ardmore, Carter County and Poteau, Le Flore County, OK.

SECTION 4 ENVIRONMENTAL CONSEQUENCES: Identifies individual and cumulative potential environmental, cultural, and socioeconomic effects of implementing the Proposed Action and alternatives, and identifies best management practices.

SECTION 5 COMPARISON OF ALTERNATIVES AND CONCLUSIONS: Compares the environmental effects of the considered alternatives and summarizes the significance of individual and expected cumulative effects from these alternatives.

SECTION 6 REFERENCES: Provides bibliographical information for cited sources.

SECTION 7 GLOSSARY: Defines terms used in the EA.

SECTION 8 LIST OF PREPARERS: Identifies document preparers and their areas of expertise.

SECTION 9 AGENCIES AND INDIVIDUALS CONSULTED: Lists agencies and individuals consulted during EA preparation.

- ✓ ***Funding Source: MILCON Project No. 400601***
- ✓ ***Proponent: Oklahoma Army National Guard***
- ✓ ***Fiscal Year (FY): 2017***

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ENVIRONMENTAL ASSESSMENT

SIGNATURE PAGE

LEAD AGENCY:	National Guard Bureau (NGB)
COOPERATING AGENCIES:	None
TITLE OF PROPOSED ACTION:	Proposed Construction and Operation of a National Guard Readiness Center and Associated Unit Re-stationing Improvements
AFFECTED JURISDICTION:	Ardmore and Poteau, Carter and Le Flore Counties, OK
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DOCUMENT DESIGNATION: Final Environmental Assessment (EA)

ABSTRACT: The NGB and OKARNG propose to construct and operate a facility of sufficient size and modern design within south-central Oklahoma to efficiently achieve and maintain mission requirements and requisite mobilization readiness levels for four units within the 45th Infantry Brigade Combat Team (IBCT): (1) Headquarters, Headquarters Troop (HHT), 1st Squadron 180th (1-180th) Cavalry Regiment (Cav Reg); (2) Company (Co) D, 700th Brigade Support Battalion (700 BSB); (3) Troop B/180th Cav Reg; and (4) Troop C/1-180th Cav Reg. The Proposed Action includes three main elements: (1) construction and operation of the proposed Ardmore Readiness Center (RC); (2) demolition of the existing Ardmore RC; and (3) transfer of the existing Poteau RC to a county, city, or state entity.

This EA evaluates the individual and cumulative effects of the Proposed Action and the No Action Alternative with respect to the following criteria: land use and cover; air quality; noise; topography, geology, and soils; water resources; biological resources; cultural resources; socioeconomics; environmental justice; infrastructure; and hazardous and toxic materials/wastes (HTMW).

The evaluation performed in this EA concludes there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life associated with implementing the Proposed Action, provided standard best management practices (BMPs) specified in this EA are implemented. As such, the EA recommends implementation of the Preferred Action Alternative.

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EXECUTIVE SUMMARY

This Environmental Assessment (EA) evaluates the proposal of the National Guard Bureau (NGB) and Oklahoma Army National Guard (OKARNG) to construct and operate a Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, Carter and Le Flore Counties, OK. Implementation of the Proposed Action would provide the necessary training and administrative capacity to meet OKARNG's mission and to properly support the following four units within the 45th Infantry Brigade Combat Team (IBCT): (1) Headquarters, Headquarters Troop (HHT), 1st Squadron 180th (1-180th) Cavalry Regiment (Cav Reg); (2) Company (Co) D, 700th Brigade Support Battalion (700 BSB); (3) Troop B/180th Cav Reg; and (4) Troop C/1-180th Cav Reg.

This EA has been prepared under the provisions of, and in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code [USC] §4321 et seq.), the *Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA* (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651 *(Environmental Analysis of Army Actions*, Final Rule, 29 March 2002). This EA will facilitate the decision-making process regarding the Proposed Action and its alternatives considered by the OKARNG.

PROPOSED ACTION

The Proposed Action includes three main elements: (1) construction and operation of the proposed Ardmore RC; (2) demolition of the existing Ardmore RC; and (3) transfer of the Poteau RC. The proposed Ardmore RC would house OKARNG units and equipment. The proposed Ardmore RC is a Fiscal Year (FY) 2017 Military Construction (MILCON) project (Project Number 400601).

Construction activities associated with the Proposed Action would include land alterations throughout the approximately 46-acre project site located southwest of the intersection of Cooper Drive and East Prairie Valley Road; this intersection is approximately 0.25 mile west of I-35 (Exit 33). The proposed building would be no more than three stories (approximately 36 feet high) and would include 85,904 square feet (SF) of total facility space for OKARNG. The proposed RC combined with the existing McAlester Armed Forces Reserve Center (AFRC) would provide approximately 68,563 SF more in indoor facility space than under current conditions for the four assigned 45th IBCT units. In addition to the proposed RC building itself, implementation of the project would include construction of up to 10 acres of various paved areas and support facilities. Support facilities include military equipment, privately owned vehicle (POV) parking, as well as sidewalks, lighting, a refuse collection facility, access roads, and fencing. Proposed facilities would provide the units with adequate administrative, supply, classroom, locker, latrine, kitchen, maintenance, training, and parking space (OKARNG 2014a).

The proposed Ardmore RC is projected to be used for normal administrative functions five days per week by the OKARNG. The proposed facility would support approximately 29 full-time and 314 part-time OKARNG personnel annually. A two-day Inactive Duty Training (IDT) assembly is expected two or three times per month throughout the year. Construction of the proposed Ardmore RC is scheduled to begin in 2017 and be complete by 2019.

PURPOSE AND NEED

The *purpose* of the Proposed Action is to provide the OKARNG with a facility of sufficient size and modern design within south-central Oklahoma to effectively achieve and maintain mission requirements and requisite mobilization readiness levels for the assigned units in accordance with Department of the Army (DA) and State of Oklahoma requirements. The Proposed Action is *needed* to address a shortfall in available and suitable administrative, training, storage, military equipment and POV parking and maintenance space within south-central Oklahoma as set forth in National Guard Pamphlet (NG Pam) 415-12 (NGB 2011), and Anti-Terrorism Force Protection (ATFP) setback requirements outlined in Unified Facilities Criteria (UFC) 4-010-01, *Department of Defense (DoD) Minimum Antiterrorism Standards for Buildings* (2013). The RC is needed to house all elements of the HHT 1-180th Cav Reg, Troop B/180th Cav Reg, and Co D 700 BSB from McAlester and Poteau, OK. These units have a combined required strength of 314 personnel. The proposed space would allow personnel to perform the necessary training and tasks to maintain and improve the units' readiness postures. Unit re-stationing would be conducted in compliance with Amy Regulation (AR) 5-10 *Stationing* (DA 2010).

HHT 1-180th Cav Reg and Co D 700 BSB are currently stationed at the McAlester AFRC. Based on space and facility requirements of the two assigned units, the McAlester AFRC lacks adequate administrative, storage, parking, and classroom space. Troop B/180th Cav Reg is stationed at the Poteau RC. This facility is approximately 60 years old and lacks adequate parking for the OKARNG's units. The Poteau RC also has foundation issues, a lack of fire protection, inadequate storage for assigned weapons, no Class V vault door, and poor ventilation in the supply room. The property is landlocked by the Carl Albert State College with no opportunity for expansion.

The existing 26,414 SF Ardmore RC, built in 1985, was condemned due to water penetration, foundation damage, and mold. As a result, Troop C/1-180th Cav Reg has been using two 1,600 SF portable buildings for administrative space and a portable weapons vault. Consequently, the existing facilities are lacking in adequate space for administrative, storage, training, maintenance, and parking for the assigned unit. This property also lacks proper fencing, lighting, and standoffs in accordance with ATFP standards, and directly abuts the Ardmore Regional Park; thus, Soldiers and military property are at risk. The demolition of the existing structure is necessary because it is considered a human health and safety hazard. Remodeling options were evaluated but would not gain any additional space and ultimately were not deemed cost effective.

Furthermore, as a result of issues associated with the existing Ardmore RC and an overall lack of facility space at other existing RCs, south-central Oklahoma has been without an adequate facility to support civilian authorities and recruit the next generation into the military service. During this time, two major winter storm events occurred that required the OKARNG to clear I-35 of stranded motorists. These operations were hindered by a lack of this type of facility in the region. In addition, this area does not have an acceptable place of refuge for its citizens during times of emergency.

ALTERNATIVES

NEPA, CEQ regulations, and 32 CFR Part 651 require all reasonable alternatives to be explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered "reasonable" only if it would enable the OKARNG to meet the purpose and need of the Proposed Action. "Unreasonable" alternatives would not enable the OKARNG to meet the purpose of and need for the Proposed Action. The OKARNG considered the following alternatives: (1) implement a reduced-scale alternative, (2) use an existing local surplus building, (3) use an existing DA facility in south-central Oklahoma, (4) purchase a new tract of land, (5) construct the proposed Ardmore RC at the existing location, (6) use an alternate location in south-central Oklahoma, and (7) use an alternate location in the City of Ardmore, OK. These alternatives were eliminated from further consideration because they did not meet one or more of the screening criteria. For more detailed information on OKARNG's screening criteria and on the alternatives eliminated from further consideration, refer to **Section 2.3.3**.

After an examination of the existing OKARNG facilities and properties within south-central Oklahoma, the OKARNG identified that the property located adjacent to I-35 (Exit 33) in northwestern Ardmore, OK met all of the selection criteria needed to support the HHT 1-180th Cav Reg, Troop B/180th Cav Reg, and Co D 700 BSB. This EA examines in-depth two alternatives, the Preferred Action Alternative and No Action Alternative, defined as follows:

- Preferred Action Alternative – Under this alternative, the construction and operation of the proposed RC in Ardmore, OK (and associated unit re-stationing), as identified in **Section 2.2**, would be implemented.
- No Action Alternative – Continue with operations as currently conducted and do not implement the Proposed Action.

The Preferred Action Alternative provides the best combination of land and resources to sustain quality military training and to maintain and improve the units' readiness postures. The No Action Alternative would limit the capability of the OKARNG to carry out its assigned mission to provide adequate training facilities, and would not meet the purpose of or need for the Proposed Action. However, pursuant to NEPA and CEQ regulations, the No Action Alternative must be considered to provide a comparative baseline analysis.

AFFECTED ENVIRONMENT

The proposed 46-acre Ardmore RC and the existing 10-acre Ardmore RC properties are located within the City of Ardmore, Carter County, OK approximately 100 miles north of Dallas, Texas and 100 miles south of Oklahoma City, OK. The existing Poteau RC is located on a 2-acre parcel within the City of Poteau in Le Flore County, OK.

The proposed Ardmore RC would be constructed on an approximately 46-acre parcel located southwest of the intersection of Cooper Drive and East Prairie Valley Road (see **Figures 1** and **2**); this intersection is approximately 0.25 mile west of I-35, Exit 33. The property is currently owned by the

State of Oklahoma. The proposed project site is zoned for light industrial use and consists primarily of maintained grasslands (e.g., little blue stem, switch grass, and Johnson grass) with scrub-shrub habitat in the south (e.g., hackberry, eastern red cedar, dogwood). Two ponds occur within the northeast and southeast portions of the project site. Past activities have included agricultural terracing, mowing, and utility installation. A high-power electric line runs east-west through the center of the property.

The existing Ardmore RC building, proposed for demolition, is located on an approximately 10-acre parcel consisting of impervious surfaces (e.g., building, parking), maintained grasslands and a few oak trees used in landscaping. The existing Ardmore RC Site is also located within the city limits of the City of Ardmore and is zoned for public facilities and institutions. The property is bound on the north and west by the Ardmore Regional Park, on the south by Veterans Boulevard, and to the east by the Oklahoma Highway Patrol Troop F Headquarters and Driver License Services Division facilities.

The Poteau RC building (built in 1954) would be vacated by OKARNG and the property transferred to a county, city, or state entity in accordance with the deed for this property (see **Figure 3**). The site consists of open landscaping, and both asphalt and gravel parking areas. The Poteau RC property is also located within the city limits of the City of Poteau and is zoned for light-industrial use, and is consistent with the surrounding land use. This RC is landlocked by facilities and operations associated with Carl Albert State College.

ENVIRONMENTAL CONSEQUENCES

The Proposed Action was evaluated to determine its potential direct or indirect impact(s) on the physical, environmental, cultural, and socioeconomic aspects of the project areas as well as the surrounding vicinity. Technical areas evaluated include: land use and cover; air quality; noise; topography, geology, and soils; water resources; biological resources; cultural resources; socioeconomics; environmental justice; infrastructure; and hazardous and toxic materials and waste (HTMW). The Preferred Action Alternative and No Action Alternative would result in the impacts identified throughout **Section 4** and summarized in **Table ES-1**.

Table ES-1. Alternative Comparison Matrix		
Technical Resource Area	**No Action Alternative**	**Preferred Action Alternative**
Land Use and Cover	No impact attributable to the OKARNG action. OKARNG's full readiness potential would continue to be limited and the facilities necessary to accommodate the mission would remain inadequate.	Long-term *positive* impacts to land use, the OKARNG mission, the Ardmore community and south-central Oklahoma from the construction of the proposed RC in Ardmore, OK. Aesthetic changes to the proposed Ardmore site's landscape would occur, but would result in a *less-than-significant adverse* impact. The proposed Ardmore RC would not cause land use restrictions, conflict with applicable local or regional land use management plans or local zoning ordinances, or foster changes in adjacent property land use. Short-term and long-term, *less-than-significant adverse* effects to land cover are anticipated. OKARNG would minimize clearing and earthwork to the maximum extent possible to minimize disturbance.
Air Quality	No impact attributable to the OKARNG action. Ongoing operations' emissions would continue.	Short-term, *less-than-significant adverse* impacts due to the potential for dust generation from construction activities and the proximity of sensitive receptors. Impacts would be reduced with implementation of standard Best Management Practices (BMPs). Long-term, *less-than-significant adverse* impacts to the local air quality due to increased site activities and vehicle traffic. Sustainable practices and technologies would be used to increase energy efficiency and reduce greenhouse gas emissions.
Noise	No impact attributable to the OKARNG action. Ongoing noise associated with the current Ardmore and Poteau facilities would continue.	Short-term, *less-than-significant adverse* impacts due to the potential for noise generation from construction activities and the proximity of sensitive receptors. Long-term, *less-than-significant adverse* impacts due to increased noise levels associated with proposed site usage and the proximity of sensitive receptors. Impacts would be reduced with implementation of BMPs.
Geology, Topography, and Soils	No impact attributable to the OKARNG action.	Short-term and long-term *less-than-significant adverse* impacts to soils from construction of the proposed Ardmore RC and demolition of the existing Ardmore RC. Impacts would be reduced with implementation of BMPs.
Water Resources	No impact attributable to the OKARNG action.	Potential short-term, *less-than-significant adverse* impacts to water quality during construction activities resulting in erosion and sedimentation, and long-term, *less-than-significant adverse* impacts from stormwater runoff during facility usage. Impacts would be reduced with implementation of BMPs.

Table ES-1. Alternative Comparison Matrix

Technical Resource Area	No Action Alternative	Preferred Action Alternative
Biological Resources	No impact attributable to the OKARNG action.	Short-term, *less-than-significant adverse* impacts to biological resources from construction noise and vegetation removal. Long-term, *less-than-significant adverse* impacts due to elimination of vegetation and wildlife habitat, which would be minor on a regional and local scale.
Cultural Resources	No impact attributable to the OKARNG action.	No effects to cultural resources are anticipated as a result of the Proposed Action. If an inadvertent discovery of cultural resources is made during ground-disturbing activities, impacts would be reduced to *less-than-significant* levels with implementation of BMPs.
Socioeconomics (including Protection of Children)	No impact attributable to the OKARNG action. The OKARNG and the Ardmore region as a whole would not benefit from the use of the proposed facility, and would continue to use less than adequate facilities.	Short-term and long-term *less-than-significant beneficial* impacts to the local economy and Ardmore community from increased military spending and the construction of the proposed facility for use by the OKARNG and the community. No *significant adverse* impacts to public health and safety or children are anticipated. The OKARNG will establish strict procedures which limit access to potentially hazardous areas to avoid public health or safety threat. Indirect, *less-than-significant adverse* effects to the local economy in the City of Poteau due to the OKARNG vacating the Poteau RC. Impacts are anticipated to be negligible because the loss of full-time positions would be small and this facility would be transferred for use to another county, city, or state entity.
Environmental Justice	No impact attributable to the OKARNG action.	Short-term, *minor positive* impacts would be expected as a result of minor increases in local employment.
Infrastructure	No impact attributable to the OKARNG action. OKARNG would continue to use the less than adequate existing Ardmore and Poteau facilities, and south-central Oklahoma would continue to lack a facility for civilians during emergency situations.	Short-term and long-term *less-than-significant adverse* impacts from construction and operation of the proposed Ardmore RC associated with utility extensions during construction, increased utility consumption during operation, and increased vehicle traffic.
HTMW	No impact attributable to the OKARNG action. The OKARNG Environmental Standard Operating Procedure (SOP) would continue to be implemented.	Short-term and long-term, *less-than-significant adverse* impacts due to construction activities and increased use of the Ardmore RC Site. Impacts would be controlled through BMPs and ongoing regulatory compliance.

Best Management Practices (BMPs)

Per established protocols, procedures, and requirements, the OKARNG will implement BMPs and will satisfy all applicable regulatory requirements in association with the Proposed Action. BMPs are included as components of the Preferred Action Alternative and summarized below. BMPs are regulatory compliance measures that the OKARNG regularly implements as part of their activities, as appropriate, across the State of Oklahoma. These are different from "mitigation measures," which are defined as project-specific requirements, not routinely implemented by the OKARNG, necessary to reduce identified potentially significant adverse environmental impacts to *less-than-significant* levels. ***No project-specific mitigation measures are needed to reduce impacts to less-than-significant levels.*** With implementation of the following routine BMPs, the Preferred Action Alternative would not result in significant adverse impacts to the current environmental setting.

Land Use and Cover. The OKARNG will minimize clearing and earthwork to the maximum extent possible to minimize disturbance and associated construction costs.

Air Quality. The OKARNG will ensure dust control associated with construction of the proposed Ardmore RC is conducted in accordance with the Oklahoma Department of Environmental Quality (ODEQ) – Air Quality Division guidelines. Available methods include application of water, soil stabilizers, or vegetation; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-movement activities during high wind conditions. To minimize dust generated by vehicles and equipment on unpaved surfaces, the OKARNG will maintain an appropriate speed limit. Electricity from established electrical power sources or other energy-efficient supplies will be used, whenever possible, instead of generators. Equipment will be shut down when it is not in use. Construction equipment will be repaired and serviced in accordance with the regular maintenance schedule recommended for each individual equipment type, and cleaned of excess soil before leaving the construction zone to prevent off-site transport. These dust-reducing measures will be briefed to the contractor at the kick-off meeting. This information will be incorporated into construction contracts.

Permits for installing and operating stationary emission sources (e.g., boilers, space heating equipment, degreasers, or parts washers) will be obtained as necessary. Emission sources will be specified to meet New Source Performance Standards as defined in 40 CFR Part 60 as required. As mandated by Army Policy, the proposed facility will be constructed to meet a minimum US Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Silver level rating, and the American Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc. (ASHRAE) Standard 189.1 will be followed.

Noise. The following standard BMPs will be implemented by the OKARNG as appropriate to limit noise impacts during construction. The OKARNG will limit, to the extent possible, construction, and associated heavy truck traffic between 9 PM and 7 AM. Stationary equipment and material transportation routes will be located as far away from sensitive receivers as possible. Equipment will be operated per manufacturer's recommendations, and noise-generating heavy equipment will be shut down when not needed. Construction personnel will be directed to operate equipment in the quietest manner practicable (e.g., speed restrictions, retarder brake restrictions, engine speed restrictions, etc.). These noise-reducing measures will be briefed to the contractor at the construction kick-off

meeting. The OKARNG's on-site construction manager would be responsible to bring noise issues, if they arise, to the OKARNG for resolution. This information will be incorporated into construction contracts.

Soils. The OKARNG will prepare a detailed, site-specific Erosion & Sedimentation (E&S) Control Plan to address all earth-disturbance aspects of the Proposed Action, including all project components. The E&S Control Plan will include standard BMPs such as specific guidelines and engineering controls to address anticipated erosion and resultant sedimentation impacts from establishing and operating the proposed facilities. The OKARNG will implement the following measures: install and monitor erosion-prevention measures such as silt fences and water breaks, sedimentation basins, filter fences, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures; re-spread stockpiled topsoil; seed/revegetate areas temporarily cleared of vegetation with native vegetation; and retain existing trees to the maximum extent possible.

Water Resources. The OKARNG will obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Surface Water Discharge Associated with Construction Activities from the ODEQ for all land disturbing activities that result in the disturbance of one or more acres of total land. In addition, a site-specific Storm Water Pollution Prevention Plan (SWPPP) would be developed for construction and demolition activities. The OKARNG would comply with the terms of the permit and implement standard BMPs to protect water quality during construction and demolition activities as discussed above. In addition, a site-specific SWPPP will be developed for construction activities. The plan will include all phases of construction and identify the location and scale of E&S controls. The plan will be maintained on-site during construction and demolition. The OKARNG will conduct periodic visual inspections to verify that the E&S Control Plan is being followed and is working. Long-term surface water protection during operation of the facilities would be accomplished by implementing storm water BMPs, maintaining vegetative cover, the site-specific Facility Response Plan (FRP), and the OKARNG Environmental SOP.

Biological Resources. The OKARNG will limit ground-disturbing activities at the proposed Ardmore RC Site to the maximum extent feasible. Native plant species will be used to the maximum extent practicable when revegetating land disturbed by construction and demolition.

Cultural Resources. Should archaeological materials or human remains be inadvertently discovered during construction activities, all work will cease immediately and the OKARNG Integrated Cultural Resources Management Plan (ICRMP) SOP No. 5 would be followed (OKARNG 2010a).

Public Health and Safety. The OKARNG will establish strict procedures which limit access to potentially hazardous areas to avoid public health or safety threat. No explosives or large quantities of hazardous materials will be kept on-site. Military vehicles and equipment will be stored in a fenced, secure area to prevent access by children and unauthorized persons.

HTMW. During construction and operation of the proposed Ardmore RC, all hazardous and toxic substances that would be used or generated will be handled and disposed of in compliance with the OKARNG Environmental SOP. During the demolition of the condemned Ardmore RC building, the OKARNG will follow all applicable laws, regulations and Army Policy pertaining to the handling and

disposal of mold-containing materials, lead-based paint, asbestos-containing materials, fluorescent light fixtures, or other material requiring special handling.

AGENCY AND PUBLIC INVOLVEMENT

Federal agencies consulted for this EA include the US Army Corps of Engineers (USACE), US Environmental Protection Agency (USEPA), US Fish and Wildlife Service (USFWS), US Geological Survey (USGS), and US Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). State agencies that were contacted include the Oklahoma Archeological Survey (OAS); Oklahoma Department of Agriculture, Food, and Forestry; ODEQ; Oklahoma Department of Transportation; Oklahoma Department of Wildlife Conservation (ODWC); Oklahoma Historical Society (OHS); and the Oklahoma Natural Heritage Inventory. Several local entities/stakeholders were also contacted that include City of Ardmore, Oklahoma Gas & Electric (OGE) Energy Resources, Oklahoma Natural Gas Company, and the City of Poteau. Agency information and comments have been incorporated into this EA. Copies of relevant correspondence can be found in **Appendix A.**

The OKARNG is consulting with federally recognized Native American tribes as required under Department of Defense Instruction (DoDI) 4710.02. The OKARNG has considered the *Annotated DoD American Indian and Alaska Native Policy*, Executive Order (EO) 13175, and AR 200-1. **Section 9** contains a list of the federally recognized tribes that were invited to consult. A Memorandum for Record (MFR) that summarizes these consultation efforts is included in **Appendix A**.

The OKARNG, as the proponent of the Proposed Action, will publish and distribute the final EA and draft Finding of No Significant Impact (FNSI) for a 30-day public review and comment period, as announced by a Notice of Availability (NOA) published in *The Daily Ardmoreite* and *Poteau Daily News*. Review copies will also be made available for public review at the Ardmore Public Library. Throughout this process, the public may obtain information on the status and progress of the EA through the Oklahoma National Guard Public Affairs Office at (405) 228-5158.

CONCLUSIONS

The evaluation performed within this EA concludes that there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life as a result of implementing the Preferred Action Alternative, provided standard BMPs specified in this EA are implemented. This EA's analysis determines, therefore, an Environmental Impact Statement (EIS) is unnecessary for implementing the Proposed Action, and that a FNSI is appropriate. The Preferred Action Alternative was determined by the OKARNG to provide the best combination of land and resources to sustain quality military training and to maintain and improve the units' readiness postures. The No Action Alternative was not found to satisfy the purpose of and need for the Proposed Action. This alternative would limit the capability of the OKARNG to carry out its assigned mission to provide adequate training facilities, and would jeopardize the proficiency and military readiness of the OKARNG. As such, this EA recommends implementation of the Preferred Action Alternative.

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ACRONYMS AND ABBREVIATIONS

°F	degrees Fahrenheit
1-180th	1st Squadron, 180th
700 BSB	700th Brigade Support Battalion
ABC	American Bird Conservancy
ADA	Ardmore Development Authority
ADNL	Day-Night Average Sound Level
AFRC	Armed Forces Reserve Center
APE	Area of Potential Effect
AR	Army Regulation
ARNG	Army National Guard
ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc.
ATFP	Anti-Terrorism Force Protection
BMP	Best Management Practice
Cav Reg	Cavalry Regiment
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CJC	CJC Architects, Inc.
Co	Company
CO	carbon monoxide
CWA	Clean Water Act
DA	Department of the Army
dB	decibel
dBA	A-scale decibel
dBP	peak sound level
DoD	Department of Defense
DoDI	Department of Defense Instruction
E&S	Erosion and Sedimentation
EA	Environmental Assessment
ECOP	Environmental Condition of Property
EIS	Environmental Impact Statement
EO	Executive Order
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FICON	Federal Interagency Committee on Noise
FICUN	Federal Interagency Committee on Urban Noise
FNSI	Finding of No Significant Impact
FRP	Facility Response Plan
ft amsl	feet above mean sea level
FY	Fiscal Year
HEMTT	Expanded-Mobility Tactical Truck
HHT	Headquarters Troop
HMMWV	High-Mobility Multipurpose Wheeled Vehicle
HRI	Hickory Ridge Addition
HTMW	Hazardous and Toxic Materials and Waste
HUC	Hydrologic Unit Code
Hz	Hertz
IBCT	Infantry Brigade Combat Team
ICRMP	Integrated Cultural Resources Management Plan
IDT	Inactive Duty Training
IICEP	Interagency and Intergovernmental Coordination for Environmental Planning
JD	Jurisdictional Determination
LEED	Leadership in Energy and Environmental Design
MBTA	Migratory Bird Treaty Act
MFR	Memorandum for Record
MILCON	Military Construction
MOU	Memorandum of Understanding
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act of 1969
NGB	National Guard Bureau
NG Pam	National Guard Pamphlet
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NO_x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRCS	Natural Resources Conservation Service

NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O_3	ozone
OAS	Oklahoma Archeological Survey
OCS	Oklahoma Climatological Survey
ODEQ	Oklahoma Department of Environmental Quality
ODWC	Oklahoma Department of Wildlife Conservation
OESC	Oklahoma Employment Security Commission
OGE	Oklahoma Gas & Electric
OGS	Oklahoma Geological Society
OHS	Oklahoma Historical Society
OK	Oklahoma
OKARNG	Oklahoma Army National Guard
OKESFO	Oklahoma Ecological Services Field Office
OMD	Oklahoma Military Department
ONMP	Operational Noise Management Plan
OSHA	Occupational Safety and Health Administration
Pb	lead
PCB	polychlorinated biphenyl
PLS	Palletized Load System
PM	particulate matter
$PM_{2.5}$	PM with aerodynamic size less than or equal to 2.5 micrometers
PM_{10}	PM with aerodynamic size less than or equal to 10 micrometers
POV	privately owned vehicles
RC	Readiness Center
REC	Record of Environmental Consideration
ROI	Region of Influence
SF	Square feet
SHPO	State Historic Preservation Office
SO_2	sulfur dioxide
SOP	Standard Operating Procedure
SWPPP	Storm Water Pollution Prevention Plan
TX	Texas
UFC	Unified Facilities Criteria
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	US Green Building Council
USGS	United States Geological Survey
VOC	Volatile Organic Compound

SECTION 1: PURPOSE OF AND NEED FOR THE PROPOSED ACTION

1.1 Introduction

This Environmental Assessment (EA) evaluates the proposal by the National Guard Bureau (NGB) and Oklahoma Army National Guard (OKARNG) to construct and operate a Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, Carter and Le Flore Counties, OK (see **Figures 1-3**). The proposed Ardmore RC would house OKARNG units and equipment. The proposed Ardmore RC is a Fiscal Year (FY) 2017 Military Construction (MILCON) project (Project Number 400601).

The Proposed Action would provide the necessary training and administrative capacity to meet OKARNG's mission and to properly support the following four units within the 45th Infantry Brigade Combat Team (IBCT): (1) Headquarters, Headquarters Troop (HHT), 1st Squadron 180th (1-180th) Cavalry Regiment (Cav Reg); (2) Company (Co) D, 700th Brigade Support Battalion (700 BSB); (3) Troop B/180th Cav Reg; and (4) Troop C/1-180th Cav Reg. The first two units are currently located at the McAlester Armed Forces Reserve Center (AFRC), the third at the Poteau RC, and the fourth at the existing Ardmore RC. All four units would be re-stationed under the Proposed Action to new locations. HHT 1-180th Cav Reg, Co D/700 BSB, and Troop B/180th Cav Reg would be relocated into the proposed Ardmore RC, while Troop C/1-180th Cav Reg would be relocated to the McAlester AFRC once the proposed RC is constructed.

The Poteau RC was originally built in 1954, and does not comply with current space allowances in accordance with National Guard Pamphlet (NG Pam) 415-12, *Army National Guard Facilities* (NGB 2011), and cannot be expanded because it is landlocked by facilities and operations associated with Carl Albert State College. Facilities at this property would be vacated by the OKARNG and transferred to a county, city, or state entity as an element of the overall Proposed Action. In addition, under the Proposed Action, the existing Ardmore RC (built in 1985) would be demolished and the property returned to the City of Ardmore. This existing RC is uninhabitable and has been condemned due to health and safety issues resulting from water penetration, foundation damage, and mold. Troop C/1-180th Cav Reg is currently using two portable buildings of insufficient size for their administrative space and a portable vault for storage of weapons adjacent to the condemned structure in lieu of the RC.

This EA has been prepared under the provisions of and in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 US Code [USC] §4321 *et seq.*), *Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA* (40 Code of Federal Regulations [CFR] Parts 1500-1508), 32 CFR Part 651, and 2011 *Army National Guard (ARNG) NEPA Handbook, Guidance on Preparing Environmental Documentation for ARNG Actions in Compliance with the National Environmental Policy Act of 1969* (ARNG 2011a). This EA will facilitate the decision-making process regarding the Proposed Action and its alternatives considered by the OKARNG.

1.2 Purpose and Need

The *purpose* of the Proposed Action is to provide the OKARNG with a facility of sufficient size and modern design within south-central Oklahoma to effectively achieve and maintain mission requirements and requisite mobilization readiness levels for the assigned units in accordance with Department of the Army (DA) and State of Oklahoma requirements. The Proposed Action is *needed* to address a shortfall in available and suitable administrative, training, storage, military equipment and privately owned vehicle (POV) parking and maintenance space within south-central Oklahoma as set forth in NG Pam 415-12 (NGB 2011), and Anti-Terrorism Force Protection (ATFP) setback requirements outlined in Unified Facilities Criteria (UFC) 4-010-01, *Department of Defense (DoD) Minimum Antiterrorism Standards for Buildings* (2013). The RC is needed to house all elements of the HHT 1-180th Cav Reg, Troop B/180th Cav Reg, and Co D 700 BSB from McAlester and Poteau, OK. These units have a combined required strength of 314 personnel. The proposed space would allow personnel to perform the necessary training and tasks to maintain and improve the units' readiness postures. Unit re-stationing would be conducted in compliance with Amy Regulation (AR) 5-10 *Stationing* (DA 2010).

HHT 1-180th Cav Reg and Co D 700 BSB are currently stationed at the McAlester AFRC. Based on space and facility requirements of the two assigned units, the McAlester AFRC lacks adequate administration, storage, parking, and classroom space. Troop B/180th Cav Reg is stationed at the Poteau RC. This facility is approximately 60 years old and lacks adequate parking for any of OKARNG's units. The Poteau RC also has foundation issues, a lack of fire protection, inadequate storage for assigned weapons, no Class V vault door, and poor ventilation in the supply room. The property is landlocked by the Carl Albert State College with no opportunity for expansion.

The existing 26,414-square foot (SF) Ardmore RC, built in 1985, was condemned due to water penetration, foundation damage, and mold. As a result, Troop C/1-180th Cav Reg has been using two 1,600 SF portable buildings for administrative space and a portable weapons vault. Consequently, the existing facilities are lacking in adequate space for administrative, storage, training, maintenance, and parking for the assigned unit. This property also lacks proper fencing, lighting, and standoff distances in accordance with ATFP standards, and directly abuts the Ardmore Regional Park; thus, Soldiers and military property are at risk. The demolition of the existing structure is necessary because it is considered a human health and safety hazard. Remodeling options were evaluated but would not gain any additional space and ultimately were not deemed cost effective.

Furthermore, as a result of issues associated with the existing Ardmore RC and an overall lack of facility space at other existing RCs, south-central Oklahoma has been without an adequate facility to support civilian authorities and recruit the next generation into the military service. During this time, two major winter storm events occurred that required the OKARNG to clear I-35 of stranded motorists. These operations were hindered by a lack of this type of facility in the region. In addition, this area does not have an acceptable place of refuge for its citizens during times of emergency.

If administrative, storage, and training areas continue to be limited, units will have to travel to other locations to meet training requirements, such as Fort Sill or Camp Gruber Training Site (approximately 110 and 200 miles from Ardmore, respectively). Department of Defense Instruction (DoDI) 1215.13, *Reserve Component Member Participation Policy* (2009), establishes requirements for the maximum

distance an Inactive Duty Training (IDT; weekend) troops may be required to travel involuntarily between their residence and the IDT site. These distances are:

1) A 100-mile radius of the IDT site or a distance that may be traveled by automobile under average conditions of traffic, weather, and roads in 3 hours. This applies only to those units that normally do four IDT sessions on two consecutive days and where government meals and quarters are provided.

2) A 50-mile radius of the IDT site or a distance that may be traveled by automobile under average conditions of traffic, weather, and roads in a 1.5-hour period, where government meals and quarters are not provided at the unit IDT site.

1.3 Scope of the EA

This EA evaluates the potential direct, indirect, and cumulative environmental, cultural, socioeconomic, and physical effects of implementing the Proposed Action and reasonable alternatives to that scenario. A detailed description of the Proposed Action is provided in **Section 2.2**. The OKARNG developed 12 screening criteria (described in **Section 2.3.1**) to identify potential sites/facilities that would meet the *purpose of* and *need for* the Proposed Action. Alternatives were eliminated from further consideration when they did not meet one or more of the screening criteria (see **Section 2.3.3**). After an examination of the existing OKARNG facilities and properties within south-central Oklahoma, the OKARNG identified that the property located in northwestern Ardmore, OK met all of the selection criteria. In accordance with NEPA and CEQ Regulations, this EA considers two alternatives for implementing the Proposed Action:

- Preferred Action Alternative – Implement the Proposed Action by constructing and operating the proposed Ardmore RC, re-stationing OKARNG units, demolishing the existing RC in Ardmore, and transferring the RC in Poteau, OK, as described in **Section 2.2**, to fulfill the assigned mission and space requirements of the units in the 45th IBCT.

- No Action Alternative – Continue with operations as currently conducted and do not implement the Proposed Action.

Resource categories described in **Section 3** and evaluated in **Section 4** include: land use; air quality; noise; topography, geology, and soils; water resources, including surface and groundwater; biological resources, including vegetation, wildlife, protected species, and wetlands; cultural resources; socioeconomics, including children's health and safety risks and environmental justice; infrastructure; and hazardous and toxic materials and wastes (HTMW). This EA also considers the cumulative effects of other past, present, and reasonably foreseeable actions within the Proposed Action's Region of Influence (ROI). This ROI includes the City of Ardmore, City of Poteau, and Carter County. Meaningful effects beyond this ROI would not be anticipated, based on the nature and scope of the Proposed Action and the considered reasonable range of alternatives.

As specified under NEPA and CEQ regulations, a monetary cost-benefit analysis is not required as part of the EA. The Proposed Action and its alternatives have been developed based on military training needs and mission requirements. As such, no quantitative financial assessment has been performed as part of

this EA. However, economic factors that result in socioeconomic impacts to the ROI are addressed in this document, as required under NEPA.

1.4 Decision-making

As described in 32 CFR Part 651.5, the NEPA process is intended to provide the Army's planners and decision-makers with a meaningful review of environmental considerations associated with a given action. The analysis set forth in this EA allows the decision-makers to carefully balance the protection of these environmental resources while fulfilling the Army's essential role, including national defense. Both environmental staff and military personnel within the OKARNG were consulted and provided guidance on the development of this EA.

Per amendments to 10 USC §10501, described in DoD Directive 5105.77 (21 May 2008), the NGB is a joint activity of the DoD. NGB serves as a channel of communication and funding between the US Army and state Guard organizations in the 54 US states and territories. The ARNG is a Directorate within NGB. The ARNG's Environmental Programs Division is the division within ARNG that is responsible for environmental matters, including compliance with the NEPA. As ARNG is the federal decision-maker concerning this Proposed Action and controls the federal funds that would be used for its implementation, this is a federal Proposed Action. The federal decision-making on the part of the ARNG includes selecting an alternative to implement, and identifying the actions that the Government will commit to undertake to minimize environmental effects, as required under the NEPA, CEQ Regulations, and 32 CFR Part 651.

1.5 Public and Agency Involvement

The OKARNG invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision-making on the Proposed Action is guided by 32 CFR Part 651, the Army's policy for implementing NEPA. Consideration of the views of and information provided by all interested persons promotes open communication and enables better decision-making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action, including minority, low-income, disadvantaged, and Native American groups, are encouraged to participate. A record of public involvement, agency coordination, and Native American consultation associated with this EA is provided in **Appendix A**. Refer to **Section 9** for a complete list of agencies and individuals consulted in support of analyses conducted during preparation of the EA.

1.5.1 Public Review

The OKARNG, as the proponent of the Proposed Action, will publish and distribute the Final EA and draft Finding of No Significant Impact (FNSI) for a 30-day public review and comment period, as announced by a Notice of Availability (NOA) published in *The Daily Ardmoreite* and *Poteau Daily News*. Review copies will also be made available for public review at the Ardmore Public Library in Ardmore, OK and Patrick Lynch Public Library in Poteau, OK. The Oklahoma National Guard Public Affairs Officer will be responsible for reviewing notices for distribution within the local newspaper, and will be the primary contact for local news media inquiries. The OKARNG environmental office will be responsible for receiving comments submitted during the 30-day public comment period. If it is determined implementation of the Proposed Action would result in significant impacts, the OKARNG will either not

implement this action as proposed, or will publish in the *Federal Register* a Notice of Intent to prepare an Environmental Impact Statement (EIS). Throughout this process, the public may obtain information on the status and progress of the EA through the Oklahoma National Guard Public Affairs Office at (405) 228-5158.

1.5.2 Agency Coordination

Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) is a federally mandated process for informing and coordinating with other governmental agencies regarding federal Proposed Actions. CEQ regulations require intergovernmental notifications prior to making any detailed statement of environmental impacts. Through the IICEP process, the OKARNG notifies relevant federal, state, and local agencies and allows them sufficient time to make known their environmental concerns specific to a Proposed Action. Comments and concerns submitted by these agencies during the IICEP process are subsequently incorporated into the analysis of potential environmental impacts conducted as part of the EA. This coordination fulfills requirements under Executive Order (EO) 12372 (*Intergovernmental Review of Federal Programs*; superseded by EO 12416, and subsequently supplemented by EO 13132), which requires federal agencies to cooperate with and consider state and local views in implementing a federal proposal. It also constitutes the IICEP process for this EA.

Agencies and local entities consulted for this EA include the US Army Corps of Engineers (USACE); US Fish and Wildlife Service (USFWS); US Environmental Protection Agency (USEPA); US Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS); US Geological Survey (USGS); Oklahoma Conservation Commission; Oklahoma Department of Wildlife Conservation (ODWC); Oklahoma State Historic Preservation Office (SHPO); Oklahoma Archeological Survey (OAS); Oklahoma Department of Environmental Quality (ODEQ); Oklahoma Department of Transportation; Oklahoma Department of Agriculture, Food, and Forestry; the City of Ardmore; City of Ardmore Planning Department; Carter County Planning Department; City of Poteau; and local utilities. Agency information and comments have been incorporated into this EA as appropriate. Copies of relevant correspondence can be found in **Appendix A.**

1.5.3 Native American Consultation/Coordination

The OKARNG is conducting consultation with federally recognized Native American tribes as required under DoDI 4710.02 (*DoD Interactions with Federally Recognized Tribes*), which implements the Annotated DoD American Indian and Alaska Native Policy (27 October 1999); AR 200-1, *Environmental Protection and Enhancement* (DA 2007); the National Historic Preservation Act (NHPA); and the Native American Graves Protection and Repatriation Act (NAGPRA). Tribes were invited to participate in the EA and NHPA Section 106 processes as Sovereign Nations per EO 13175 (*Consultation and Coordination with Indian Tribal Governments*). Based on the OKARNG's 2009 Integrated Cultural Resources Management Plan (ICRMP), six federally recognized Native American tribes are being consulted, including the Caddo Nation, Chickasaw Nation, Kialegee Tribal Town, Osage Nation, Seminole Nation of Oklahoma, and Wichita and Affiliated Tribes. All correspondence was conducted by certified letters. A copy of all correspondence and a Memorandum for Record (MFR), which summarizes the consultation efforts by the OKARNG, is included in **Appendix A**.

1.6 Related NEPA, Environmental, and Other Documents and Processes

The property proposed for RC development is currently owned by the State of Oklahoma. The following early planning level documents and studies have been conducted for the 46-acre development site in support of the preparation of this EA.

- *OKARNG Project Planning Document Charrette Report for AFRC in Ardmore, OK* (CJC Architects, Inc. [CJC] 2012)
- *Environmental Site Assessment for Ardmore Westport Industrial Park Site, Ardmore OK* (Oklahoma Military Department [OMD] 2011)
- *Archaeological Site Detection Survey of Approximately 227 Acres at Eleven OKARNG Readiness Centers/Support Facilities in Carter, Hughes, Oklahoma, Pontotoc and Tulsa Counties, OK* (Cole and Neel 2013)
- *ARNG Environmental Checklist and Record of Environmental Consideration (REC) for Ardmore AFRC and Field Maintenance Shop* (OMD 2012).

1.7 Regulatory Framework

This EA has been prepared under the provisions of, and in accordance with NEPA, CEQ Regulations, and 32 CFR Part 651. In addition, the document has been prepared as prescribed in the 2011 *ARNG NEPA Handbook, Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with the National Environmental Policy Act of 1969* (ARNG 2011a). A summary of regulations relevant to resource areas analyzed in this EA is included as **Appendix B**.

SECTION 2: DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

Implementation of the Proposed Action would provide a facility of sufficient size and modern design within south-central Oklahoma to efficiently achieve and maintain mission requirements and requisite mobilization readiness levels for the assigned units. **Section 2.2** provides a detailed description of the Proposed Action. The proposed Ardmore RC is a FY 2017 MILCON project (Project Number 400601).

NEPA, CEQ regulations, and 32 CFR Part 651 require all reasonable alternatives to be explored and objectively evaluated. This EA examines in-depth two alternatives, the Preferred Action Alternative and No Action Alternative, which are described in detail in **Section 2.3.2.** The development of alternatives and the screening criteria established are presented in **Section 2.3.1**. Alternatives were eliminated from further consideration when they did not meet one or more of the screening criteria (see **Section 2.3.3**).

2.2 Proposed Action

The Proposed Action includes three main elements: (1) construction and operation of the proposed Ardmore RC; (2) demolition of the existing Ardmore RC; and (3) transfer of the Poteau RC to a county, city, or state entity (see **Figures 2** and **3**). The following sections provide a detailed overview of these elements included in the Proposed Action. Best Management Practices (BMPs) associated with the Proposed Action are summarized in **Section 4.12**.

An Environmental Condition of Property (ECOP) investigation is required for all MILCON funded projects in accordance with American Society for Testing and Materials Standards, AR 200-1, and the 2011 *ARNG ECOP Handbook* (ARNG 2011b). ECOP investigations are required for MILCON actions to ensure protection of construction workers, staff, and Soldiers, and to ensure unforeseen cleanup costs and delays are avoided. ECOPs are typically valid for one year, but may be valid longer depending on site-specific issues and proposed activities. Under the Proposed Action, the OKARNG would conduct an ECOP prior to implementing this MILCON funded project.

2.2.1 Proposed Ardmore Readiness Center

2.2.1.1 Proposed Construction

Construction activities associated with the Proposed Action would include land use alterations throughout the approximately 46-acre project site located southwest of the intersection of Cooper Drive and Prairie Valley Road; this intersection is approximately 0.25 mile west of I-35 (Exit 33). The proposed building would be no more than three stories (approximately 36 feet high) and would include 85,904 SF of total facility space for OKARNG that would encompass an approximately 2-acre footprint. The proposed RC combined with the existing McAlester AFRC would provide approximately 68,563 SF more in indoor facility space than under current conditions for the four assigned 45th IBCT units. In addition to the proposed RC building itself, implementation of the project would include construction of up to 10 acres of various paved areas and support facilities. Support facilities include military equipment, POV parking, as well as sidewalks, lighting, a refuse collection facility, access roads, and fencing. Proposed facilities would provide the OKARNG units with adequate administrative, supply, classroom, locker, latrine,

kitchen, maintenance, training, and parking space (OKARNG 2014a). A conceptual layout of the proposed Ardmore RC is illustrated in **Figure 4**.

Physical security measures would be incorporated into design in accordance with UFC 4-010-01, and would include maximum feasible standoff distances from roads, parking areas, and vehicle unloading areas. Berms, landscaping, and bollards would be used for security, as appropriate.

Cost-effective, energy-conserving features will be incorporated into the RC's design, including energy management control systems and high efficiency motors, lighting, radiant floor heating, and Heating, Ventilating and Air-Conditioning systems. The proposed RC would be designed and constructed to Leadership in Energy and Environmental Design (LEED)[1] Silver standards, at a minimum.

Utilities to be provided under the Proposed Action would include water, sewer, electric, gas, and communication services. Utility lines for these services exist currently within or adjacent to the proposed development site. Only minor utility line extensions from the existing lines to the proposed facility would be required.

Construction of the proposed Ardmore RC is scheduled to begin in 2017 and be complete by 2019. During construction, a National Pollution Discharge Elimination System (NPDES) Storm Water General Permit for Construction Activities would be required from the ODEQ.

2.2.1.2 Proposed OKARNG Operations

The proposed Ardmore RC is projected to be used for normal administrative functions five days per week by the OKARNG. The OKARNG is also expected to conduct a two-day IDT assembly two or three times per month throughout the year. The proposed facility would support approximately 29 full-time and 314 part-time OKARNG personnel annually. The 29 full-time permanent employees would include 21 enlisted personnel, 3 officers, and 5 civilians. These permanent employees would support the 314 part-time or traditional OKARNG soldiers using the facility for training, including 281 enlisted personnel and 33 officers (OKARNG 2014a).

The assigned units from the 45th IBCT would carry out the OKARNG's mission at the proposed Ardmore RC. The OKARNG has the following federal and state missions:

- The federal role is to maintain properly trained and equipped units, available for prompt mobilization for war, national emergency, or as otherwise needed. The ARNG is a partner with the Active Army and the Army Reserves in fulfilling the country's military needs.
- The state role is to provide well-trained, fully qualified, and well-equipped personnel and units that are continually ready to support national military strategy, state requirements, and local community needs. OKARNG provides units and equipment to protect life and property, preserve

[1] The LEED Green Building Rating System™ is the nationally accepted benchmark for the design, construction, and operation of high performance green buildings. LEED gives building owners and operators the tools they need to have an immediate and measurable impact on their buildings' performance. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality.

peace and order, and ensure the public safety of Oklahoma's citizens as ordered by the Governor of Oklahoma (OKARNG 2014b).

Light training would occur at the RC, which could include basic weapons training using practice (i.e., inert) ordnance. No live fire activities would occur. Only light vehicle maintenance would occur on site, such as Preventative Maintenance Checks and Services, which include vehicle inspection and routine maintenance, such as adding oil or antifreeze to vehicles.

Parking for both military equipment and POVs would be available at the proposed RC. On average and for planning purposes, it was assumed that every person using the facility would drive their own POV to and from the site. Military equipment stored on-site would include 77 wheeled vehicles, 80 trailers, 12 vehicles of >30 feet (e.g., Heavy Expanded-Mobility Tactical Truck [HEMTT] or Palletized Load System [PLS] trailers), and 2 Mobile Fuel Tankers (OKARNG 2014a). Examples of the military equipment most likely to be present at the proposed Ardmore RC are provided below.

High-Mobility Multipurpose Wheeled Vehicle (HMMWV) – The HMMWV is a light, highly mobile, diesel-powered, four-wheel-drive vehicle equipped with an automatic transmission. It entered service in 1985. The HMMWV can be configured to become a troop carrier, armament carrier, S250 shelter carrier, ambulance, missile carrier, and a scout vehicle. The M998 is the baseline vehicle for this series of 1 1/4-ton trucks, which are known as the HMMWV vehicles (DA 2010).

Heavy Expanded Mobility Tactical Truck (HEMTT) – The HEMTT provides transport capabilities for re-supply of combat vehicles and weapons systems. It entered service in 1982. There are five basic configurations of the HEMTT series trucks: M977 cargo truck with Materiel Handling Crane; M978 2,500-gallon fuel tanker; M985 cargo truck with Materiel Handling Crane; M983 tractor; and the M984 wrecker (DA 2010).

Palletized Load System (PLS) – The PLS performs line haul, local haul, unit resupply, and other missions in the tactical environment to support modernized and highly mobile combat units. Rapid movement of combat configured loads of ammunition and all classes of supply, shelters, and containers. It entered service in 1993 (DA 2010).

2.2.2 Closure of Legacy Facilities

The Proposed Action includes the demolition of the existing Ardmore RC and the transfer of the Poteau RC to a county, city, or state entity. Section F-37 of AR 415-15, *Army Military Construction and Non-appropriated Funded Construction Program Development and Execution* (DA 2006), requires disposal of 1 SF of existing facilities to offset each 1 SF of new construction added to Army installations. The

Proposed Action would comply with this requirement through the disposal of 88,059 SF (while new construction for OKARNG would total 85,904 SF).

2.2.2.1 Demolition of Existing Ardmore RC

The existing Ardmore RC was built in 1985 and is currently uninhabitable and condemned due to water penetration and foundation damage. The structure to be demolished also contains mold and may contain lead-based paint, asbestos-containing materials, polychlorinated biphenyls (PCBs), or other material requiring special handling. Special handling and disposal requirements may be required during demolition. The OKARNG will evaluate all potential hazards and follow the applicable laws, regulations, and Army policy pertaining to the special handling and disposal of these materials when necessary. Once the existing Ardmore RC is demolished, the property on which it is currently located would be returned to the City of Ardmore in accordance with the reversionary clause in the deed.

The Poteau RC, built in 1954, would be vacated and transferred once Troop B/180th Cav Reg moves out of the facility and into the proposed Ardmore RC. The OKARNG will transfer this property over to a county, city, or state entity in accordance with the deed for this property.

2.3 Alternatives Considered

NEPA, CEQ regulations, and 32 CFR Part 651 require all reasonable alternatives to be explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified along with a brief summary of the reasons for their dismissal. For purposes of analysis, an alternative was considered “reasonable” only if it would enable the OKARNG to accomplish the primary mission of providing land, facilities, and resources within south-central Oklahoma to meet the purpose of and need for the Proposed Action. “Unreasonable” alternatives would not enable the OKARNG to meet the purpose of and need for the Proposed Action.

2.3.1 Alternatives Development (Screening Criteria)

The OKARNG developed and applied the following criteria to screen and evaluate possible sites that would meet the purpose of and need for the Proposed Action. The OKARNG identified that a suitable site must meet the following criteria:

1) Have a sufficient amount of land, preferably previously disturbed or cleared, to accommodate the proposed units, as well as all required space and facilities to allow attainment of required mobilization readiness levels
2) Avoid land acquisition costs
3) Have high visibility within the community
4) Have support from the community
5) Be located adjacent to a major interstate or highway with easy access to the interstate
6) Be located in a south-central Oklahoma community that does not hinder state emergency response capabilities

7) Be suitable for construction of the proposed facilities and have limited to no constraints to development (e.g., proximate to existing utilities)
8) Be located at a site where the potential for future encroachment is minimized or avoided
9) Be located at a site compatible with other current and approved future land uses in the area, and that is compatible with current local planning development vision and zoning
10) Be located on a site with few existing known environmental constraints, notably wetlands, forested areas, or cultural resources
11) Ensure no net loss in the capacity of the OKARNG or the assigned units to support the military mission.

After an examination of the existing OKARNG facilities and properties within south-central Oklahoma, the OKARNG identified that the property located adjacent to I-35 (Exit 33) in northwestern Ardmore, OK met all of the selection criteria needed to support the HHT 1-180th Cav Reg, Troop B/180th Cav Reg, and Co D 700 BSB. For more detailed information on other alternatives screened during this process, refer to **Section 2.3.3**. Implementation of the Proposed Action identified in **Section 2.2** has been determined by the OKARNG to be the Preferred Action Alternative. The No Action Alternative is also evaluated, as required by CEQ regulations.

2.3.2 Evaluated Alternatives

2.3.2.1 Preferred Action Alternative

Under this alternative, the construction and operation of the proposed RC in Ardmore, OK (and associated unit re-stationing), as identified in **Section 2.2**, would be implemented. This is the OKARNG's Preferred Action Alternative because it best meets the screening criteria set forth in **Section 2.3.1**. It effectively provides the best combination of land and resources to sustain quality military training and to maintain and improve the units' readiness postures. The 46-acre property in Ardmore, OK provides many advantages, including:

- Ample space/acreage for the assigned units, including their facilities and equipment
- No land acquisition costs
- Located within a south-central Oklahoma community that has historically been and continues to be supportive of the military
- Adjacent to I-35 with good visibility and site access for assigned units and emergency response personnel
- Limited to no constraints for construction of a RC (e.g., utilities would be readily accessible)
- Limited to no concerns associated with future encroachment
- Compatible with current and future land uses and local planning development and zoning
- Located in an area with few environmental concerns
- Complies with NG Pam 415-12 and ATFP requirements as well as industry standards and building codes.

2.3.2.2 No Action Alternative

While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, this alternative was retained to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required in the CEQ Regulations (40 CFR Part 1502.14). The No Action Alternative reflects the status quo and serves as a benchmark against which the effects of the Proposed Action can be evaluated. With selection of the No Action Alternative, the RC in Ardmore, OK would not be constructed and current operations would continue.

Under this alternative, the four units within the 45th IBCT would remain in their existing deficient facilities in Ardmore, McAlester, and Poteau, OK. These facilities lack adequate storage, parking, administrative, and training space; provide no room for expansion; and require extensive upgrades due to age or health and safety hazards. The ability of these units to meet their training objectives would continue to be compromised due to poor training facilities and lack of adequate functional space, and mobilization readiness levels would continue to decline. The overall readiness of the OKARNG would continue to be threatened as these units could become a non-mobilization asset. In addition, the citizens of south-central Oklahoma would continue to lack a place of refuge, and emergency operations would continue to be hampered during emergency response activities (e.g., storm events).

The four units require a combined square footage of 99,131 of building space per NG Pam 415-12. The existing facilities in Ardmore, McAlester, and Poteau that are currently housing these units comprise a total of 30,568 SF, leaving a deficiency of 68,563 SF. Due to facility space constraints, the assigned OKARNG units would continue to be forced to move training operations to other locations (e.g., Fort Sill or Camp Gruber) and lose valuable training time in transit to these areas as well as increased expense during a time of constrained training resources.

2.3.3 Alternatives Eliminated From Further Consideration

Alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered “unreasonable” if it would not enable the OKARNG to meet the purpose of and need for the Proposed Action. The OKARNG considered the following alternatives: (1) implement a reduced-scale alternative; (2) use an existing local surplus building; (3) use an existing DA facility in south-central Oklahoma; (4) purchase a new tract of land; (5) construct proposed Ardmore RC at existing location; (6) construct RC at another location in south-central Oklahoma; and (7) construct RC at another location in the City of Ardmore. These alternatives were eliminated from further consideration because they did not meet one or more of the screening criteria included in **Section 2.3.1**, and summarized in **Table 1**. For additional information on eliminated alternatives, refer to **Sections 2.3.3.1** through **2.3.3.7**.

Table 1. Summary of Alternatives Eliminated from Further Consideration

Screening Criteria (see Section 2.3.1)		Alternatives Eliminated and the Screening Criteria that Would *Not* Be Met						
		Implement reduced-scale alternative	Use of existing local surplus building	Use of existing DA facility in south-central Oklahoma	Purchase new tract of land	Construct proposed Ardmore RC at existing location	Construct RC at another location in south-central Oklahoma	Construct RC at another location in the City of Ardmore
		Section 2.3.3.1	Section 2.3.3.2	Section 2.3.3.3	Section 2.3.3.4	Section 2.3.3.5	Section 2.3.3.6	Section 2.3.3.7
1	Have a sufficient amount of land, preferably previously disturbed or cleared, to accommodate the proposed units, as well as all required space and facilities	✓		✓		✓		
2	Avoid land acquisition costs		✓		✓			
3	Have high visibility within the community							✓
4	Have support from the community							
5	Be located adjacent to a major interstate or highway with easy access to the interstate							✓
6	Be located in a south-central Oklahoma community that does not hinder state emergency response capabilities						✓	
7	Be suitable for construction of the proposed facilities and have limited to no constraints to development					✓		

Table 1. Summary of Alternatives Eliminated from Further Consideration

Screening Criteria (see Section 2.3.1)		Alternatives Eliminated and the Screening Criteria that Would *Not* Be Met						
		Implement reduced-scale alternative	Use of existing local surplus building	Use of existing DA facility in south-central Oklahoma	Purchase new tract of land	Construct proposed Ardmore RC at existing location	Construct RC at another location in south-central Oklahoma	Construct RC at another location in the City of Ardmore
		Section 2.3.3.1	Section 2.3.3.2	Section 2.3.3.3	Section 2.3.3.4	Section 2.3.3.5	Section 2.3.3.6	Section 2.3.3.7
8	Be located at a site where the potential for future encroachment is minimized or avoided					✓		
9	Be located at a site compatible with other current and approved future land uses in the area, and that is compatible with current local planning development vision and zoning					✓		
10	Be located on a site with few existing known environmental constraints, notably wetlands, forested areas, or cultural resources					✓		
11	Ensure no net loss in the capacity of the OKARNG or the assigned units to support the military mission	✓		✓		✓	✓	✓

2.3.3.1 Reduced-scale Alternative

The potential for a reduced-scale alternative was considered and evaluated by the OKARNG. The Preferred Action Alternative represents the optimum, and minimum, facility development proposal necessary to meet the purpose of and need for the Proposed Action. The OKARNG determined that there are no nonessential components of the Proposed Action. For example, a smaller RC building or reduction in support facilities (e.g., less classrooms, lockers, parking) would not meet the space requirements for these units per NG Pam 415-12. Thus, the reduced-scale alternative does not meet Screening Criteria #1 or #11 in **Section 2.3.1**, and therefore was removed from further consideration.

2.3.3.2 Use an Existing Local Surplus Building

The potential of using an existing local surplus building was considered; however, no surplus buildings were identified as available. Furthermore, this alternative was determined unsatisfactory because it would be less cost effective in comparison to the Preferred Action Alternative. To meet all requirements would be significant and the expense of remodeling and property acquisition would be cost prohibitive. As such, this alternative did not meet Screening Criteria #2 in **Section 2.3.1**, and was not evaluated further.

2.3.3.3 Use an Existing DA Facility in South-Central Oklahoma

A reasonable alternative would be to utilize an existing DA facility and/or expand upon one located in south-central Oklahoma. All existing facilities in the area were surveyed and none of them could adequately house these units and their equipment, or be expanded to meet the screening criteria outlined in **Section 2.3.1**. The following facilities were examined: US Army Reserve Center in Ardmore, OK (8 miles from proposed project location), Durant RC (53 miles), Ada RC (62 miles), McAlester AFRC (120 miles), and Poteau RC (180 miles). The use of an existing DA facility as an alternative to the Preferred Action Alternative was eliminated from further consideration because it would not meet Screening Criteria #1 or #11 as outlined in **Section 2.3.1**.

2.3.3.4 Purchase New Tract of Land

The alternative to purchase a new tract of land within south-central Oklahoma for the construction of the RC would be less cost effective in comparison to the Preferred Action Alternative because the cost of property acquisition would be incurred in addition to the cost of constructing a new facility. As such, this scenario was not evaluated as a feasible alternative because it does not meet Screening Criteria #2 as outlined in **Section 2.3.1**.

2.3.3.5 Construct Proposed Ardmore RC at Existing Location

The potential to demolish the existing RC and construct the proposed facility at the same location was evaluated. The existing RC is located on a parcel comprising approximately 10 acres of land, with only 7.8 acres of usable land available due to utilities-related constraints. The property is not large enough to accommodate the required administrative, storage, training, maintenance and parking areas as set forth in NG Pam 415-12, or the necessary security and ATFP standards per UFC 4-010-01. Furthermore, this site is landlocked by the Ardmore Regional Park, which is located directly adjacent to the OKARNG property. Construction at this site would require demolition of the existing facility. In addition, this property has poor drainage due site topography and the nearby waterway, as well as geotechnical issues that would need to be overcome. Thus, construction at this site was deemed cost prohibitive. This alternative

was eliminated from further consideration due to property size, environmental constraints, significant construction costs, and the site being landlocked, and therefore, does not satisfy Screening Criteria #1 or #7 – #11 as outlined in **Section 2.3.1**.

2.3.3.6 Alternate Location in South-Central Oklahoma

The potential to construct the RC on a property in Pauls Valley, which is approximately 45 miles north of the existing Ardmore RC, was also considered. However, it was deemed to be an unsuitable location because state emergency response capabilities would be hindered during inclement weather events that could render the Arbuckle Mountain range impassable. The Arbuckle Mountains are a mountain range in south-central Oklahoma that are located between Ardmore and Pauls Valley within Murray, Carter, Pontotoc and Johnston Counties. The Pauls Valley alternative does not meet Screening Criteria #6 or #11, as outlined in **Section 2.3.1**, and therefore, it was removed from further consideration.

2.3.3.7 Alternate Location in the City of Ardmore

The Ardmore Development Authority (ADA) offered the OKARNG a property at no cost within the Ardmore Industrial Airpark, a former Air Force Base, which is situated 16 miles northeast of Ardmore. However, this property was not situated beside a major interstate nor did it provide easy access to one. This property was eliminated from further consideration because it does not meet Screening Criteria #3, #5, or #11, as outlined in **Section 2.3.1**.

2.3.4 Impacts Comparison Matrix for Proposed Alternatives

This EA evaluates the potential direct, indirect, and cumulative environmental, cultural, socioeconomic, and physical effects of two alternatives to implementing the construction of the proposed Ardmore RC, re-stationing of the four 45th IBCT units, and disposal of two legacy RCs. A comparison of the anticipated environmental consequences of these alternatives is provided in **Table 2**.

Table 2. Alternative Comparison Matrix

Technical Resource Area	No Action Alternative	Preferred Action Alternative
Land Use and Cover	No impact attributable to the OKARNG action. OKARNG's full readiness potential would continue to be limited and the facilities necessary to accommodate the mission would remain inadequate.	Long-term positive impacts to land use, the OKARNG mission, the Ardmore community and south-central Oklahoma from the construction of the proposed RC in Ardmore, OK. Aesthetic changes to the proposed Ardmore site's landscape would occur, but would result in a *less-than-significant adverse* impact. The proposed Ardmore RC would not cause land use restrictions, conflict with applicable local or regional land use management plans or local zoning ordinances, or foster changes in adjacent property land use. Short-term and long-term, *less-than-significant adverse* effects to land cover are anticipated. OKARNG would minimize clearing and earthwork to the maximum extent possible to minimize disturbance.

Table 2. Alternative Comparison Matrix

Technical Resource Area	No Action Alternative	Preferred Action Alternative
Air Quality	No impact attributable to the OKARNG action. Ongoing operations' emissions would continue.	Short-term, *less-than-significant adverse* impacts due to the potential for dust generation from construction activities and the proximity of sensitive receptors. Impacts would be reduced with implementation of standard BMPs. Long-term, *less-than-significant adverse* impacts to the local air quality due to increased site activities and vehicle traffic. Sustainable practices and technologies would be used to increase energy efficiency and reduce greenhouse gas emissions.
Noise	No impact attributable to the OKARNG action. Ongoing noise associated with the current Ardmore and Poteau facilities would continue.	Short-term, *less-than-significant adverse* impacts due to the potential for noise generation from construction activities and the proximity of sensitive receptors. Long-term, *less-than-significant adverse* impacts due to increased noise levels associated with proposed site usage and the proximity of sensitive receptors. Impacts would be reduced with implementation of BMPs.
Geology, Topography, and Soils	No impact attributable to the OKARNG action.	Short-term and long-term *less-than-significant adverse* impacts to soils from construction of the proposed Ardmore RC and demolition of the existing Ardmore RC. Impacts would be reduced with implementation of BMPs.
Water Resources	No impact attributable to the OKARNG action.	Potential short-term, *less-than-significant adverse* impacts to water quality during construction activities resulting in erosion and sedimentation, and long-term, *less-than-significant adverse* impacts from stormwater runoff during facility usage. Impacts would be reduced with implementation of BMPs.
Biological Resources	No impact attributable to the OKARNG action.	Short-term, *less-than-significant adverse* impacts to biological resources from construction noise and vegetation removal. Long-term, *less-than-significant adverse* impacts due to elimination of vegetation and wildlife habitat, which would be minor on a regional and local scale.
Cultural Resources	No impact attributable to the OKARNG action.	No effects to cultural resources are anticipated as a result of the Proposed Action. If an inadvertent discovery of cultural resources is made during ground-disturbing activities, impacts would be reduced to *less-than-significant* levels with implementation of BMPs.

Table 2. Alternative Comparison Matrix

Technical Resource Area	No Action Alternative	Preferred Action Alternative
Socioeconomics (including Protection of Children)	No impact attributable to the OKARNG action. The OKARNG and the Ardmore region as a whole would not benefit from the use of the proposed facility, and would continue to use less than adequate facilities.	Short-term and long-term *less-than-significant beneficial* impacts to the local economy and Ardmore community from increased military spending and the construction of the proposed facility for use by the OKARNG and the community. No *significant adverse* impacts to public health and safety or children are anticipated. The OKARNG will establish strict procedures which limit access to potentially hazardous areas to avoid public health or safety threat. Indirect, *less-than-significant adverse* effects to the local economy in the City of Poteau due to the OKARNG vacating the Poteau RC. Impacts are anticipated to be negligible because the loss of full-time positions would be small and this facility would be transferred for use to another county, city, or state entity.
Environmental Justice	No impact attributable to the OKARNG action.	Short-term *minor positive* impacts would be expected as a result of minor increases in local employment.
Infrastructure	No impact attributable to the OKARNG action. OKARNG would continue to use the less than adequate existing Ardmore and Poteau facilities, and south-central Oklahoma would continue to lack a facility for civilians during emergency situations.	Short-term and long-term *less-than-significant adverse* impacts from construction and operation of the proposed Ardmore RC associated with utility extensions during construction, increased utility consumption during operation, and increased vehicle traffic.
HTMW	No impact attributable to the OKARNG action. The OKARNG Environmental Standard Operating Procedure (SOP) would continue to be implemented.	Short-term and long-term, *less-than-significant adverse* impacts due to construction activities and increased use of the Ardmore RC Site. Impacts would be controlled through BMPs and ongoing regulatory compliance.

SECTION 3: AFFECTED ENVIRONMENT

Per 40 CFR Part 1501.7 (a)(3), the CEQ recommends agencies identify and eliminate from detailed study any issues that are not significant or have been covered in another environmental review, narrowing the discussion to a brief presentation of why they will not have a significant effect on the human environment, or providing a reference to their coverage elsewhere. Therefore, this section specifically describes current baseline conditions within and in the vicinity of the existing and proposed Ardmore RC properties in Ardmore, Carter County, and where applicable the existing Poteau RC in Le Flore County (e.g., land use, socioeconomics, environmental justice), with emphasis on those resources that would be potentially affected by the implementation of the Proposed Action or its alternative. **Section 4**, Environmental Consequences, identifies potential direct, indirect, and cumulative effects of the identified project alternatives on each of the issue areas presented in this section. The reader is referred to **Appendix B** for an overview of the regulatory framework for each of the technical areas discussed in this section.

3.1 Site Location

The 46-acre site for the proposed Ardmore RC is located southwest of the intersection of Cooper Drive and East Prairie Valley Road; this intersection is approximately 0.25 mile west of I-35 (Exit 33). The property is currently owned by the State of Oklahoma. The proposed site is located in the City of Ardmore, Carter County, OK, and is approximately 100 miles south of Oklahoma City, OK and approximately 100 miles north of Dallas, Texas (TX). Current activities on this property include regular site maintenance (e.g., mowing).

The existing Ardmore RC is situated on an approximately 10-acre property located approximately 1 mile east of the proposed Ardmore RC Site at 2015 Veterans Boulevard (see **Figure 2**). Current activities include administrative operations during the week and IDT training during some weekends. Assigned units carry out OKARNG's state and federal missions, as described in **Section 2.2.1.2**.

The existing Poteau RC is located on a 2-acre parcel in Le Flore County, OK at 1505 South McKenna Street in the City of Poteau (see **Figure 3**). The Poteau RC property is approximately 160 miles west of the existing and proposed Ardmore RC locations. The site is approximately 12 miles west of the Oklahoma/Arkansas border and is approximately 33 miles southwest of Fort Smith, Arkansas. Further, the Ouachita National Forest is located 19 miles to the south. Current activities at this facilities are the same as the existing Ardmore RC described above.

The regional climate in Oklahoma is classified as humid subtropical because of the long hot summers and short mild winters. Moist air moving north from the Gulf of Mexico has a large influence on the region and results in greater humidity and precipitation compared to western portions of the state (Oklahoma Climatological Survey [OCS] 2014). In the winter, the average temperature is 46 degrees Fahrenheit (°F), and the average daily minimum temperature is 34°F. In the summer, the average daily temperature is 83°F, and the average daily maximum is 94°F. The area on average receives 39.07 inches of precipitation annually with 62 percent occurring between April and September (OCS 2015).

3.2 Land Use and Cover

Land use can be separated into two primary categories: natural and human modified. Natural land cover includes woodlands, rangeland, grasslands, and other open or undeveloped areas. Human-modified land use includes residential, commercial, industrial, communications and utilities, agricultural, institutional, recreational, and generally other areas developed from a natural land cover condition. Land use is regulated by management plans, policies, regulations, and ordinances (i.e., zoning) that determine the type and extent of land use allowable in specific areas and protect specially designated or environmentally sensitive areas.

3.2.1 Proposed Ardmore Site

The 46-acre site proposed for the Ardmore RC is comprised of undeveloped land, which is currently owned by the State of Oklahoma. According to historical records dating back to 1837, this property has been used for agricultural purposes in the past, but remains undeveloped to date (OMD 2011). The ADA acquired this parcel in 1994. In 2010, they transferred ownership of this parcel to the State of Oklahoma. Water, sewer, and natural gas lines are in utility easements located along the boundaries of the property. A high voltage power line also runs through the center of the property, and has a 50-foot easement associated with it.

Proposed 46-acre site for OKARNG Ardmore RC

Surface impoundment in the northeast portion of the property

The 46-acre parcel lies within the city limits of the City of Ardmore and is zoned for light industrial land use. The land to the north and south is zoned for light industrial use, and the land to the west and east is zoned for agricultural use and general commercial use, respectively (OMD 2011).

The proposed site is surrounded by industrial and commercial land use to the north, south, and east as well as rural single family homes and undeveloped land to the west (see **Figures 2 and 4**). Properties adjacent to the north of the proposed development site include a distribution facility, motorcycle repair business, and an equipment rental business. Properties adjacent to the east of the proposed site include a Flying J Travel Plaza/Fuel Station for automobiles and tractor trailers, an earth moving/agricultural equipment sales business, and a construction company. Properties adjacent to the south include a storage building for the Michelin Tire manufacturing plant and undeveloped land owned by the ADA.

Finally, the property adjacent to the west of the proposed development site is occupied by undeveloped land and a rural single family home.

3.2.2 Existing Ardmore RC

The existing Ardmore RC Site is comprised of the condemned RC building, open mowed grass areas, a few oak (*Quercus* spp.) trees used in landscaping, and asphalt parking areas. The 10-acre property also includes a 2-acre road easement along Veterans Boulevard. Portable buildings for administrative use, a portable weapons vault, and storage buildings are located on the northern portion of the site. A review of historic maps dating back to 1871 revealed that this area has been used for agriculture purposes in the past, but was developed in approximately 1978 (Cole and Neel 2013).

The existing Ardmore RC Site is also located within the city limits of the City of Ardmore and is zoned for public facilities and institutions. The land to the north and east is also zoned for public facilities and institutions, while the land to the west and south is zoned as agricultural and as a commercial corridor (i.e., Veterans Boulevard), respectively (OMD 2011).

View of existing Ardmore RC

View of buildings behind existing Ardmore RC

The existing Ardmore RC Site is bordered on the north and west by the Ardmore Regional Park. The Ardmore Regional Park offers a variety of recreational opportunities including a lake, disk miniature golf, softball complex, hiking, jogging, rollerblading trails, and a picnic area. More specifically, the northwest corner of the existing Ardmore RC Site sits immediately adjacent to a skate park that is part of Ardmore Regional Park. The southern portion of the property is bound by Veterans Boulevard, and the eastern boundary is adjacent to the Oklahoma Highway Patrol Troop F Headquarters and Driver License Services Division facilities (see **Figure 2**).

3.2.1 Existing Poteau RC

The 2-acre Poteau RC site was acquired by the State of Oklahoma on 19 February 1954. Construction of the Poteau RC was completed in 1955. The site consists of open landscaping, and both asphalt and gravel parking areas.

View of Poteau RC from northwest

View of Poteau RC from southwest

The Poteau RC property is also located within the city limits of the City of Poteau and is zoned for light-industrial use, and is consistent with the surrounding land use. The Poteau RC property is surrounded by the Carl Albert State College campus (see **Figure 3**). Properties surrounding the Poteau RC consist of similar landscaping with ornamental trees, parking areas, and many large multi-story buildings (Schenker et al. 2011). The northern and eastern boundary of the property is adjacent to college dormitories, while the southern and eastern boundaries are adjacent to the college business center and auditorium.

3.3 Air Quality

3.3.1 Ambient Air Quality

The ambient air quality in an area can be characterized in terms of whether or not it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The Clean Air Act (CAA), as amended requires the USEPA to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for six principal pollutants, called “criteria pollutants” (as listed under Section 108 of the CAA): carbon monoxide (CO); lead (Pb); nitrogen oxides (NO_x); ozone (O_3); particulate matter (PM), divided into two size classes of 1) aerodynamic size less than or equal to 10 micrometers (PM_{10}), and 2) aerodynamic size less than or equal to 2.5 micrometers ($PM_{2.5}$); and sulfur dioxide (SO_2). The General Conformity Rule (40 CFR Part 51, Subpart W) requires federal agencies to prepare written Conformity Determinations for federal actions in or affecting NAAQS in nonattainment areas, except when the action is covered under the Transportation Conformity Rule or when the action is exempted because the total increase in emissions is insignificant, or a *de minimis*.

The primary regulatory authority for air quality in Oklahoma is the ODEQ – Air Quality Division. All counties in the State of Oklahoma are designated in “attainment” for all NAAQS criteria pollutants (USEPA 2015a). Therefore, the procedural requirements of the General Conformity Provision of the CAA do not apply to the Proposed Action and no Conformity Determination is required.

Current emissions on the proposed and existing Ardmore RC Sites consist of ongoing site maintenance (e.g., mowing), use of portable facilities at the existing Ardmore RC Site, and nearby vehicle emissions along adjacent roadways and within nearby properties.

3.3.2 Sensitive Receptors

Sensitive receptors include, but are not limited to, asthmatics, children, and the elderly, as well as specific facilities, such as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, and childcare centers.

3.3.2.1 Proposed Ardmore RC Site

Sensitive receptors within 1 mile of the proposed Ardmore RC Site include some rural residences to the west. Additionally, the nearest school (Ardmore High School) is approximately 2 miles east of the proposed Ardmore RC Site. No other schools, hospitals, daycare facilities, nursing homes, or other sensitive receptors are located within 1 mile of the proposed Ardmore RC Site (see **Figures 2 and 4**). However, there is a residential area to the east of the proposed development site that is located within 1.5 miles of the eastern boundary of the proposed site. As discussed in **Section 3.2.1**, zoning within the vicinity of the proposed property includes incorporated areas zoned as light industrial/general commercial. Areas zoned for residential use within 1 mile of the subject property are located east of I-35.

3.3.2.2 Existing Ardmore RC Site

Sensitive receptors within 1 mile of the existing Ardmore RC include residential areas to the south and east, and Ardmore Regional Park to the north and west. The park includes a sports complex, hiking trails, and a skate park. The nearest school is also Ardmore High School located approximately 1.3 miles to the east of the existing Ardmore RC. No other schools, hospitals, daycare facilities, nursing homes, or other highly sensitive receptors are located within 1 mile of the existing Ardmore RC (see **Figures 2 and 4**).

3.4 Noise

3.4.1 Background

Noise is generally defined as unwanted sound. It can be any sound that is undesirable because it interferes with communications or other human activities, is intense enough to affect hearing, or is otherwise annoying. Noise may be intermittent or continuous, steady, or impulsive. Human response to noise varies, depending on the type of the noise, distance from the noise source, sensitivity, and time of day.

Land use guidelines identified by the Federal Interagency Committee on Urban Noise (FICUN) are used to determine compatible levels of noise exposure for land use planning and control (FICUN 1980). Chapter 14 of AR 200-1 implements federal regulations associated with operational noise from DA activities. The decibel (dB) is the accepted unit of measurement for noise level, and it uses a logarithmic scale. The A-scale decibel (dBA) is an adjusted dB that corresponds to the range of normal human hearing. One of the metrics used by the DA to quantify the noise environment at DA installations is peak sound level (dBP), which is the maximum instantaneous sound level of an event. The dBP is neither weighted nor time integrated, and is used to further define noise zones. Another metric used in defining noise zones is the Day-Night Average Sound Level (ADNL). The ADNL represents sound levels measured by totaling and averaging levels during a 24-hour period. People are usually more sensitive to sound levels at night based on low background sound levels; therefore, a 10 dB "penalty" is added to

operations occurring between the hours of 10:00 PM and 7:00 AM. Thus, one nighttime sound event is equivalent to 10 daytime events of the same level.

AR 200-1 Section 14-4 defines land use compatibility concerning operational noise for DA activities. A summary of expected noise levels for three general defined noise zones is presented in **Table 3**.

Table 3. Noise Limits for Land Use Compatibility

Noise Zone	Population Highly Annoyed	Noise Sensitive Land Use	Small Arms and Transportation ADNL	Small Arms Peak
Zone I	<15%	Acceptable	<65 dBA	<87 dBP
Zone II	15%-39%	Normally Not Recommended	65-75 dBA	87-104 dBP
Zone III	>39%	Not Recommended	>75 dBA	>104 dBP

3.4.2 Current Noise Environment

The Operational Noise Management Plan (ONMP) is the primary tool the ARNG uses to analyze noise impacts and land use compatibility. The ONMP includes noise contour footprints associated with operations taking into account both location and intensity. Management practices are then implemented to isolate and minimize noise based on findings within the ONMP (OKARNG 2010a).

The City of Ardmore does not have a specific noise control ordinance but has the authority to control noises if they become a public nuisance. Under the Ardmore Code of Ordinances Section 18-6, certain public nuisances are defined as “the continued making of loud or unusual noises which may annoy persons of ordinary sensibilities, or the keeping of an animal which makes such noises.”

3.4.2.1 Proposed Ardmore RC Site

The areas surrounding the proposed Ardmore RC Site include rural single family residences to the west, industrial areas to the north and south, and a residential development to the east. Most of the remaining population residing in rural or other non-urban areas is estimated to experience outdoor DNL values ranging between 30 and 50 dB (Federal Interagency Committee on Noise [FICON] 1992; USEPA 1974). Sensitive areas with respect to noise are the same as those listed for air quality (refer to **Section 3.3.2.1**). The predominant off-site source of ambient noise in the site vicinity includes roadway traffic and the routine operations of nearby businesses (refer to **Section 3.2.1**).

3.4.2.2 Existing Ardmore RC Site

The areas surrounding the existing Ardmore RC Site include public recreation areas to the north and west, commercial areas to the east and south, and residential areas to the southeast. Sensitive areas with respect to noise are the same as those listed for air quality (refer to **Section 3.3.2.2**). The predominant source of ambient noise in the vicinity of the existing Ardmore RC is local roadway traffic. Noise produced from the existing Ardmore RC is negligible relative to the surrounding uses and is not loud or consistent enough to generate noise contours. To date, no noise complaints have been documented for the existing Ardmore RC.

3.5 Topography, Geology, and Soils

Geological resources consist of surface and subsurface materials and their properties. Principal geologic factors influencing the ability to support structural development are seismic properties (i.e., potential for subsurface shifting, faulting, or crustal disturbance), soil stability, and topography.

Topography is the change in elevation over the surface of a land area. An area's topography is influenced by many factors, including human activity, underlying geologic material, seismic activity, climatic conditions, and erosion. A discussion of topography typically encompasses a description of surface elevations, slope, and distinct physiographic features (e.g., mountains) and their influence on human activities.

The term soil, in general, refers to unconsolidated materials overlying bedrock or other parent material. Soil structure, elasticity, strength, shrink-swell potential, and erodibility all determine the ability for the ground to support man-made structures. Soils typically are described in terms of their complex type, slope, physical characteristics, and relative compatibility or constraining properties with regard to particular construction activities and types of land use.

3.5.1 Regional and Local Geology and Topography

The existing Ardmore RC, as well as the proposed development site area, lies in the Osage Plains section of the Central Lowlands province of the Interior Plains physiographic region. The Osage Plains formed during the Cretaceous period when a shallow continental sea covered the area, depositing carbonate rocks (Oklahoma Historical Society [OHS] 2014). Surface geology underlying the proposed Ardmore RC Site has been mapped as the Deese Group of Middle Pennsylvanian-age. The Deese Group is a member of the Glenn Formation and consists mainly of massive sandstone, conglomerate, and shale (Cole and Neel 2013).

The topographic relief of Carter County is nearly level to gently sloping. The northern portion of the county drains into the Washita River, and the southern portion of the county drains into the Red River. The highest elevation, approximately 1,300 feet above mean sea level (ft amsl), is located in the western end of the Arbuckle Mountains, while the lowest elevation, approximately 630 ft amsl, occurs along the Washita River (Oklahoma Geological Society [OGS] 1928). Much of Carter County is within the Ardmore Basin. The Ardmore Basin was formed as a result of a large accumulation of sediments over geologic time.

The center of the proposed Ardmore RC Site is located on a high point locally. Elevations within the proposed Ardmore RC Site range from 932 ft asml near the center of the property to 902 ft asml at the pond near the northeast corner of the property. Approximately three-fourths of the site slopes toward this northeast corner, while the far southern portion slopes south (see **Figure 5a**).

Site elevations within the existing Ardmore RC range from 884 to 856 ft amsl. The site generally slopes east to west with the lowest elevations occurring in the far southwestern corner of the property (see **Figure 5b**).

3.5.2 Soils

Soils information for the proposed Ardmore RC and existing RC properties is available through the NRCS (2014). Soil types are summarized for these two properties in **Table 4** and illustrated in **Figures 5a and 5b**.

Five soil types occur within the proposed Ardmore RC Site. The main soil management concerns for each of these soil types are shrink-swell capacity. Additionally, approximately 73 percent (33.4 acres) of the proposed site is designated as prime farmland (see **Table 4**).

Two soil types occur within the existing Ardmore RC Site. Similar to the soils at the proposed Ardmore RC, the main soil management concerns for these soils are shrink-swell capacity. No soils are designated as prime farmland within the existing site boundaries (see **Table 4**).

Table 4. Soils within the Proposed and Existing Ardmore RC Properties

Soil Type	Ardmore Property	Acres	Prime Farmland	Hydric	Description / Building Limitations
Clarita silty clay, 3 to 5% slopes	Proposed	24.6	Yes	No	Moderately-well drained soils. Depth to the water table is more than 80 inches. Very limited due to shrink-swell.
Durant loam, 3 to 5% slopes	Proposed	0.7	Yes	No	Moderately well-drained soils. Depth to the water table is more than 80 inches. Very limited due to shrink-swell.
Heiden clay, 1 to 3% slopes	Proposed	8.1	Yes	No	Well-drained soils. Depth to the water table is more than 80 inches. Very limited due to shrink-swell.
Normangee loam, 3 to 5% slopes	Existing	6.5	No	No	Moderately well-drained soils. Depth to the water table is greater than 80 inches. Very limited due to shrink-swell.
Normangee loam, 3 to 5% slopes, eroded	Proposed	6.1	No	No	Moderately well-drained soils. Depth to the water table is greater than 80 inches. Very limited due to shrink-swell.
Steedman clay loam, 5 to 20% slopes	Existing	3.5	No	No	Moderately well-drained soils. Depth to water table about 12 to 24 inches. 20 to 40 inches to paralithic bedrock.
Windthorst fine sandy loam, 3 to 5% slopes, eroded	Proposed	6.6	No	No	Moderately well-drained soils. Depth to the water table is greater than 80 inches. Somewhat limited due to depth to shrink-swell.
Sources: NRCS 1979, 1983, 2014					

3.6 Water Resources

Water resources evaluated in this analysis include surface water and groundwater. The quality and availability of surface and groundwater and potential for flooding are addressed in this section. Surface water resources comprise lakes, rivers, and streams and are important for a variety of reasons including ecological, economic, recreational, aesthetic, and human health. Groundwater comprises the subsurface

hydrologic resources of the physical environment and is an essential resource in many areas; groundwater is commonly used for potable water consumption, agricultural irrigation, and industrial applications. Groundwater properties are often described in terms of depth to aquifer, aquifer or well capacity, water quality, and surrounding geologic composition.

The USACE defines wetlands as "those areas that are inundated or saturated with ground or surface water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted to life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas" (33 CFR Part 328). Wetlands are protected as a subset of the "waters of the United States" under Section 404 of the Clean Water Act (CWA). The term "waters of the United States" has broad meaning under the CWA and incorporates deep water aquatic habitats and special aquatic habitats (including wetlands). Section 401 of the CWA gives the State of Oklahoma the authority to regulate, through the state water quality certification program, proposed federally permitted activities that may result in a discharge to water bodies, including wetlands.

Other issues relevant to water resources include watershed areas affected by existing and potential runoff and hazards associated with 100-year floodplains. Floodplains are belts of low, level ground present on one or both sides of a stream channel and are subject to either periodic or infrequent inundation by flood water. Inundation dangers associated with floodplains have prompted Federal, state, and local legislation that limits development in these areas largely to recreation and preservation activities.

3.6.1 Surface Waters

3.6.1.1 Proposed Ardmore RC Site

The proposed Ardmore RC Site is part of two watersheds. The southern portion of the site is part of the Lake Texoma watershed (Hydrologic Unit Code [HUC] 11130210) that lies in both Oklahoma and Texas, and the northern portion of the site is part of the Middle Washita Watershed (HUC 11130303). Hickory Creek is located approximately 1.5 miles to the south of the proposed development site, while Lake Murray is located southeast of the City of Ardmore approximately 12 miles from the site. Two minor surface water features occur on the proposed site, a surface impoundment in the northeast corner of the property and a small, isolated wet area near the southeastern corner. The surface impoundment is recharged by storm water runoff. The property is not located in the 100-year or 500-year flood zone (Federal Emergency Management Agency [FEMA] 2015) (see **Figure 6**).

According to the CWA Section 303(d) list[2] of impaired waterbodies, leading pollutants or impairments within the Oklahoma portion of the Lake Texoma watershed include turbidity and enterococcus bacteria. A total of four waterbodies are considered impaired within the Oklahoma portion of the watershed (USEPA 2015b). Hickory Creek, located south of the proposed Ardmore RC Site, is listed as impaired due to enterococcus bacteria. Additionally, Lake Murray, located south and east of the site, has high levels of dissolved oxygen. A total of 56 waterbodies are listed as impaired within the Middle Washita Watershed.

[2] Section 303(d) of the Clean Water Act requires states to identify waters, through their Section 305(b) water quality assessments, that do not or are not expected to meet applicable water quality standards with federal technology based standards alone. States are also required to develop a priority ranking for these waters taking into account the severity of the pollution and the designated uses of the waters.

Leading impairments within this watershed include enterococcus bacteria, fecal coliform, total suspended solids, chloride, and ammonia (USEPA 2015b).

Drainage on the proposed Ardmore RC Site flows away from the center of the property, since the boundary between the Lake Texoma and Middle Washita watersheds crosses this area. The southern portion of subject property drains water overland primarily to the south. The northern and central portions of the subject property drains water overland to the east or into an engineered ditch that empties into the surface impoundment located in the northeast corner of the property.

3.6.1.2 Existing Ardmore RC Site

The site of the existing Ardmore RC is also located within the Middle Washita Watershed (HUC 1130303). The closest waterbody is an unnamed tributary to Caddo Creek located approximately 0.2 mile to the northwest. City Lake is also nearby, located approximately 0.8 mile north of the subject property. Drainage on the existing Ardmore RC Site flows to the west toward the unnamed tributary of Caddo Creek. No surface water features occur within the existing Ardmore RC Site, and the property is not located in the 100-year or 500-year flood zone (FEMA 2015) (see **Figure 6**).

3.6.1.3 Existing Poteau RC Site

No surface water features occur within the existing Ardmore RC Site, and the property is not located in the 100-year or 500-year flood zone (FEMA 2015). However, McMurtrey Creek and its associated floodplains occur within 0.3 mile of the proposed site and several freshwater ponds occur within 0.5 mile (see **Figure 3**).

3.6.2 Wetlands

A palustrine unconsolidated bottom, permanently flooded, diked/impounded feature is identified within the northeast corner of the proposed Ardmore RC Site on National Wetland Inventory (NWI) mapping (see **Figure 6**). No NWI wetlands occur within the existing Ardmore or Poteau RC properties (USFWS 2015). Through USACE consultation efforts, it was determined that the proposed project site does not contain jurisdictional wetlands or other waters of the United States. In a letter dated 4 November 2011, the OKARNG requested a jurisdictional determination (JD) for the proposed 46-acre Ardmore RC Site. The USACE provided a JD on this property in a letter dated 14 December 2011. Refer to **Appendix A** for a copy of the 2011 USACE JD for the proposed 46-acre Ardmore property and recent coordination with the USACE Tulsa District for the Proposed Action dated 5 February 2015.

3.6.3 Groundwater

No aquifers occur beneath the proposed Ardmore RC Site or the existing Ardmore RC Site. The closest aquifer to either site is the Antlers aquifer located approximately 5 miles to the southeast of Ardmore, OK. The Early Cretaceous-age Antlers Sandstone is an important source of water in an area that underlies about 4,400-square miles in southern Oklahoma. The Antlers aquifer consists of sand, clay, conglomerate, and limestone in the outcrop areas. The Antlers is overlain by alluvial and terrace deposits and a few small thin outcrops of the Goodland Limestone (Abott et al. 1997). Approximately 45 million acre-feet of water is stored in the Antlers aquifer. The quality of the water is generally adequate; however,

in some portions of the aquifer the concentrations of dissolved solids exceeds 1,000 milligrams per liter and is unsuitable for some uses.

3.7 Biological Resources

Biological resources include native or naturalized plants and animals and the habitats in which they occur. Sensitive biological resources are defined as those plant and animal species listed as threatened or endangered, or proposed as such, by the USFWS or ODWC. The federal Endangered Species Act (ESA) of 1973 protects listed species against killing, harming, harassing, or any action that may damage their habitat. Federal Species of Concern are not protected by law; however, these species could become listed and protected. The State of Oklahoma has an endangered species statute (29 Okl. St. Ann. 5-402, 412, 412.1; 29 Okl. St. Ann. §2-109, 135) that gives the state the authority to list a wildlife species as threatened or endangered within the state of Oklahoma although it might not be classified as threatened or endangered federally through the ESA. At the present time, four wildlife species are listed as state-threatened or state-endangered in Oklahoma.

Migratory birds, as listed in 50 CFR Part 10.13, are ecologically and economically important to the United States recreational activities, including bird watching, studying, feeding, and hunting, are practiced by many Americans. In 2001, EO 13186 (*Responsibilities of Federal Agencies to Protect Migratory Birds*) was issued to focus attention of federal agencies on the environmental effects to migratory bird species and, where feasible, implement policies and programs that support the conservation and protection of migratory birds.

3.7.1 Vegetation and Wildlife

3.7.1.1 Proposed Ardmore RC Site

The majority of the proposed Ardmore RC Site located in Carter County, OK is comprised of undeveloped grassland with scrub-shrub habitat in the south. The property contains a surface water impoundment in the northeast corner and a wet area in the south-central corner (see **Figures 4 and 6**). Consultation with the USACE has determined that there are no jurisdictional waters on site (refer to **Section 3.6.2**).

Beavers are potentially utilizing the surface water impoundment based on observations made by Amec Foster Wheeler biologists during the October 2014 site reconnaissance for this EA. The following plant species were noted in the southern upland areas during the October 2014 site reconnaissance: hackberry (*Celtis occidentalis*), eastern red cedar (*Juniperus virginiana*), dogwood (*Cornus* spp.), little bluestem (*Schizachyrium scoparium*), switch grass (*Panicum virgatum*), Johnson grass (*Sorghum halepense*), white heath aster (*Symphyotrichum ericoides*), coralberry (*Symphoricarpos orbiculatus*), sneeze weed (*Helenium autumnale*), and multiple sages (*Salvia* spp.). The wet area in the southern portion of the site contained willows (*Salix* spp.), cattails (*Typha* spp.), and rough cocklebur (*Xanthium strumarium*). Wildlife likely to utilize this habitat would be typical of non-forested wildlife species, such as deer, rodents, hawks, and opportunistic species.

3.7.1.2 Existing Ardmore RC Site

The existing Ardmore RC Site is characterized by poor quality wildlife habitat and is highly developed and consists of mostly buildings, parking lots, or roads, with a monoculture of landscape vegetation and

maintained grassland. The ability of the existing Ardmore RC to support a diversity of plant and wildlife species is limited by its overwhelmingly developed land area and small size (see **Figure 5b**).

3.7.1.3 Existing Poteau RC Site

Similar to the existing Ardmore RC Site, the existing Poteau RC property is also characterized by poor quality wildlife habitat and is highly developed and consists of mostly buildings, parking lots, or roads, with monoculture of landscape vegetation and maintained grassland. The ability of the existing Poteau RC property to support a diversity of plant and wildlife species is similarly limited by its overwhelmingly developed land area and small size (see **Figure 3**).

3.7.2 Special Status Species

The USFWS administers the ESA of 1973, as amended. This law provides federal protection for species designated as federally endangered or threatened. An endangered species is “in danger of extinction throughout all or a significant portion of its range,” and a threatened species “is likely to become an endangered species within the foreseeable future.” Special status species are listed as threatened or endangered, are proposed for listing, or are candidates for listing by the state and/or federal government.

According to the USFWS, five federally listed species have been observed or have the potential to occur in Carter County within the vicinity of the existing and proposed Ardmore RC Sites (USFWS 2014a, USFWS 2014b). Additionally, eight federally listed species have been observed or have the potential to occur in Le Flore County in the vicinity of the Poteau RC (USFWS 2014c). The ODWC has also listed the black-sided darter (*Percina maculata*) as a state-listed threatened species in Le Flore County. No federally listed species have been observed and no critical habitat has been designated at the existing or proposed Ardmore RC Sites or at the existing Poteau RC. Furthermore, no suitable habitat for these species occurs on these properties. A summary of the listed species with the potential to occur in the vicinity of the Proposed Action area and their suitable habitat are summarized in **Table 5**. Limited habitat exists on-site for the American burying beetle (*Nicrophorus americanus*) and whooping crane (*Grus americana*) based on a review of suitable habitat for these species, available desktop information, and an assessment of general on-site habitat. A copy of the ESA Section 7 consultation package and USFWS concurrence letter are included in **Appendix A**.

The bald eagle (*Haliaeetus leucocephalus*) was delisted from the federal ESA on 8 August 2007 and from the Oklahoma State endangered and threatened species list in June of 2007. The bald eagle remains protected by the MBTA and Bald and Golden Eagle Protection Act. Eagles begin arriving in Oklahoma in November and early December, and they reach peak numbers in January and February. Most birds have left for their northern breeding grounds by the end of March (ODWC 2014b). While there is a potential for nesting to occur within Carter and Le Flore counties, it is not anticipated that the bald eagle would occur within or in the vicinity of the RC sites due to a lack of suitable habitat. Notably lacking habitat includes nearby lakes and reservoirs.

Table 5. Federally Threatened and Endangered Species with the Potential to Occur

Common Name	Scientific Name	State Listing	Federal Listing	County	Habitat
Least tern	*Sterna antillarum*	N/A	E	Carter & Le Flore	Least terns live along large rivers and may sometimes be found hunting fish in shallow wetlands and the margins of ponds and lakes. This bird requires bare sand and gravel for nesting and typically nests in small colonies, which can also occur on salt flats. They are found in Oklahoma during the late spring and summer breeding season.
Piping plover	*Charadrius melodus*	N/A	T	Carter & Le Flore	Piping plovers are found on mudflats, sandy beaches and shallow wetlands with sparse vegetation. They may be found along the margins of lakes and large rivers where there is exposed (bare) sand or mud. They are normally a spring or fall migrant in Oklahoma.
Red knot	*Calidris canutus rufa*	N/A	T	Carter & Le Flore	The red knot winters at the tip of South America in Tierra del Fuego, in northern Brazil, throughout the Caribbean, and along the United States coasts from Texas to North Carolina. It breeds in the tundra of the central Canadian Arctic from northern Hudson Bay to the southern Queen Elizabeth Islands.
Whooping crane	*Grus americana*	N/A	E	Carter	Whooping cranes pass through Oklahoma each spring and fall during migration. In Oklahoma, they are typically found in shallow wetlands, marshes, the margins of ponds and lakes, sandbars and shorelines of shallow rivers, wet prairies and crop fields near wetlands.
Black-sided darter	*Percina maculata*	LT	N/A	Le Flore	The black-sided darter is found in clear, gravel-bottom, perennial streams in eastern Oklahoma along the state line with Arkansas.
American burying beetle	*Nicrophorus americanus*	N/A	E	Carter & Le Flore	American burying beetles occupy a wide range of habitat types including tallgrass prairie, woodlands and forests. They reproduce in the spring and summer (early May through August).
Scaleshell mussel	*Leptodea leptodon*	N/A	E	Le Flore	This mussel is typically found in riffles within relatively swift moving water. It commonly lies buried a few inches below the bottom of the riffle in gravel or cobble.
Winged mapleleaf	*Quadrula fragosa*	N/A	E	Le Flore	Winged mapleleaf mussels are found in small rivers and large streams with at least a moderate rate of flow. Within the river, these mussels embed themselves in areas of gravel or coarse sand substrate in the main channel.

Table 5. Federally Threatened and Endangered Species with the Potential to Occur

Common Name	Scientific Name	State Listing	Federal Listing	County	Habitat
Indiana bat	*Myotis sodalis*	N/A	E	Le Flore	Indiana bats spend the summer months living solitarily or in small groups of less than10 individuals, and they are usually found in forested habitats. During the summer, they live in hollow tree cavities, spaces underneath loose tree bark, abandoned buildings, and abandoned mines or in caves. During the winter months, they hibernate in colonies in caves.
Northern long-eared bat	*Myotis septentrionalis*	N/A	T	Le Flore	Northern long-eared bats spend winter hibernating in caves and mines. During summer, northern long-eared bats roost singly or in colonies underneath bark, in cavities, or in crevices of both live and dead trees. Males and non-reproductive females may also roost in cooler places, like caves and mines.

FEDERAL STATUS
E = Endangered = Danger of extinction throughout range
T = Threatened = Likely to become endangered in foreseeable future throughout range
OKLAHOMA STATUS
LT = Listed Threatened

Sources: USFWS 2014a, 2014b, 2014c; ODWC 2014a.

The OKARNG is responsible under the Migratory Bird Treaty Act (MBTA; 16 USC §703-712), 50 CFR Part 21, and EO 13186 (*Responsibilities of Federal Agencies to Protect Migratory Birds*) to promote, support, and contribute to the conservation of migratory birds. The MBTA prohibits, unless permitted by regulations, the pursuit, hunting, take, capture, killing or attempting to take, capture, kill, or possess any migratory bird included in the Migratory Bird Treaty, including any part, nest, or egg of any such bird (16 USC §703). Per 50 CFR Part 21.15, *Authorization of Take Incidental to Military Readiness Activities*, the DoD is authorized to incidentally take migratory birds in the course of military readiness activities, but with limitations. The OKARNG must confer and cooperate with the USFWS to develop and implement appropriate conservation measures for actions that, determined through the NEPA process, may result in a significant adverse effect on a population of migratory bird species.

EO 13186 requires each Federal Agency to develop a Memorandum of Understanding (MOU) with the USFWS that promotes the conservation of migratory birds. Effective in July 2006, the MOU between DoD and USFWS outlines a collaborative approach to promote the conservation of migratory bird populations. This MOU specifically pertains to actions that are not classified as military readiness activities and places emphasis on migratory bird species of concern, which are species that may experience greater degrees of impacts from direct or indirect disturbances. The NEPA process is used to assess the direct and indirect impacts of a proposed action on migratory birds, and their habitat, within the project area. A copy of this MOU is included in **Appendix C**.

Land cover within the proposed project areas consists primarily of maintained grasslands. The proposed Ardmore RC Site also contains some scrub shrub habitat in the southern portion of the property and a surface water impoundment in the northeast corner.

Several migratory birds of concern are known to occur in Carter and Le Flore Counties. The piping plover (*Charadrius melodus*) qualifies as a red list species for the American Bird Conservancy (ABC 2014). While the general habitat for the piping plover and the whooping crane include wetland and shoreline habitat, this habitat type is only marginally present on the proposed Ardmore RC Site. Thus, the potential for them to be present, even as a stopover species in the fall and spring, is limited. Other migratory birds that are not water-dependent, such as the Mississippi kite (*Ictinia mississippiensis*) that breeds in Oklahoma and prefers open woodlands and shrub lands, and the scissor-tailed flycatcher (*Muscivora forficate*) that is common along roadsides and around pastures and farms, are also not likely to be present.

3.8 Cultural Resources

3.8.1 Overview

Cultural resources are historic properties as defined by the NHPA, cultural items as defined by the NAGPRA, archaeological resources as defined by the Archaeological Resources Protection Act, sacred sites as defined by EO 13007 to which access is afforded under the American Indian Religious Freedom Act, and collections and associated records as defined by 36 CFR Part 79. NEPA requires consideration of “important historic, cultural, and natural aspects of our natural heritage.” Consideration of cultural resources under NEPA includes the necessity to independently comply with the applicable procedures and requirements of other federal and state laws, regulations, EOs, presidential memoranda, and ARNG guidance.

The NHPA of 1966, as amended (Public Law 89-665; 54 USC §300101 *et seq.*), establishes the policy of the federal government to provide leadership in the preservation of historic properties and administer federally owned or controlled historic properties. Section 106 of the NHPA (54 USC §306108) requires federal agencies to consider the effect an undertaking may have on historic properties; its implementing regulations, 36 CFR Part 800, describe the procedures for identifying and evaluating historic properties; assessing the effects of federal actions on historic properties; and consulting to avoid, reduce, or minimize adverse effects. As part of the Section 106 process, agencies are required to consult with the SHPO. The Section 106 process requires each undertaking to define an Area of Potential Effect (APE). An APE is “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any properties exist…[and the APE] is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking” (36 CFR Part 800.16[d]). The Proposed Action is an undertaking as defined by 36 CFR Part 800.3, and is required to comply with Section 106 of the NHPA. The Oklahoma State Register of Historic Places Act (Title 53, Chapter 20, Section 361) gives permitting authority for archaeological investigations to the OAS and establishes the need for a review of any undertaking by both the SHPO and the OAS in order to complete the Section 106 process. As the OAS has historically been Oklahoma’s repository for recorded prehistoric sites, the SHPO and the OAS operate under a cooperative agreement to jointly meet Section 106 review requirements in accordance with federal laws, regulations, and standards. Therefore,

federal undertakings within the state of Oklahoma require consultation with both the SHPO and the OAS to complete the Section 106 process.

The OKARNG ICRMP, prepared in consultation with the SHPO, OAS, and representatives of Native American tribes, provides detailed guidelines and procedures to enable the OKARNG to meet legal responsibilities for identification, evaluation, and treatment of historic properties under its jurisdiction in accordance with applicable federal and state regulations affording protection to cultural resources. The document contains a detailed cultural resource management strategy, an inadvertent discovery response plan, and SOP in relation to cultural and paleontological resources (OKARNG 2010b).

3.8.2 Area of Potential Effect

The APE is defined as a 0.5-mile radius from the center of the proposed 46-acre parcel, as well as the boundary of the existing OKARNG properties (see **Figures 2 and 4**). The OKARNG conducted the background research and cultural resource surveys pursuant to Section 800.4(a) and (b) of 36 CFR Part 800, the regulations implementing Section 106 of the NHPA, in order to further identify resources that may be affected by the proposed undertaking.

Early coordination was conducted for the Ardmore properties with SHPO (File #1852-12), OAS, and Native American tribe/groups in July 2012. No structures over 50 years old occur within the proposed or existing Ardmore RC properties, and no known historic properties were identified in the APE during this early coordination effort. The OKARNG conducted follow-up consultation with the SHPO and OAS for this undertaking; this was initiated in January 2014. The SHPO concurred with the determination of no historical properties affected for this undertaking on 5 February 2015. In a letter dated 29 January 2015, the OAS found no record of archaeological sites in the area, but requested that if anything is discovered during construction to contact them immediately (see **Appendix A**).

An archeological survey was conducted for the proposed and existing Ardmore sites and documented by Cole and Neel (2013). One archeological site, site 34CA132, has been previously identified within 1 mile of the proposed Ardmore RC, outside of the 0.5-mile APE. Site 34CA132 was recorded in 1994 and is an unassigned prehistoric period open camp located on a terrace landform along an unnamed tributary of Caddo Creek (Cole and Neel 2013). No archeological artifacts or features were found as a result of these surveys, and no further archeological investigations were recommended (Cole and Neel 2013). The SHPO concurred with this determination in a letter dated 29 January 2013 (File # 0700-13). In a letter dated 5 February 2013, OAS deferred opinion on potential eligibility and possible effects associated with this undertaking to the SHPO.

An architectural survey and assessment was conducted by Schenker et al. (2011) in the *Assessment of Six OKARNG Facilities*; it was determined that the Poteau RC was not eligible for the National Register of Historic Places (NRHP). The SHPO concurred with this determination in a letter dated 18 January 2012 (File # 0888-11).

3.8.3 Native American Consultation

The OKARNG is conducting formal consultation with federally recognized Native American tribes as required under DoDI 4710.02. The OKARNG has considered the *Annotated DoD American Indian and Alaska Native Policy*, EO 13175 (*Consultation and Coordination with Indian Tribal Governments*), and AR 200-1. The following six federally recognized tribes were identified as having potential ancestral ties to the project areas: Caddo Nation of Oklahoma, Chickasaw Nation, Kialegee Tribal Town, Osage Nation of Oklahoma, Seminole Nation of Oklahoma, and Wichita and Affiliated Tribes of Oklahoma. These entities were invited to participate as Sovereign Nations per EO 13175 (*Consultation and Coordination with Indian Tribal Governments*) in both the EA and the NHPA Section 106 process. A copy of the correspondence letters and the MFR are included in **Appendix A**.

3.9 Socioeconomics

Socioeconomics is defined as the basic attributes and resources associated with the human environment, particularly population and economic activity. Human population is affected by regional birth and death rates as well as net migration. Economic activity typically comprises employment, personal income, and industrial growth. Impacts on these two fundamental socioeconomic indicators can also influence other components such as housing availability and public services provision.

The following subsections identify and describe the socioeconomic environment surrounding the proposed Ardmore RC Site as well as the existing Ardmore RC and Poteau RC. Socioeconomic areas of discussion include the local demographics, regional, and local economy, local housing, and local recreation activities. Data used in preparing this section was collected from the 2009-2013 American Community Survey (US Census Bureau 2014), 2010 US Census Bureau, and Oklahoma Employment Security Commission (OESC).

3.9.1 Population

The population of Carter County was 45,621 in 2000 and 47,577 in 2010, an increase of 4.24 percent (US Census Bureau 2010). Similar to Carter County, the populations of Le Flore County increased by 4.5 percent in 2010 (50,384). The State of Oklahoma had a population of 3,751,351 in 2010, an overall increase of 8.7 percent from 2000, similar to the overall 9.3 percent increase in the United States population over the same period (US Census Bureau 2010). As with Carter County, the City of Ardmore's population increased by 2.52 percent between 2000 (23,687) and 2010 (24,283). The City of Poteau's population increased by 6.82 percent between 2000 (7,976) and 2010 (8,520). Population projections suggest population increases will continue; however, Carter and Le Flore Counties are projected to grow at the same rate as the overall State (see **Table 6**).

Table 6. County and State Population Projections			
Year	**State of Oklahoma**	**Carter County**	**Le Flore County**
2010	3,751,351	47,577	50,384
2015	3,838,400	48,700	53,500
2020	3,963,800	50,200	55,500
2025	4,081,400	51,500	57,300
2030	4,192,400	52,900	59,100
Projected Change, 2010-2030 (%)	**10.7**	**10.4**	**10.4**
Source: OESC 2014			

3.9.2 Regional Economy

The labor force in 2013 was 21,637 in Carter County and 20,671 in Le Flore County. Regional economic information is provided in **Table 7**. According to the US Census Bureau (2014), the top five industries in Carter County in 2013 included: (1) educational, health, and social services (19.9%); (2) retail trade (14.6%); (3) manufacturing (12.3%); (4) arts, entertainment, recreation, accommodation, and food services (9.6%); and (5) agriculture, forestry, fishing and hunting, and mining (7.3%). Further, the top five industry types in the Le Flore County in 2013 included: (1) educational, health, and social services (23.8%); (2) manufacturing (12.4%); (3) retail trade (12.0%); (4) agriculture, forestry, fishing and hunting, and mining (8.5%); and (5) construction (7.7%).

Per capita and median household income statistics from the 2009-2013 American Community Survey indicate that both Carter County and Le Flore County have lower incomes in comparison to the State of Oklahoma. However, poverty levels for Le Flore County, City of Ardmore, and City of Poteau are higher than the overall levels for the state (US Census Bureau 2014).

The United States unemployment rate in September 2014 was 5.9 percent. Carter County had an unemployment rate of 3.4 percent and Le Flore County had an unemployment rate of 6.7 percent. The overall state unemployment rate was 4.5 percent, with the highest unemployment rate in Latimer County at 7.5 percent. Unemployment rates in the City of Ardmore and the City of Poteau were 4.9 percent and 5.3 percent, respectively (OESC 2014).

The OKARNG employs three permanent staff members at both the existing Ardmore RC and the Poteau RC. In addition, one weekend month there are an additional 81 part-time personnel at the existing Ardmore RC and an additional 92 part-time personnel at the Poteau RC.

Table 7. Regional Income					
Area	**Number of Households**	**Median Household Income**	**Per Capita Income**	**Population Below Poverty Level (%)**	**Unemployment Rate (%) September 2014**
State of Oklahoma	1,444,081	45,339	24,208	16.9	4.5
Carter County	17,411	41,401	21,476	16.3	3.4
Le Flore County	18,412	36,542	18,141	22.2	6.7
City of Ardmore	9,056	39,011	22,900	19.3	4.9
City of Poteau	3,230	39,347	19,427	19.0	5.3
Sources: US Census Bureau 2014; OESC 2014.					

3.9.3 Housing

Median home values in the State of Oklahoma are slightly higher than Carter County, with Carter County being slightly higher than Le Flore County. Additionally, the City of Ardmore and the City of Poteau have slightly higher home values than the Carter and Le Flore Counties. Owner occupancy rates are lowest in the City of Ardmore and highest in Le Flore County. Overall occupied housing units are very similar between the State of Oklahoma, Carter County, and the City of Poteau. **Table 8** presents selected housing characteristics for state, counties, and cities within the ROI.

Table 8. Housing Characteristics							
Area	**Housing Units Available**	**Occupied (%)**	**Owner-Occupied (%)**	**Median Value**	**Median Home Mortgage**	**Renter-Occupied (%)**	**Median Contract Rent**
State of Oklahoma	1,669,828	86.5	67.1	$112,800	$1,137	32.9	$699
Carter County	21,230	82.0	69.0	$90,600	$1,030	31.0	$634
Le Flore County	21,460	85.8	74.1	$80,100	$892	25.9	$554
City of Ardmore	10,962	82.6	60.3	$95,700	$1,084	39.7	$644
City of Poteau	3,733	86.5	65.8	$91,700	$872	34.2	$546
Source: US Census Bureau 2014.							

3.9.4 Schools

Several education facilities are located within 5 miles of the proposed Ardmore RC Site in the City of Ardmore. These include Ardmore High School, Ardmore Middle School, Plainview Elementary School, Plainview Middle School and Oakhall School. Murray State College is also located in the City of Ardmore

just 3.5 miles from the proposed RC. Notably more colleges and universities are located 100 miles to the north near Oklahoma City and 100 miles to the south near Dallas.

According to the US Census statistics, the State of Oklahoma has a higher percentage of individuals with a post-secondary degree compared to both Carter and Le Flore Counties. The State of Oklahoma also has a slightly higher percentage of individuals with a high school diploma. However, Le Flore County had a lower percentage of high school graduates than Carter County. **Table 9** provides regional educational attainment for persons 25 years and older.

Table 9. Regional Educational Attainment of Persons 25 years and Older

Area	No Diploma (%)	High School Graduates (%)	Post-Secondary Graduates (%)
State of Oklahoma	12.7	86.4	23.5
Carter County	14.3	85.7	17.1
Le Flore County	19.5	80.5	12.9
City of Poteau	17.0	83.0	19.6
City of Ardmore	15.5	84.5	20.0
Source: US Census Bureau 2014.			

3.9.5 Shops and Services

Commercial shops and services are available in Ardmore with businesses in close proximity to the eastern portion of the proposed Ardmore RC Site. The majority of businesses in close proximity are located to the east on the east side of I-35. These services primarily consist of hotels and restaurants; however, a much larger variety of shops and services are located to the southeast towards the center of Ardmore.

3.9.6 Recreational Facilities

Recreational areas nearby include the Ardmore Regional Park as well as other city parks located to the east of the proposed Ardmore RC Site. Ardmore Regional Park encompasses the 160-acre City Lake, which offers a boat ramp, boat dock, wheelchair accessible fishing pier and a permanent restroom facility. Additional recreational opportunities at Ardmore Regional Park include baseball and softball fields, hiking trails, a skate park, and Lake View Golf Course. Additional recreational opportunities nearby include the Dornick Hills Golf and Country Club and the Ardmore Rod and Gun Club located adjacent to the Lake View Golf Course. Lake Murray State Park is also a short distance to the southeast of the proposed Ardmore RC Site and offers a variety of recreational activities including fishing, boating, water sports, golfing, picnics, camping, horseback riding, hayrides, hiking, biking, rollerblading, swimming, miniature golf and paddle boating.

3.9.7 Public and Occupational Health and Safety

The OKARNG is responsible for law enforcement patrol at the existing Ardmore RC, and reports issues to local law enforcement. The Ardmore Police Department, a full service law enforcement agency, is located approximately 5 miles southeast of the proposed RC in City Hall. The Ardmore Fire Department is located approximately 2.5 miles south of the proposed Ardmore RC Site. The closest medical facility to the proposed Ardmore RC is the Mercy Hospital Ardmore, which is a 190-bed facility located approximately 2.5 miles southeast of the proposed Ardmore RC Site. The hospital services the entire city of Ardmore and the surrounding area in southern Oklahoma.

3.9.8 Protection of Children

Because children may suffer disproportionately from environmental health risks and safety risks, EO 13045 (*Protection of Children from Environmental Health Risks and Safety Risks*) (1997) was intended to prioritize identification and assessment of environmental health risks and safety risks that may affect children and to ensure federal agencies' policies, programs, activities, and standards address environmental and safety risks to children.

No individuals currently live on or occupy the proposed Ardmore RC Site. Some single-family homes are located in the vicinity of the proposed Ardmore RC Site, but given the rural nature of the area these homes are limited immediately adjacent to the property. The existing Ardmore RC Site is located adjacent to the Ardmore Regional Park, while the existing Poteau RC is situated within the Carl Albert State College campus. While there is a potential for children to occur nearby, they are not anticipated to occur on a regular basis. The percentage of the population under age 18 is generally similar between the cities, counties, and state (see **Table 10**).

Table 10. Total Population Versus Population under Age 18

Area	Total Population	Population under 18	% Population under 18
State of Oklahoma	3,785,742	935,359	24.7
Carter County	47,904	12,270	25.7
Le Flore County	50,062	12,200	24.3
City of Ardmore	24,553	6,436	26.2
City of Poteau	8,535	1,924	22.5
Source: US Census Bureau 2014.			

3.10 Environmental Justice

EO 12898 (*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*) (1994), requires federal agencies to identify and address disproportionate adverse effects of their programs, policies, and activities on minority and low-income populations. Potential environmental justice considerations are determined by comparing demographic and economic characteristics (minority

population composition and poverty rates) within the project sites to the same characteristics in the surrounding region.

The term "minority population" includes persons who identify themselves as African American, Asian or Pacific Islander, Native American or Alaska Native, or Hispanic. A minority population exists where the percentage of minorities in an affected area either exceeds 50 percent or is meaningfully greater than in the general population of the large surrounding area. **Table 11** presents regional demographics by race for the areas surrounding the proposed site (US Census Bureau 2014). The State of Oklahoma, the Cities of Ardmore and Poteau, and Carter and Le Flore Counties have a similar percentage of minorities. None of these areas meet the definition of a minority population area.

Table 11. Regional Population by Race

Area	All Individuals	White (%)	African-American (%)	American Indian and Alaska Native (%)	Asian or Pacific Islander (%)	Other Race (%)	Hispanic or Latino* (%)
State of Oklahoma	3,785,742	80.6	8.8	13.2	2.5	3.0	9.1
Carter County	47,904	80.5	8.8	13.5	1.8	1.7	5.8
Le Flore County	50,062	84.4	2.8	17.4	0.9	3.5	6.8
City of Ardmore	24,553	74.1	14.1	14.2	2.4	3.1	8.8
City of Poteau	8,535	80.0	4.6	12.8	0.9	6.0	10.2

* Persons of Hispanic or Latino origin may be of any race

Source: US Census Bureau 2014

The US Census Bureau defines a "poverty area" as a census tract where 20 percent or more of the residents have incomes below the poverty threshold, and an "extreme poverty area" as one with 40 percent or more below the poverty level. Le Flore County's poverty rate was estimated at 22.2 percent, which meets the definition of a poverty area (US Census Bureau 2014). However, the City of Poteau's poverty rate was estimated at 19.0 percent, which does not meet the criteria of a "poverty area." The poverty rates for the State of Oklahoma, Carter County, and the City of Ardmore were all found to be below 20 percent (see **Table 7**).

Because Le Flore County technically meets the definition of a poverty area and the City of Poteau was just under the 20 percent threshold, poverty levels were examined in further detail. Additional poverty level data was gathered by census tract. The Poteau RC is located entirely within census tract 8925. The poverty level within the census tract 8925 was 12.5 percent (US Census Bureau 2014). Poverty levels were 15.7 percent within census tract 8926, which lies directly adjacent to the Poteau RC to the east. Thus, poverty levels for the census tracts within and adjacent to the Poteau RC were all found to be

below 20 percent. Therefore, the area in the vicinity of the Poteau RC does not meet the definition of a poverty area.

3.11 Infrastructure

The proposed Ardmore RC Site consists of an undeveloped tract of land. No structures occur on the property with the exception of the high power line that runs east-west through the center of the property. Major utility infrastructure (i.e., natural gas, electric, potable water, and sanitary sewer) that serves neighboring businesses would be available to the proposed site from adjacent lands through utility extensions (see **Figure 7**). Oklahoma Gas & Electric (OGE) Energy Resources supplies electric power, while Oklahoma Natural Gas supplies natural gas to the proposed development site. Potable water and wastewater services are supplied to the City of Ardmore by the Ardmore Water Distribution Department and the Ardmore Sewer Collection Department. Solid waste collection, disposal, and recycling services are handled through the City of Ardmore.

Access to the proposed Ardmore RC facilities would be along East Prairie Valley Road to the north and Cooper Drive to the east, which are both easily accessible from I-35. I-35 runs north-south through the City of Ardmore and Carter County, and serves as the major interstate connection between Oklahoma City and Dallas/Fort Worth, TX.

Three international airports occur within 100 miles north and south of Ardmore, OK in Oklahoma City, OK and Dallas, TX; they include Will Rogers World Airport, Dallas Love Field Airport and Dallas/Fort Worth International Airport. Airfreight is also transported to and from these airports through several carriers.

3.12 Hazardous and Toxic Materials/Wastes

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (through either physical or chemical reactions) to human health or the environment. Regulated hazardous substances are identified through a number of federal laws and regulations. The most comprehensive list is contained in 40 CFR Part 302, and identifies quantities of these substances that, when released to the environment, require notification to a federal government agency. Hazardous wastes, defined in 40 CFR Part 261.3, are considered hazardous substances. Generally, hazardous wastes are discarded materials (solids or liquids) not otherwise excluded by 40 CFR Part 261.4 that exhibit a hazardous characteristic (i.e., ignitable, corrosive, reactive, or toxic), or are specifically identified within 40 CFR Part 261. Petroleum products are specifically exempted from 40 CFR Part 302, but some are also generally considered hazardous substances due to their physical characteristics (especially fuel products), and their ability to impair natural resources.

3.12.1.1 Proposed Ardmore RC Site

A Phase I Environmental Site Assessment of the proposed Ardmore RC Site was conducted in March 2011. During the site reconnaissance, no evidence of spills or environmental contamination was observed. The proposed development site does not generate, handle or store hazardous waste on site. Based on review of aerial photographs, the site had been primarily utilized for agricultural purposes since at least 1949 (refer to **Section 3.2.1**). Adjacent property owners did not indicate any knowledge of contamination or other issues of concern associated with the subject property (OMD 2011).

The DoD defines seven categories of ECOP. Based on the Phase I Environmental Site Assessment findings, the proposed development site was characterized as a Category 1 property because there was no evidence of a release of petroleum products associated with, or at, the subject property. Category 1 is defined as areas where no release or disposal of hazardous substances or petroleum products has occurred, including migration of these substances from adjacent areas (OMD 2011).

3.12.1.2 Existing Ardmore and Poteau RCs

The OKARNG maintains an Environmental SOP as required by AR 200-1 to ensure compliance with applicable military, federal, state and local rules and regulations pertaining to HTMW and pollution prevention. In addition, the OKARNG develops a site-specific Facility Response Plan (FRP) for its facilities. The FRP identifies potential sources of pollution, BMPs to limit this potential, and procedures to respond to pollution events.

The hazardous waste generator status for the existing facilities is currently identified as a Conditionally Exempt Small Quantity Generator, generating less than 220 pounds of hazardous waste per month. Diesel fuel accounts for most of the hazardous material used at the existing facilities, followed by other petroleum, oil, and lubricant products. Most of the hazardous waste consists of fluorescent light bulbs, aerosol cans, batteries, filters, and paint. Used oil, antifreeze, lead acid batteries, and off-spec fuel are recycled. No bulk solvents are used at these facilities.

The existing Ardmore RC (built in 1985) is currently uninhabitable and has been condemned due to health and safety issues resulting from water penetration, foundation damage, and mold. The structure to be demolished contains mold and may contain lead-based paint, asbestos-containing materials, PCBs, or other material requiring special handling. Special handling and disposal requirements may be required during demolition. In addition, the existing Poteau RC, which will be transferred to a county, city, or state entity for use, was built in 1955 and is likely to contain lead-based paint, asbestos-containing materials, and PCBs due to the age of this facility.

SECTION 4: ENVIRONMENTAL CONSEQUENCES

This section describes the potential direct, indirect, and cumulative effects of implementing the Proposed Action or its alternatives, as well as standard BMPs that would reduce the level of identified impacts. The OKARNG considers BMPs integral to implementation, and they are not considered separate from the Proposed Action. Definitions of key terms used throughout **Section 4** and a summary of the regulatory framework for NEPA subject areas are included in **Appendix B**.

Per 40 CFR Part 1501.7 (a)(3), the CEQ recommends agencies identify and eliminate from detailed study any issues that are not significant or have been covered in another environmental review, narrowing the discussion to a brief presentation of why they will not have a significant effect on the human environment, or providing a reference to their coverage elsewhere. The transfer of the existing Poteau RC would only entail the transfer of this property and facilities to a county, city, or state entity; it does not entail any proposed land or facility alterations, improvements or ground disturbance. Therefore, similar to **Section 3,** this section describes the potential impacts of the proposed construction and operation of the proposed Ardmore RC and demolition of the existing Ardmore RC, and where applicable, the transfer of the existing Poteau RC property to a county, city, or state entity.

4.1 Land Use and Cover

4.1.1 Preferred Action Alternative

Under the Preferred Action Alternative, no *significant adverse* effects to land use or land cover within or in the vicinity of the project area would be anticipated.

Under the Preferred Action Alternative, land use would change from undeveloped open grassland/shrub land to a RC facility for use by the OKARNG. The proposed property is currently zoned for light industrial land use and is situated within an industrial park. Therefore, the proposed Ardmore RC would be consistent and compatible with existing zoning and adjacent land uses, and would not conflict with applicable local or regional land use management plans or local zoning ordinances, or foster changes in adjacent property land use.

The City of Ardmore and Carter County would have a direct, long-term *beneficial* impact from the construction and operation of the proposed Ardmore RC. The OKARNG facility would provide a facility of sufficient size and modern design within south-central Oklahoma to efficiently achieve and maintain mission requirements and requisite mobilization readiness levels for the assigned units. Further, it would provide a facility to support civilian authorities, recruit the next generation into the military service, and provide an acceptable place of refuge for its citizens during times of emergency.

The facility would support 29 full-time and up to 314 part-time OKARNG personnel. It is anticipated that new employees would be drawn from the local population, or could readily find housing within the existing market. Thus, the proposed facility is not anticipated to foster increased development in the City of Ardmore or Carter County.

Outdoor lighting is used to illuminate roads, parking lots, sidewalks, signs, and buildings. Outdoor lighting improves visibility, safety, and a sense of security. Long-term *minor adverse* impacts associated with light pollution may occur for the rural residences west of the proposed facility. However, this impact is considered negligible as these residences are already located adjacent to other industrial uses and the proposed facility would be consistent with existing and adjacent land use and County land use plans. Therefore, no significant visual or aesthetic impacts are anticipated as a result of the Proposed Action. The OKARNG facilities would be developed to complement other architectural features within the general area. Potential air and noise impacts to adjacent land uses are discussed in **Sections 4.2.1 and 4.3.1**, respectively.

Under the Preferred Action Alternative, long-term *minor adverse* impacts to existing land cover would be anticipated. However, based on the conceptual design for the proposed Ardmore RC facility (see **Figure 4**), not all of the 46 acres would be directly disturbed. Disturbance, in the form of conversion of open space land use, would only occur within the proposed facility footprints and at proposed access roads, parking areas, and utility corridors. The OKARNG would minimize clearing and earthwork to the maximum extent possible to minimize disturbance and associated construction costs. The Preferred Action Alternative effectively would disturb approximately 15 acres of land to improved surfaces (for structures, parking areas, and roads) and grassland. Approximately 5 acres of the disturbance area is currently shrub land.

No effect to land use is anticipated as a result of the demolition of the existing Ardmore RC or Poteau RC property transfer. Short-term, *minor land cover* impacts would arise during demolition activities due to land disturbance within the immediate vicinity of the existing RC building. However, long-term, *minor beneficial* impacts are anticipated to land cover due to the removal of the condemned RC facility. The approximately 1-acre building footprint would be restored to grassland. No effect on land use or on land cover would occur under the Preferred Action Alternative within the existing Poteau RC.

4.1.2 No Action Alternative

Under the No Action Alternative, the Preferred Action Alternative would not be implemented and no changes in land use or land cover would occur within the proposed or existing Ardmore RC properties or the existing Poteau RC property. The OKARNG would continue to use the existing less than adequate Ardmore and Poteau RC facilities.

4.2 Air Quality

4.2.1 Preferred Action Alternative

Air emissions generated from the implementation of the Preferred Action Alternative would have short-term and long-term, *minor adverse* impacts to the existing air quality environment in the vicinity of the proposed OKARNG facilities. Direct impacts to air quality would include minor short-term and long-term increased air emissions as a result of: (1) construction and demolition activities within the proposed and existing Ardmore RC properties (short-term), and (2) operation of the proposed Ardmore RC facility (long-term). No effect, either positive or negative, is anticipated to occur as a result of the Poteau RC facility transfer.

Short-term, *minor adverse* impacts would occur from increased air emission levels as a result of construction and demolition activities. Air pollutant generating sources present during these activities would be associated primarily with standard large-scale construction equipment. A minor increase in fugitive dust and vehicular engine emissions would be expected. NO_x and PM are the pollutants of greatest concern with respect to these activities. NO_x emissions are generated by equipment engines. PM emissions can result from a variety of activities, including demolition, excavation, grading, vehicle travel on paved and unpaved surfaces, and vehicle and equipment exhaust. NO_x emissions contribute to regional O_3 concentrations. Construction-related emissions, particularly site grading, can substantially increase localized concentrations of PM_{10} and $PM_{2.5.}$ PM emissions from construction can lead to adverse health effects and nuisance concerns, such as reduced visibility. Implementing dust control measures can significantly reduce particulate emissions from construction.

Prior to project implementation, structures planned for demolition, renovation, or conversion would be inspected by an Oklahoma-certified asbestos inspector. Asbestos-containing materials disturbed by demolition activities will be removed in accordance with applicable laws, regulations, and Army policy to prevent release (see **Section 4.11.1**).

The OKARNG would ensure dust control associated with construction and demolition is conducted in accordance with the ODEQ – Air Quality Division guidelines. To minimize the potential for adverse air quality impacts, the OKARNG would implement procedures for ensuring consistent usage of the following standard dust control BMPs, as applicable:

- Use appropriate dust suppression methods during on-site construction activities, and if necessary, during dry weather training activities. Available methods include application of water (fresh water only), soil stabilizers, or vegetation; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-movement or disturbance activities during high wind conditions.
- Require a speed of less than 15 miles per hour for construction equipment on unpaved surfaces.
- Use electricity from established electrical power sources instead of generators whenever possible.
- Use low volatile organic compound (VOC) architectural materials, supplies, and equipment.
- Repair and service construction equipment to prevent excess emissions.
- Shut down heavy equipment when not needed.
- Clean excess soil from heavy equipment and trucks leaving the construction zone to prevent off-site transport.

These dust-reducing measures would be briefed to the contractor at the construction kick-off meeting. The OKARNG's on-site construction manager would be responsible to bring air quality issues, if they arise, to the OKARNG for resolution. The OKARNG will communicate regularly with the surrounding residents, including sensitive populations identified in **Section 3.3.2**, regarding construction schedules.

Long-term, *minor adverse* operational air quality impacts would be expected as a result of the proposed Ardmore RC. Long-term impacts from site activities would be associated with military equipment, POVs, and heating units, with additional, insignificant emissions from routine facility maintenance and operations. Additionally, stationary sources of air emissions would be created under the Preferred Action Alternative. Permits for installing and operating stationary emission sources (e.g., boilers or space heating equipment) would be obtained as necessary. Emission sources would be specified to meet New Source Performance Standards as defined in 40 CFR Part 60, as required.

The Preferred Action Alternative would not cause an exceedance of the NAAQS and would occur in an area currently in attainment with the NAAQS for all criteria pollutants. A conformity analysis is not required for the Proposed Action, and no significant adverse impacts to air quality would occur as a result of implementing the Preferred Action Alternative.

Per EO 13514 (*Federal Leadership in Environmental, Energy, and Economic Performance*), federal agencies are required to implement sustainable practices and technologies, increase energy efficiency, and reduce greenhouse gas emissions. New facility construction and operation would result in an increase of greenhouse gas emissions within the vicinity of the proposed Ardmore RC. However, the proposed facility would be anticipated to provide only a negligible increase in greenhouse gas emissions due to its type and size. In addition, greenhouse gas emissions would be minimized through the implementation of energy conserving features incorporated into the design of the facilities. As mandated by Army Policy, new facility construction must conform to the five guiding principles in the Federal Leadership in High Performance and Sustainable Buildings Memorandum of Understanding, follow guidance as detailed in American Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc. (ASHRAE) Standard 189.1, and achieve a minimum US Green Building Council (USGBC) LEED Silver level rating (refer to **Section 2.2.1.1**).

Travel associated with POVs and government owned vehicles would result in a slight increase in greenhouse gas emissions within the vicinity of the proposed Ardmore RC. If the Preferred Action Alternative were implemented, approximately 29 full-time and 314 part-time personnel would utilize the site. It is not known where trips associated with these individuals would originate; however, it is anticipated that their contribution to regional greenhouse gas emissions within south-central Oklahoma would be negligible.

4.2.2 No Action Alternative

Under the No Action Alternative, no air quality impacts would occur.

4.3 Noise

4.3.1 Preferred Action Alternative

Under the Preferred Action Alternative, short-term and long-term, *minor adverse* impacts to the local noise environment would be anticipated. Direct impacts would include short-term increased noise levels as a result of construction and demolition activities and long-term increased noise levels as a result of

operation of the proposed Ardmore RC. No effect, either positive or negative, is anticipated to occur as a result of the Poteau RC facility transfer.

4.3.1.1 Short-term Impacts

Noise generating sources during construction and demolition activities would be associated primarily with standard heavy construction equipment. These increased noise levels could directly affect the neighboring areas adjacent to the proposed and existing Ardmore RC facilities. However, these impacts are not considered to be significant because they are temporary.

Based on existing noise levels and the anticipated use of heavy construction equipment to construct the proposed Ardmore RC, sensitive receivers adjacent to the proposed development site would be directly impacted by general construction noise. Construction activities generate noise by their very nature and are highly variable, depending on the type, number, and operating schedules of equipment. Construction projects are usually executed in stages, each having its own combination of equipment and noise characteristics and magnitudes. Construction activities would be expected to be typical of other similar construction projects and would include mobilization, site preparation, excavation, placing foundations, utility development, heavy equipment movement, and paving roadways and parking areas. The most prevalent noise source at construction sites is the internal combustion engine. General pieces of construction equipment that use combustion engines include: heavy, medium, and light equipment such as excavators; roller compactors; front-end loaders; bulldozers; graders; backhoes; dump trucks; water trucks; concrete trucks; pump trucks; utility trucks; cranes; sheet pile drivers; man lifts; forklifts; and lube, oil, and fuel trucks.

Peak noise levels vary at a given location based on line of sight, topography, vegetation, and atmospheric conditions. In addition, peak noise levels would be variable and intermittent because each piece of equipment would only be operated when needed. However, peak construction noise levels would be considerably higher than existing noise levels. Relatively high peak noise levels in the range of 93-108 dBA would occur on the active construction site, decreasing with distance from the construction areas. **Table 12** presents peak noise levels that could be expected from a range of construction equipment during proposed construction activities.

Generally speaking, peak noise levels within 50 feet of active construction areas and material transportation routes would most likely be considered “striking” or “very loud,” comparable to peak crowd noise at an indoor sports arena. At approximately 200 feet, peak noise levels would be loud, approximately comparable to a garbage disposal or vacuum cleaner at 10 feet. At 0.25 miles, construction noise levels would generally be quiet enough so as to be considered insignificant, although transient noise levels may be noticeable at times.

Combined peak noise levels, or worst-case noise levels, occur when several loud pieces of equipment are used in a small area at the same time as described in **Table 12**. This level of noise would occur rarely, if ever, during proposed construction and demolition activities within the proposed and existing Ardmore RC properties. However, under these circumstances, peak noise levels could exceed 90 dBA within 200 feet of the construction area, depending on equipment being used.

Table 12. Peak Noise Levels Expected from Typical Construction Equipment

Source	Peak Noise Level (dBA, attenuated)							
	Distance from Source (feet)							
	0	50	100	200	400	1,000	1,700	2,500
Heavy Truck	95	84-89	78-93	72-77	66-71	58-63	54-59	50-55
Dump Truck	108	88	82	76	70	62	58	54
Concrete Mixer	108	85	79	73	67	59	55	51
Jackhammer	108	88	82	76	70	62	58	54
Scraper	93	80-89	74-82	68-77	60-71	54-63	50-59	46-55
Bulldozer	107	87-102	81-96	75-90	69-84	61-76	57-72	53-68
Generator	96	76	70	64	58	50	46	42
Crane	104	75-88	69-82	63-76	55-70	49-62	45-48	41-54
Loader	104	73-86	67-80	61-74	55-68	47-60	43-56	39-52
Grader	108	88-91	82-85	76-79	70-73	62-65	58-61	54-57
Pile driver	105	95	89	83	77	69	65	61
Forklift	100	95	89	83	77	69	65	61

Worst-case Combined Peak Noise Level (Bulldozer, Jackhammer, Scraper)					
Combined Peak Noise Level	Distance from Source (feet)				
	50	100	200	0.25 Mile	0.50 Mile
	103	97	91	74	68

Source: Tipler 1976.

Although noise levels would be quite loud in the immediate vicinity of the proposed development site, the intermittent nature of peak construction noise levels would not create the steady noise level conditions for an extended duration that could lead to hearing damage. Construction workers would follow standard federal Occupational Safety and Health Administration (OSHA) requirements to prevent hearing damage.

Areas that would be most affected by noise from construction include those closest to the construction footprint, such as the rural residences west the proposed Ardmore RC construction footprint (see **Figure 4**). The residence approximately 0.3 mile to the southwest is the closest sensitive receptor. The remaining sensitive receptors are 0.5 mile or greater from the proposed site. Sensitive receptors with the potential to be affected by demolition activities at the existing Ardmore RC Site include Ardmore Regional Park users and the residential areas 0.25 and 0.4 mile east of the property along Veterans Boulevard. These areas are likely to experience some construction and demolition related noise, particularly during outdoor activities occurring at these locations. However, indoor noise levels at these locations would be expected to be 15-25 decibels lower than outdoor levels. Additionally, impacts would be anticipated to be minor because they would be temporary.

Indirect impacts include noise from workers commuting and material transport. Area traffic volumes and noise levels would increase slightly as construction employees commute to and from work at the project areas, and delivery and service vehicles (including trucks of various sizes) transit to and from the proposed development site. Because trucks would be present during most phases of construction and leave and enter the site via local thoroughfares, truck noises tend to impact more people over a wider

area. Under the Preferred Action Alternative, individuals living in the area near the existing and proposed Ardmore RC Sites would experience temporary increases in traffic noise during daytime hours. These effects would be anticipated to be minor because they would likely be temporary

The following standard BMPs would be used by the OKARNG as appropriate to limit noise impacts during construction:

- Limit, to the extent possible, construction and associated heavy truck traffic between 9 PM and 7 AM. This measure would reduce noise impacts during sensitive night-time hours.
- Locate stationary equipment as far away from sensitive receivers as possible
- Select material transportation routes as far away from sensitive receivers as possible
- Shut down noise-generating heavy equipment when it is not needed
- Maintain noisy equipment per manufacturer's recommendations
- Encourage construction personnel to operate equipment in the quietest manner practicable (e.g., speed restrictions, retarder brake restrictions, engine speed restrictions, etc.).

These noise-reducing measures would be briefed to the contractor at the construction kick-off meeting. The OKARNG's on-site construction manager would be responsible to bring noise issues, if they arise, to the OKARNG for resolution. This information will be incorporated into construction contracts.

4.3.1.2 Long-term Impacts

Operation of the proposed Ardmore RC would result in increased noise levels on- and off-site, and represents a direct long-term, *minor adverse* impact as a result of on-site activities, ground-based traffic, and routine facility operations. Operation of the new facilities would not appreciably alter the noise environment or interfere with surrounding activities.

Vehicular traffic is anticipated to increase as a result of the Preferred Action Alternative. Access to the proposed Ardmore RC would be provided along East Prairie Valley Road and Cooper Drive. Residences along East Prairie Valley Road and North Plainview Road to the west of the proposed site may experience a minor increase in traffic and associated noise. However, the area is already subject to some truck and vehicle noise from nearby industry on the north, east and south sides of the proposed site. Because on-site noise will be limited and nearby sensitive receptors are 0.3 mile or greater from the site boundary, only a *minor adverse* effect is anticipated to the residences west of the site.

Routine operation of the proposed Ardmore RC would continue to result in intermittent light-duty and heavy-duty vehicle noise that could be audible in the adjacent areas. Most of the noise created by these vehicles would be consistent with other activities already occurring within adjacent areas.

Training activities would occur mostly on weekends, with associated increases in noise levels. However, these actions would occur during daytime hours and be of short duration. Noise from vehicle maintenance would not be expected to increase from current conditions. Operation of the new facilities would not appreciably alter the noise environment or interfere with surrounding activities.

4.3.2 No Action Alternative

Implementation of the No Action Alternative would have no effects on the current local noise environment, beneficial or otherwise. Operations at the existing Ardmore and Poteau RCs would continue under current conditions and levels.

4.4 Geology, Topography, and Soils

4.4.1 Preferred Action Alternative

Under the Preferred Action Alternative, *no significant adverse* impacts to geology, topography, or soils would be anticipated. No effect to topography, geology or soils would occur as a result of the Poteau RC property transfer.

Implementation of the Preferred Action Alternative would require minimal grading; substantial changes in topography and drainage patterns would not be expected. No impacts to geology or bedrock (i.e., deep excavation) are proposed or would be anticipated as a result of the Preferred Action Alternative. As described in **Section 3.5.1**, no geologic hazards are apparent in the proposed or existing Ardmore RC Sites, and would not be expected to impact human health as a result of project implementation. Based on currently available data, no active significant faults are known at this time to extend through the proposed development site subsurface geology. As such, no impacts associated with seismic hazards would be anticipated. No impacts to mineral resources would be anticipated, as none of the Preferred Action Alternative project components would involve the commercial extraction of mineral resources, or would affect mineral resources considered important on a local, state, national, or global basis.

Under the Preferred Action Alternative, direct short-term, *minor adverse* soil erosion and sedimentation impacts would be possible as the proposed RC building, parking areas, access roads, fence, and other project components are constructed within the proposed Ardmore RC Site. Construction would remove vegetative cover, disturb the soil surface, and compact the soil. The soil would then be susceptible to erosion by wind and surface runoff. Similarly, short-term, *minor adverse* impacts to soil in the area immediately surrounding the existing Ardmore RC building would be directly impacted during demolition activities. Exposure of the soils during construction and demolition activities would have the minor potential to result in increased sedimentation in on- or off-site surface waters.

Direct long-term, *minor adverse* soil erosion impacts would occur as a result of increased impervious surfaces within the proposed Ardmore RC Site (i.e., increased runoff or alteration in natural drainage patterns). Training activities associated with the Preferred Action Alternative would not be anticipated to impact soils on-site. Further, outdoor training would not include ground-disturbing activities. Vehicle traffic would remain within paved areas (i.e., roads and parking areas).

The OKARNG would prepare a detailed, site-specific Erosion and Sedimentation (E&S) Control Plan to address all earth-disturbance aspects of the Proposed Action, including all project components. The E&S Control Plan would include standard BMPs such as specific guidelines and engineering controls to address anticipated erosion and resultant sedimentation impacts from establishing and operating the proposed facilities. These measures would include:

- Installing and monitoring erosion-prevention BMPs such as silt fences and water breaks, sedimentation basins, filter fences, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures; re-spreading stockpiled topsoil; and seeding/revegetating areas temporarily cleared of vegetation
- Retaining trees to the maximum extent possible
- Planting and maintaining soil-stabilizing vegetation on disturbed areas other than bare earth training areas
- Using native vegetation to revegetate disturbed soils
- Complying with the OKARNG Environmental SOP and site-specific FRP and ensuring all OKARNG staff members are trained in spill response.

With implementation of the E&S Control Plan during site development and operation, soil erosion and resulting sedimentation would be minimized to *less-than-significant* levels. Successful implementation of these measures would ensure that the Preferred Action Alternative is in compliance with state and federal water quality standards and minimizes both the short- and long-term potential for erosion and sedimentation.

Soils within the proposed Ardmore development site are classified as prime farmland; they include Clarita silty clay with 3 to 5 percent slopes, Durant loam with 3 to 5 percent slopes and Heiden clay with 1 to 3 percent slopes. Approximately 9 acres of prime farmland soils are anticipated to be permanently impacted by the construction of the RC building, roads, parking areas and other support structures. Coordination with the USDA-NRCS was completed for this project in accordance with the Farmland Protection Policy Act (FPPA; 7 CFR Part 658).

4.4.2 No Action Alternative

Implementation of the No Action Alternative would have no impact on the current geology, topography, and soils within the Proposed Action area. The three sites in Ardmore and Poteau, OK would remain as described in **Section 3.5**. The OKARNG would continue to use the less than adequate existing Ardmore and Poteau facilities.

4.5 Water Resources

4.5.1 Preferred Action Alternative

Under the Preferred Action Alternative, short-term and long-term, *minor adverse* impacts to water resources would be anticipated. Implementation of specific standard BMPs and adherence to Regulatory Requirements would be required for implementation of the Preferred Action Alternative. No effect to water resources is anticipated as a result of the Poteau RC property transfer.

No direct impacts to floodplains, wetlands, streams, or other surface waterbodies would be anticipated as a result of the implementation of the Preferred Action Alternative. None of the three OKARNG properties in Ardmore and Poteau, OK are located within a FEMA floodplain and no jurisdictional streams, wetlands or other waters occur within or in the immediate vicinity of these sites. A copy of the 2011 USACE JD for

the proposed Ardmore RC Site and consultation letter (5 February 2015) with the USACE Tulsa District for the Proposed Action can be found in **Appendix A.** Further, no direct impacts to the stormwater pond/surface impoundment or wet area in the proposed Ardmore RC Site are proposed. These features would be avoided during construction activities and would be utilized for stormwater management during operation of the facility.

Potential impacts to ground and surface water resources are possible from inadvertent releases of contaminants, such as fuel and other petroleum products, other fluids from vehicles used on the OKARNG facilities, and sediment from soil disturbance during construction and demolition activities. **Section 4.11** discusses potential pollution (i.e., from chemicals, fuels, etc.) impacts attributable to the Preferred Action Alternative, and identifies BMPs that render potential impacts to *less-than-significant* levels.

Project activities, which include clearing, grading, excavation, demolition, or other land disturbing activities, would result in the disturbance of 1 acre or more of total land. A NPDES General Permit for Surface Water Discharge Associated with Construction Activities would be obtained from the ODEQ prior to conducting construction activities within the proposed Ardmore RC Site and demolition activities within the existing Ardmore RC Site. The OKARNG would comply with the terms of the permit and implement standard BMPs during construction and demolition activities, as discussed in **Section 4.5.1**. In addition, a site-specific Storm Water Pollution Prevention Plan (SWPPP) would be developed for construction activities. The plan would include all phases of construction and identify the location and scale of E&S controls. The plan would be maintained on-site during construction and demolition. The OKARNG would conduct periodic visual inspections to verify that the E&S Control Plan is being followed and is working. Short-term *adverse* impacts to water resources during construction and demolition activities would be reduced to *less-than-significant* levels through implementation of BMPs and permit conditions.

Long-term surface water protection during operation of the facilities would be accomplished by implementing storm water BMPs, maintaining vegetative cover, the site-specific FRP, and the OKARNG Environmental SOP. This would reduce potential impacts associated with runoff to *less-than-significant* levels.

4.5.2 No Action Alternative

Implementation of the No Action Alternative would have no effect on the current ground and surface water resources within or in the vicinity of the proposed OKARNG site. The proposed site would remain as described in **Section 3.6**. The OKARNG would continue to use the less than adequate existing Ardmore and Poteau facilities.

4.6 Biological Resources

4.6.1 Preferred Action Alternative

Under the Preferred Action Alternative, short-term and long-term, *minor adverse* and long-term *beneficial* impacts to biological resources would be anticipated. No effect, positive or negative, is anticipated as a result of the Poteau RC property transfer.

4.6.1.1 Vegetation and Wildlife

A short-term, *minor adverse* impact to biological resources would occur during construction and demolition activities within the Ardmore properties due to the removal of existing vegetation during site preparation and activities. Based on the conceptual design for the proposed Ardmore RC facility (see **Figure 4**), not all of the 46 acres would be directly disturbed. Disturbed vegetation would mainly consist of maintained grasslands; however, approximately 5 acres of shrub land would require some shrub and tree clearance. The OKARNG would minimize tree clearing and earthwork to the maximum extent possible to minimize disturbance and associated construction costs. Vegetation disturbed temporarily during construction and demolition activities would be re-vegetated and maintained as grassland. Native species will be used to the extent practicable when revegetating land disturbed by construction.

Under the Preferred Action Alternative, a long-term, *minor adverse* effect is anticipated due to the permanent loss of grassland and shrub land within the proposed Ardmore RC Site. The Preferred Action Alternative would result in the permanent loss of approximately 12 acres of maintained grassland and shrub land to improved surfaces (for structures, parking areas, and roads). However, a long-term, *negligible beneficial* impact to the existing Ardmore RC Site would result due to the removal of the condemned building on the property; this 1-acre footprint would be revegetated. Given the limited amount of tree clearing and impervious surfaces proposed on the proposed Ardmore RC Site, coupled with the fact that the proposed site was previously disturbed during past agricultural activities and the surrounding area is primarily industrial/commercial use, the overall impact to vegetative communities is anticipated to be minor under the Preferred Action Alternative.

Wildlife in the project areas would sustain both short- and long-term, *minor adverse* impacts, primarily associated with loss of habitat within the proposed Ardmore RC Site. Additionally, wildlife would likely experience short-term, *minor indirect* impacts associated with construction and demolition activities. During construction and demolition activities, wildlife would be expected to vacate the project areas; less mobile species (i.e., small mammals, reptiles, amphibians) could potentially suffer loss of life during initial construction activities. Most wildlife species would likely permanently vacate the project areas due to habitat changes and losses, noise, and increased human activity. However, the total amount of habitat lost would be relatively minor.

4.6.1.2 Special Status Species

No adverse impacts to threatened or endangered species are anticipated as a result of the Preferred Action Alternative. No federally listed species have been observed and no critical habitat has been designated at the existing or proposed Ardmore RC Sites or at the existing Poteau RC. Due to a lack of suitable habitat present on the proposed and existing Ardmore RC site, no effect is anticipated to occur to

the least tern, piping plover and red knot. Limited habitat is present for the whooping crane and American burying beetle on the proposed Ardmore RC Site. Some potential discountable effects could occur to these species; however, it was determined due to limited habitat on-site that the Proposed Action may affect, but is not likely to adversely affect these species. No effect to listed species is anticipated to occur as a result of the transfer of the Poteau RC due to a lack of habitat.

A copy of the USFWS concurrence letter and ESA Section 7 consultation packet is included in **Appendix A**. The USFWS Oklahoma Ecological Services Field Office (OKESFO) utilizes an Online Project Review Process to comply with 50 CFR 402, *Interagency Cooperation*. The OKARNG completed this consultation packet per the OKESFO internet tool. An initial consultation letter was sent via regular mail on 13 January 2015 to the local USFWS office. However, after further investigation and discussions with the OKESFO, the OKARNG submitted the 5 May 2015 consultation packet in accordance with the USFWS OKESFO online instructions. Per the OKESFO online tool instructions, the USFWS will only contact the proponent if additional information is needed to make their concurrence determination. ESA Section 7 consultation is deemed complete if USFWS does not contact the proponent within 60 days.

The OKARNG is responsible under the MBTA, 50 CFR Part 21, and EO 13186 (*Responsibilities of Federal Agencies to Protect Migratory Birds*) to promote and protect migratory birds. Construction activities can have direct impacts on migratory birds and other ground nesting birds during the breeding season due to potential stressors, such as the use of heavy machinery, vegetation and land clearing, and increased noise. Indirect impacts on birds could also result from the permanent or temporary loss of habitat. Direct or indirect impacts are anticipated to be negligible. Ground disturbance would occur within maintained grassland areas within the proposed and existing Ardmore RC Sites. Because these grassland areas experience regular mowing, habitat is limited and ground nesting birds are unlikely. To minimize potential impacts to migratory birds, no effect to the existing pond or scrub shrub habitat would occur on the proposed Ardmore RC Site. Furthermore, BMPs for migratory birds will be conducted in accordance with MOU between USFWS and DoD (see **Appendix C**).

4.6.2 No Action Alternative

Under the No Action Alternative, no impacts to biological resources would occur. Conditions would remain similar to those described in **Section 3.7**.

4.7 Cultural Resources

4.7.1 Preferred Action Alternative

The Preferred Action Alternative is anticipated to have no effect on historic structures, archaeological resources, or recorded tribal resources.

As described in **Section 3.8.2**, no historic structures or archaeological sites have been identified within the APE, which was defined as a 0.5-mile radius from the center of the proposed 46-acre Ardmore property and the boundary of the existing Ardmore and Poteau RC properties. Therefore, under the Preferred Action Alternative, no historic properties would be affected pursuant to 36 CFR Part

800.4(d)(1). The Oklahoma SHPO and OAS concurred with this evaluation in correspondence dated 5 February 2015 and 29 January 2015, respectively (see **Appendix A** for concurrence letters).

Native American consultation for this EA was initiated by the OKARNG in accordance with NEPA, NHPA, and DoDI 4710.02 (*DoD Interactions with Federally Recognized Tribes*), which implements the *Annotated DoD American Indian and Alaska Native Policy* (dated 27 October 1999); EO 13175 (*Consultation and Coordination with Indian Tribal Governments*); and AR 200-1. There have been no sacred, religious, cultural or traditional resources identified by the Native American Indian tribes that will be affected by the Preferred Action Alternative. A list of tribes contacted, copies of correspondence letters, and a MFR are included in **Appendix A**.

Should archaeological materials or human remains be inadvertently discovered during construction activities, all work shall cease immediately and the OKARNG ICRMP SOP No. 5 would be followed (OKARNG 2010a). Therefore, impacts to cultural resources under the Preferred Action Alternative would be *less-than-significant*.

4.7.2 No Action Alternative

Under the No Action Alternative, no impacts to cultural resources, including historic and archeological resources, would occur. The OKARNG would continue to use the less than adequate Poteau and Ardmore facilities.

4.8 Socioeconomics

4.8.1 Preferred Action Alternative

Under the Preferred Action Alternative, short-term and long-term*, minor beneficial* and long-term *adverse* socioeconomic impacts would be anticipated.

Short-term, *minor beneficial* socioeconomic impacts associated with construction activities would be anticipated for local employment and personal income under the Preferred Action Alternative. Construction of the proposed Ardmore RC and the demolition of the existing Ardmore RC would potentially provide additional temporary construction jobs in the private sector, thus providing short-term socioeconomic benefit to the Ardmore, OK area. However, due to the intermittent and finite nature of these construction projects, no long-term *beneficial* impacts to the civilian construction labor force would be anticipated. Increased construction in the region would indirectly benefit the local economy through the spending of business and personal income generated during the construction of the facilities.

The City of Ardmore and Carter County would have a direct, long-term *beneficial impact* from the construction and operation of the proposed Ardmore RC. The OKARNG facility would provide a facility of sufficient size and modern design within south-central Oklahoma to efficiently achieve and maintain mission requirements and requisite mobilization readiness levels for the assigned units. Further, it would provide a facility to support civilian authorities, recruit the next generation into the military service, and provide an acceptable place of refuge for its citizens during times of emergency.

The proposed Ardmore RC would support 29 full-time and up to 314 part-time OKARNG personnel. However, because 3 full-time and 81 part-time OKARNG personnel currently use the existing Ardmore facility that would be demolished, the net increase in OKARNG personnel to the region would only be 26 full-time and 233 part-time personnel as a result of the Preferred Action Alternative. As such, a long-term *beneficial indirect* impact to the local economy, including shops and services, would be anticipated from operation of the facilities. Socioeconomic impacts to the region primarily would be based on the temporary influx of training personnel during the two-day weekend training assemblies. The operation of the proposed Ardmore RC would not be anticipated to significantly impact area schools, permanent housing, or the overall population of the City of Ardmore and Carter County.

No *significant adverse* impacts to public health and safety or children are anticipated to result from construction or operation of the proposed Ardmore RC. Construction areas would be secured to prevent unauthorized access. The OKARNG would work with the contractor to limit construction dust and noise as practicable. The proposed RC would be constructed in accordance with the UFC 4-010-01, *DoD Minimum Antiterrorism Standards for Buildings* (2013). Children could occur within the property on occasion, but are unlikely to occur on a regular basis. The OKARNG has established strict procedures which limit access to potentially hazardous areas to avoid public health or safety threat. No explosives or large quantities of hazardous materials would be kept on-site. Military vehicles and equipment will be stored in a fenced, secure area to prevent access by children and unauthorized persons.

No significant additional load is expected to be placed on the fire or police departments or medical facilities as the result of implementing the Proposed Action. No direct or indirect impacts to recreational activities would be anticipated in the region. The proposed Ardmore RC would be constructed within an existing industrial park and would be compatible with existing land uses and zoning.

A *minor, indirect, adverse* effect to the local economy in the City of Poteau, including shops and services, would be anticipated due to the OKARNG vacating the Poteau RC, particularly during training weekends. This facility currently employs 3 permanent staff members, and an additional 92 part-time personnel use the site one weekend per month during two-day weekend training assemblies. However, this impact is anticipated to be negligible because the loss of full-time positions would be small and this facility would be transferred for use to another county, city, or state entity.

4.8.2 No Action Alternative

Implementation of the No Action Alternative would result in no increased revenue through military spending for the general area within Carter County. The OKARNG would continue to use the less adequate existing facilities. In addition, the condemned Ardmore RC building would not be demolished, and the costs of maintaining this uninhabitable structure and the health and safety issues related to it would remain.

4.9 Environmental Justice

The concept of environmental justice is based on the premise that no segment of the population should bear a disproportionate share of adverse human health or environmental effects of a proposed federal action. Historically, low-income and minority communities have, in some cases, been disproportionately

affected by negative environmental effects, receiving few of the benefits of economic growth and development while absorbing much of the societal cost. In accordance with EO 12898 (*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*) and DoDI 4715.9, this section examines the demographic profile of the population around the proposed OKARNG site.

4.9.1 Preferred Action Alternative

Under the Preferred Action Alternative, *no significant* environmental justice impacts would be anticipated.

As described in **Section 3.9**, no specific concentrations of minority or low-income populations are located in the vicinity of the project areas, and no local groups are known to principally rely on fish or wildlife for subsistence. Consequently, no *adverse* impacts to such disadvantaged segments of the population would be anticipated as a result of implementation of the Preferred Action Alternative.

Implementation of the Preferred Action Alternative would be anticipated to result in short-term, *minor beneficial* socioeconomic impacts. These positive impacts would result from construction of the proposed facilities, which would be expected to provide additional opportunities and increases in local employment and personal income. Specifically, new short-term jobs may be created in the local construction industry, subsequently providing potential opportunities for unemployed, low-income, or minority groups. As such, a short-term, *indirect beneficial* environmental justice impact may occur. However, the extent of this benefit would be dependent upon the degree to which minority or low-income persons are employed in these activities. No long-term *beneficial* environmental justice impacts would be anticipated.

4.9.2 No Action Alternative

Implementation of the No Action Alternative would not affect environmental justice populations. The OKARNG would continue to use the less than adequate existing Poteau and Ardmore facilities.

4.10 Infrastructure

4.10.1 Preferred Action Alternative

Under the Preferred Action Alternative, short-term and long-term, *minor adverse* and long-term *beneficial* impacts to the infrastructure in Ardmore, OK would be anticipated. No effect, positive or negative, is anticipated to occur as a result of the Poteau RC property transfer.

The proposed Ardmore RC would not be anticipated to require extraordinary utility needs beyond those of a light industrial/commercial operation at the site. The proposed Ardmore RC would be designed to meet LEED Silver rating standards or higher. The highest operating costs over the life of the buildings and facilities results from energy demand management. Energy efficiency, water conservation, and sustainable design are the basis for EO 13123 (*Greening the Government through Efficient Energy Management*), 3 June 1999. While utility line extensions would be required, all major utility services are available within or immediately adjacent to the proposed Ardmore RC Site. Impacts associated with utility extensions are anticipated to be both temporary and negligible. The OKARNG would obtain all required permits before any proposed utility line expansion commences and would adhere to permit conditions. No significant long-term *adverse* impacts associated with increased utility use would be anticipated. Local

service providers have the capacity to meet the projected increased utility use and no impacts are anticipated.

Beneficial impacts would result from the proposed Ardmore RC construction because the facility would provide the OKARNG with the necessary administrative, training, and storage areas required to achieve proficiency in required training tasks and to accomplish and maintain the units' readiness posture. Furthermore, south-central Oklahoma would benefit from having an adequate facility to support civilian authorities during emergencies as well as provide a place of refuge for its citizens during these times.

Short-term, *minor adverse* traffic impacts from the Proposed Action would be related to construction activities. Construction traffic would not be routed through residential neighborhoods. Additional traffic on I-35 (Exit 33), East Prairie Valley Road, Cooper Drive, and Veterans Boulevard would be expected, consisting of trucks, workers' personal vehicles, and construction equipment. Debris and soil may deposit on roadways from construction vehicles, resulting in a potential safety hazard as well as annoyance to area residents. No traffic detours or road closings are planned. Access would be maintained during construction. However, construction traffic could disrupt local traffic, especially during morning and evening peak periods. This would be expected to be a short-term, *minor adverse* impact and would not be considered significant because it would be temporary.

Long-term, *minor adverse* impacts to local traffic are anticipated due to the Preferred Action Alternative. Public roadways in the vicinity of the proposed Ardmore RC would experience additional traffic as a result of facility usage. This would be expected to be a long-term, *minor adverse* impact and would not be considered significant. Approximately 30 POVs per weekday are anticipated from full-time OKARNG personnel. Weekend training could add an additional 300 POVs per day, two or three weekends per month. This additional traffic is not anticipated to cause undue burden on the existing roadway system. Occasional, localized, short delays could result when units are arriving or departing.

4.10.2 No Action Alternative

The No Action Alternative would have no effect on area infrastructure or transportation. The OKARNG would continue to use the less than adequate existing Ardmore and Poteau facilities. In addition, the condemned Ardmore RC building would not be demolished and the costs of maintaining this uninhabitable structure and the health and safety issues related to it would remain. The beneficial impacts to the OKARNG and south-central Oklahoma region discussed above would not be recognized.

4.11 Hazardous and Toxic Materials and Wastes

4.11.1 Preferred Action Alternative

Under the Preferred Action Alternative, short-term and long-term, *minor adverse* impacts associated with HTMW would be anticipated. No positive or negative overall effect to HTMW is anticipated as a result of the Poteau RC property transfer.

The proposed Ardmore RC would have at least some potential for adverse effects due to the increased presence and use of HTMW. The implementation of the Preferred Action Alternative could potentially have impacts on the existing environment due to the increase in construction vehicle traffic, which

effectively raises the likelihood for release of vehicle operating fluids (e.g., oil, diesel, gasoline, antifreeze, etc.) and maintenance materials. As such, a short-term, *minor adverse* impact would be anticipated.

In general, the potential short-term *minor adverse* effects from HTMW would be due to construction vehicle activity and general construction activities. These facilities would have potential contamination sources for such products as diesel fuel, gasoline, oil, antifreeze, lubricants, and lead, among others. Even without major release events, multiple minor releases could have potential effects to the environment at the proposed development site. Releases could potentially lead to soil, surface water, and/or groundwater contamination, and thus require some form of remediation.

Operation of the installation post-construction would continue to involve use or generation of small amounts of regulated substances, including cleaning solvents, mineral spirits, and oils and lubricants for vehicles and equipment. All hazardous and toxic substances that would be used or generated would be handled and disposed of in compliance with federal and state requirements, as well as the OKARNG Environmental SOP.

The existing Ardmore RC to be demolished has been condemned due to health and safety issues resulting from water penetration, foundation damage, and mold. The structure to be demolished contains mold and may contain lead-based paint, asbestos-containing materials, PCBs, or other material requiring special handling. Prior to implementing the demolition of this structure, the OKARNG would notify the Oklahoma Department of Labor in accordance with the Oklahoma Asbestos Control Act (Title 40 Oklahoma Statute [OS] §450-456) and Abatement of Friable Asbestos Materials Rules (Oklahoma Administrative Code [OAC] 380:50-1-1 through 380:50-29-1). Additionally the OKARNG would notify the ODEQ – Air Quality Division and will ensure compliance with the provisions set forth in the National Emission Standards for Hazardous Air Pollutants guidelines (40 CFR Part 63, OAC 252:100-41-15). Special handling and disposal requirements would be required during demolition. The OKARNG would follow the applicable laws, regulations and Army Policy pertaining to the handling and disposal of lead-based paint, asbestos-containing materials, fluorescent light fixtures, or other materials requiring special handling.

4.11.2 No Action Alternative

Implementation of the No Action Alternative would have no effects with respect to HTMW at the proposed development site. The OKARNG would continue to use the less than adequate existing Ardmore and Poteau facilities. In addition, the condemned Ardmore RC building would not be demolished and the costs of maintaining this uninhabitable structure and the health and safety issues related to it would remain.

4.12 Mitigation Measures and BMPs

Per established protocols, procedures, and requirements, the OKARNG will implement BMPs and will satisfy all applicable regulatory requirements in association with the Proposed Action. BMPs are are included as components of the Preferred Action Alternative and described below. BMPs are regulatory compliance measures that the OKARNG regularly implements as part of their activities, as appropriate, across the State of Oklahoma. These are different from “mitigation measures,” which are defined as project-specific requirements, not routinely implemented by the OKARNG, necessary to reduce identified

potentially significant adverse environmental impacts to *less-than-significant* levels. ***No project-specific mitigation measures are needed to reduce impacts to less-than-significant levels.*** With implementation of the following routine BMPs, the Preferred Action Alternative would not result in significant adverse impacts to the current environmental setting.

Land Use and Cover. The OKARNG will minimize clearing and earthwork to the maximum extent possible to minimize disturbance and associated construction costs.

Air Quality. The OKARNG will ensure dust control associated with construction of the proposed Ardmore RC is conducted in accordance with the ODEQ – Air Quality Division guidelines. Available methods include application of water, soil stabilizers, or vegetation; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-movement activities during high wind conditions. To minimize dust generated by vehicles and equipment on unpaved surfaces, the OKARNG will maintain an appropriate speed. Electricity from established electrical power sources or other energy-efficient supplies will be used, whenever possible, instead of generators. Equipment will be shut down when it is not in use. Construction equipment will be repaired and serviced in accordance with the regular maintenance schedule recommended for each individual equipment type, and cleaned of excess soil before leaving the construction zone to prevent off-site transport. These dust-reducing measures will be briefed to the contractor at the kick-off meeting. This information will be incorporated into construction contracts.

Permits for installing and operating stationary emission sources (e.g., boilers, space heating equipment, degreasers, or parts washers) will be obtained as necessary. Emission sources will be specified to meet New Source Performance Standards as defined in 40 CFR Part 60, as required. As mandated by Army Policy, the new facilities will be constructed to meet a minimum USGBC LEED Silver level rating, and ASHRAE Standard 189.1 will be followed.

Noise. The following standard BMPs will be implemented by the OKARNG, as appropriate, to limit noise impacts during construction. The OKARNG will limit, to the extent possible, construction and associated heavy truck traffic between 9 PM and 7 AM. Stationary equipment and material transportation routes will be located as far away from sensitive receivers as possible. Equipment will be operated per manufacturer's recommendations, and noise-generating heavy equipment will be shut down when not needed. Construction personnel will be directed to operate equipment in the quietest manner practicable (e.g., speed restrictions, retarder brake restrictions, engine speed restrictions, etc.). These noise-reducing measures will be briefed to the contractor at the construction kick-off meeting. The OKARNG's on-site construction manager would be responsible to bring noise issues, if they arise, to the OKARNG for resolution. This information will be incorporated into construction contracts.

Soils. The OKARNG will prepare a detailed, site-specific E&S Control Plan to address all earth-disturbance aspects of the Proposed Action, including all project components. The E&S Control Plan will include standard BMPs, such as specific guidelines and engineering controls to address anticipated erosion and resultant sedimentation impacts from establishing and operating the proposed facilities. The OKARNG will implement the following measures: install and monitor erosion-prevention measures such as silt fences and water breaks, sedimentation basins, filter fences, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures; re-spread stockpiled topsoil;

seed/revegetate areas temporarily cleared of vegetation with native vegetation; and retain existing trees to the maximum extent possible.

Water Resources. The OKARNG will obtain a NPDES General Permit for Surface Water Discharge Associated with Construction Activities from the ODEQ for all land-disturbing activities that result in the disturbance of 1 or more acres of total land. In addition, a site-specific SWPPP would be developed for construction and demolition activities. The OKARNG would comply with the terms of the permit and implement standard BMPs to protect water quality during construction and demolition activities as discussed above. In addition, a site-specific SWPPP will be developed for construction activities. The plan will include all phases of construction and identify the location and scale of E&S controls. The plan will be maintained on-site during construction and demolition. The OKARNG will conduct periodic visual inspections to verify that the E&S Control Plan is being followed and is working. Long-term surface water protection during operation of the facilities would be accomplished by implementing storm water BMPs, maintaining vegetative cover, the site-specific FRP, and the OKARNG Environmental SOP.

Biological Resources. The OKARNG will limit ground-disturbing activities at the proposed Ardmore RC Site to the maximum extent feasible. Native plant species will be used to the maximum extent practicable when revegetating land disturbed by construction and demolition.

Cultural Resources. Should archaeological materials or human remains be inadvertently discovered during construction activities, all work will cease immediately and the OKARNG ICRMP SOP No. 5 would be followed (OKARNG 2010a).

Public Health and Safety. The OKARNG will establish strict procedures which limit access to potentially hazardous areas to avoid public health or safety threat. No explosives or large quantities of hazardous materials will be kept on-site. Military vehicles and equipment will be stored in a fenced, secure area to prevent access by children and unauthorized persons.

HTMW. During construction and operation of the proposed Ardmore RC, all hazardous and toxic substances that would be used or generated will be handled and disposed of in compliance with the OKARNG Environmental SOP. During the demolition of the condemned Ardmore RC building, the OKARNG will follow all applicable laws, regulations and Army Policy pertaining to the handling and disposal of mold-containing materials, lead-based paint, asbestos-containing materials, fluorescent light fixtures, or other material requiring special handling.

4.13 Cumulative Effects

As defined by CEQ regulations in 40 CFR Part 1508.7, cumulative impacts are those that “result from the incremental impact of the Proposed Action when added to other past, present and reasonably foreseeable future actions, without regard to the agency (federal or non-federal) or individual who undertakes such other actions.” Cumulative impact analysis captures the effects that result from the Proposed Action(s) in combination with the effects of other actions in the Proposed Action’s ROI.

Because of extensive influences both within the project areas and outside their boundaries, cumulative effects are the most difficult to analyze. NEPA requires analysis of cumulative environmental effects of a

an action, or set of actions, on resources that may often be manifested only at the cumulative level, such as traffic and circulation, air quality, noise, biological resources, cultural resources, socioeconomic conditions, utility system capacities, and others.

The OKARNG consulted regional plans and contacted several local entities (see **Section 9**) to identify past, present and reasonably foreseeable future actions within the ROI. The ROI for cumulative analysis includes the City of Poteau, City of Ardmore, and Carter County. However, no cumulative effects within the City of Poteau are anticipated to result from the proposed transfer of the existing Poteau RC property to another local or government agency due to the relatively minor scope of this component of the Proposed Action. Further, no potential cumulative effects within the City of Poteau were identified during the scoping period for this EA. Therefore, the cumulative effects analysis within this section focuses on the past, present, and reasonably foreseeable actions in the City of Ardmore and Carter County that were identified within available regional and local plans and through consultation with local personnel. Actions identified are summarized below.

- ✓ The ADA owns four industrial parks in and near Ardmore for the purposes of business relocation and expansion. These include the Ardmore Industrial Airpark, New Horizons Industrial Park, Westport Industrial Park, and Colvert Business Park (ADA 2015). Recent expansions and new industry within these industrial parks include: Beetle Plastics; Southwest Silicon Technologies; Online Packaging; Dollar General Corporation; Dot Foods, Inc.; Carbonyx Carbon Technologies; and Michelin North America. Further, Best Buy opened a new 750,000 SF facility in May 2004, located in the Westport Industrial Park, across the street from the proposed Ardmore RC Site (see **Figures 2 and 4**). This facility employs 195 people and is one of seven large Best Buy distribution centers within the United States (ADA 2015).

- ✓ The ADA partnered with the Samuel Roberts Noble Foundation and the Southern Oklahoma Technology Center to create a business incubator facility in 2005. The Ardmore Technology Transfer Center is located on the Southern Oklahoma Technology Center, approximately 5 miles east of the proposed Ardmore RC Site; it was designed to recruit and retain technology-oriented companies in Ardmore, OK. According to the ADA, advantages of the business incubator include more affordable lease space and access to on-site managerial, administrative, and financial services that assist the companies in overcoming challenges faced in the market place. The long-term objective of this project is to create a technology park in Ardmore, OK (ADA 2015).

- ✓ In 2007, the first homes were constructed in the Hickory Ridge Addition (HRI), which is located approximately 2 miles northwest of the proposed Ardmore RC Site. The HRI was a result of a partnership between the Ardmore Chamber of Commerce, the ADA, and the City of Ardmore designed to increase the amount of affordable housing in the City of Ardmore. The first homes were completed in 2008, and plans for Phase 3 are currently underway. Eventually, 200 homes will be constructed in the HRI (ADA 2015).

- ✓ The Ardmore Comprehensive Plan 2015, adopted in 1995, includes a framework of goals, objectives and policies that support the development goals of the City. There are 10 elements to the Ardmore Comprehensive Plan, including the Land Use Element, Housing Element, Economic

Development Element, and the Environmental Resources and Drainage Element (Robinson & Assoc. 2011).

4.13.1 Cumulative Effects within the Area

Carter County was established in 1907. However, the City of Ardmore developed with the establishment of the Santa Fe Railroad in 1887, while Oklahoma was still Indian Territory (ADA 2015). Oil production from the nearby Healdton Oil Field began in 1913, leading to further development and rail construction. During this time, oil production greatly contributed to the development of the City of Ardmore as an important refining center. In 1975, Carter County produced approximately 22 million barrels of crude oil; however, production has since fallen. Ranching and agriculture production have also played an active part in the County's economy throughout its history (OHS 2007).

In 1907, the County's population was 26,402 and nearly doubled by 1920 to 40,247. However, after World War II, the population decreased to 36,455, remaining fairly stable with only a slight increase to 39,144 by 1960. The population of Carter County was 45,621 in 2000 and 47,577 in 2010, an increase of 4.24 percent (US Census Bureau 2010). As discussed in Section 3.9.1, the City of Ardmore experienced even less population growth between 2000 and 2010, growing just 2.52 percent from 23,687 to 24,283. Population projections indicate Carter County will continue to experience population growth (refer to **Table 6**); however, this growth is not anticipated to be significant relative to the overall State of Oklahoma. Regardless, it is expected that some increased regional development would occur in the future to accommodate the increase in population within Carter County and the City of Ardmore. Further, similar to past efforts described above (e.g., industrial park development, business incubators, etc.), it is anticipated that the City of Ardmore and the ADA will continue to pursue investments and capital development projects to actively grow the business and industrial centers within the City of Ardmore.

4.13.2 Cumulative Effects of the Proposed Action

The Preferred Action Alternative would result in impacts identified by resource area throughout **Section 4**. These include potential less-than-significant adverse impacts to land use and cover, air quality, noise, geology, topography, and soil, water resources, biological resources, cultural resources, socioeconomics, infrastructure, and HTMW. These impacts would be further reduced through implementation of standard OKARNG BMPs as identified **in Section 4.12**. No adverse impacts to historic or archeological resources, streams, wetlands, 100-year floodplains, public health and safety, and environmental justice are anticipated. Further, positive effects to land use and cover, socioeconomics, environmental justice, and infrastructure could occur as a result of the Proposed Action.

Implementation of the Preferred Action Alternative would not be expected to cumulatively significantly *adversely* impact any resource area discussed within this EA. The proposed Ardmore development site is zoned for light industrial land use consistent with that proposed in the Preferred Action Alternative. Additionally, the land to the north and south is also zoned for light industrial use (OMD 2011). As described in **Section 4**, the Preferred Action Alternative would not result in significant impacts to biological or cultural resources. These impacts would be *negligible* with the implementation of standard BMPs. As such, the Preferred Action Alternative would not noticeably contribute to the ongoing regional

decline in natural or cultural resources. Further, cumulative net positive impacts to infrastructure, environmental justice, and the local socioeconomic environment would be realized.

While the area immediately surrounding the proposed Ardmore RC Site has experienced recent commercial and industrial growth (e.g., Best Buy distribution center), this local development as well as the Preferred Action Alternative are consistent with development plans and policies. The majority of projects proposed within the City of Ardmore pertain to improving, growing and maintaining local industry. Planned projects are not anticipated to facilitate degradation or strain on existing infrastructure. Cumulative effects would likely produce localized*, less-than-significant* adverse effects to the human environment through less-than-significant potential increases in local area traffic and utility consumption and *less-than-significant* increases in air quality emissions and noise in the immediate vicinity of the proposed Ardmore RC Site. Regional cumulative impacts are not as likely because these *less-than-significant* impacts would be localized, and the traffic increase would be readily absorbed by existing road capacity within and around the proposed facility. In addition, the Preferred Action Alternative would not generate additional development in the local area or impact area schools, permanent housing, or the overall population.

Under the No Action Alternative, the OKARNG's full training potential would continue to be limited, and the facilities necessary to accommodate the four units of the 45th IBCT would remain inadequate and continue to decline. Further, south-central Oklahoma would continue to not have an adequate facility to support civilian authorities during emergency response activities or have an acceptable place of refuge for its citizens during times of emergency.

4.13.3 Inter-relationship of Cumulative Effects

As previously described, the region experienced *significant cumulative* impacts to the environment due to large-scale development and population growth during the early 1900s associated with the railroad and oil production. Since that time the population of Carter County has fluctuated; however, the population continues to grow and is expected to increase 10.4 percent from 2010 to 2030, which is similar to the projected populations for the State of Oklahoma. Consequently, the region has experienced and will likely continue to experience increased growth and development in the future. The implementation of the Preferred Action Alternative as described in **Section 2** would involve the construction of a new modern RC, the demolition of existing inadequate existing facilities in Ardmore and Poteau, and restationing of units into a larger, more modern and economical facility that would be utilized for the same function.

The majority of the recently constructed and planned projects within the City of Ardmore pertain to improving, growing, and maintaining local industry. The Ardmore Comprehensive Plan 2015 directs growth within the City of Ardmore, while other planning documents including the ODWC Comprehensive Wildlife Conservation Strategy and the Ardmore Historic Preservation Plan limit development in sensitive areas (Robinson & Assoc. 2011). Planned projects within the region would comply with these plans and polices, and as such, would not facilitate further degradation or strain on existing infrastructure or cultural and natural resources. Rather, proposed regional projects would be more likely to result in positive cumulative effects to regional socioeconomics.

No *significant adverse* cumulative impacts to the environment, induced by the changes under the Preferred Action Alternative, would be anticipated within the region. Coordination between the OKARNG

and regional planning and community representatives would serve to minimize any potential land use conflicts in the future. Implementation of land use and resource management plans would serve to control the extent of environmental impacts, and proper planning would ensure that future socioeconomic conditions maintain the quality of life for residents in the area. Implementation of effective environmental, cultural resources, and natural resources BMPs would minimize or eliminate potential cumulative degradation of the natural ecosystem.

SECTION 5: COMPARISON OF ALTERNATIVES AND CONCLUSIONS

5.1 Comparison of the Environmental Consequences of the Alternatives

This EA has evaluated the potential physical, environmental, cultural, and socioeconomic effects of the OKARNG's proposed implementation of the proposed Ardmore RC and re-stationing of units in Ardmore, Carter County, OK as detailed in **Section 2.2** (Proposed Action). Two alternatives were evaluated: Preferred Action Alternative and No Action Alternative. A comparison of the environmental consequences of these alternatives is provided in **Table 13**.

Table 13. Alternative Comparison Matrix

Technical Resource Area	No Action Alternative	Preferred Action Alternative
Land Use and Cover	No impact attributable to the OKARNG action. OKARNG's full readiness potential would continue to be limited and the facilities necessary to accommodate the mission would remain inadequate.	Long-term positive impacts to land use, the OKARNG mission, the Ardmore community and south-central Oklahoma from the construction of the proposed RC in Ardmore, OK. Aesthetic changes to the proposed Ardmore site's landscape would occur, but would result in a *less-than-significant adverse* impact. The proposed Ardmore RC would not cause land use restrictions, conflict with applicable local or regional land use management plans or local zoning ordinances, or foster changes in adjacent property land use. Short-term and long-term, *less-than-significant adverse* effects to land cover are anticipated. OKARNG would minimize clearing and earthwork to the maximum extent possible to minimize disturbance.
Air Quality	No impact attributable to the OKARNG action. Ongoing operations' emissions would continue.	Short-term, *less-than-significant adverse* impacts due to the potential for dust generation from construction activities and the proximity of sensitive receptors. Impacts would be reduced with implementation of standard BMPs. Long-term, *less-than-significant adverse* impacts to the local air quality due to increased site activities and vehicle traffic. Sustainable practices and technologies would be used to increase energy efficiency and reduce greenhouse gas emissions.
Noise	No impact attributable to the OKARNG action. Ongoing noise associated with the current Ardmore and Poteau facilities would continue.	Short-term, *less-than-significant adverse* impacts due to the potential for noise generation from construction activities and the proximity of sensitive receptors. Long-term, *less-than-significant adverse* impacts due to increased noise levels associated with proposed site usage and the proximity of sensitive receptors. Impacts would be reduced with implementation of BMPs.

Table 13. Alternative Comparison Matrix

Technical Resource Area	No Action Alternative	Preferred Action Alternative
Geology, Topography, and Soils	No impact attributable to the OKARNG action.	Short-term and long-term *less-than-significant adverse* impacts to soils from construction of the proposed Ardmore RC and demolition of the existing Ardmore RC. Impacts would be reduced with implementation of BMPs.
Water Resources	No impact attributable to the OKARNG action.	Potential short-term, *less-than-significant adverse* impacts to water quality during construction activities resulting in erosion and sedimentation, and long-term, *less-than-significant adverse* impacts from stormwater runoff during facility usage. Impacts would be reduced with implementation of BMPs.
Biological Resources	No impact attributable to the OKARNG action.	Short-term, *less-than-significant adverse* impacts to biological resources from construction noise and vegetation removal. Long-term, *less-than-significant adverse* impacts due to elimination of vegetation and wildlife habitat, which would be minor on a regional and local scale.
Cultural Resources	No impact attributable to the OKARNG action.	No effects to cultural resources are anticipated as a result of the Proposed Action. If an inadvertent discovery of cultural resources is made during ground-disturbing activities, impacts would be reduced to *less-than-significant* levels with implementation of BMPs.
Socioeconomics (including Protection of Children)	No impact attributable to the OKARNG action. The OKARNG and the Ardmore region as a whole would not benefit from the use of the proposed facility, and would continue to use less than adequate facilities.	Short-term and long-term *less-than-significant beneficial* impacts to the local economy and Ardmore community from increased military spending and the construction of the proposed facility for use by the OKARNG and the community. No *significant adverse* impacts to public health and safety or children are anticipated. The OKARNG will establish strict procedures which limit access to potentially hazardous areas to avoid public health or safety threat. Indirect, *less-than-significant adverse* effects to the local economy in the City of Poteau due to the OKARNG vacating the Poteau RC. Impacts are anticipated to be negligible because the loss of full-time positions would be small and this facility would be transferred for use to another county, city, or state entity.
Environmental Justice	No impact attributable to the OKARNG action.	Short-term *minor positive* impacts would be expected as a result of minor increases in local employment.

Table 13. Alternative Comparison Matrix		
Technical Resource Area	**No Action Alternative**	**Preferred Action Alternative**
Infrastructure	No impact attributable to the OKARNG action. OKARNG would continue to use the less than adequate existing Ardmore and Poteau facilities, and south-central Oklahoma would continue to lack a facility for civilians during emergency situations.	Short-term and long-term *less-than-significant adverse* impacts from construction and operation of the proposed Ardmore RC associated with utility extensions during construction, increased utility consumption during operation, and increased vehicle traffic.
HTMW	No impact attributable to the OKARNG action. The OKARNG Environmental SOP would continue to be implemented.	Short-term and long-term, *less-than-significant adverse* impacts due to construction activities and increased use of the Ardmore RC Site. Impacts would be controlled through BMPs and ongoing regulatory compliance.

5.2 Conclusions

The evaluation performed within this EA concludes that there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life as a result of implementing the Preferred Action Alternative, provided standard BMPs specified in this EA are implemented. This EA's analysis determines, therefore, an EIS is unnecessary for implementing the Proposed Action, and that a FNSI is appropriate. The Preferred Action Alternative was determined by the OKARNG to provide the best combination of land and resources to sustain quality military training and to maintain and improve the units' readiness postures. The No Action Alternative was not found to satisfy the purpose of and need for the Proposed Action. This alternative would limit the capability of the OKARNG to carry out its assigned mission to provide adequate training facilities, and would jeopardize the proficiency and military readiness of the OKARNG. As such, this EA recommends implementation of the Preferred Action Alternative.

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SECTION 7: GLOSSARY

100-year Flood – A flood event of such magnitude that it occurs, on average, every 100 years; this equates to a 1 percent chance of its occurring in a given year.

Aesthetics – Pertaining to the quality of human perception of natural beauty.

Ambient - The environment as it exists around people, plants, and structures.

Ambient Air Quality Standards - Those standards established according to the CAA to protect health and welfare (AR 200-1).

Aquifer - An underground geological formation containing usable amounts of groundwater which can supply wells and springs.

Asbestos - Incombustible, chemical-resistant, fibrous mineral forms of impure magnesium silicate used for fireproofing, electrical insulation, building materials, brake linings, and chemical filters. Asbestos is a carcinogenic substance.

Attainment Area - Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the CAA.

Bedrock - the solid rock that underlies all soil, sand, clay, gravel and loose material on the earth's surface.

Best Management Practices (BMPs) - Methods, measures, or practices to prevent or reduce the contributions of pollutants to US waters. Best management practices may be imposed in addition to, or in the absence of, effluent limitations, standards, or prohibitions (AR 200-1).

Commercial land use – land use that includes private and public businesses (retail, wholesale, etc.), institutions (schools, churches, etc.), health services (hospitals, clinics, etc.) and military buildings and installations.

Compaction - The packing of soil together into a firmer, denser mass, generally caused by the pressure of great weight.

Company - A military unit that is the next smaller unit of a battalion; the most basic administrative and tactical unit (approximately 50 to 200 persons, depending on the type of unit).

Contaminants - Any physical, chemical, biological or radiological substances that have an adverse effect on air, water or soil.

Council on Environmental Quality (CEQ) - An Executive Office of the President composed of three members appointed by the President, subject to approval by the Senate. Each member shall be exceptionally qualified to analyze and interpret environmental trends; to appraise programs and activities of the federal government. Members are to be conscious of and responsive to the scientific, economic, social, aesthetic, and cultural needs of the Nation; and to formulate and recommend national policies to promote the improvement of the quality of the environment.

Criteria Pollutants - The CAA of 1970 required the USEPA to set air quality standards for common and widespread pollutants in order to protect human health and welfare. There are six "criteria pollutants": ozone (O_3), carbon monoxide (CO), sulfur dioxide (SO_2), lead (Pb), nitrogen dioxide (NO_2), and particulate matter (PM).

Cultural Resources - Cultural resources are historic properties as defined by the NHPA, cultural items as defined by the Native American Graves Protection and Repatriation Act (NAGPRA), archaeological resources as defined by the Archaeological Resources Protection Act, sacred sites as defined by EO 13007 to which access is afforded under the American Indian Religious Freedom Act, and collections and associated records as defined by 36 CFR Part 79.

Cumulative Impact - The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR Part 1508.7).

dBA – “A-weighted” non-impulse noise measurement in decibels, weighted to match human hearing frequency response.

Decibel (dB) - A unit of measurement of sound pressure level.

Direct Impact - A direct impact is caused by a Proposed Action, and occurs at the same time and place.

Elevation - Raising a building and placing it on a higher foundation so the first or lowest floor is above flood levels.

Emission - A release of a pollutant.

Endangered Species - Any species which is in danger of extinction throughout all or a significant portion of its range.

Environmental Assessment (EA) - An EA is a publication that provides sufficient evidence and analysis to show whether a proposed action will adversely affect the environment or be environmentally controversial.

Erosion - The wearing away of the land surface by detachment and movement of soil and rock fragments through the action of moving water and other geological agents.

Farmland - Cropland, pastures, meadows, and planted woodland.

Fauna - Animal life, especially the animal characteristics of a region, period, or special environment.

Flora - Vegetation; plant life characteristic of a region, period, or special environment.

Floodplain - The relatively flat area or lowlands adjoining a river, stream, ocean, lake, or other body of water that is susceptible to being inundated by floodwaters.

FNSI - Finding of No Significant Impact, a NEPA document.

Fugitive Dust - Particles light enough to be suspended in air which are not caught in a capture or filtering system. For this document, this refers to particles put in the air by moving vehicles and air movement over disturbed soils at construction sites.

Geology - Science which deals with the physical history of the earth, the rocks of which it is composed, and physical changes in the earth.

Groundwater - Water found below the ground surface. Groundwater may be geologic in origin and as pristine as it was when it was entrapped by the surrounding rock, or it may be subject to daily or seasonal effects depending on the local hydrologic cycle. Groundwater may be pumped from wells and used for drinking water, irrigation and other purposes. It is recharged by precipitation or irrigation water soaking into the ground. Thus, any contaminant in precipitation or irrigation water may be carried into groundwater.

Hazardous Substance - Hazardous materials are defined within several laws and regulations to have certain meanings. For this document, a hazardous material is any one of the following:

Any substance designated pursuant to section 311(b)(2)(A) of the Clean Water Act.

Any element, compound, mixture, solution or substance designated pursuant to Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

Any hazardous waste as defined under the Resource Conservation and Recovery Act (RCRA).

Any toxic pollutant listed under Toxic Substances Control Act (TSCA).

Any hazardous air pollutant listed under Section 112 of Clean Air Act (CAA).

Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of TSCA.

The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

A list of hazardous substances is found in 40 CFR Part 302.4.

Hazardous Waste - A solid waste, which when improperly treated, stored, transported or disposed of poses a substantial hazard to human health or the environment. Hazardous wastes are identified in 40 CFR Part 261.3 or applicable foreign law, rule, or regulation (see also solid waste).

Hazardous Waste Storage - As defined in 40 CFR Part 260.10, ". . . the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere."

Hydric Soil - a soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic (oxygen-lacking) conditions that favor the growth and regeneration of hydrophytic vegetation. A wetland indicator.

Inactive Duty Training - Authorized training performed by a member of a Reserve component not on active duty or active duty for training and consisting of regularly scheduled unit training assemblies, additional training assemblies, periods of appropriate duty or equivalent training, and any special additional duties authorized for Reserve component personnel by the Secretary concerned, and performed by them in connection with the prescribed activities of the organization in which they are assigned with or without pay. Does not include work or study associated with correspondence courses.

Indirect Impact - An indirect impact is caused by a Proposed Action, but occurs later in time or farther removed in distance, but is still reasonably foreseeable. Indirect impacts may include induced changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural and social systems. For example, referring to the possible direct impacts described above, the clearing of trees for new development may have an indirect impact on area wildlife by decreasing available habitat.

Industrial Land Use – Land uses of a relatively higher intensity that are generally not compatible with residential development. Examples include light and heavy manufacturing, mining, and chemical refining.

Isolated Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, but do not have a direct connection to the waters of the United States.

Jurisdictional wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, and have a direct connection to the Waters of the US. These wetlands are regulated by the US Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act (CWA).

Listed Species - Any plant or animal designated as a state or federal threatened, endangered, special concern, or candidate species.

Major Impact - An impact which would be particularly large in magnitude, considering both context and intensity.

Minor Impact - An impact which would be of a smaller scale or would be more readily mitigated than impacts categorized as major.

Mitigation - Measures taken to reduce adverse impacts on the environment.

Mobile Sources - Vehicles, aircraft, watercraft, construction equipment, and other equipment that use internal combustion engines for energy sources.

Monitoring – A process of inspecting and recording the progress of mitigation measures implemented.

National Ambient Air Quality Standards (NAAQS) - Nationwide standards set up by the USEPA for widespread air pollutants, as required by Section 109 of the Clean Air Act (CAA). Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone (O_3), particulate matter (PM), and sulfur dioxide (SO_2).

National Environmental Policy Act (NEPA) - United States statute that requires all federal agencies to consider the potential effects of Proposed Actions on the human and natural environment.

Nonattainment Area - An area that has been designated by the EPA or the appropriate state air quality agency as exceeding one or more national or state ambient air quality standards.

Parcel - A plot of land, usually a division of a larger area.

Particulates or Particulate Matter (PM) - Fine liquid or solid particles such as dust, smoke, mist, fumes or smog found in air.

Physiographic Region - A portion of the Earth's surface with a basically common topography and common morphology.

Pollutant - A substance introduced into the environment that adversely affects the usefulness of a resource.

Potable Water - Water which is suitable for drinking.

Prime Farmland - A special category of highly productive cropland that is recognized and described by the US Department of Agriculture's Soil Conservation Service (now the Natural Resources Conservation Service [NRCS]) and receives special protection under the Surface Mining Law.

Real Property – A building, the land on which it sits, and any permanent improvements or fixtures made to the property (for example, addition of built-in bookshelves).

Remediation - A long-term action that reduces or eliminates a threat to the environment.

River Basin - The land area drained by a river and its tributaries.

Sedimentation – Deposition of eroded material in an alternate location by dispersing agents such as water or wind.

Sensitive Receptors - Include, but are not limited to, asthmatics, children, and the elderly, as well as specific facilities, such as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, and childcare centers.

Short-term Impacts – Direct or indirect impacts resulting from an action in the near term. In this context, short-term does not refer to any rigid time period and is determined on a case-by-case basis in terms of the environmental consequences of the Proposed Action.

Significant Impact - According to 40 CFR Part 1508.27, "significance" as used in NEPA requires consideration of both context and intensity.

Context. The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the Proposed Action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

Soil - The mixture of altered mineral and organic material at the earth's surface that supports plant life.

Solid Waste - Any discarded material that is not excluded by section 261.4(a) or that is not excluded by variance granted under sections 260.30 and 260.3 1.

Threatened species - Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Topography - The relief features or surface configuration of an area.

Toxic Material/Waste - A harmful substance that includes elements, compounds, mixtures, and materials of complex composition.

Waters of the United States include the following: (1) All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide. (2) All interstate waters including interstate wetlands. (3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce.

Watershed - The region draining into a particular stream, river, or entire river system.

Wetlands - Areas that are regularly saturated by surface or groundwater and, thus, are characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Examples include swamps, bogs, fens, marshes and estuaries.

Wildlife Habitat - Set of living communities in which a wildlife population lives.

SECTION 8: LIST OF PREPARERS

Oklahoma Military Department
Directorate of Facility Management
Environmental Branch
3515 Military Circle
Oklahoma City, OK 73111-4398

MAJ Terry C. Hale, Jr., Environmental Branch Chief
Mr. Jeremy Bolyard, Deputy Environmental Program Manger
Ms. Jennifer Ziegler, NEPA Manager

Amec Foster Wheeler Environment & Infrastructure, Inc.
201 S. Capitol Ave, Suite 200
Indianapolis, IN 46225

Name	Role	Degree	Years of Experience
Jennifer Warf	Project Manager, NEPA Analysis and Oversight, GIS	M.S. in Environmental Studies B.A. in Zoology	15
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Doug McFarling	Senior QA/QC of the EA	B.A. in Environmental Studies	25
Jarrod Armstrong	Preparation of EA Sections	B.S. in Forestry M.S. in Forestry	4
Kari Morehouse	Preparation of Biological Resources Section	M.S. in Biology B.S. in Biology	10
Nick Meisinger	Peer Review and Preparation of EA Sections	B.S. in Environmental Science	4
Dan Conn	Map Preparation, GIS	B.S. Geography and Environmental Analysis	7

SECTION 9: AGENCIES AND INDIVIDUALS CONSULTED

Copies of all correspondence, including sample data request letters and responses are included in **Appendix A**.

Federal Agencies

US Army Corps of Engineers
Tulsa District
CESWT-RO
1645 South 101st East Avenue
Tulsa, OK 74128-4609
POC: Andrew R. Commer, Chief

US Environmental Protection Agency Region 6
Fountain Place 12th Floor, Suite 1200
1445 Ross Avenue
Dallas, Texas 75202
POC: John Blevins, Director

US Fish and Wildlife Service
Oklahoma Ecological Services Field Office
9014 East 21st Street
Tulsa, Oklahoma 74129-1428
POC: Jontie Aldrich, Acting Field Supervisor

US Geological Survey
Oklahoma Water Science Center
Broadway Executive Park
202 NW 66 St., Building 7
Oklahoma City, OK 73116
POC: Darryl Williams, Geospatial Liaison

USGS Oklahoma Cooperative Fish and Wildlife Research Unit
007 Agriculture Hall
Oklahoma State University
Stillwater, OK 74078
POC: Dr. James Long, Assistant Unit Leader

USDA – Natural Resources Conservation Service
Ardmore Field Service Center
2428 Autumn Run Road, Suite A
Ardmore, OK 73401
POC: James Williams, District Conservationist

State Agencies

Oklahoma Archeological Survey
111 E. Chesapeake
Norman OK 73019-5111
POC: Robert L. Brooks, State Archaeologist

Oklahoma Department of Agriculture, Food, and Forestry
PO Box 528804
Oklahoma City, OK 73152
POC: Jim Reese, Commissioner of Agriculture

Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677
POC: Scott Thompson, Executive Director

Oklahoma Department of Transportation
Field Division 7
P.O. Box 460
Duncan, OK 73534
POC: Bob Rose, Division Engineer

Oklahoma Department of Wildlife Conservation
PO Box 53465
Oklahoma City, OK 73152
POC: Richard Hatcher, Director

Oklahoma Historical Society
State Historic Preservation Office
Oklahoma History Center
800 Nazih Zuhdi Drive
Oklahoma City, OK 73105
POC: Melvena Heisch, Deputy SHPO

Oklahoma Natural Heritage Inventory
Oklahoma Biological Survey
111 East Chesapeake Street
Norman, OK 73019-0575
POC: Bruce W. Hoagland, Coordinator

Local Government / Utilities

City of Ardmore
23 S Washington St.
Ardmore, OK 73401
POC: Martin Dyer, Mayor

Ardmore Development Services Department
23 S Washington St.
Ardmore, OK 73401
POC: Nick Diaz, Development Services Director

Ardmore Engineering & Street Department
23 S. Washington
Ardmore, OK 73401
POC: Thomas Mansur, City Engineer

Ardmore Sewer Collection Department
PO Box 249
Ardmore, OK 73402
POC: Wayne Spivey, Field Supervisor

Ardmore Water Distribution Department
PO Box 249
Ardmore, OK 73402
POC: Rex Butler, Field Supervisor

OGE Energy Resources
OG&E Electric Services
PO Box 321
Oklahoma City, OK 73101-0321
POC: Usha Turner, Director of Environmental

Oklahoma Natural Gas Company
PO Box 401
Oklahoma City, OK 73101-0401
POC: Jim Stout, Economic Development

City of Poteau
City Hall
111 Peters St.
Poteau, OK 74953
POC: Jeff Shockley, Mayor

Native American Tribes

Caddo Nation of Oklahoma
PO Box 487
Binger, OK 73009
POC: Philip Smith, Acting Chairman

Chickasaw Nation
PO Box1548
Ada, OK 74820
POC: Bill Anoatubby, Governor

Kialegee Tribal Town
PO Box 332
Wetumka, OK 74883
POC: Jeremiah Hobia, Mekko

Osage Nation of Oklahoma
627 Grandview
Pawhuska, OK 74056
POC: Geoffrey Standing Bear, Principal Chief

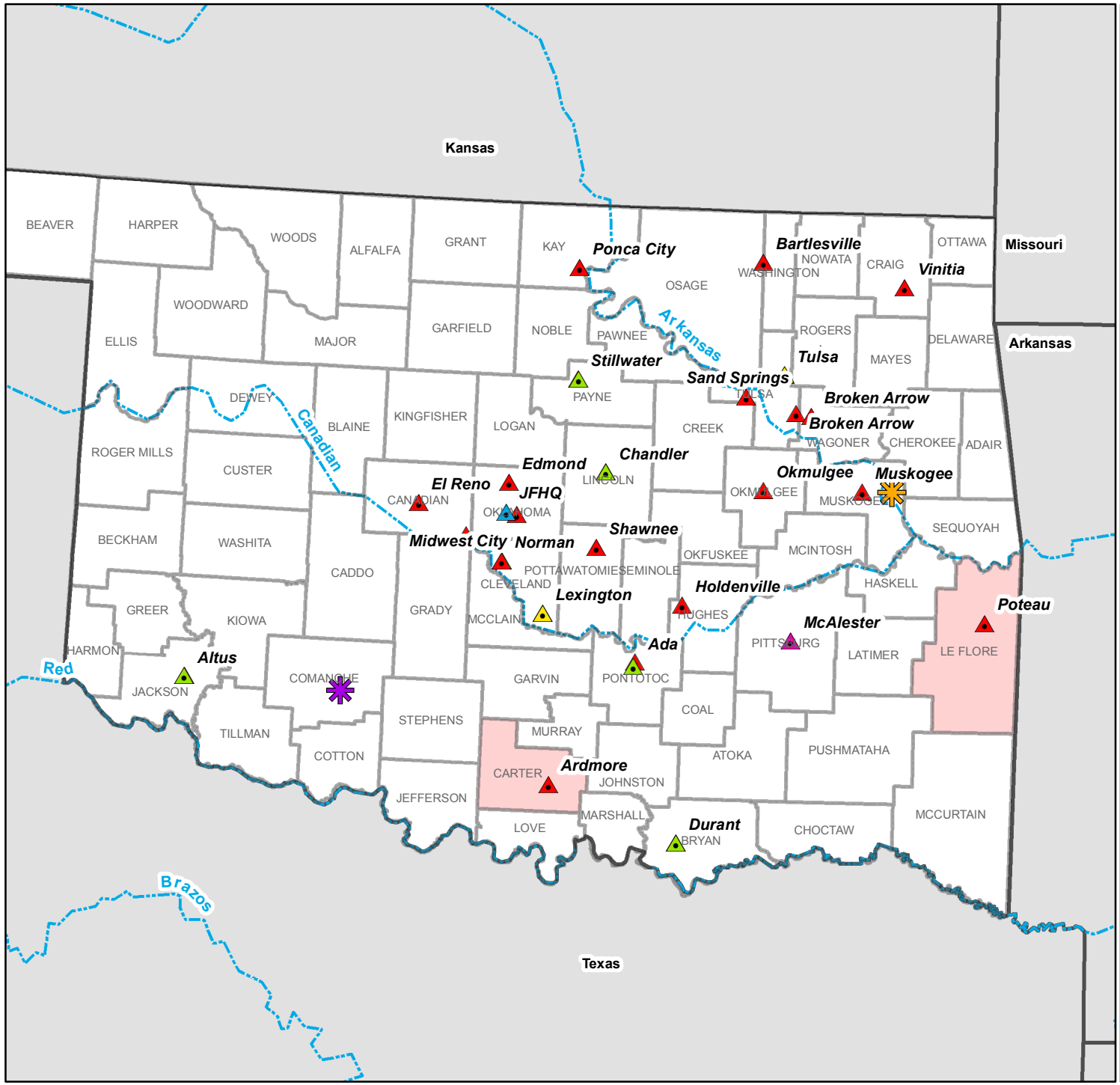
Seminole Nation of Oklahoma
PO Box 1498
Wewoka, OK 74884
POC: Leonard M. Harjo, Principal Chief

Wichita and Affiliated Tribes of Oklahoma
PO Box 729
Anadarko, OK 73005
POC: Terri Parton, President

FIGURES

FIGURE 1
REGIONAL LOCATION MAP

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center (RC)
Ardmore & Poteau, Carter & Le Flore Counties, OK



Legend

- Army Aviation Support Facility (AASF)
- Readiness Center (RC)
- Facility Maintenance Shop (FMS)
- Joint Forces Headquarters (JFHQ)
- Camp Gruber
- Fort Sill
- Oklahoma Counties

0 20 40 60 80 Miles

N

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

"No warranty is made by the OKARNG/ARNG-ILE as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document", in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database."

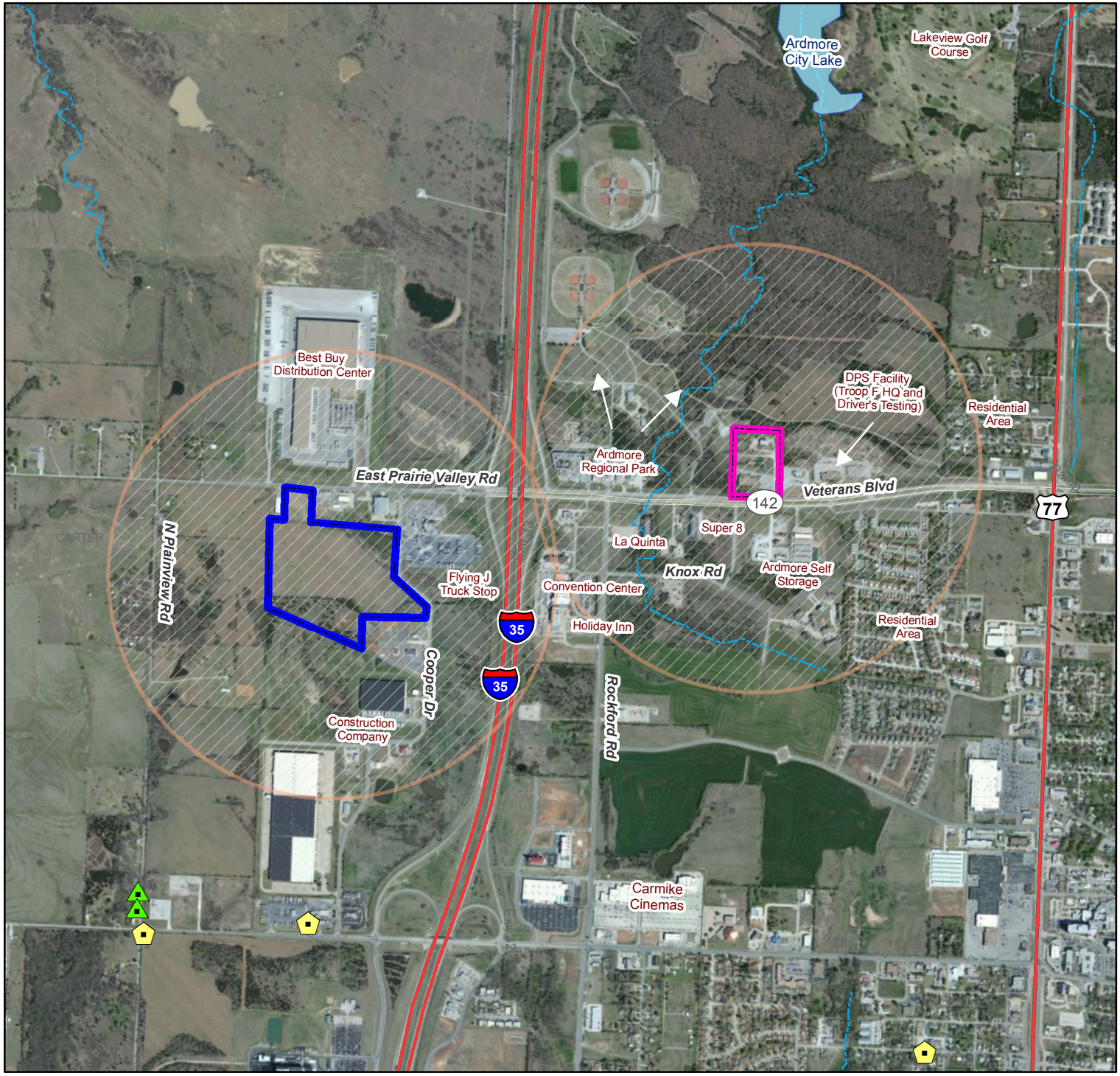


FIGURE 2
PROPOSED & EXISTING ARDMORE PROPERTIES

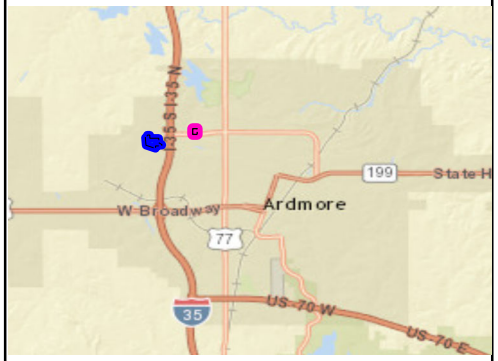
Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

- Ardmore City Lake
- Streams
- Area of Potential Effect (APE)
- Churches
- High School & Middle School

Ardmore Properties

- Proposed RC
- Existing RC



0 500 1,000 2,000 3,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

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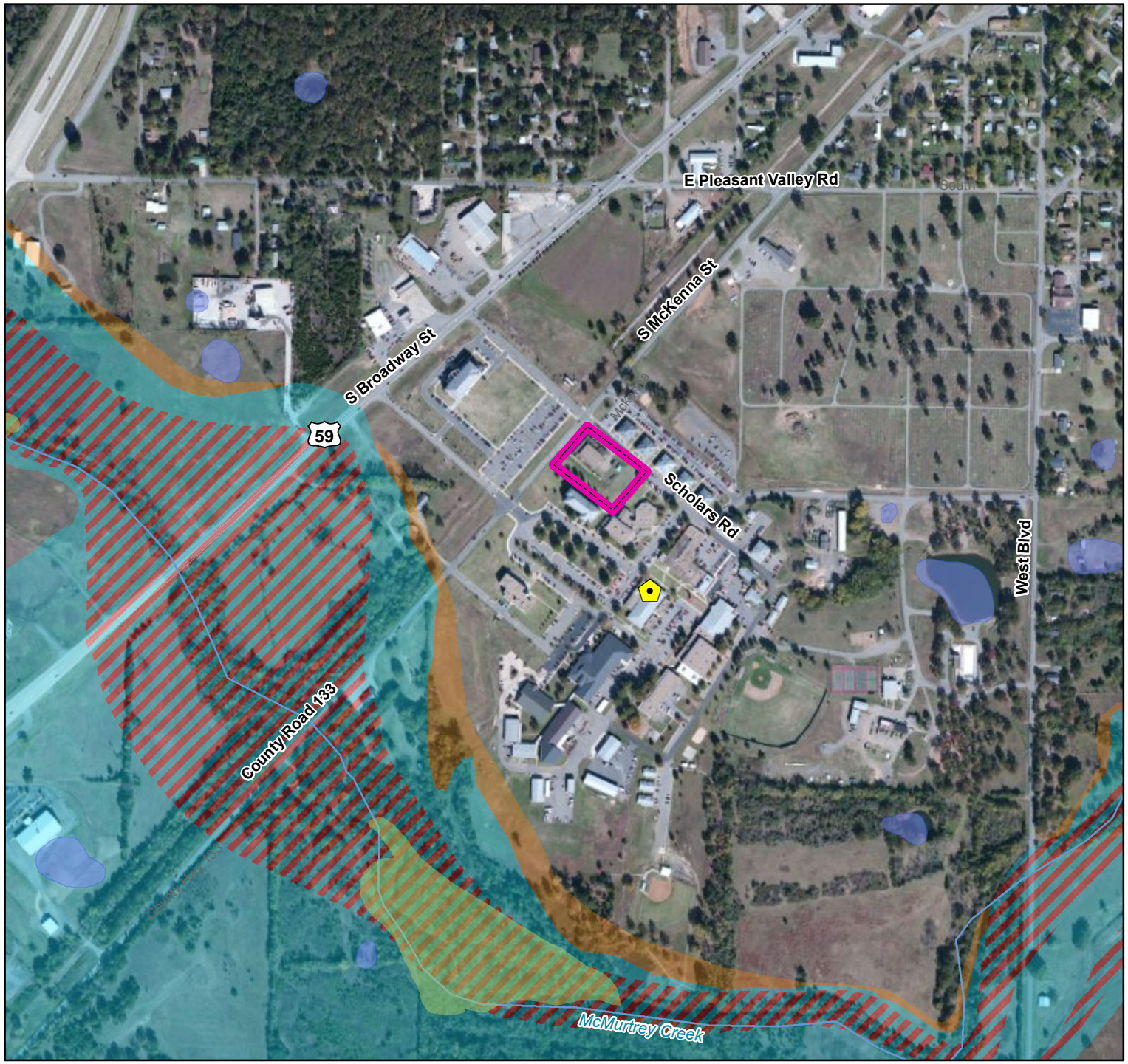


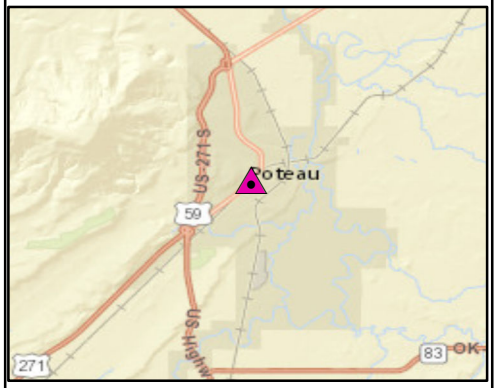
FIGURE 3
Legacy Poteau RC
Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

- Poteau Property
- Carl Albert State College
- Named Streams and Rivers
- FEMA Regulatory Floodway
- FEMA 100-year Floodplain
- FEMA 500-year floodplain

NWI Wetlands

- Freshwater Forested/Shrub Wetland
- Freshwater Pond



0 250 500 1,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

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N

FIGURE 4
CONCEPTUAL LAYOUT OF PROPOSED RC

Oklahoma Army National Guard Environmental Assesssment Readiness Center Ardmore, Carter County, OK

Legend

- Proposed Ardmore Property
- Readiness Center
- Isolated Wet Area
- Pond

Paved Areas

- Military Equipment Parking
- POV Parking
- Access Roads

0 250 500 1,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

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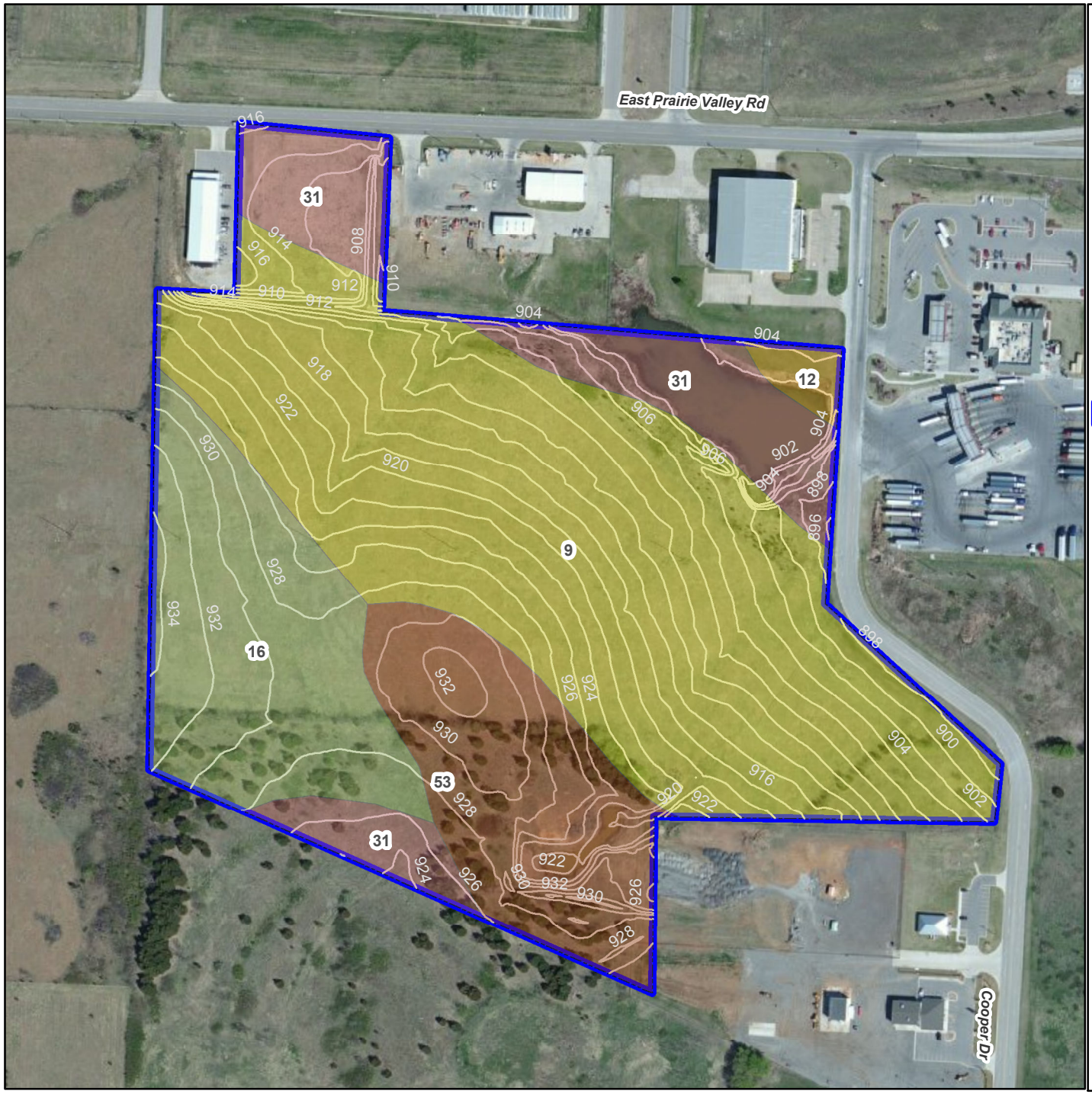

FIGURE 5a
TOPOGRAPHY & SOILS
PROPOSED
ARDMORE RC SITE

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

- Proposed Ardmore Property
- Elevation Contours (feet amsl)

NRCS Soils

- 9 - Clarita silty clay, 3-5% slopes
- 12 - Durant loam, 3-5% slopes
- 16 - Heiden clay, 1-3% slopes
- 31 - Normangee loam, 3-5% slopes, eroded
- 53 - Windthorst fine sandy loam, 3-5% slopes

0 125 250 500 750 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

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N

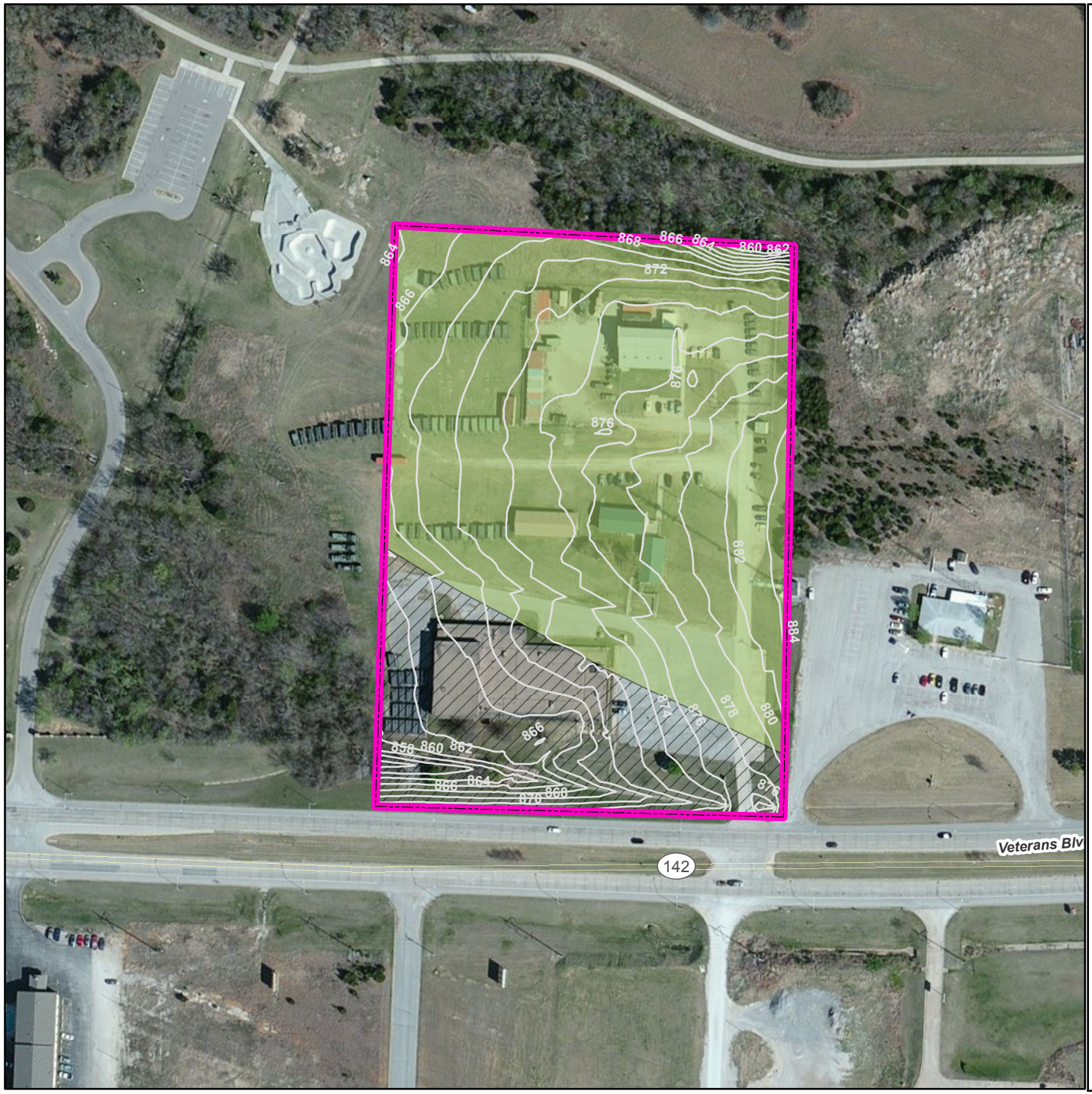

FIGURE 5b
TOPOGRAPHY & SOILS
EXISTING
ARDMORE RC SITE

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

Existing Ardmore RC Property

Elevation Contours (feet amsl)

NRCS Soils

30 - Normangee loam, 3- 5% slopes

40 - Steedman clay loam, 5-20% slopes

0 125 250 500 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

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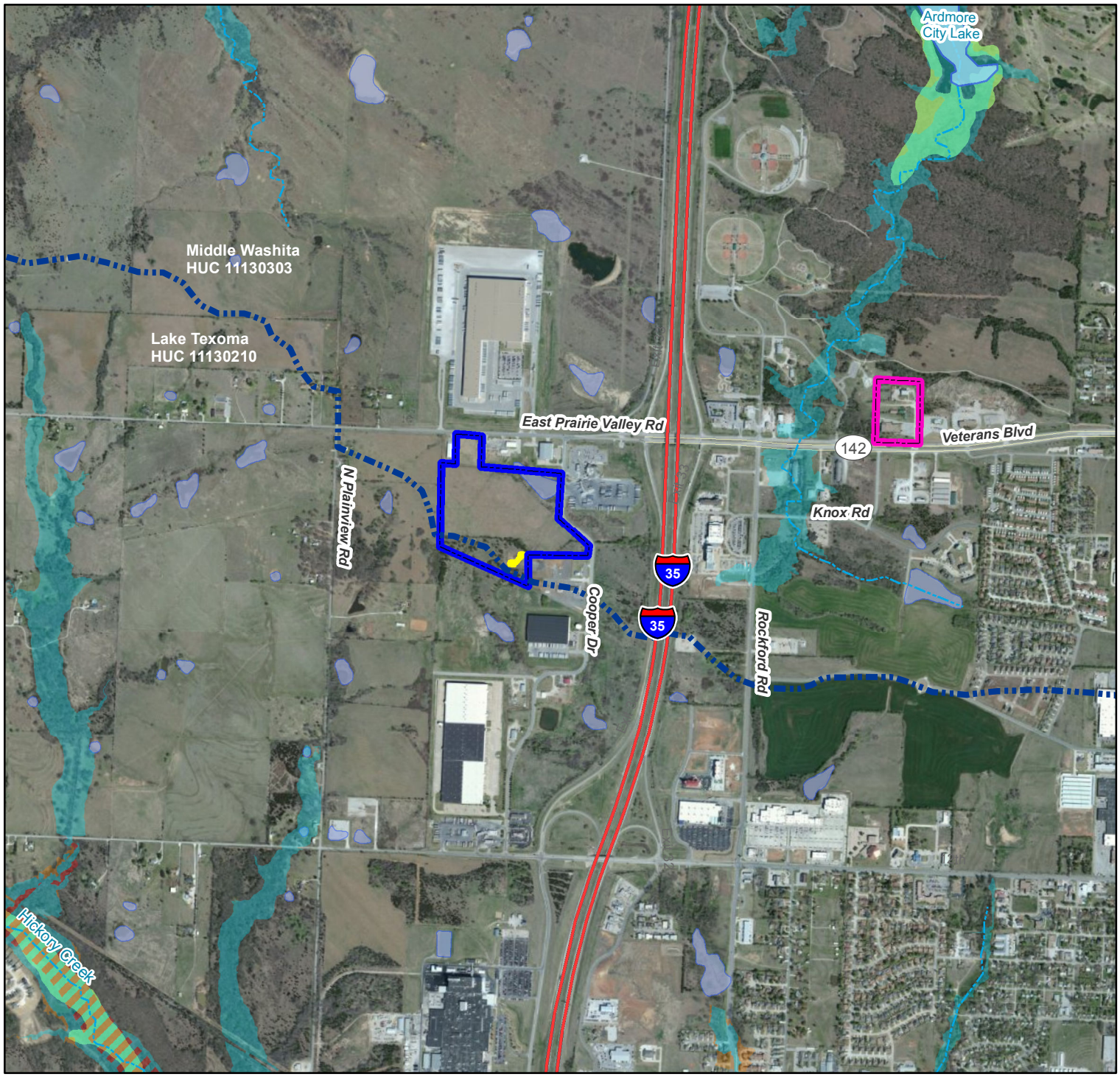


FIGURE 6
WATER RESOURCES

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

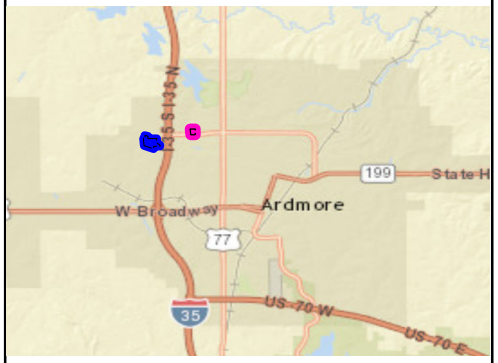
- FEMA Regulatory Floodway
- FEMA 100-year Floodplain
- Ardmore City Lake
- Streams
- USGS Watershed Boundary

Ardmore Properties

- Proposed RC
- Existing RC
- Wet Area

NWI Wetlands

- Freshwater Forested/Shrub Wetland
- Freshwater Pond



0 500 1,000 2,000 3,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

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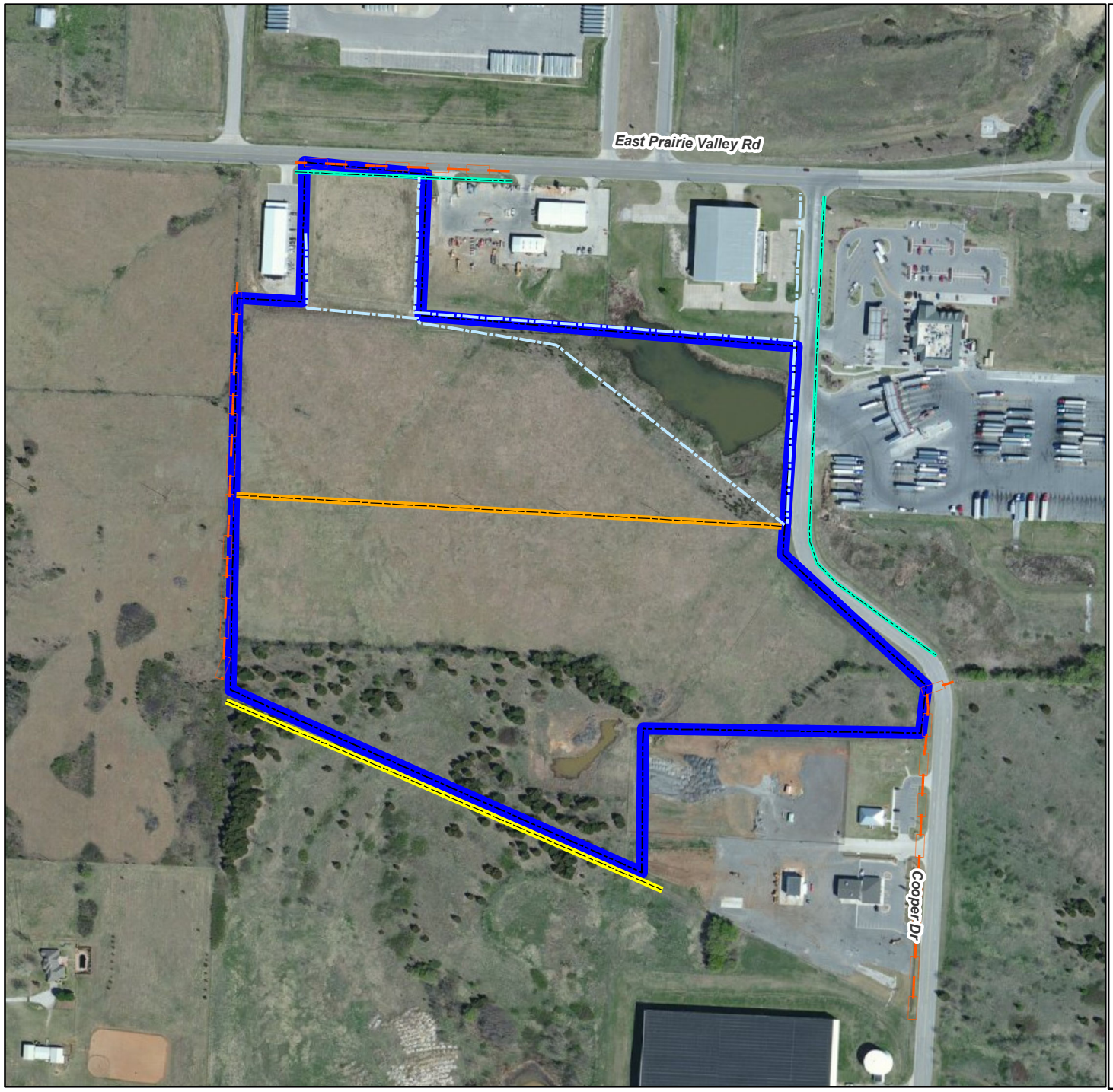

FIGURE 7
EXISTING INFRASTRUCTURE

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

- Proposed Ardmore Property
- Gas Line (30-ft Easement)
- HV Power Line (50-ft Easement)
- Sanitary Sewer
- City Water Line
- City Telephone Line

0 125 250 500 750 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

"No warranty is made by the OKARNG/ARNG-ILE as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document", in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database."

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APPENDIX A

Agency Coordination, Native American Consultation & Public Participation

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Agency Correspondence

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Public Involvement

TBD

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OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Jontie Aldrich, Acting Field Supervisor
US Fish and Wildlife Service
Oklahoma Ecological Services Field Office
9014 East 21st Street
Tulsa, Oklahoma 74129-1428

Dear Mr. Aldrich:

The purpose of this letter is to solicit comments regarding the Oklahoma Army National Guard's (OKARNG) intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership.

The OKARNG is preparing an Environmental Assessment (EA) to evaluate potential physical, environmental, cultural, and socioeconomic effects associated with the Proposed Action pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code (USC) §4321 et seq.), the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651.

The proposed Ardmore RC would be constructed on an approximately 46-acre parcel located southwest of the intersection of Cooper Drive and East Prairie Valley Road (see **Figures 1** and **2**); this intersection is approximately 0.25 mile west of I-35, Exit 33. The proposed project site is zoned for light industrial use and consists primarily of maintained grasslands (e.g., little blue stem, switch grass, and Johnson grass) with scrub-shrub habitat in the south (e.g., hackberry, eastern red cedar, dogwood). Two ponds occur within the northeast and southeast portions of the project site. Past activities have included agricultural terracing, mowing, and utility installation. A high-power electric line runs east-west through the center of the property.

Under the Proposed Action, four units within the 45th Infantry Brigade Combat Team (IBCT) would be relocated to facilities, which will provide the necessary space and equipment to train a modern army. The proposed Ardmore RC would house OKARNG units and equipment, an Oklahoma DPS driver's license testing facility, and the Oklahoma Highway Patrol Troop F Headquarters.

The proposed Ardmore RC building would be no more than three stories (approximately 36 feet high) and would include 94,640 SF of total facility space. The RC building would include an assembly hall, classrooms, kitchen/break/vending area, toilets/showers, flammable materials storage, controlled waste handling facility, administrative office space and unit storage space. In addition, approximately 220,400 SF or 5.1 acres of various paved areas and support facilities would be constructed, which include parking, sidewalks, lighting, a refuse collection facility, access roads, fencing, and utility line extensions (see **Figure 2**).

As an element of the overall Proposed Action, two legacy RCs in Ardmore and Poteau, OK would be closed. The existing Ardmore RC building was built in 1985 and would be demolished and the property returned to the City of Ardmore. This RC is uninhabitable and has been condemned due to health and safety issues resulting from water penetration, foundation damage, and mold. The existing Ardmore RC building, proposed for demolition, is located on an approximately 10-acre parcel consisting of impervious surfaces (e.g., building, parking) and maintained grasslands (see **Figure 1**).

The Poteau RC building was built in 1954 and would be vacated and the property transferred to a state or local governmental entity. This RC does not comply with current space requirements, and cannot be expanded because it is landlocked by facilities and operations associated with Carl Albert State College (see **Figure 3**).

According to the USFWS Information, Planning, and Conservation (IPAC) System (accessed 11 December 2014), federally listed species with known occurrence in the vicinity of the proposed and existing Ardmore RC properties in Carter County, OK include the endangered least tern (*Sterna antillarum*), threatened piping plover (*Charadrius melodus*), threatened red knot (*Calidris canutus rufa*), endangered whooping crane (*Grus Americana*), and endangered American burying beetle (*Nicrophorus americanus*). Federally-listed species with known occurrence near the existing Poteau RC in Le Flore County, OK include the least tern, piping plover, red knot, American burying beetle, endangered scaleshell mussel (*Leptodea leptodon*), winged mapleleaf (*Quadrula fragosa*), Indiana bat (*Myotis sodalis*), and northern long-eared bat (*Myotis septentrionalis*). No federally-designated critical habitat occurs in the vicinity of the Proposed Action.

It is the conclusion of the OKARNG that no effect to federally-listed species in Le Flore County, OK would occur as a result of the Proposed Action. The Proposed Action includes the transfer of land in Poteau, OK and would not result in any ground disturbing activities with the potential to effect federally-listed species habitat.

Because the Proposed Action includes new construction and the demolition of existing structures within the proposed and existing Ardmore properties, respectively, a more detailed analysis is provided below for the species known to occur in Carter County, OK.

Least Tern – According to the USFWS IPAC (accessed 11 December 2014), this species should only be considered for projects that include wind turbines, wind farm towers, or other types of towers. No towers are included in the Proposed Action; therefore, it is the conclusion of the OKARNG that the Proposed Action will have no effect on the least tern.

Piping Plover, Red Knot, and Whooping Crane – The piping plover is typically found on mudflats, sandy beaches and shallow wetlands with sparse vegetation. The plover migrates bi-annually through Oklahoma. The red knot is a shorebird that is considered a rare migrant through Oklahoma, but has been documented in Carter County. The whooping crane is typically found in shallow wetlands, marshes, the margins of ponds and lakes, sandbars and shorelines of shallow rivers, wet prairies and crop fields near wetlands. It passes through Oklahoma during the fall and spring migration. Occurrences of these birds would be limited to brief stopovers due to the minimal water features on the proposed Ardmore RC property. Due to a lack of suitable habitat, it is the conclusion of the OKARNG that the Proposed Action may affect, but is not likely to adversely affect these bird species.

American burying beetle (ABB) – Generally, ABB are found in mature forest with moderate understory and intact rolling grasslands, preferably with some sandy content to the soil. However, these preferences are not rigid and habitat use by ABB appears to be more related to the availability of appropriate carcasses. Based on the current available ABB Range Map shapefile (April 2014) on the USFWS Oklahoma Field Office website, the project area is located on the eastern-most edge of the ABB range, but approximately 50 miles east of the Conservation Priority Area. It is the conclusion of the OKARNG the Proposed Action may affect, but is not likely to adversely affect the ABB due to past land use and current land management practices (i.e., site is maintained and regularly mowed) at the existing and proposed Ardmore properties coupled with the information on "unfavorable areas" for use by ABBs found within the *ABB Oklahoma Presence/Absence Live-Trapping Survey Guidance* (USFWS 2014).

We request USFWS review and concurrence of our findings. If there is anything we need to do to complete the Proposed Action without negatively impacting federally listed species that is not mentioned in this letter, please let us know.

Please address written comments to: Oklahoma National Guard, Joint Force Headquarters, ATTN: Jennifer Ziegler, 3515 Military Circle, Oklahoma City OK, 73111-4305 or via telephone at (405)228-5521 or via email at jennifer.d.ziegler.nfg@mail.mil.

Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Andrew R. Commer, Chief
US Army Corps of Engineers, Tulsa District
CESWT-RO
1645 South 101st East Avenue
Tulsa, OK 74128-4609

Dear Mr. Commer:

The purpose of this letter is to solicit comments regarding the Oklahoma Army National Guard's (OKARNG) intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership.

The OKARNG is preparing an Environmental Assessment (EA) to evaluate potential physical, environmental, cultural, and socioeconomic effects associated with the Proposed Action pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code (USC) §4321 et seq.), the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651.

The proposed Ardmore RC would be constructed on an approximately 46-acre parcel located southwest of the intersection of Cooper Drive and East Prairie Valley Road (see **Figures 1** and **2**); this intersection is approximately 0.25 mile west of I-35, Exit 33. The proposed project site is zoned for light industrial use and consists primarily of maintained grasslands (e.g., little blue stem, switch grass, and Johnson grass) with scrub-shrub habitat in the south (e.g., hackberry, eastern red cedar, dogwood). Two ponds occur within the northeast and southeast portions of the project site. Past activities have included agricultural terracing, mowing, and utility installation. A high-power electric line runs east-west through the center of the property.

In a letter dated 4 November 2011, the OKARNG requested a jurisdictional determination (JD) for the proposed 46-acre Ardmore RC property located in NW1/4 of Section 23, Township 4S, Range 1E, Carter County, OK. The proposed project was assigned Identification Number SWT-2011-992. The USACE provided a JD on this property in a letter dated 14 December 2011 (see attached).

Under the Proposed Action, four units within the 45th Infantry Brigade Combat Team

(IBCT) would be relocated to facilities, which will provide the necessary space and equipment to train a modern army. The proposed Ardmore RC would house OKARNG units and equipment, an Oklahoma DPS driver's license testing facility, and the Oklahoma Highway Patrol Troop F Headquarters.

The proposed Ardmore RC building would be no more than three stories and would include 94,640 SF of total facility space. The RC building would include an assembly hall, classrooms, kitchen/break/vending area, toilets/showers, flammable materials storage, controlled waste handling facility, administrative office space and unit storage space. In addition, approximately 220,400 SF or 5.1 acres of various paved areas and support facilities would be constructed, which include parking, sidewalks, lighting, a refuse collection facility, access roads, fencing, and utility line extensions (see **Figure 2**).

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Please provide any comments, concerns, information, studies, or other data you and/or your staff may have regarding the Proposed Action within thirty (30) days of receipt of this letter. All responses shall be considered for incorporation into the draft EA. Please direct your correspondence to: Oklahoma National Guard, Joint Force Headquarters, ATTN: Jennifer Ziegler, 3515 Military Circle, Oklahoma City OK, 73111-4305 or via telephone at (405)228-5521 or via email at jennifer.d.ziegler.nfg@mail.mil.

Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
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3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Jeff Shockley, Mayor
City of Poteau
City Hall
111 Peters Street
Poteau, OK 74953

Dear Mayor Shockley:

The purpose of this letter is to solicit comments regarding the Oklahoma Army National Guard's (OKARNG) intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership.

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Under the Proposed Action, four units within the 45th Infantry Brigade Combat Team (IBCT) would be relocated to facilities, which will provide the necessary space and equipment to train a modern army. The new facility will provide the necessary training and administrative space to enable OKARNG to support and train soldiers to meet OKARNG missions. The proposed Ardmore RC would house OKARNG units and equipment, an Oklahoma DPS driver's license testing facility, and the Oklahoma Highway Patrol Troop F Headquarters.

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Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Jim Stout, Economic Development
Oklahoma Natural Gas Company
P.O. Box 401
Oklahoma City, OK 73101-0401

Dear Mr. Stout:

The purpose of this letter is to solicit comments regarding the Oklahoma Army National Guard's (OKARNG) intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership.

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Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Usha Turner, Director of Environmental
OGE Energy Resources
OG&E Electric Services
P.O. Box 321
Oklahoma City, OK 73101-0321

Dear Ms. Turner:

The purpose of this letter is to solicit comments regarding the Oklahoma Army National Guard's (OKARNG) intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership.

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Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Rex Butler, Field Supervisor
Ardmore Water Distribution Department
P.O. Box 249
Ardmore, OK 73402

Dear Mr. Butler:

The purpose of this letter is to solicit comments regarding the Oklahoma Army National Guard's (OKARNG) intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership.

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Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Wayne Spivey, Field Supervisor
Armore Sewer Collection Department
P.O. Box 249
Ardmore, OK 73402

Dear Mr. Spivey:

The purpose of this letter is to solicit comments regarding the Oklahoma Army National Guard's (OKARNG) intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership.

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Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Thomas Mansur, City Engineer
Ardmore Engineering & Street Department
23 S. Washington Street
Ardmore, OK 73401

Dear Mr. Mansur:

The purpose of this letter is to solicit comments regarding the Oklahoma Army National Guard's (OKARNG) intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership.

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The proposed Ardmore RC would be constructed on an approximately 46-acre parcel located southwest of the intersection of Cooper Drive and East Prairie Valley Road (see **Figures 1** and **2**); this intersection is approximately 0.25 mile west of I-35 (Exit 33). The proposed project site is zoned for light industrial use and consists primarily of maintained grasslands (e.g., little blue stem, switch grass, and Johnson grass) with scrub-shrub habitat in the south (e.g., hackberry, eastern red cedar, dogwood). Two ponds occur within the northeast and southeast portions of the project site. Past activities have included agricultural terracing, mowing, and utility installation. A high-power electric line runs east-west through the center of the property.

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Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Nick Diaz, Development Services Director
Ardmore Development Services Department
23 S. Washington Street
Ardmore, OK 73401

Dear Mr. Diaz:

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Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
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3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Martin Dyer, Mayor
City of Ardmore
23 S. Washington Street
Ardmore, OK 73401

Dear Mayor Dyer:

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Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
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OKLAHOMA CITY OK 73111-4305

January 13, 2015

Bruce W. Hoagland, Coordinator
Oklahoma Natural Heritage Inventory
Oklahoma Biological Survey
111 E. Chesapeake Street
Norman, OK 73019-0575

Dear Mr. Hoagland:

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Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Richard Hatcher, Director
Oklahoma Department of Wildlife Conservation
P.O. Box 53465
Oklahoma City, OK 73152

Dear Mr. Hatcher:

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Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
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OKLAHOMA CITY OK 73111-4305

January 13, 2015

Bob Rose, Division Engineer
Oklahoma Department of Transportation
Field Division 7
P.O. Box 460
Duncan, OK 73534

Dear Mr. Rose:

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Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Scott Thompson, Executive Director
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

Dear Mr. Thompson:

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Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
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3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Jim Reese, Commissioner of Agriculture
Oklahoma Department of Agriculture, Food, and Forestry
P.O. Box 528804
Oklahoma City, OK 73152

Dear Mr. Reese:

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Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

James Williams, District Conservationist
USDA - Natural Resources Conservation Service
Ardmore Field Service Center
2428 Autumn Run Road, Suite A
Ardmore, OK 73401

Dear Mr. Williams:

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Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Dr. James Long, Assistant Unit Leader
USGS Oklahoma Cooperative Fish and Wildlife Research Unit
007 Agriculture Hall
Oklahoma State University
Stillwater, OK 74078

Dear Dr. Long:

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Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Darryl Williams, Geospatial Liason
US Geological Survey
Oklahoma Water Science Center
202 NW 66 St., Building 7
Tulsa, OK 73116

Dear Mr. Williams:

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Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

John Blevins, Director
US Environmental Protection Agency, Region 6
Fountain Place 12th Floor, Suite 1200
1445 Ross Avenue
Dallas, TX 75202

Dear Mr. Blevins:

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Major, OKARNG
Environmental Program Manager

Enclosures

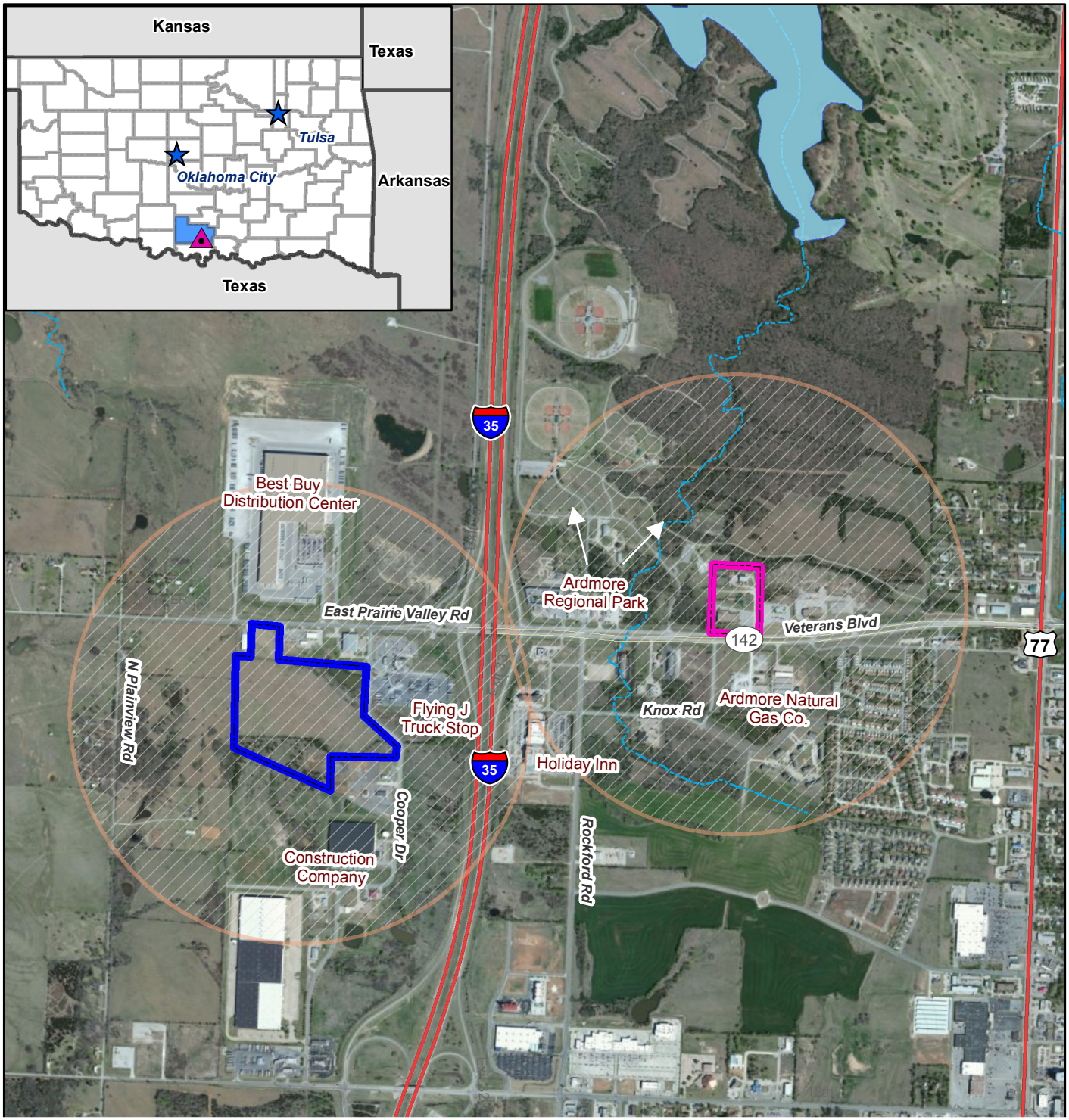

FIGURE 1
PROPOSED & EXISTING ARDMORE PROPERTIES

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

- Ardmore City Lake
- Streams
- Area of Potential Effect (APE)

Ardmore Properties

- Proposed RC
- Existing RC

N

0 500 1,000 2,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

"No warranty is made by the OKARNG/ARNG-ILE as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document", in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database."

FIGURE 2
CONCEPTUAL LAYOUT OF PROPOSED RC

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

- Proposed Ardmore Property
- Readiness Center
- DPS Annex

Paved Areas

- Military Equipment Parking
- POV Parking
- DPS Annex Parking
- Access Roads

N

0 250 500 1,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

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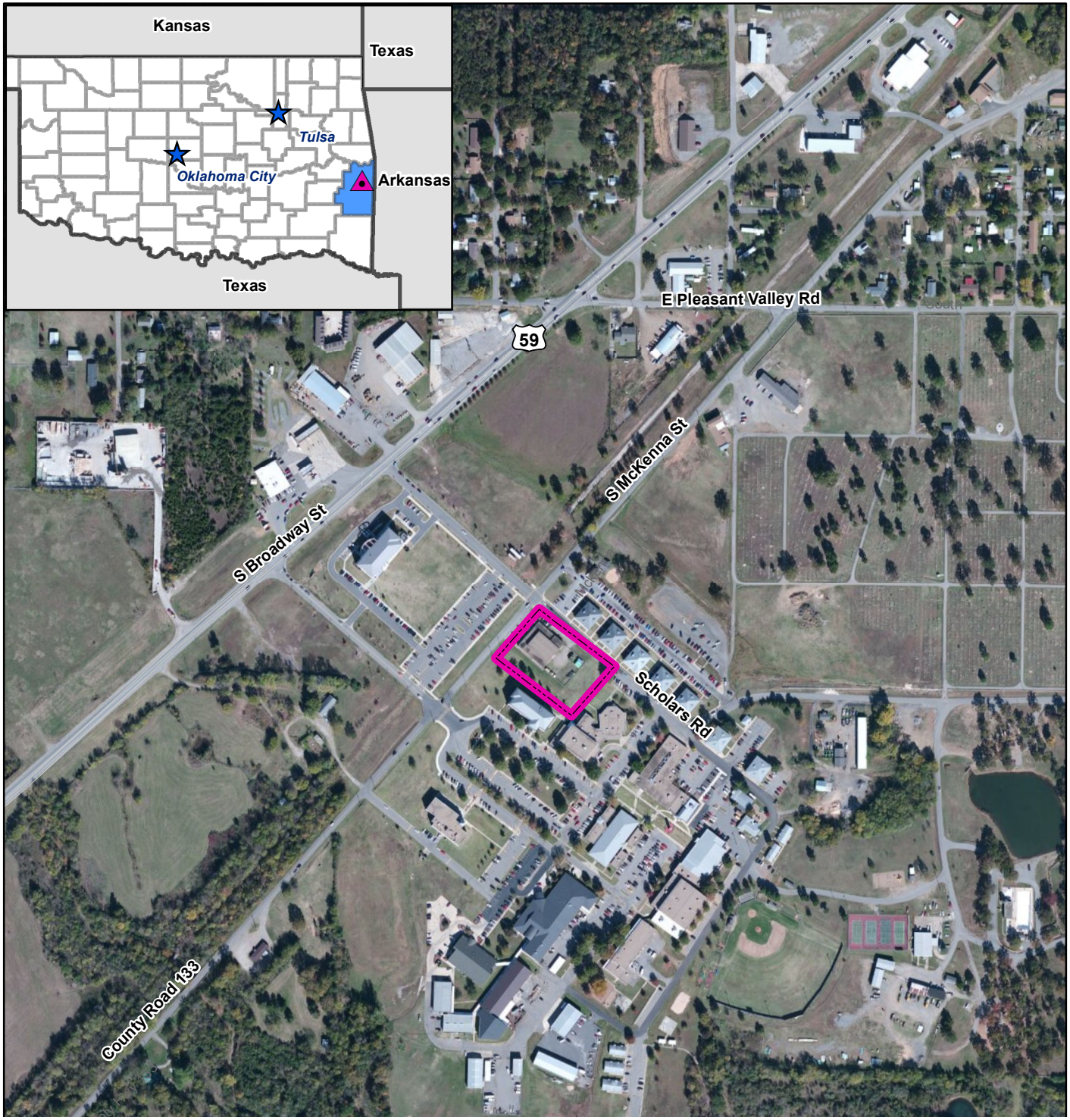

FIGURE 3
Legacy Poteau RC

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

Poteau Property

N

0 250 500 1,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

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DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, TULSA DISTRICT
1645 SOUTH 101ST EAST AVENUE
TULSA, OKLAHOMA 74128-4609

February 4, 2015

Regulatory Office

PROJECT NAME: Armed Forces Reserve Center, Ardmore, Carter County, Oklahoma

CORPS CASE NO.: SWT-2011-00992

CORPS POC: Mr. Justin Smither, 918-669-7400

Ms. Jennifer Ziegler
Oklahoma National Guard
3515 Military Circle
Oklahoma City, OK 73111-4305

Dear Ms. Ziegler:

Please reference your correspondence regarding the above listed project.

The provided information does not indicate that a placement of dredged or fill material will be required, permanently or temporarily, into any "waters of the United States," including jurisdictional wetlands. Therefore, your proposal is not subject to regulation pursuant to Section 404 of the Clean Water Act (CWA), and a Department of the Army (DA) permit will not be required. Should your method of construction necessitate such a discharge into an aquatic area or tributary stream, we suggest that you resubmit that portion of your project so that we may determine whether an individual DA permit will be required.

Although Section 404 CWA authorization is not required, this does not preclude the possibility that a real estate interest or other Federal, State, or local permits may be required.

If you have any questions or if further assistance is desired, contact the Corps POC listed above. Please refer to the case number listed above during any future correspondence. If you desire to complete a "Customer Service Survey" on your experience with the Corps Regulatory Program, please visit http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey on the internet at your convenience and submit your comments.

Sincerely,

for Andrew R. Commer
Chief, Regulatory Office

From: Fields, Quiana [quiana.fields@deq.ok.gov]
Sent: Monday, February 09, 2015 10:42 AM
To: Ziegler, Jennifer D NFG NG OKARNG (US)
Subject: RE: OKARNG a new Readiness Center in Ardmore, Carter County

Ms. Ziegler,

Our agency have reviewed your proposal and have the following comment:

The scope of the project indicates that it will disturb more than 1 acre of land. As such, the project
will be subject to OKR 10 stormwater construction permitting. This will require the submittal of a Notice of Intent (NOI) to the DEQ and receipt of an authorization prior to beginning ground disturbing activity. If you have any questions regarding the comment please feel free to call our Environmental Complaints and Local Services Division for more information at (405) 702-6100.

Thank you!

Quiana Fields, Administrative Programs Officer

Office of the Executive Director

Oklahoma Department of Environmental Quality

Phone: (405) 702-7152

Fax: (405) 702-7101

quiana.fields@deq.ok.gov

United States Department of Agriculture

NRCS
Natural Resources Conservation Service
Ardmore Field Office
2428 Autumn Run, Suite A
Ardmore, OK 73401
Telephone (580) 223-7277

February 10, 2015

Subject: Environmental Review for OK Army National Guard
Project Name: Army National Guard Readiness Center

To: Jennifer Ziegler, NEPH Manager
Oklahoma National Guard Joint Force Headquarters
3515 Military Circle
Oklahoma City, OK 73111-4305

Dear Ms. Ziegler:

I have completed your request for an environmental evaluation of the project in Carter County for the Army National Guard Readiness Center.

In evaluating the site, I found that the site includes prime farmland soils that would be converted because of this project. I have completed parts II, IV and V of the Farmland Conversion Impact Rating (form AD-1006) due to the fact that this site does contain prime farmland soils. All disturbed areas in the construction zone should be protected from erosion after construction is completed in order to protect the environment.

If I can be of any further assistance now or in the future, please let me know.

Sincerely,

James Williams
District Conservationist

The Natural Resources Conservation Service provides leadership in a partnership effort to help people conserve, maintain, and improve our natural resources and environment.
An Equal Opportunity Provider and Employer

U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I *(To be completed by Federal Agency)*	Date Of Land Evaluation Request 5 February 2015
Name of Project Army National Guard Readiness Center	Federal Agency Involved Oklahoma Army National Guard
Proposed Land Use Military Training	County and State Carter County, Oklahoma
PART II *(To be completed by NRCS)*	Date Request Received By NRCS 2/5/2015 / Person Completing Form: Jim Williams

Does the site contain Prime, Unique, Statewide or Local Important Farmland? *(If no, the FPPA does not apply - do not complete additional parts of this form)*	YES ✔	NO ☐	Acres Irrigated 332	Average Farm Size 213

Major Crop(s)	Farmable Land In Govt. Jurisdiction	Amount of Farmland As Defined in FPPA
wheat	Acres: 235211% 38	Acres: 147844% 24
Name of Land Evaluation System Used	**Name of State or Local Site Assessment System**	**Date Land Evaluation Returned by NRCS**
CALES	None	2/10/2015

PART III *(To be completed by Federal Agency)*	Alternative Site Rating			
	Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly	8			
B. Total Acres To Be Converted Indirectly	38			
C. Total Acres In Site	46			
PART IV *(To be completed by NRCS)* Land Evaluation Information				
A. Total Acres Prime And Unique Farmland	33			
B. Total Acres Statewide Important or Local Important Farmland	0			
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted	.001			
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value	43.4			
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)	36.9			

PART VI *(To be completed by Federal Agency)* Site Assessment Criteria *(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)*	**Maximum Points**	Site A	Site B	Site C	Site D
1. Area In Non-urban Use	(15)				
2. Perimeter In Non-urban Use	(10)				
3. Percent Of Site Being Farmed	(20)				
4. Protection Provided By State and Local Government	(20)				
5. Distance From Urban Built-up Area	(15)				
6. Distance To Urban Support Services	(15)				
7. Size Of Present Farm Unit Compared To Average	(10)				
8. Creation Of Non-farmable Farmland	(10)				
9. Availability Of Farm Support Services	(5)				
10. On-Farm Investments	(20)				
11. Effects Of Conversion On Farm Support Services	(10)				
12. Compatibility With Existing Agricultural Use	(10)				
TOTAL SITE ASSESSMENT POINTS	160	0	0	0	0
PART VII ***(To be completed by Federal Agency)***					
Relative Value Of Farmland *(From Part V)*	100	36.9	0	0	0
Total Site Assessment *(From Part VI above or local site assessment)*	160	0	0	0	0
TOTAL POINTS ***(Total of above 2 lines)***	260	36.9	0	0	0

Site Selected:	Date Of Selection	Was A Local Site Assessment Used? YES ☐ NO ☐

Reason For Selection:

Name of Federal agency representative completing this form:	Date:

(See Instructions on reverse side) **Form AD-1006 (03-02)**

STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

Step 1 - Federal agencies (or Federally funded projects) involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form. For Corridor type projects, the Federal agency shall use form NRCS-CPA-106 in place of form AD-1006. The Land Evaluation and Site Assessment (LESA) process may also be accessed by visiting the FPPA website, http://fppa.nrcs.usda.gov/lesa/.

Step 2 - Originator (Federal Agency) will send one original copy of the form together with appropriate scaled maps indicating location(s)of project site(s), to the Natural Resources Conservation Service (NRCS) local Field Office or USDA Service Center and retain a copy for their files. (NRCS has offices in most counties in the U.S. The USDA Office Information Locator may be found at http://offices.usda.gov/scripts/ndISAPI.dll/oip_public/USA_map, or the offices can usually be found in the Phone Book under U.S. Government, Department of Agriculture. A list of field offices is available from the NRCS State Conservationist and State Office in each State.)

Step 3 - NRCS will, within 10 working days after receipt of the completed form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland. (When a site visit or land evaluation system design is needed, NRCS will respond within 30 working days.

Step 4 - For sites where farmland covered by the FPPA will be converted by the proposed project, NRCS will complete Parts II, IV and V of the form.

Step 5 - NRCS will return the original copy of the form to the Federal agency involved in the project, and retain a file copy for NRCS records.

Step 6 - The Federal agency involved in the proposed project will complete Parts VI and VII of the form and return the form with the final selected site to the servicing NRCS office.

Step 7 - The Federal agency providing financial or technical assistance to the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM

(For Federal Agency)

Part I: When completing the "County and State" questions, list all the local governments that are responsible for local land use controls where site(s) are to be evaluated.

Part III: When completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them or other major change in the ability to use the land for agriculture.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities planned build out capacity) that will cause a direct conversion.

Part VI: Do not complete Part VI using the standard format if a State or Local site assessment is used. With local and NRCS assistance, use the local Land Evaluation and Site Assessment (LESA).

1. Assign the maximum points for each site assessment criterion as shown in § 658.5(b) of CFR. In cases of corridor-type project such as transportation, power line and flood control, criteria #5 and #6 will not apply and will, be weighted zero, however, criterion #8 will be weighed a maximum of 25 points and criterion #11 a maximum of 25 points.

2. Federal agencies may assign relative weights among the 12 site assessment criteria other than those shown on the FPPA rule after submitting individual agency FPPA policy for review and comment to NRCS. In all cases where other weights are assigned, relative adjustments must be made to maintain the maximum total points at 160. For project sites where the total points equal or exceed 160, consider alternative actions, as appropriate, that could reduce adverse impacts (e.g. Alternative Sites, Modifications or Mitigation).

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, convert the site assessment points to a base of 160.
Example: if the Site Assessment maximum is 200 points, and the alternative Site "A" is rated 180 points:

$$\frac{\text{Total points assigned Site A}}{\text{Maximum points possible}} = \frac{180}{200} \text{ X } 160 = 144 \text{ points for Site A}$$

For assistance in completing this form or FPPA process, contact the local NRCS Field Office or USDA Service Center.

NRCS employees, consult the FPPA Manual and/or policy for additional instructions to complete the AD-1006 form.

THE CITY OF
ARDMORE, OKLAHOMA
PO BOX 249 * 73402
DEPARTMENT OF DEVELOPMENT SERVICES
15 1ST AVENUE SE
TELEPHONE: (580) 223-3477 FAX: (580) 221-7360

OKLAHOMA CERTIFIED CITIES

February 10, 2015

Re: Response to letter dated January 13, 2015

Dear Jennifer,

The zoning for the location is IL (Light Industrial) which is appropriate for RC building and it's proposed uses.

The only issue that the Planning and Zoning departments have is a Minor Subdivision would be required to combine Lots 3, 4, and 5A, Block 2 Westport Industrial Park into one lot.

Cordially,

Nick F. Diaz
Development Services Director

CITY OF ARDMORE
Engineering Department
Ardmore, Oklahoma 73401

February 17, 2015

MAJ Terry Hale, Jr., Environmental Program Manager
Oklahoma Army National Guard (OKARNG)
Joint Force Headquarters
3515 Military Circle
Oklahoma City, Oklahoma 73111-4305

SUBJECT: Readiness Center in Ardmore

Dear MAJ Hale:

Reference your letter of January 13, 2015 concerning the Oklahoma National Guard's plans to construct a new Readiness Center here in Ardmore.

Your information has been reviewed by this office as well as our Departments of Public Utilties. A response from our Development Services Department has been submitted under separate cover. We have no comments or concerns relevant to the development of your Environmental Assessment.

As your project unfolds, please do not hesitate to contact me if you have any questions or need of assistance.

Sincerely,

Thomas D. Mansur, P.E.
City Engineer

TDM/bh

Forward scan via email

State of Oklahoma
Department of Agriculture, Food, and Forestry

Mary Fallin
Governor

Jim Reese
Secretary of Agriculture

February 24, 2015

Jennifer Ziegler
3515 Military Circle
Oklahoma City, OK 73111

RE: Request for Comments Concerning Oklahoma Army National Guard New Readiness Center in Ardmore, Oklahoma

Dear Ms. Ziegler:

The Oklahoma Department of Agriculture, Food, and Forestry, appreciates the opportunity to review and comment on projects that may impact Oklahoma's agriculture industry and associated natural resources. Per request in your letter dated January 13, 2015, we have reviewed your proposed plan for the Oklahoma Army National Guard new Readiness Center in Ardmore, Oklahoma. We are not aware of any areas that would be affected by the project, but because the project may involve some degree of soil disturbance, we encourage you to take the necessary steps during construction to minimize erosion and negative effects on local water resources. Otherwise, we have no issues or concerns with the project.

We appreciate the opportunity to review your plan. If you have any questions please feel to contact me.

Respectfully,

Jim Reese
Secretary of Agriculture

2800 N. Lincoln Blvd., Oklahoma City, OK 73105 (405) 521-3864
www.oda.state.ok.us

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Division of Ecological Services
9014 East 21st Street
Tulsa, Oklahoma 74129
918/581-7458 / (FAX) 918/581-7467

May 8, 2015

Online Project Review Concurrence Letter

To: Oklahoma Military Department
Attn: MAJ Terry C. Hale
3515 Military Circle
Oklahoma City, OK 73111
Phone: (405) 228-5699; Email: terry.c.hale.mil@mail.mil

Project Name: Environmental Assessment for Proposed Construction and Operation of a National Guard Readiness Center and Associated Unit Re-Stationing Ardmore and Poteau, Carter and Le Flore Counties, OK

Dear Applicant:

Thank you for using the U.S. Fish and Wildlife Service (Service) Oklahoma Ecological Services Field Office online project review process. By providing this letter in conjunction with your project review package, you are certifying that you have accurately completed the online project review process for the referenced project in accordance with all instructions provided, using the best available information to reach your conclusions. Concurrence with "not likely to adversely affect" determinations does not provide any exemption for violations of section 9 of the ESA or "take" of federally-listed species. The Federal action agency is ultimately responsible for ensuring compliance with the ESA and any take that occurs due to your proposed action would be considered a violation under section 9 of the ESA.

This letter and the enclosed project review package complete the review of your project in accordance with the Endangered Species Act of 1973 (16 U.S.C. 1531-1544, 87 Stat. 884), as amended (ESA). This letter also provides information for your project review under the National Environmental Policy Act (National Environmental Policy Act of 1969 (P.L. 91-190, 42 U.S.C. 4321-4347, 83 Stat. 852), as amended. A copy of this letter and the project review package must be emailed to **okprojectreview@fws.gov** for this certification to be valid. This letter and the project review package will be maintained in Service records. **Please allow the OKESFO 60 days to review your information. If the OKESFO determines that the package is not complete, or that additional coordination is necessary, we will contact your office. If after 60 days from the time you emailed your project review package the OKESFO has not contacted your office, consider your section 7 consultation complete.**

The proposed action consists of

The purpose of this letter is to solicit comments regarding the Oklahoma Army National Guard's (OKARNG) intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see Figures 1-3). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership.

The proposed Ardmore RC would be constructed on an approximately 46-acre parcel located southwest of the intersection of Coopers Drive and Prairie Valley Road (see Figures 1 and 2); this intersection is approximately 0.25 mile west of I-35 (Exit 33). The proposed project site is zoned for light industrial use and consists primarily of maintained grasslands (e.g., little blue stem, switch grass, and Johnson grass) with scrub-shrub habitat in the south (e.g., hackberry, eastern red cedar, dogwood). Two ponds occur within the northeast and southeast portions of the project site. Past activities have included agricultural terracing, mowing, and utility installation (e.g., high-power electric line runs east-west through property).

Under the Proposed Action, four units within the 45th Infantry Brigade Combat Team (IBCT) would be relocated to ensure these units are provided with the necessary training and administrative capacity to meet the OKARNG's mission. The proposed Ardmore RC would house OKARNG units and equipment, an Oklahoma DPS driver's license testing facility, and the Oklahoma Highway Patrol Troop F Headquarters.

The proposed Ardmore RC building would be no more than three stories (approximately 36 feet high) and would include 94,640 SF of total facility space. The RC building would include an assembly hall, classrooms, kitchen/break/vending area, toilets/showers, flammable materials storage, controlled waste handling facility, administrative office space and unit storage space. In addition, approximately 220,400 SF (5.1 acres) of various paved areas and support facilities would be constructed, which include parking, sidewalks, lighting, a refuse collection facility, access roads, fencing, and utility line extensions (see Figure 2).

As an element of the overall Proposed Action, two legacy RCs in Ardmore and Poteau, OK would be closed. The existing Ardmore RC building (built in 1985) would be demolished and the property returned to the City of Ardmore. This old RC is uninhabitable and has been condemned due to health and safety issues resulting from water penetration, foundation damage, and mold. The existing Ardmore RC building, proposed for demolition, is located on an approximately 10-acre parcel consisting of impervious surfaces (e.g., building, parking) and maintained grasslands (see Figure 1).

The Poteau RC building (built in 1954) would be vacated and the property transferred to a state or local governmental entity. This RC does not comply with current space requirements, and cannot be expanded because it is landlocked by facilities and operations associated with Carl Albert State College (see Figure 3).

The project is expected to be completed:

The proposed Ardmore RC is a Fiscal Year (FY) 2017 Military Construction (MILCON) project. Construction is slated to start in spring 2017 and be complete by spring 2019.

This project review is needed for:

The OKARNG is preparing an Environmental Assessment (EA) to evaluate potential physical, environmental, cultural, and socioeconomic effects associated with the Proposed Action pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code (USC) §4321 et seq.), the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651.

The species conclusions table in the enclosed project review package summarizes your ESA conclusions. These conclusions resulted in "not likely to adversely affect/modify" determinations for listed species and critical habitat in relation to potential effects of your proposed project. We certify that the use of the online project review process in strict accordance with the instructions provided as documented in the enclosed project review package results in reaching the appropriate determinations. Therefore, we concur with determinations of "not likely to adversely affect" for listed species and critical habitat reached by proper use of this process. For projects where this particular determination is reached, additional coordination with this office is not needed.

Candidate species are not legally protected pursuant to the ESA. However, the Service encourages efforts to avoid or minimize adverse impacts to them from project effects. Some federal agencies have standing policies that grant limited protections to candidate species. Conservation of candidate species now may preclude future needs to federally list them as endangered or threatened, at which point their legal protection would become required. Please contact this office for additional coordination if your project action area contains candidate species.

Should project plans change or if additional information on the distribution of listed species or critical habitat becomes available, this determination may be reconsidered. You should re-visit the Service's Information, Planning, and Conservation (IPaC) website at http://ecos/fws.gov/ipac/ within 90 days of project inititaion to ensure species information is correct. If new species or critical habitat is identified, this letter is no longer valid and a new project package should be submitted to the OKESFO.

Information about the online project review process including instructions and use, species information, and other information regarding project reviews within Oklahoma is available at our website: <http://www.fws.gov/southwest/es/oklahoma/ >. If you have any questions, please call 918-581-7458 or send an email message to OKProjectReview@fws.gov.

Sincerely,
/s/ Jontie Aldrich
Acting Field Supervisor
Oklahoma Ecological Services Field Office

Enclosures:

1) ENTIRE PROJECT REVIEW PACKAGE:
   - ☑ Species Conclusion Table
   - ☑ IPaC Species List and Action Area map
   - ☑ This letter (Online Concurrence Letter)
   - ☑ (Optional) Additional maps
2) Other relevant project data/documents

Not Applicable

TABLE 1. Species Conclusions Table for Proposed and Existing Ardmore Readiness Center Project Areas

Species / Critical Habitat	Habitat Determination	Notes / Documentation	ESA Determination
Least Tern	No habitat present	Site reconnaissance reveals no exposed salt flats, beaches or sand bars within the vicinity of the project area. No towers are proposed under the Proposed Action.	No effect
Piping Plover	No habitat present	Site reconnaissance reveals no sand bars, salt flats or mudflats within the vicinity of the project area.	No effect
Red Knot	No habitat present	Site reconnaissance reveals no shoreline habitat.	No effect
Whooping Crane	Limited habitat present, some potential discountable effects if species was present	Site reconnaissance revealed a surface impoundment in the northeast corner of the property and a small, isolated wet area near the southeastern corner in the proposed Ardmore RC Site. Occurrence of this bird would be limited to brief stopovers due to the minimal water features in the action area.	May affect, but is not likely to adversely affect
American Burying Beetle	Limited habitat present (mostly unfavorable for use), potential discountable effects	Sites contain primarily maintained grasslands with some scrub-shrub habitat at the proposed Ardmore RC Site. Based on the current available ABB Range Map shapefile (2015) on the USFWS Oklahoma Field Office website, the project area is located on the eastern-most edge of the ABB range, but approximately 50 miles east of the Conservation Priority Area.	May affect, but is not likely to adversely affect

TABLE 2. Species Conclusions Table for Existing Poteau Readiness Center Project Area

Species / Critical Habitat	Habitat Determination	Notes / Documentation	ESA Determination
Least Tern	No habitat present	No exposed salt flats, beaches or sand bars within the vicinity of the project area; no ground disturbance proposed.	No effect
Piping Plover	No habitat present	Site survey reveals no exposed salt flats, beaches or sand bars within the vicinity of the project area	No effect
Red Knot	No habitat present	No surface water features within the project area; no ground disturbance proposed.	No effect
Scaleshell mussel	No habitat present	No surface water features within the project area; no ground disturbance proposed.	No effect
Winged Mapleleaf	No habitat present	No surface water features within the project area; no ground disturbance proposed.	No effect
American Burying Beetle	No habitat present	Site consists of well-maintained grassland and a few landscaping trees; no ground disturbance proposed.	No effect
Indiana bat	No habitat present	Site consists of well-maintained grassland and a few landscaping trees; no ground disturbance proposed.	No effect
Northern long-eared bat	No habitat present	Site consists of well-maintained grassland and a few landscaping trees; no ground disturbance proposed.	No effect

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Oklahoma Ecological Services Field Office
9014 EAST 21ST STREET
TULSA, OK 74129
PHONE: (918)581-7458 FAX: (918)581-7467
URL: www.fws.gov/southwest/es/Oklahoma/

Consultation Code: 02EKOK00-2015-SLI-1001 May 07, 2015
Event Code: 02EKOK00-2015-E-01074
Project Name: Environmental Assessment for Proposed Construction and Opera

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Non-federal entities conducting activities that may result in take of listed species should consider seeking coverage under section 10 of the ESA, either through development of a Habitat Conservation Plan (HCP) or, by becoming a signatory to the General Conservation Plan (GCP) currently under development for the American burying beetle. Each of these mechanisms provides the means for obtaining a permit and coverage for incidental take of listed species during otherwise lawful activities.

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit through our Project Review step-wise process http://www.fws.gov/southwest/es/oklahoma/OKESFO%20Permit%20Home.htm.

Attachment

Official Species List

Provided by:

Oklahoma Ecological Services Field Office
9014 EAST 21ST STREET
TULSA, OK 74129
(918) 581-7458
http://www.fws.gov/southwest/es/Oklahoma/

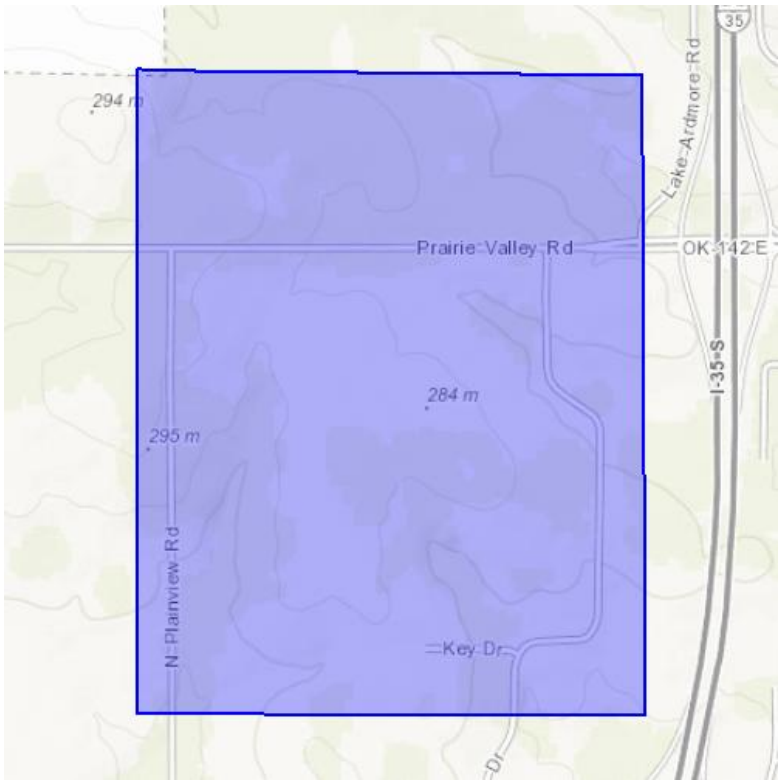
Consultation Code: 02EKOK00-2015-SLI-1001
Event Code: 02EKOK00-2015-E-01074

Project Type: MILITARY OPERATIONS / MANEUVERS

Project Name: Environmental Assessment for Proposed Construction and Opera
Project Description: The OKARNG proposes to construct and operate a facility of sufficient size and modern design within south-central Oklahoma to efficiently achieve and maintain mission requirements and requisite mobilization readiness levels for four units within the 45th Infantry Brigade Combat Team (IBCT).The Proposed Action includes: (1) construction of the proposed Ardmore Readiness Center (RC); and (2) operation of the proposed Ardmore RC.

Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-97.17838167969603 34.205638592650175, -97.16612577089109 34.20556169036956, -97.16604351560818 34.19226885028157, -97.17877507122466 34.19229843313922, -97.17881083313841 34.20566816919236, -97.17838167969603 34.205638592650175)))

Project Counties: Carter, OK

Endangered Species Act Species List

There are a total of 5 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 1 of these species should be considered only under certain conditions. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

Birds	**Status**	**Has Critical Habitat**	**Condition(s)**
Least tern *(Sterna antillarum)* Population: interior pop.	Endangered		Wind Turbines and Wind FarmsTowers (i.e. radio, television, cellular, microwave, meterological)
Piping Plover *(Charadrius melodus)* Population: except Great Lakes watershed	Threatened	Final designated	
Red Knot *(Calidris canutus rufa)*	Threatened		
Whooping crane *(Grus americana)* Population: except where EXPN	Endangered	Final designated	
Insects			
American Burying beetle *(Nicrophorus americanus)* Population: Entire	Endangered		

Critical habitats that lie within your project area

There are no critical habitats within your project area.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Oklahoma Ecological Services Field Office
9014 EAST 21ST STREET
TULSA, OK 74129
PHONE: (918)581-7458 FAX: (918)581-7467
URL: www.fws.gov/southwest/es/Oklahoma/

Consultation Code: 02EKOK00-2015-SLI-1002 May 07, 2015
Event Code: 02EKOK00-2015-E-01075
Project Name: Environmental Assessment for Proposed Construction and Opera

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Non-federal entities conducting activities that may result in take of listed species should consider seeking coverage under section 10 of the ESA, either through development of a Habitat Conservation Plan (HCP) or, by becoming a signatory to the General Conservation Plan (GCP) currently under development for the American burying beetle. Each of these mechanisms provides the means for obtaining a permit and coverage for incidental take of listed species during otherwise lawful activities.

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit through our Project Review step-wise process http://www.fws.gov/southwest/es/oklahoma/OKESFO%20Permit%20Home.htm.

Attachment

Official Species List

Provided by:

Oklahoma Ecological Services Field Office
9014 EAST 21ST STREET
TULSA, OK 74129
(918) 581-7458
http://www.fws.gov/southwest/es/Oklahoma/

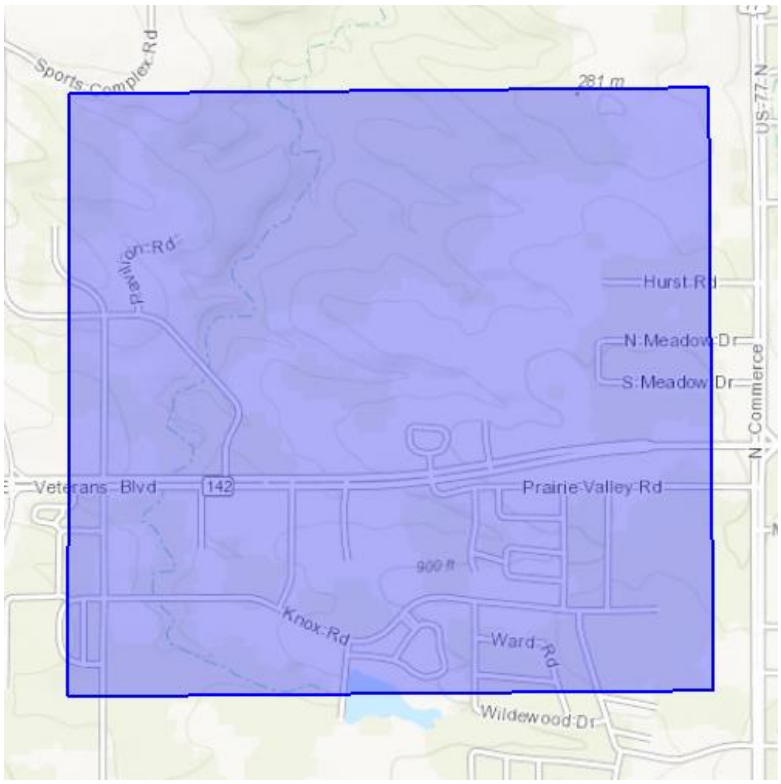
Consultation Code: 02EKOK00-2015-SLI-1002
Event Code: 02EKOK00-2015-E-01075

Project Type: MILITARY OPERATIONS / MANEUVERS

Project Name: Environmental Assessment for Proposed Construction and Opera
Project Description: The OKARNG proposes to construct and operate a facility of sufficient size and modern design within south-central Oklahoma to efficiently achieve and maintain mission requirements and requisite mobilization readiness levels for four units within the 45th Infantry Brigade Combat Team (IBCT).The Proposed Action includes demolition of the existing Ardmore RC building. This old RC is uninhabitable and has been condemned due to health and safety issues resulting from water penetration.

Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-97.16137647192227 34.21060142143611, -97.16139078140257 34.19736853401323, -97.14426040562103 34.19752826386119, -97.14438915689243 34.21073746716623, -97.16137647192227 34.21060142143611)))

Project Counties: Carter, OK

Endangered Species Act Species List

There are a total of 5 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 1 of these species should be considered only under certain conditions. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

Birds	**Status**	**Has Critical Habitat**	**Condition(s)**
Least tern *(Sterna antillarum)* Population: interior pop.	Endangered		Towers (i.e. radio, television, cellular, microwave, meterological)Wind Turbines and Wind Farms
Piping Plover *(Charadrius melodus)* Population: except Great Lakes watershed	Threatened	Final designated	
Red Knot *(Calidris canutus rufa)*	Threatened		
Whooping crane *(Grus americana)* Population: except where EXPN	Endangered	Final designated	
Insects			
American Burying beetle *(Nicrophorus americanus)* Population: Entire	Endangered		

Critical habitats that lie within your project area

There are no critical habitats within your project area.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Oklahoma Ecological Services Field Office
9014 EAST 21ST STREET
TULSA, OK 74129
PHONE: (918)581-7458 FAX: (918)581-7467
URL: www.fws.gov/southwest/es/Oklahoma/

Consultation Code: 02EKOK00-2015-SLI-1003 May 07, 2015
Event Code: 02EKOK00-2015-E-01076
Project Name: Environmental Assessment for Proposed Construction and Opera

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Non-federal entities conducting activities that may result in take of listed species should consider seeking coverage under section 10 of the ESA, either through development of a Habitat Conservation Plan (HCP) or, by becoming a signatory to the General Conservation Plan (GCP) currently under development for the American burying beetle. Each of these mechanisms provides the means for obtaining a permit and coverage for incidental take of listed species during otherwise lawful activities.

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit through our Project Review step-wise process http://www.fws.gov/southwest/es/oklahoma/OKESFO%20Permit%20Home.htm.

Attachment

Official Species List

Provided by:

Oklahoma Ecological Services Field Office
9014 EAST 21ST STREET
TULSA, OK 74129
(918) 581-7458
http://www.fws.gov/southwest/es/Oklahoma/

Consultation Code: 02EKOK00-2015-SLI-1003
Event Code: 02EKOK00-2015-E-01076

Project Type: MILITARY OPERATIONS / MANEUVERS

Project Name: Environmental Assessment for Proposed Construction and Opera
Project Description: The OKARNG proposes to construct and operate a facility of sufficient size and modern design within south-central Oklahoma to efficiently achieve and maintain mission requirements and requisite mobilization readiness levels for four units within the 45th Infantry Brigade Combat Team (IBCT). The Proposed Action includes the OKARNG vacating the Poteau RC (built in 1954). The property would be transferred to a state or local governmental entity for use.

Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.

Project Location Map:

Project Coordinates: MULTIPOLYGON (((-94.63889479811769 35.04218363261381, -94.638608697569 35.03846498239176, -94.63850140658904 35.03752797206863, -94.63170647795778 35.03770366218865, -94.63202834303956 35.04241787339047, -94.63889479811769 35.04218363261381)))

Project Counties: Le Flore, OK

Endangered Species Act Species List

There are a total of 8 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

Birds	**Status**	**Has Critical Habitat**	**Condition(s)**
Least tern *(Sterna antillarum)* Population: interior pop.	Endangered		
Piping Plover *(Charadrius melodus)* Population: except Great Lakes watershed	Threatened	Final designated	
Red Knot *(Calidris canutus rufa)*	Threatened		
Clams			
Scaleshell mussel *(Leptodea leptodon)*	Endangered		
Winged Mapleleaf *(Quadrula fragosa)* Population: Entire; except where listed as experimental populations	Endangered		
Insects			
American Burying beetle *(Nicrophorus americanus)* Population: Entire	Endangered		
Mammals			
Indiana bat *(Myotis sodalis)* Population: Entire	Endangered		

Northern long-eared Bat *(Myotis septentrionalis)*	Threatened		

Critical habitats that lie within your project area

There are no critical habitats within your project area.

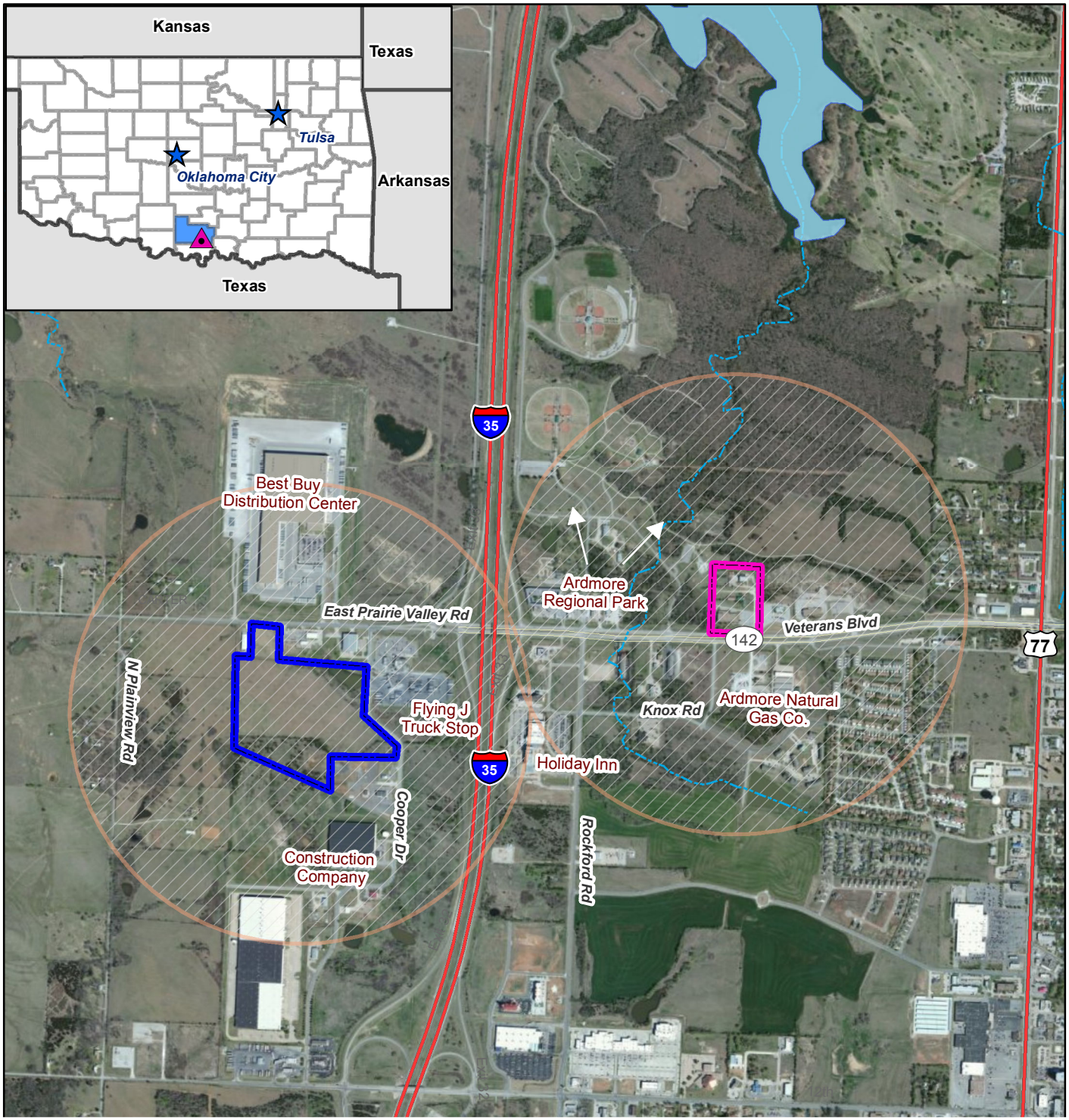


FIGURE 1
PROPOSED & EXISTING ARDMORE PROPERTIES

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

- Ardmore City Lake
- Streams
- Area of Potential Effect (APE)

Ardmore Properties

- Proposed RC
- Existing RC

N

0 500 1,000 2,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

"No warranty is made by the OKARNG/ARNG-ILE as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document", in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database."

FIGURE 2
CONCEPTUAL LAYOUT OF PROPOSED RC

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

- Proposed Ardmore Property
- Readiness Center
- DPS Annex

Paved Areas

- Military Equipment Parking
- POV Parking
- DPS Annex Parking
- Access Roads

N

0 250 500 1,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

"No warranty is made by the OKARNG/ARNG-ILE as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document", in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database."

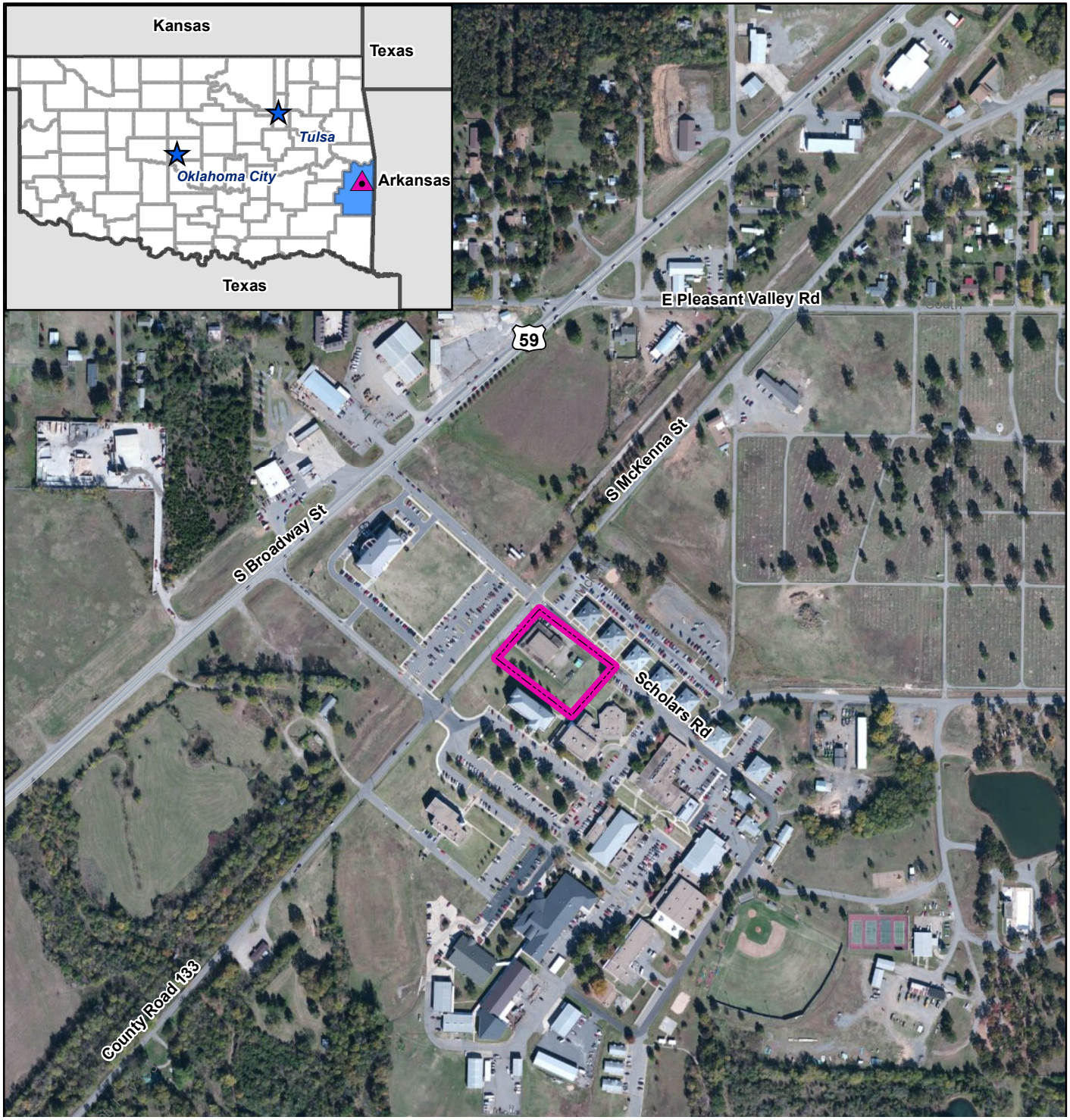


FIGURE 3
Legacy Poteau RC

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

Poteau Property

N

0 250 500 1,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

"No warranty is made by the OKARNG/ARNG-ILE as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document", in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database."

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305
(405) 228-5000 OR DSN 628-5000

NGOK-ENG-ENV

13 August 2015

MEMORANDUM FOR RECORD

SUBJECT: SHPO, OAS, and Tribal Consultation for Ardmore RC EA

1. SHPO, OAS, and Tribal consultation was initiated via formal certified letter dated Jan 15 and mailed by the Oklahoma Army National Guard (OKARNG) on 29 Jan 15 t eleven federally-recognized tribes recorded as having cultural affiliation and interest the project area in Carter County. Tribes were invited to participate as consulting par for the undertaking located at Ardmore, OK.

2. The six tribes invited to participate as consulting parties were:
   a. Caddo Nation
   b. Chickasaw Nation
   c. Kialegee Tribal Town
   d. Osage Nation
   e. Seminole Nation of Oklahoma
   f. Wichita and Affiliated Tribes

3. The following responses were received:
   - The SHPO sent a letter dated 5 Feb 15 concurring with the determination of No Historical Properties Affected in Ardmore. Another letter was sent dated 5 Feb approving a new readiness center in Poteau, OK, though this letter only stated the current RC in Poteau would be vacated once the new RC in Ardmore open. On 3 Aug 15 a corrected letter approving the transfer of the Poteau RC.
   - OAS sent a letter dated 29 Jan 15 saying that they have no record of archaeological sites in the area, but if anything is uncovered during construction they should be contacted immediately.
   - The Osage Nation sent a letter dated 25 Jun 15 requesting a copy of the Draft EA and look forward to reviewing it.

4. The point of contact for this memorandum is the undersigned at 405-228-5333 or Hannah.c.parker6.nfg@mail.mil

Hannah Goodman

Hannah C Goodman
Cultural Resources Manager

EXECUTIVE SUMMARY

For use of this form, see Policy Memorandum 00-09 dated 1 Apr 00, Subject: Use of OKARNG Fm 14-E, Executive Summary; The proponent agency is OKCofS

DATE 01/13/2015

TIME 1030

TYPE ☐ VISIT ☐ MEETING ☒ CORRESPONDENCE ☐ DECISION ☐ TELEPHONE

NAME OF PERSON INITIATING SUMMARY	PHONE	NAME OF ADDRESSEE	ROUTING
MAJ Terry C. Hale, Jr. NGOK-ENG-ENV	EXT 5521	MG Myles L. Deering	

SUBJECT:
Section 106, National Historic Preservation Act (NHPA) Consultation Letters for and Environmental Assessment (EA) on proposed construction of an Ardmore, OK Readiness Center

NAME/SYMBOL	INITIAL

SUMMARY:

1. Consultation in accordance with Section 106 of the NHPA, insures that coordination with culturally affiliated Native American Governments has been conducted prior to a proposed federal undertaking. It also satisfies the requirements of Executive Order 13175 which require Federal agencies to contact federally recognized Indian governments on a government-to-government basis.

2. The Environmental Branch of the Directorate of Facilities Management submits these letters IAW AR 200-1 and NGB Guidance. As Installation Commander as defined in AR 200-1, the Adjutant General's signature is required on documents initiating government-to-government consultation.

3. The Oklahoma Military Department (OMD) proposes to build a Readiness Center in Ardmore, OK. An Environmental Assessment (EA) is being conducted on the site before construction begins.

ACTION REQUIRED:
Signature

TYPED NAME OF INITIATOR	SIGNATURE	DATE
MAJ Terry C. Hale, Jr.	Terry C. Hale	13 JAN 2015

RESPONSE:

SIGNATURE:	TITLE:	DATE:

OKARNG Form 14-E (1 Apr 00)

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Ms. Melvena Heisch
Deputy State Historic Preservation Officer
Oklahoma Historical Society -Oklahoma History Center
800 Nazih Zuhdi Drive
Oklahoma City, OK 73105

Dear Ms. Heisch:

The purpose of this letter is to solicit comments regarding the Oklahoma Army National Guard's (OKARNG) intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership. The Proposed Action is located within Sections 23 and 13 of Township 4 South, Range 1 East; and Section 35, Township 7 North and Range 25 East.

The OKARNG is preparing an Environmental Assessment (EA) to evaluate potential physical, environmental, cultural, and socioeconomic effects associated with the Proposed Action pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code (USC) §4321 et seq.), the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651.

The proposed undertaking involves the construction and operation of a new Ardmore RC on an approximately 46-acre parcel located southwest of the intersection of Cooper Drive and East Prairie Valley Road (see **Figures 1** and **2**); this intersection is approximately 0.25 mile west of I-35, Exit 33. The proposed project site is zoned for light industrial use and consists primarily of maintained grasslands (e.g., little blue stem, switch grass, and Johnson grass) with scrub-shrub habitat in the south (e.g., hackberry, eastern red cedar, dogwood). Two ponds occur within the northeast and southeast portions of the project site. Past activities have included agricultural terracing, mowing, and utility installation. A high-power electric line runs east-west through the center of the property.

The proposed Ardmore RC building would be no more than three stories (approximately 36 feet high) and would include 94,640 SF of total facility space. The RC building would include an assembly hall, classrooms, kitchen/break/vending area, toilets/showers, flammable materials storage, controlled waste handling facility,

administrative office space and unit storage space. In addition, approximately 220,400 SF or 5.1 acres of various paved areas and support facilities would be constructed, which include parking, sidewalks, lighting, a refuse collection facility, access roads, fencing, and utility line extensions (see **Figure 2**).

Under the Proposed Action, four units within the 45th Infantry Brigade Combat Team (IBCT) would be relocated to facilities, which will provide the necessary space and equipment to train a modern army. The proposed Ardmore RC would house OKARNG units and equipment, an Oklahoma DPS driver's license testing facility, and the Oklahoma Highway Patrol Troop F Headquarters.

As an element of the overall Proposed Action, two legacy RCs in Ardmore and Poteau, OK would be closed. The existing Ardmore RC building was built in 1985 and would be demolished and the property returned to the City of Ardmore. This RC is uninhabitable and has been condemned due to health and safety issues resulting from water penetration, foundation damage, and mold. The existing Ardmore RC building, proposed for demolition, is located on an approximately 10-acre parcel consisting of impervious surfaces (e.g., building, parking) and maintained grasslands (see **Figure 1**).

The Poteau RC building was built in 1954 and would be vacated and the property transferred to a state or local governmental entity (see **Figure 3**). This RC does not comply with current space requirements, and cannot be expanded because it is landlocked by facilities and operations associated with Carl Albert State College.

The Area of Potential Effect (APE) is defined as a ½ mile radius from the center of the new 46-acre parcel as well as the boundary of the existing OKARNG properties. The OKARNG has conducted the background research and cultural resource surveys pursuant to Section 800.4(a) and (b) of 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act (NHPA), in order to further identify resources that may be affected by the proposed undertaking. As a result of our efforts to identify and evaluate historic properties, we have determined, pursuant to §800.4(d)(1), that there are **no historic properties affected** as a result of our proposed project.

Early coordination was conducted for the Ardmore properties with your agency (File #1852-12), Oklahoma Archeological Survey, and Native American tribe/groups in July 2012. No structures over 50 years old occur within the proposed or existing Ardmore RC properties, and no known historic properties were identified in the APE during the early coordination effort. An archeological survey was conducted for the Ardmore sites and documented by Cole and Neel (2013) in the *Archaeological Site Detection Survey of Approximately 227 Acres at Eleven OKARNG Readiness Centers/Support Facilities in Carter, Hughes, Oklahoma, Pontotoc, and Tulsa Counties, OK*. No archaeological sites were recorded at the 11 OKARNG facilities, and no further archaeological investigations were recommended by Cole and Neel (2013). In a letter dated 5 February 2013, OAS deferred opinion on potential eligibility and possible effects associated with

this undertaking to the SHPO. The SHPO concurred with this determination in a letter dated 29 January 2013 (File # 0700-13).

An architectural survey and assessment was conducted by Schenker et al. (2011) in the *Assessment of Six OKARNG Facilities*; it was determined that the Poteau RC was not eligible for the National Register of Historic Places (NRHP). The SHPO concurred with this determination in a letter dated 18 January 2012 (File # 0888-11).

If we do not hear from you within thirty (30) days as per 36 CFR 800.4(d)(1)(i), we will assume that you concur with our finding of **no historic properties affected** and will proceed with our project. Please direct your correspondence to: Hannah C. Parker Goodman, Cultural Resources Manager, at Oklahoma Military Department, Directorate of Facility Management, Environmental Branch (NGOK-ENG-ENV), 3515 Military Circle, Oklahoma City, OK 73111-4398, via telephone at 405-228-5333, or via email at hannah.c.parker6.nfg@mail.mil.

Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Mr. Robert L. Brooks
State Archaeologist
Oklahoma Archaeological Survey
111 E. Chesapeake
Norman, OK 73019-5111

Dear Mr. Brooks:

The purpose of this letter is to solicit comments regarding the Oklahoma Army National Guard's (OKARNG) intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership. The Proposed Action is located within Sections 23 and 13 of Township 4 South, Range 1 East; and Section 35, Township 7 North and Range 25 East.

The OKARNG is preparing an Environmental Assessment (EA) to evaluate potential physical, environmental, cultural, and socioeconomic effects associated with the Proposed Action pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code (USC) §4321 et seq.), the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651.

The proposed undertaking involves the construction and operation of a new Ardmore RC on an approximately 46-acre parcel located southwest of the intersection of Cooper Drive and East Prairie Valley Road (see **Figures 1** and **2**); this intersection is approximately 0.25 mile west of I-35, Exit 33. The proposed project site is zoned for light industrial use and consists primarily of maintained grasslands (e.g., little blue stem, switch grass, and Johnson grass) with scrub-shrub habitat in the south (e.g., hackberry, eastern red cedar, dogwood). Two ponds occur within the northeast and southeast portions of the project site. Past activities have included agricultural terracing, mowing, and utility installation. A high-power electric line runs east-west through the center of the property.

The proposed Ardmore RC building would be no more than three stories and would include 94,640 SF of total facility space. The RC building would include an assembly hall, classrooms, kitchen/break/vending area, toilets/showers, flammable materials storage, controlled waste handling facility, administrative office space and unit storage

space. In addition, approximately 220,400 SF or 5.1 acres of various paved areas and support facilities would be constructed, which include parking, sidewalks, lighting, a refuse collection facility, access roads, fencing, and utility line extensions (see **Figure 2**).

Under the Proposed Action, four units within the 45th Infantry Brigade Combat Team (IBCT) would be relocated to facilities, which will provide the necessary space and equipment to train a modern army. The proposed Ardmore RC would house OKARNG units and equipment, an Oklahoma DPS driver's license testing facility, and the Oklahoma Highway Patrol Troop F Headquarters.

As an element of the overall Proposed Action, two legacy RCs in Ardmore and Poteau, OK would be closed. The existing Ardmore RC building was built in 1985 and would be demolished and the property returned to the City of Ardmore. This RC is uninhabitable and has been condemned due to health and safety issues resulting from water penetration, foundation damage, and mold. The existing Ardmore RC building, proposed for demolition, is located on an approximately 10-acre parcel consisting of impervious surfaces (e.g., building, parking) and maintained grasslands (see **Figure 1**).

The Poteau RC building was built in 1954 and would be vacated and the property transferred to a state or local governmental entity (see **Figure 3**). This RC does not comply with current space requirements, and cannot be expanded because it is landlocked by facilities and operations associated with Carl Albert State College.

The Area of Potential Effect (APE) is defined as a ½ mile radius from the center of the new 46-acre parcel as well as the boundary of the existing OKARNG properties. The OKARNG has conducted the background research and cultural resource surveys pursuant to Section 800.4(a) and (b) of 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act (NHPA), in order to further identify resources that may be affected by the proposed undertaking. As a result of our efforts to identify and evaluate historic properties, we have determined, pursuant to §800.4(d)(1), that there are **no historic properties affected** as a result of our proposed project.

Early coordination was conducted for the Ardmore properties with State Historic Preservation Office (SHPO) (File #1852-12), Oklahoma Archeological Survey (OAS), and Native American tribe/groups in July 2012. No structures over 50 years old occur within the proposed or existing Ardmore RC properties, and no known historic properties were identified in the APE during the early coordination effort. An archeological survey was conducted for the Ardmore sites and documented by Cole and Neel (2013) in the *Archaeological Site Detection Survey of Approximately 227 Acres at Eleven OKARNG Readiness Centers/Support Facilities in Carter, Hughes, Oklahoma, Pontotoc, and Tulsa Counties, OK*. No archaeological sites were recorded at the 11 OKARNG facilities, and no further archaeological investigations were recommended by Cole and Neel (2013). In a letter dated 5 February 2013, OAS deferred opinion on

potential eligibility and possible effects associated with this undertaking to the SHPO. The SHPO concurred with this determination in a letter dated 29 January 2013 (File # 0700-13).

An architectural survey and assessment was conducted by Schenker et al. (2011) in the *Assessment of Six OKARNG Facilities*; it was determined that the Poteau RC was not eligible for the National Register of Historic Places (NRHP). The SHPO concurred with this determination in a letter dated 18 January 2012 (File # 0888-11).

A response within thirty (30) days would assist us in our evaluation. Please address any questions or comments to our NEPA Manager. Please direct your correspondence to: Hannah C. Parker Goodman, Cultural Resources Manager, at Oklahoma Military Department, Directorate of Facility Management, Environmental Branch (NGOK-ENG-ENV), 3515 Military Circle, Oklahoma City, OK 73111-4398, via telephone at 405-228-5333, or via email at hannah.c.parker6.nfg@mail.mil.

Sincerely,

Terry C. Hale, Jr.
Major, OKARNG
Environmental Program Manager

Enclosures

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Philip Smith, Acting Chairman
Caddo Nation of Oklahoma
P.O. Box 487
Binger, OK 73009

Dear Chairman Smith:

The purpose of this letter is to solicit comments regarding the Oklahoma Military Department's intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership. The Proposed Action is located within Sections 23 and 13 of Township 4 South, Range 1 East; and Section 35, Township 7 North and Range 25 East.

The Oklahoma Military Department is preparing an Environmental Assessment (EA) to evaluate potential physical, environmental, cultural, and socioeconomic effects associated with the Proposed Action pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code (USC) §4321 et seq.), the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651.

The Oklahoma Military Department has conducted the background research and cultural resource surveys pursuant to Section 800.4(a) and (b) of 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act, in order to further identify resources that may be affected by the proposed undertaking. As a result of our efforts to identify and evaluate historic properties, we have determined, pursuant to §800.4(d)(1), that there are no historic properties affected as a result of the proposed undertaking.

The proposed undertaking involves the construction and operation of a new Ardmore RC on an approximately 46-acre parcel located southwest of the intersection of Cooper Drive and East Prairie Valley Road (see **Figures 1** and **2**); this intersection is approximately one quarter mile west of I-35, exit 33. The proposed project site is zoned for light industrial use and consists primarily of maintained grasslands with scrub-shrub habitat in the south. Two ponds occur within the northeast and southeast portions of the project site. Past activities have included agricultural terracing, mowing, and utility installation.

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Sincerely,

Myles L. Deering
Major General, OKARNG
The Adjutant General

Enclosure

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1. Article Addressed to:

Chairman Anthony Carter
Caddo Nation
P.O. Box 487
Binger, Oklahoma 73009-0487

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A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) Jason Bidwell
C. Date of Delivery 2.2.15

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OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Bill Anoatubby, Governor
Chickasaw Nation
P.O. Box 1548
Ada, OK 74820

Dear Governor Anoatubby:

The purpose of this letter is to solicit comments regarding the Oklahoma Military Department's intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership. The Proposed Action is located within Sections 23 and 13 of Township 4 South, Range 1 East; and Section 35, Township 7 North and Range 25 East.

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Sincerely,

Myles L. Deering
Major General, OKARNG
The Adjutant General

Enclosure

SENDER: COMPLETE THIS SECTION

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1. Article Addressed to:

Governor Bill Anoatubby
Chickasaw Nation
P.O. Box 1548
Ada, OK 74820

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A. Signature
X [illegible] ☐ Agent ☐ Addressee

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Postage	$
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Return Receipt Fee (Endorsement Required)	
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PS Form 3800, February 2000 See Reverse for Instructions

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Jeremiah Hobia, Mekko
Kialegee Tribal Town
P.O. Box 332
Wetumka, OK 74883

Dear Mekko Hobia:

The purpose of this letter is to solicit comments regarding the Oklahoma Military Department's intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership. The Proposed Action is located within Sections 23 and 13 of Township 4 South, Range 1 East; and Section 35, Township 7 North and Range 25 East.

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Myles L. Deering
Major General, OKARNG
The Adjutant General

Enclosure

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1. Article Addressed to:

Mekko Tiger Hobia
Kialegee Tribal Town
P.O. Box 332
Wetumka, OK 74883-0332

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A. Signature
X K Dann
☐ Agent
☐ Addressee

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OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Geoffrey Standing Bear, Principal Chief
Osage Nation of Oklahoma
627 Grandview
Pawhuska, OK 74056

Dear Chief Standing Bear:

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Major General, OKARNG
The Adjutant General

Enclosure

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1. Article Addressed to:

Principle Chief Geoffrey Standing Bear
Osage Nation
627 Grandview
Pawhuska, OK 74056

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Tonya Red Corn ☐ Agent ☐ Addressee

B. Received by (Printed Name) Tonya Red Corn
C. Date of Delivery 2-2-15

D. Is delivery address different from item 1? ☐ Yes
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3. Service Type
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Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

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Street, Apt. No.; or PO Box No.
City, State, ZIP+ 4

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OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Leonard M. Harjo, Principal Chief
Seminole Nation of Oklahoma
P.O. Box 1498
Wewoka, OK 74884

Dear Chief Harjo:

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The proposed Ardmore RC building would be no more than three stories, and would include 94,640 SF of total facility space. The RC building would include an assembly hall, classrooms, kitchen/break/vending area, toilets/showers, flammable materials storage, controlled waste handling facility, administrative office space and unit storage space. In addition, approximately 220,400 SF or 5.1 acres of various paved areas and support facilities would be constructed, which include parking, sidewalks, lighting, a refuse collection facility, access roads, fencing, and utility line extensions (see **Figure 2**).

Under the Proposed Action, four units within the 45th Infantry Brigade Combat Team would be relocated to facilities, which will provide the necessary space and equipment to train a modern army. The proposed Ardmore RC would house Oklahoma Army National Guard (OKARNG) units and equipment, an Oklahoma DPS driver's license testing facility, and the Oklahoma Highway Patrol Troop F Headquarters.

As an element of the overall Proposed Action, two legacy RCs in Ardmore and Poteau, OK would be closed. The existing Ardmore RC building was built in 1985 and would be demolished and the property returned to the City of Ardmore. This RC is uninhabitable and has been condemned due to health and safety issues resulting from water penetration, foundation damage, and mold. The existing Ardmore RC building, proposed for demolition, is located on an approximately 10-acre parcel consisting of impervious surfaces and maintained grasslands (see **Figure 1**).

The Poteau RC building was built in 1954 and would be vacated and the property transferred to a state or local governmental entity (see **Figure 3**). This RC does not comply with current space requirements, and cannot be expanded because it is landlocked by facilities and operations associated with Carl Albert State College.

The Area of Potential Effect (APE) is defined as a half mile radius from the center of the new 46-acre parcel as well as the boundary of the existing OKARNG properties. Early coordination was conducted for the Ardmore properties with State Historic Preservation Office (SHPO) (File #1852-12), Oklahoma Archeological Survey (OAS), and Native American tribe/groups in July 2012. No structures over 50 years old occur within the proposed or existing Ardmore RC properties, and no known historic properties were identified in the APE during the early coordination effort.

An archeological survey was conducted for the Ardmore sites and documented by Cole and Neel (2013) in the *Archaeological Site Detection Survey of Approximately 227 Acres at Eleven OKARNG Readiness Centers/Support Facilities in Carter, Hughes, Oklahoma, Pontotoc, and Tulsa Counties, OK.* No archaeological sites were recorded at the 11 OKARNG facilities, and no further archaeological investigations were recommended. In a letter dated 5 February 2013, OAS deferred opinion on potential

eligibility and possible effects associated with this undertaking to the SHPO. The SHPO concurred with this determination in a letter dated 29 January 2013 (File # 0700-13).

An architectural survey and assessment was conducted by Schenker et al. (2011) in the *Assessment of Six OKARNG Facilities*; it was determined that the Poteau RC was not eligible for the National Register of Historic Places (NRHP). The SHPO concurred with this determination in a letter dated 18 January 2012 (File # 0888-11).

We invite you to join us as a consulting party as we conduct this EA in accordance with 36 CFR Part 800.2, Executive Order (EO) 13175, and Department of Defense Instruction (DoDI) 4710.02 – *Interactions with Federally Recognized Tribes*. If you have any questions, comments, or concerns about this project, please contact Hannah C. Parker Goodman, Cultural Resources Manager, at Oklahoma Military Department, Directorate of Facility Management, Environmental Branch (NGOK-ENG-ENV), 3515 Military Circle, Oklahoma City, OK 73111-4398, via telephone at 405-228-5333, or via email at hannah.c.parker6.nfg@mail.mil. With your advice and assistance, we hope to maintain an ongoing cooperative relationship between your Nation and the Oklahoma Military Department.

Sincerely,

Myles L. Deering
Major General, OKARNG
The Adjutant General

Enclosure

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1. Article Addressed to:

Principal Chief Leonard Harjo
Seminole Nation of Oklahoma
P.O. Box 1498
Wewoka, OK 74884-1498

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OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305

January 13, 2015

Terri Parton, President
Wichita and Affiliated Tribes of Oklahoma
P.O. Box 729
Anadarko, OK 73005

Dear President Parton:

The purpose of this letter is to solicit comments regarding the Oklahoma Military Department's intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK (see **Figures 1-3**). The proposed Ardmore RC would be constructed jointly with the Oklahoma Department of Public Safety (DPS) and would entail a community partnership. The Proposed Action is located within Sections 23 and 13 of Township 4 South, Range 1 East; and Section 35, Township 7 North and Range 25 East.

The Oklahoma Military Department is preparing an Environmental Assessment (EA) to evaluate potential physical, environmental, cultural, and socioeconomic effects associated with the Proposed Action pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code (USC) §4321 et seq.), the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651.

The Oklahoma Military Department has conducted the background research and cultural resource surveys pursuant to Section 800.4(a) and (b) of 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act, in order to further identify resources that may be affected by the proposed undertaking. As a result of our efforts to identify and evaluate historic properties, we have determined, pursuant to §800.4(d)(1), that there are no historic properties affected as a result of the proposed undertaking.

The proposed undertaking involves the construction and operation of a new Ardmore RC on an approximately 46-acre parcel located southwest of the intersection of Cooper Drive and East Prairie Valley Road (see **Figures 1** and **2**); this intersection is approximately one quarter mile west of I-35, exit 33. The proposed project site is zoned for light industrial use and consists primarily of maintained grasslands with scrub-shrub habitat in the south. Two ponds occur within the northeast and southeast portions of the project site. Past activities have included agricultural terracing, mowing, and utility installation.

The proposed Ardmore RC building would be no more than three stories, and would include 94,640 SF of total facility space. The RC building would include an assembly hall, classrooms, kitchen/break/vending area, toilets/showers, flammable materials storage, controlled waste handling facility, administrative office space and unit storage space. In addition, approximately 220,400 SF or 5.1 acres of various paved areas and support facilities would be constructed, which include parking, sidewalks, lighting, a refuse collection facility, access roads, fencing, and utility line extensions (see **Figure 2**).

Under the Proposed Action, four units within the 45th Infantry Brigade Combat Team would be relocated to facilities, which will provide the necessary space and equipment to train a modern army. The proposed Ardmore RC would house Oklahoma Army National Guard (OKARNG) units and equipment, an Oklahoma DPS driver's license testing facility, and the Oklahoma Highway Patrol Troop F Headquarters.

As an element of the overall Proposed Action, two legacy RCs in Ardmore and Poteau, OK would be closed. The existing Ardmore RC building was built in 1985 and would be demolished and the property returned to the City of Ardmore. This RC is uninhabitable and has been condemned due to health and safety issues resulting from water penetration, foundation damage, and mold. The existing Ardmore RC building, proposed for demolition, is located on an approximately 10-acre parcel consisting of impervious surfaces and maintained grasslands (see **Figure 1**).

The Poteau RC building was built in 1954 and would be vacated and the property transferred to a state or local governmental entity (see **Figure 3**). This RC does not comply with current space requirements, and cannot be expanded because it is landlocked by facilities and operations associated with Carl Albert State College.

The Area of Potential Effect (APE) is defined as a half mile radius from the center of the new 46-acre parcel as well as the boundary of the existing OKARNG properties. Early coordination was conducted for the Ardmore properties with State Historic Preservation Office (SHPO) (File #1852-12), Oklahoma Archeological Survey (OAS), and Native American tribe/groups in July 2012. No structures over 50 years old occur within the proposed or existing Ardmore RC properties, and no known historic properties were identified in the APE during the early coordination effort.

An archeological survey was conducted for the Ardmore sites and documented by Cole and Neel (2013) in the *Archaeological Site Detection Survey of Approximately 227 Acres at Eleven OKARNG Readiness Centers/Support Facilities in Carter, Hughes, Oklahoma, Pontotoc, and Tulsa Counties, OK*. No archaeological sites were recorded at the 11 OKARNG facilities, and no further archaeological investigations were recommended. In a letter dated 5 February 2013, OAS deferred opinion on potential

eligibility and possible effects associated with this undertaking to the SHPO. The SHPO concurred with this determination in a letter dated 29 January 2013 (File # 0700-13).

An architectural survey and assessment was conducted by Schenker et al. (2011) in the *Assessment of Six OKARNG Facilities*; it was determined that the Poteau RC was not eligible for the National Register of Historic Places (NRHP). The SHPO concurred with this determination in a letter dated 18 January 2012 (File # 0888-11).

We invite you to join us as a consulting party as we conduct this EA in accordance with 36 CFR Part 800.2, Executive Order (EO) 13175, and Department of Defense Instruction (DoDI) 4710.02 – *Interactions with Federally Recognized Tribes*. If you have any questions, comments, or concerns about this project, please contact Hannah C. Parker Goodman, Cultural Resources Manager, at Oklahoma Military Department, Directorate of Facility Management, Environmental Branch (NGOK-ENG-ENV), 3515 Military Circle, Oklahoma City, OK 73111-4398, via telephone at 405-228-5333, or via email at hannah.c.parker6.nfg@mail.mil. With your advice and assistance, we hope to maintain an ongoing cooperative relationship between your Nation and the Oklahoma Military Department.

Sincerely,

Myles L. Deering
Major General, OKARNG
The Adjutant General

Enclosure

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1. Article Addressed to:

President Terri Parton
Wichita and Affiliated Tribes
P.O. Box 729
Anadarko, OK 73005-0729

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Wichita
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City, State, ZIP+ 4

PS Form 3800, February 2000 **See Reverse for Instructions**

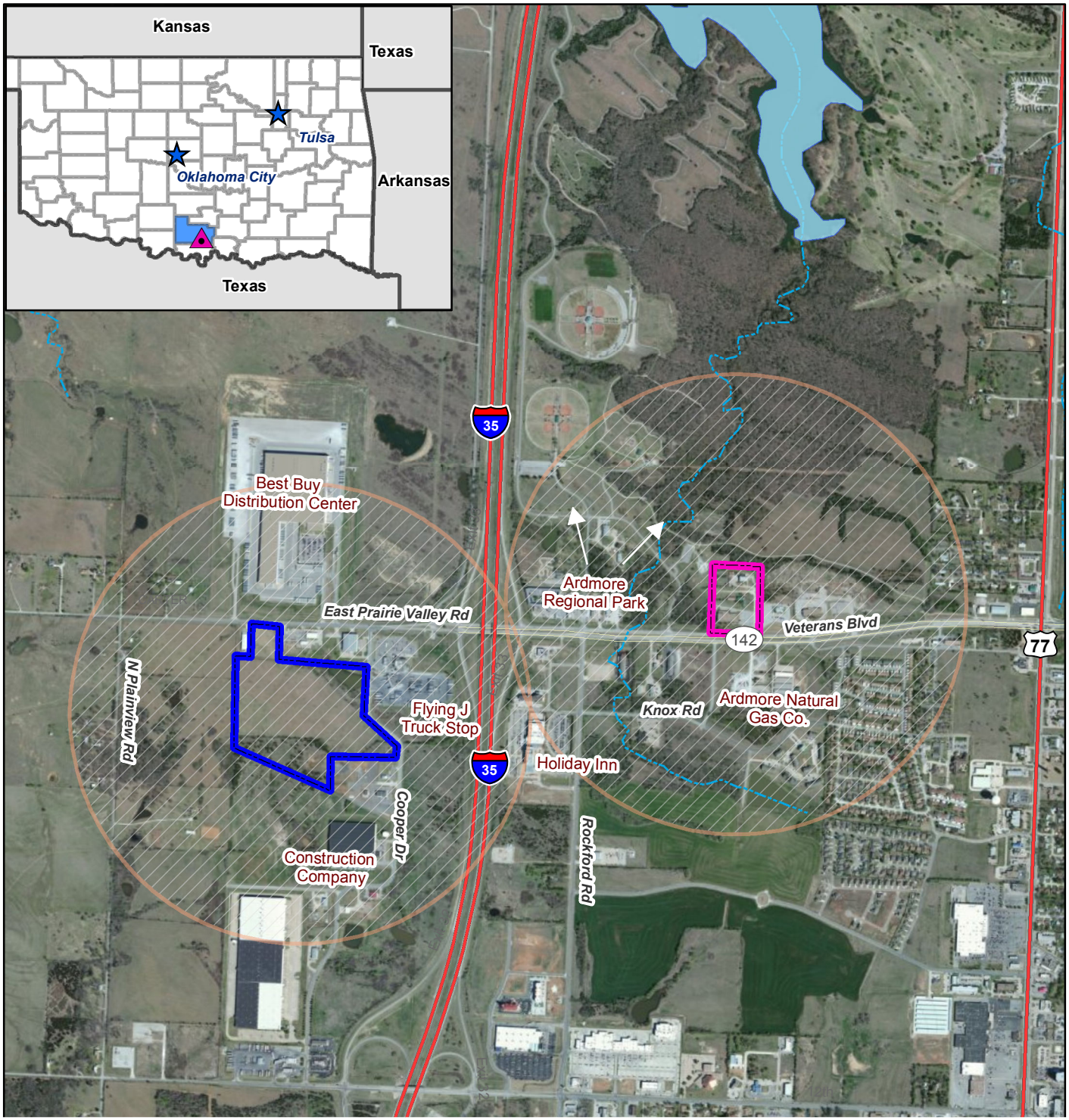

FIGURE 1
PROPOSED & EXISTING ARDMORE PROPERTIES

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

- Ardmore City Lake
- Streams
- Area of Potential Effect (APE)

Ardmore Properties

- Proposed RC
- Existing RC

N

0 500 1,000 2,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

"No warranty is made by the OKARNG/ARNG-ILE as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document", in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database."

FIGURE 2
CONCEPTUAL LAYOUT OF PROPOSED RC

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

- Proposed Ardmore Property
- Readiness Center
- DPS Annex

Paved Areas

- Military Equipment Parking
- POV Parking
- DPS Annex Parking
- Access Roads

N

0 250 500 1,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

"No warranty is made by the OKARNG/ARNG-ILE as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document", in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database."

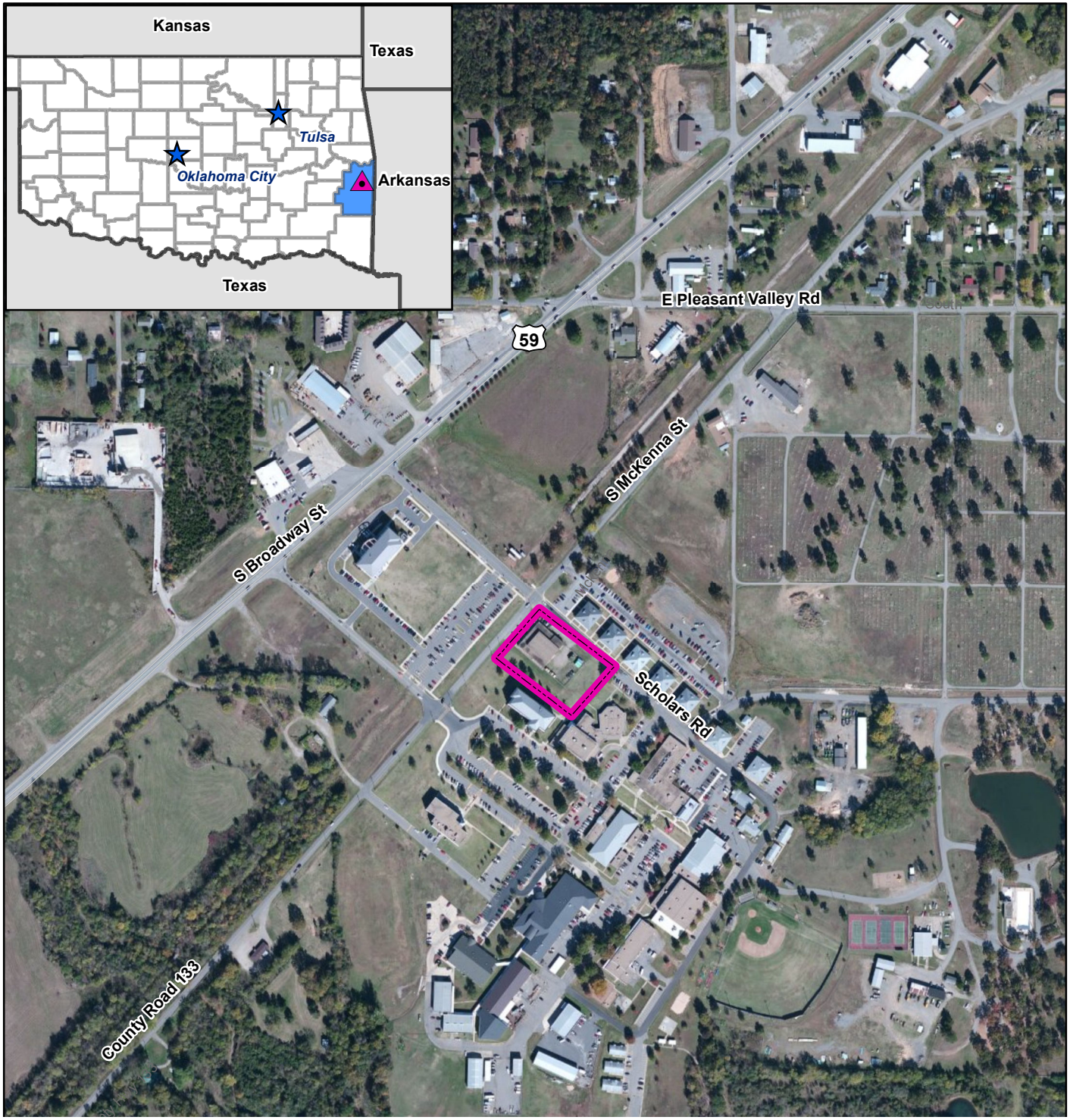

FIGURE 3
Legacy Poteau RC

Oklahoma
Army National Guard
Environmental Assesssment
Readiness Center
Ardmore, Carter County, OK

Legend

Poteau Property

N

0 250 500 1,000 Feet

Source: Spatial Data courtesy of OKARNG, Oklahoma Digital Data Online, and ArcGIS Imagery
Projection: NAD 1983 UTM Zone 15N (meters)

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Oklahoma Historical Society *Founded May 27, 1893*
State Historic Preservation Office
Oklahoma History Center • 800 Nazih Zuhdi Drive • Oklahoma City, OK 73105-7917
(405) 521-6249 • Fax (405) 522-0816 • www.okhistory.org/shpo/shpom.htm

February 5, 2015

Major Terry C. Hale, JR
Oklahoma National Guard
Joint Force Headquarters
3501 Military Circle
Oklahoma City, OK 73111-4305

RE: File #0676-15; OKARNG Proposed New Readiness Center in Ardmore

Dear Major Hale:

We have received and reviewed the documentation concerning the referenced project in Carter County. Additionally, we have examined the information contained in the Oklahoma Landmarks Inventory (OLI) files and other materials on historic resources available in our office. We find that there are no historic properties affected by the referenced project.

Thank you for the opportunity to comment on this project. We look forward to working with you in the future.

If you have any questions, please contact Catharine M. Wood, Historical Archaeologist, at 405/521-6381.

Should further correspondence pertaining to this project be necessary, please reference the above underlined file number. Thank you.

Sincerely,

Melvena Heisch
Deputy State Historic
Preservation Officer

MH:jr

Oklahoma Historical Society *Founded May 27, 1893*
State Historic Preservation Office
Oklahoma History Center • 800 Nazih Zuhdi Drive • Oklahoma City, OK 73105-7917
(405) 521-6249 • Fax (405) 522-0816 • www.okhistory.org/shpo/shpom.htm

February 5, 2015

Major Terry C. Hale, JR
Oklahoma National Guard
Joint Force Headquarters
3501 Military Circle
Oklahoma City, OK 73111-4305

RE: File #0677-15; OKARNG Proposed New Readiness Center in Poteau

Dear Major Hale:

We have received and reviewed the documentation concerning the referenced project in LeFlore County. Additionally, we have examined the information contained in the Oklahoma Landmarks Inventory (OLI) files and other materials on historic resources available in our office. We find that there are no historic properties affected by the referenced project.

Thank you for the opportunity to comment on this project. We look forward to working with you in the future.

If you have any questions, please contact Catharine M. Wood, Historical Archaeologist, at 405/521-6381.

Should further correspondence pertaining to this project be necessary, please reference the above underlined file number. Thank you.

Sincerely,

Melvena Heisch
Deputy State Historic
Preservation Officer

MH:jr

Oklahoma Archeological Survey

THE UNIVERSITY OF OKLAHOMA

January 29, 2015

Terry C. Hale, Jr.
Oklahoma National Guard
Joint Force Headquarters
3501 Military Circle
Oklahoma City, Oklahoma 73111-4305

RE: Proposed construction of a new Readiness Center. Legal Description: Sections 23 and 13 T4S R1E, Section 35 T7N R25E, Carter and LeFlore Counties, Oklahoma.

Dear Mr. Hale:

The above referenced project has been reviewed by the Community Assistance Program staff of this agency to identify potential areas that may contain prehistoric or historic archaeological materials (historic properties). The location of your project has been cross-checked with the state site files containing approximately 23,000 archaeological sites which are currently recorded for the State of Oklahoma. Our records indicate that your project area has been previously surveyed for other projects, and that no significant cultural resource sites were located. Thus, an additional field inspection is not considered necessary for your project. However, should construction activities expose buried archeological materials such as chipped stone, tools, pottery, bone, historic crockery, glass, metal items or building materials, this agency should be contacted immediately at (405)325-7211. A member of our staff will be sent to evaluate the significance of these remains.

This environmental review and evaluation is performed in order to locate, record, and preserve Oklahoma's prehistoric and historic cultural heritage in cooperation with the State Historic Preservation Office, Oklahoma Historical Society, and you must also have a letter from that office to document your consultation pursuant to Section 106 of the National Historic Preservation Act. In addition to our review comments, under 36CFR Part 800.3 you are reminded of your responsibility to consult with the appropriate Native American tribe/groups to identify any concerns they may have pertaining to this undertaking and potential impacts to properties of traditional and/or ceremonial value.

Sincerely,

Michael Walters
Staff Archaeologist

Robert L. Brooks
State Archaeologist

:ls

Cc: SHPO

111 E. Chesapeake, Room 102, Norman, Oklahoma 73019-5111 PHONE: (405) 325-7211 FAX: (405) 325-7604
A UNIT OF ARTS AND SCIENCES SERVING THE PEOPLE OF OKLAHOMA

TRIBAL HISTORIC PRESERVATION OFFICE

Date: June 25, 2015 **File: 1415-1321OK-2**

RE: OKNG, Construct New Readiness Center, Ardmore County

Oklahoma National Guard
Hannah Parker Goodman
NGOK-ENG-ENV 3515 Military Circle
Oklahoma City, OK 73111-4398

Dear Ms. Parker Goodman ,

The Osage Nation Historic Preservation Office has received notification and accompanying information for the proposed project listed as OKNG, Construct New Readiness Center, Ardmore County . **The Osage Nation requests a copy of the Draft Environmental Assessment (EA) for review and comment.**

In accordance with the National Historic Preservation Act, (NHPA) [54 U.S.C. § 300101 et seq.] 1966, undertakings subject to the review process are referred to in 54 U.S.C. § 302706 (a), which clarifies that historic properties may have religious and cultural significance to Indian tribes. Additionally, Section 106 of NHPA requires Federal agencies to consider the effects of their actions on historic properties (36 CFR Part 800) as does the National Environmental Policy Act (43 U.S.C. 4321 and 4331-35 and 40 CFR 1501.7(a) of 1969).

The Osage Nation has a vital interest in protecting its historic and ancestral cultural resources. **The Osage Nation anticipates reviewing and commenting on the Draft Environmental Assessment for the proposed OKNG, Construct New Readiness Center, Ardmore County .**

Should you have any questions or need any additional information please feel free to contact me at the number listed below. Thank you for consulting with the Osage Nation on this matter.

John Fox
Archaeologist

627 Grandview, Pawhuska, OK 74056, (918) 287-5328, Fax (918) 287-5376

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State Historic Preservation Office
Oklahoma History Center • 800 Nazih Zuhdi Drive • Oklahoma City, OK 73105-7917
(405) 521-6249 • Fax (405) 522-0816 • www.okhistory.org/shpo/shpom.htm

August 3, 2015

Major Terry Hale, Jr.
Oklahoma National Guard Joint Force HQ
3501 Military Circle – Inter-Agency
Oklahoma City, OK 73111

RE: File #0677-15; OKARNG Proposed Closure and Transfer of Poteau Readiness Center (Amending our Letter of February 5, 2015)

Dear Major Hale:

We have received and reviewed the documentation concerning the referenced project in LeFlore County. Additionally, we have examined the information contained in the Oklahoma Landmarks Inventory (OLI) files and other materials on historic resources available in our office. We find that there are no historic properties affected by the referenced project.

Thank you for the opportunity to comment on this project. We look forward to working with you in the future.

If you have any questions, please contact Catharine M. Wood, Historical Archaeologist, at 405/521-6381.

Should further correspondence pertaining to this project be necessary, please reference the above underlined file number. Thank you.

Sincerely,

Melvena Heisch

Melvena Heisch
Deputy State Historic
Preservation Officer

MH:pm

OKLAHOMA NATIONAL GUARD
JOINT FORCE HEADQUARTERS
3501 MILITARY CIRCLE
OKLAHOMA CITY OK 73111-4305
(405) 228-5000 OR DSN 628-5000

September 10, 2015

Chairperson Tamera Francis Fourkiller
Caddo Nation of Oklahoma
P.O. Box 487
Binger, OK 73009

7011 0110 0002 1463 4375

Dear Chairperson Fourkiller:

In January 2015, the Oklahoma Military Department sent notification regarding our intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK. The proposed Ardmore RC would potentially be constructed jointly with the Oklahoma Department of Public Safety. The Proposed Action is located within Sections 23 and 13 of Township 4 South, Range 1 East; and Section 35, Township 7 North and Range 25 East.

The Oklahoma Military Department has prepared a Draft Environmental Assessment (EA) to evaluate potential physical, environmental, cultural, and socioeconomic effects associated with the Proposed Action pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code §4321, et seq.), the Council on Environmental Quality Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651.

We have enclosed an electronic copy of the Draft EA per your request on 25 June 2015. If you have any questions, comments, or concerns about this project, please contact Hannah C. Goodman, Cultural Resources Manager, at Oklahoma Military Department, Directorate of Facility Management, Environmental Branch (NGOK-ENG-ENV), 3515 Military Circle, Oklahoma City, OK 73111-4398, via telephone at 405-228-5333, or via email at hannah.c.parker6.nfg@mail.mil.

With your advice and assistance, we hope to maintain an ongoing cooperative relationship between your Nation and the Oklahoma Military Department.

Sincerely,

Robbie L. Asher
Major General, OKARNG
The Adjutant General

Enclosures
cc: Kim Penrod

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Article Addressed to:

Chairperson Tamara Francis Fourkiller
Caddo Nation
P.O. Box 487
Binger, OK 73009

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A. Signature
X [signature] ☐ Agent ☐ Addressee

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C. Date of Delivery 9-25-15

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OKLAHOMA CITY OK 73111-4305
(405) 228-5000 OR DSN 628-5000

September 10, 2015

Governor Bill Anoatubby
Chickasaw Nation
P.O. Box 1548
Ada, OK 74820

7011 0110 0002 1463 4382

Dear Governor Anoatubby:

In January 2015, the Oklahoma Military Department sent notification regarding our intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK. The proposed Ardmore RC would potentially be constructed jointly with the Oklahoma Department of Public Safety. The Proposed Action is located within Sections 23 and 13 of Township 4 South, Range 1 East; and Section 35, Township 7 North and Range 25 East.

The Oklahoma Military Department has prepared a Draft Environmental Assessment (EA) to evaluate potential physical, environmental, cultural, and socioeconomic effects associated with the Proposed Action pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code §4321, et seq.), the Council on Environmental Quality Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651.

We have enclosed an electronic copy of the Draft EA. If you have any questions, comments, or concerns about this project, please contact Hannah C. Goodman, Cultural Resources Manager, at Oklahoma Military Department, Directorate of Facility Management, Environmental Branch (NGOK-ENG-ENV), 3515 Military Circle, Oklahoma City, OK 73111-4398, via telephone at 405-228-5333, or via email at hannah.c.parker6.nfg@mail.mil.

With your advice and assistance, we hope to maintain an ongoing cooperative relationship between your Nation and the Oklahoma Military Department.

Sincerely,

Robbie L. Asher
Major General, OKARNG
The Adjutant General

Enclosures
cc: Dr. Tim Baugh, THPO

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1. Article Addressed to:

Governor Bill Anoatubby
Chickasaw Nation
P.O. Box 1548
Ada, OK 74820

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X Ricky Walker
☐ Agent
☐ Addressee

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September 10, 2015

7011 0110 0002 1463 4399

Mekko Jeremiah Hobia
Kialegee Tribal Town
P.O. Box 332
Wetumka, OK 74883

Dear Mekko Hobia:

In January 2015, the Oklahoma Military Department sent notification regarding our intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK. The proposed Ardmore RC would potentially be constructed jointly with the Oklahoma Department of Public Safety. The Proposed Action is located within Sections 23 and 13 of Township 4 South, Range 1 East; and Section 35, Township 7 North and Range 25 East.

The Oklahoma Military Department has prepared a Draft Environmental Assessment (EA) to evaluate potential physical, environmental, cultural, and socioeconomic effects associated with the Proposed Action pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code §4321, et seq.), the Council on Environmental Quality Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651.

We have enclosed an electronic copy of the Draft EA. If you have any questions, comments, or concerns about this project, please contact Hannah C. Goodman, Cultural Resources Manager, at Oklahoma Military Department, Directorate of Facility Management, Environmental Branch (NGOK-ENG-ENV), 3515 Military Circle, Oklahoma City, OK 73111-4398, via telephone at 405-228-5333, or via email at hannah.c.parker6.nfg@mail.mil.

With your advice and assistance, we hope to maintain an ongoing cooperative relationship between your Nation and the Oklahoma Military Department.

Sincerely,

Robbie E. Asher
Major General, OKARNG
The Adjutant General

Enclosures
cc: Kara Gann, THPO

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1. Article Addressed to:

Mekko Jeremiah Hobia
Kialegee Tribal Town
P.O. Box 332
Wetumka, OK 74883-0332

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A. Signature
X
☐ Agent
☐ Addressee

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September 10, 2015

Principal Chief Geoffrey Standing Bear
Osage Nation of Oklahoma
627 Grandview
Pawhuska, OK 74056

7011 0110 0002 1463 4405

Dear Principal Chief Standing Bear:

In January 2015, the Oklahoma Military Department sent notification regarding our intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK. The proposed Ardmore RC would potentially be constructed jointly with the Oklahoma Department of Public Safety. The Proposed Action is located within Sections 23 and 13 of Township 4 South, Range 1 East; and Section 35, Township 7 North and Range 25 East.

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With your advice and assistance, we hope to maintain an ongoing cooperative relationship between your Nation and the Oklahoma Military Department.

Sincerely,

Robbie L. Asher
Major General, OKARNG
The Adjutant General

Enclosures
cc: Dr. Andrea Hunter, THPO

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September 10, 2015

Principal Chief Leonard M. Harjo
Seminole Nation of Oklahoma
P.O. Box 1498
Wewoka, OK 74884

7011 0110 0002 1463 4412

Dear Principal Chief Harjo:

In January 2015, the Oklahoma Military Department sent notification regarding our intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK. The proposed Ardmore RC would potentially be constructed jointly with the Oklahoma Department of Public Safety. The Proposed Action is located within Sections 23 and 13 of Township 4 South, Range 1 East; and Section 35, Township 7 North and Range 25 East.

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With your advice and assistance, we hope to maintain an ongoing cooperative relationship between your Nation and the Oklahoma Military Department.

Sincerely,

Robbie L. Asher
Major General, OKARNG
The Adjutant General

Enclosures
cc: Natalie Harjo, THPO

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1. Article Addressed to:

Principal Chief Leonard Harjo
Seminole Nation of Oklahoma
P.O. Box 1498
Wewoka, OK 74884-1498

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X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) [illegible] C. Date of Delivery 9/28/15

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September 10, 2015

President Terri Parton
Wichita and Affiliated Tribes of Oklahoma
P.O. Box 729
Anadarko, OK 73005

7011 0110 0002 1463 4429

Dear President Parton:

In January 2015, the Oklahoma Military Department sent notification regarding our intent to construct and operate a new Readiness Center (RC) in Ardmore, Carter County, Oklahoma (OK), and the associated unit re-stationing and closure of two legacy RCs in Ardmore and Poteau, OK. The proposed Ardmore RC would potentially be constructed jointly with the Oklahoma Department of Public Safety. The Proposed Action is located within Sections 23 and 13 of Township 4 South, Range 1 East; and Section 35, Township 7 North and Range 25 East.

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With your advice and assistance, we hope to maintain an ongoing cooperative relationship between your Nation and the Oklahoma Military Department.

Sincerely,

Robbie L. Asher
Major General, OKARNG
The Adjutant General

Enclosures
cc: Gary McAdams, Section 106/Cultural Resources

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1. Article Addressed to:

President Terri Parton
Wichita and Affiliated Tribes
P.O. Box 729
Anadarko, OK 73005-0729

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APPENDIX B

Regulatory Framework for NEPA Subject Areas

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REGULATORY FRAMEWORK FOR NEPA SUBJECT AREAS

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LAWS, REGULATIONS, AND EXECUTIVE ORDERS

FEDERAL

American Indian Religious Freedom Act (42 US Code [USC] §1196) – requires the US to protect and preserve religious rights of the American Indian, Eskimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites.

Animal Damage Control Act (7 USC §426 *et seq*.) – provides broad authority for investigation, demonstrations and control of mammalian predators, rodents and birds.

American Antiquities Act of 1906 (16 USC §431-433) – provides for the protection of items of archeological significance, both historic and prehistoric.

Archeological and Historical Preservation Act of 1974 (16 USC §469 *et seq*.) – provides for the preservation of historical and archeological data (including relics and specimens).

Archeological Resources Protection Act of 1979 (16 USC §470 *et seq*.) – prohibits the excavation or removal from federal or Indian lands any archeological resources without a permit from the land manager.

Bald Eagle Protection Act (16 USC §668a-d) – prohibits taking or harming bald or golden eagles, their eggs, nests, or young without appropriate permit.

Clean Air Act, as amended (42 USC §7401 *et seq*.) – regulates air emissions from area, stationary, and mobile sources. This law authorizes the US Environmental Protection Agency (USEPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public health and the environment.

Clean Water Act (CWA): Section 401 Water Quality Certification, 1986, 33 USC §1341 – requires state certification of federal permits that result in actions that discharge into navigable waters. Under Section 401, states have authority to review federal permits that may result in a discharge to wetlands or waterbodies under state jurisdiction.

CWA: Section 404, Permits for Dredged or Fill Material, 1977, 33 USC §1344 – establishes a program to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports) and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g. certain farming and forestry activities).

Consultation and Coordination with Indian Tribal Governments (Executive Order [EO] 13175) – establishes requirement to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications.

Endangered Species Act of 1973, as amended (16 USC §1531 *et seq.*) – provides for the identification and protection of threatened and endangered plants and animals and their critical habitats. Requires federal agencies to conserve threatened and endangered (T/E) species and cooperate with State and local authorities to resolve water resources issues in concert with the conservation of T/E species.

Environmental Safeguard for Activities for Animal Damage Control on Federal Lands (EO 11870) – restricts the use of chemical toxicants for mammal and bird control.

Federal Insecticide, Fungicide, and Rodenticide Act (7 USC §136) – governs the use and application of pesticides in natural resource management programs.

Federal Land Policy and Management Act (43 USC §1701) – establishes public land policy and guidelines for its administration and provides for the management, protection, development, and enhancement of the public lands.

Federal Noxious Weed Act of 1974 (7 USC §2801 *et seq*.) – establishes control and eradication of noxious weeds and regulates them in interstate and foreign commerce.

Federal Water Pollution Control Act as amended by the CWA of 1977 (33 USC §1251) – regulates dredging and filling of wetlands and waterbodies and establishes procedures for identifying and regulating non-point sources of pollutants, including turbidity, into waterways.

Federal Water Pollution Control Act: Section 404, as amended by the CWA of 1977 (33 USC §1251) – prohibits the discharge of dredged or filled materials into waters of the United States, including wetlands, without first obtaining a permit from US Army Corps of Engineers (USACE). Activities in wetlands that require federal permits include, but are not limited to: placement of fill material; ditching activities when the excavated material is sidecast, mechanized land clearing; land leveling; and most road construction.

Fish and Wildlife Conservation Act (16 USC §2901) – provides for the protection of non-game fish and wildlife.

Fish and Wildlife Coordination Act (16 USC §661 *et seq*.) – provides mechanism for wildlife conservation to receive equal consideration and be coordinated with water-resource development programs.

Floodplain Management (EO 11988) – requires agencies to assess the effects that their actions may have on floodplains and to consider alternatives to avoid adverse effects and incompatible development on floodplains.

Forest and Rangeland Renewable Resources Planning Act (16 USC §1601 *et seq*.) – requires and inventory of potential renewable resources and evaluation of opportunities for improving their yield on goods and services. Agencies must provide an opportunity for public involvement and consultation with other agencies in establishing policies for multiple use and sustained yield.

Greening the Government through Leadership in Environmental Management (EO 13148) – This EO (Section 207, Environmentally and Economically Beneficial Landscaping) states that "each agency shall strive to promote the sustainable management of federal facility lands through the implementation of cost-effective, environmentally sound landscaping practices, and programs to reduce adverse impacts to the natural environment."

Hunting and Fishing on Federal Lands (10 USC §2671 *et seq*.) – establishes requirements for regulating hunting, fishing, and trapping on military lands.

Indian Sacred Sites (EO 13007) – provides for the protection of and access to Indian sacred sites.

Invasive Species (EO 13112) – requires federal agencies to: "prevent the introduction of invasive species"; "detect and respond rapidly to and control populations of such species in a cost-effective and environmentally sound manner"; "monitor invasive species populations accurately and reliably, provide for restoration of native species and habitat conditions in ecosystems that have been invaded"; "conduct research on invasive species and develop technologies to prevent introduction and provide for environmentally sound control of invasive species"; and "promote public education on invasive species and the means to address them."

Land and Water Conservation Act of 1965 (16 USC §4601 *et seq*.) – assists in preserving, developing, and assuring accessibility to outdoor recreation resources.

Legacy Resource Protection Program Act (Public Law [PL] 101-511) – established a program for the stewardship of biological, geophysical, cultural and historic resources on DoD lands.

Migratory Bird Conservation Act (16 USC §715 *et seq*.) – establishes a Migratory Bird Conservation Commission to approve areas recommended by the Secretary of the Interior for acquisition with Migratory Bird Conservation Funds.

Migratory Bird Treaty Act, as amended (16 USC §703-712) – prohibits the taking or harming of a migratory bird, its eggs, nests, or young without the appropriate permit.

National Aquatic Invasive Species Act of 2003 (NAISA) – federal legislation to combat invasive aquatic species introduced.

National Environmental Policy Act of 1969, as amended (42 USC §4321) – provides a national charter for protection of the environment and requires federal agencies to prepare a statement of environmental impact in advance of each major action that may significantly affect the quality of the human environment.

Native American Graves Protection and Repatriation Act (NAGPRA) – NAGPRA and its implementing regulations (43 Code of Federal Regulations [CFR] Part 10) protect Native American human remains, burials, and associated burial goods.

National Historic Preservation Act of 1966 (16 USC §470 *et seq*.) – provides for the preservation of historic properties throughout the US.

Non-indigenous Aquatic Nuisance Prevention and Control Act of 1990, as amended (16 USC §4701 *et seq*.) – established a program to prevent the introduction of and to control the spread of introduced aquatic nuisance species and the brown tree snake.

Off-Road Vehicles on Public Lands (EO 11989) – limits the use of off-road vehicles on federal lands when soil, water, or natural resources could be adversely affected.

Oil Pollution Prevention Act of 1990, Public Law 101-380 – redefines the requirements of the National Contingency Plan to include planning for, rescue of, minimization of injury to, and assessment of damages for injury to fish and wildlife resources.

Outleasing for Grazing and Agriculture on Military Lands (10 USC §2667) – provides for the outleasing of public lands.

Protection and Enhancement of Environmental Quality (EO 11514) – provides for environmental protection of federal lands and enforces requirements of NEPA.

Protection and Enhancement of the Cultural Environment (EO 11593) – supports previous laws and provides for additional protection of cultural resources.

Protection of Wetlands (EO 11990) – requires agencies to take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the beneficial values of wetlands.

Recreational Fisheries (EO 12962) – requires federal agencies, to the extent practicable and where permitted by law, "to improve the quantity, function, sustainable productivity, and distribution of United States aquatic resources for increased recreational fishing opportunities".

Sale of Certain Interests in Land, Logs (10 USC §2665) – authorizes the sale of forest products and the reimbursement of the costs of managing forest resources for timber production.

Sikes Act "Conservation Programs on Military Reservations" (16 USC §670a *et seq*.) – requires federal military installations with adequate wildlife habitat to implement cooperative agreements with other agencies and develop long-range integrated natural resources management plans. Thereby, it is appropriate to manage natural resources for multipurpose uses and provide the public access to those uses to the extent consistent with the military mission. The act also sets guidelines for the collection of fees for the use of natural resources such as hunting and fishing.

Soil Conservation Act (16 USC §590a *et seq*.) – provides for soil conservation practices on federal lands.

STATE

Air Quality Standards and Increments (Oklahoma Administrative Code [OAC] 252:100-3) – identifies the primary and secondary ambient air quality standards and the significant deterioration increments.

Beneficial uses: existing and designated (OAC 785:45-5-2) – applies to specific waterbodies or defined waterbody segments, and generally addresses the goals of the CWA. The subset of beneficial uses that address water quality (as opposed to quantity) are: Public and Private Water Supply (OAC 785:45-5-10); Fish and Wildlife Propagation (OAC 785:45-5-12), Agriculture (OAC 785:45-5-13); Primary Body Contact Recreation (OAC 785:45-5-16); Secondary Body Contact Recreation (OAC 785:45-5-17); Aesthetics (OAC 785:45-5-19); and Fish Consumption (OAC 785:45-5-20).

Fugitive Dust (OAC 252:100-29) – requires that no person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards.

Oklahoma Endangered Species Act (29 Oklahoma Statutes [OS] 5-412) – requires that no person may possess, hunt, chase, harass, capture, shoot at, wound or kill, take or attempt to take, trap or attempt to trap any endangered or threatened species or subspecies without specific written permission of the Director. Violation incurs a $100 - 1,000 penalty with up to 30 days in jail. Rules and regulations, definitions, listing procedures, classifications, and species lists of threatened and endangered species are included in OAC 800:25-19.

Oklahoma Floodplain Management Act (82, OS 2001, §1601-1618, as amended) – establishes a state and local partnership to reduce flood damages through sound floodplain management. The act also addresses the need for the preservation and restoration of the natural resources and functions of the floodplains. Flood insurance through the National Flood Insurance Program (NFIP) becomes available when floodplain boards adopt floodplain regulations in compliance with certain requirements.

Oklahoma Forestry Code (Title 2, Article 16 of the Oklahoma Statutes) – includes statutes describing the responsibilities and authority of the State Board of Agriculture, State Forester and Director of Forestry, and the Forestry Services Division concerning forestry related activities in the State of Oklahoma.

Oklahoma Noxious Weed Law (2 OS 1-3-220) – designates musk thistle (*Carduus nutans*), Scotch thistle (*Onopordum acanthium*), and Canada thistle (*Cirsium arvense*) as noxious weeds. Rules are provided in: OAC 35:30-34-1.

Oklahoma Water Quality Standards (OAC 785:45-1-1 *et seq*.) – pursuant to Section 303 of the CWA, Oklahoma's surface water quality standards are promulgated by the Oklahoma Water Resources Board at OAC 785:45, Subchapter 5. Surface water quality standards are comprised of three elements: beneficial uses, numerical and narrative criteria, and water quality anti-degradation policy.

Open Burning (OAC 252:100-13) – pertains to the open burning of refuse and other combustible materials. The open burning of refuse and combustible materials is prohibited unless conducted in strict accordance with the conditions and requirements contained in 252:100-13-7 and 252:100-13-9.

Pesticide Law and Rules (2 OS 3-81 through 3-86; OAC 35:30-17-1 through 35:30-17-99) – referred to as Combined Pesticide Law. Provides rules pertaining to the use of pesticides in Oklahoma. Defines pesticide as, a substance or mixture of substances intended for defoliating or desiccating plants, preventing fruitdrop, inhibiting sprouting, or for preventing, destroying, repelling, or mitigating any insects, rodents, fungi, bacteria, weeds, or other forms of plant or animal life or viruses, which the Board declares to be a pest, except viruses on or in humans or animals.

Visible Emissions, and Particulates (OAC 252:100-25) – controls visible emissions and particulate matter from the operation of any air contaminant source. No owner or operator of any air contaminant source shall allow emissions from said source so as to cause or contribute to air pollution.

DoD Regulations and Guidance

32 CFR Part 651 – Environmental Effects of Army Actions

32 CFR Part 190 – Appendix-Integrated Natural Resources Management

Army Regulation (AR) 200-1 – Environmental Protection and Enhancement

AR 210-9 – Use of Off-Road Vehicles on Army Lands

AR 315-19 – The Army Sustainable Range Program

AR 405-80 – Granting Use of Real Estate

AR 415-15 – Army Military Construction and Non-appropriated Funded Construction Program Development and Execution

AR 420-40 – Historic Preservation

AR 420-40 – Fire and Emergency Services

Department of the Army Pamphlet (DA Pam) 200-4 – Cultural Resources Management

DA Pam 415-12 – Army National Guard Facilities

Department of Defense Instruction (DoDI) 4710.02 – DoD Interactions with Federally Recognized Tribes

DoDI 4715.03 – Environmental Conservation Program

DoDI 6055.6 – DoD Fire and Emergency Service Program

Training Circular (TC) 25-1 – Training Land

Unified Facilities Criteria (UFC) 4-010-01 – DoD Minimum Antiterrorism Standards for Buildings

BACKGROUND INFORMATION ON RESOURCE AREAS

AIR QUALITY

The ambient air quality in an area can be characterized in terms of whether or not it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The Clean Air Act (CAA) requires the USEPA to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for six principal pollutants, called "criteria pollutants" (as listed under Section 108 of the CAA):

- Carbon monoxide (CO)
- Lead (Pb)
- Nitrogen oxides (NO_x)
- Ozone (O_3)
- Particulate matter (PM), divided into two size classes:
- Aerodynamic size less than or equal to 10 micrometers (PM_{10})
- Aerodynamic size less than or equal to 2.5 micrometers ($PM_{2.5}$)
- Sulfur dioxide (SO_2)

Areas are designated by the USEPA as "attainment," "non-attainment," "maintenance," or "unclassified" with respect to the NAAQS. Regions that are in compliance with the standards are designated as attainment areas. Areas for which no monitoring data are available are designated as unclassified, and are, by default, considered to be in attainment of the NAAQS. In areas where the applicable NAAQS are not being met, a non-attainment status is designated.

The CAA regulates criteria pollutants as well as 188 specifically listed hazardous air pollutants (HAPs). The Title V Operating Permit Program under 40 CFR Part 70 requires sources that meet the definition of a "major source" of criteria pollutants or HAPs to apply for and obtain a Title V operating permit. A major source of HAPs is a source that has the potential to emit more than 10 tons per year (tpy) of any individual HAP or 25 tpy of any combination of HAPs. The definition of major source for criteria pollutants is dependent on the air quality attainment status of the region where the source is located (i.e., areas that are in attainment or non-attainment with the NAAQS). Major sources are those with the potential to emit more than 100 tpy of any criteria pollutant in an attainment area or lower levels in various classifications of non-attainment (marginal, moderate, serious, severe, and extreme).

CONFORMITY WITH STATE IMPLEMENTATION PLANS

The General Conformity Provision of the CAA of 1970 (42 USC §7401 *et seq.*; 40 CFR Parts 50-87) Section 176(c), including the USEPA's implementation mechanism, the General Conformity Rule (40 CFR Part 51, Subpart W), prohibits the federal government from conducting, supporting or approving any actions that do not conform to an USEPA-approved SIP. A SIP is a State's self-authored blueprint for achieving and maintaining compliance with the goals of the CAA. Federal agencies prepare written Conformity Determinations for federal actions in or affecting NAAQS non-attainment areas or maintenance areas when the total direct and indirect emissions of non-attainment pollutants (or their precursors) exceed specified thresholds. Conformity with the SIP is demonstrated if project emissions fall below threshold values.

Military actions in non-attainment areas that typically require a conformity review and the air emissions of concern include the following:

- Construction or modification of an air emission source that is not covered under other specified permit review programs (evaluate pollutants emitted directly from the source)

- Construction, renovation or demolition of buildings or facilities (evaluate dust or other pollutants from land clearing activities, air emissions from stationary construction equipment, motor vehicle emissions from construction vehicles)
- Increase or relocation of government personnel who did not previously work at the base (evaluate motor vehicle emissions for new traffic on the base and emissions associated with support services to accommodate increased population [i.e., potable/wastewater treatment, heating/cooling demands])

NOISE

Federal and local governments have established noise guidelines and regulations for the purpose of protecting citizens from potential hearing damage and from various other adverse physiological, psychological, and social effects associated with noise. Chapter 14 of AR 200-1 implements all federal laws concerning environmental noise from DA activities.

Noise is any sound that interferes with communications, is intense enough to damage hearing, or is otherwise annoying. One of the metrics used by the DA to quantify the noise environment at DA installations is the Average Day-Night Sound Level (DNL). The DNL represents sound levels measured by totaling and averaging levels during a 24-hour period. Because background sound levels tend to be lower at night, people are usually more sensitive to sounds. A "penalty" added to sound levels occurring at night hours takes this into account. This 10 decibel (dB) penalty is added to sound levels occurring between the hours of 2200 and 0700, thus one nighttime sound event is equivalent to 10 daytime events of the same level.

Although DNL does provide a single measure of overall noise impact, it does not provide specific information on the number of noise events or specific individual sound levels that occur. For example, a DNL of 65 dB could result from a small number of very loud events or from a large number of quieter events. Although it does not represent the sound level heard at any one particular time, it does represent total sound exposure.

Scientific studies and social surveys have found DNL to be the best measure for assessing levels of annoyance associated with all types of environmental noise. Therefore, the scientific community and governmental agencies, such as USEPA, Federal Aviation Administration (FAA), the Federal Interagency Committee on Urban Noise (FICUN), and the Federal Interagency Committee on Noise (FICON), endorse its use.

Low-frequency sounds are heard as “rumbles,” and high-frequency sounds are heard as “screeches.” “Weighting” further refines sound measurement. The normal human ear can detect sounds that range in frequency from about 20 cycles per second (Hz) to 15,000 Hz. However, all sounds throughout this range are not heard equally well. Therefore, some sound meters are calibrated to emphasize frequencies in the 1,000- to 4,000-Hz range. The human ear is most sensitive to frequencies in this range, and sounds measured with these instruments are termed “A-weighted”. C-weighting has higher amplitude than A-weighting but at a lower frequency; further, C-weighting measures the low-frequency component of noise, which can cause buildings and windows to shake and rattle.

The DNL is a useful descriptor for noise because: (1) it averages continuous noise, such as a busy highway, and (2) it measures total sound energy over a 24-hour period. Thus, DNL effectively identifies a “noise dose” for a day. Fixed- and rotary-winged aircraft, vehicles, and small arms noise are assessed using A-weighted dB (dBA), while large caliber weapons and demolition noise are quantified using C-weighted dB (dBC). The other metric used in defining noise zones is Peak sound level (dBP), which is the maximum instantaneous sound level of an event. The dBP is neither weighted or time integrated and is used to further define noise zones.

CONSTRUCTION NOISE

Construction activities generate noise by their very nature and are highly variable, depending on the type, number, and operating schedules of equipment. Construction projects are usually executed in stages, each having its own combination of equipment and noise characteristics and magnitudes. Construction activities of the proposed project are expected to be typical of other similar construction projects and will include mobilization, site preparation, excavation, placing foundations, utility development, heavy equipment movement, and paving roadways and parking areas. The most prevalent noise source at construction sites is the internal combustion engine. General construction equipment using engines includes but is not limited to: heavy, medium, and light equipment such as excavators; roller compactors; front-end loaders; bulldozers; graders; backhoes; dump trucks; water trucks; concrete trucks; pump trucks; utility trucks; cranes; sheet pile drivers; man lifts; forklifts; and lube, oil, and fuel trucks.

Actual peak noise levels vary at a given location based on line of sight, topography, vegetation, and atmospheric conditions. Relatively high peak noise levels in the range of 93-108 dBA would occur on the active construction site, decreasing with distance from the construction areas. Construction workers would follow standard Federal Occupational Safety and Health Administration (OSHA) requirements to prevent hearing damage. Peak noise levels that could be expected from a range of construction equipment during proposed construction activities are presented in the table below.

PEAK NOISE LEVELS EXPECTED FROM TYPICAL CONSTRUCTION EQUIPMENT

Source	Peak Noise Level (dBA, attenuated)							
	Distance from Source (feet)							
	0	50	100	200	400	1,000	1,700	2,500
Heavy Truck	95	84-89	78-93	72-77	66-71	58-63	54-59	50-55
Dump Truck	108	88	82	76	70	62	58	54
Concrete Mixer	108	85	79	73	67	59	55	51
Jackhammer	108	88	82	76	70	62	58	54
Scraper	93	80-89	74-82	68-77	60-71	54-63	50-59	46-55
Bulldozer	107	87-102	81-96	75-90	69-84	61-76	57-72	53-68
Generator	96	76	70	64	58	50	46	42
Crane	104	75-88	69-82	63-76	55-70	49-62	45-48	41-54
Loader	104	73-86	67-80	61-74	55-68	47-60	43-56	39-52
Grader	108	88-91	82-85	76-79	70-73	62-65	58-61	54-57
Pile driver	105	95	89	83	77	69	65	61
Forklift	100	95	89	83	77	69	65	61

Worst-Case Combined Peak Noise Level (Bulldozer, Jackhammer, Scraper)					
Combined Peak Noise Level	Distance from Source (feet)				
	50	100	200	0.25 Mile	0.5 Mile
	103	97	91	74	68

Source: Tipler 1976

Generally speaking, peak noise levels within 50 feet of active construction areas and material transportation routes would most likely be considered “striking” or “very loud,” comparable to peak crowd noise at an indoor sports arena. At approximately 200 feet, peak noise levels would be loud, approximately comparable to a garbage disposal or vacuum cleaner at ten feet. At 0.25 mile, construction

noise levels would generally be quiet enough so as to be considered insignificant, although transient noise levels may be noticeable at times.

Combined peak noise levels, or worst-case noise levels are when several loud pieces of equipment are used in a small area at the same time. Under these circumstances, peak noise levels could exceed 90 dBA within 200 feet of the construction area, depending on equipment being used.

The intermittent nature of peak construction noise levels would not create the steady noise level conditions for an extended duration that could lead to hearing damage. In addition, indoor noise levels would be expected to be 15-25 decibels lower than outdoor levels. In evaluating the potential for hearing damage (either Temporary Threshold Shift [TSS] or Noise-Induced Permanent Threshold Shift [NIPTS]), the noise level and duration of exposure are considered. For example, NIPTS would be produced by unprotected exposures of eight hours per day for several years to noise above 105 dBA. Similarly, TSS would be based on exposure to a steady noise level of 80 to 130 dBA, increasing with duration of exposure (Canter 1977).

References:

Canter, L. W. 1977. *Environmental Impact Assessment*. McGraw-Hill: New York. 331 pp.

Tipler, Paul A. 1976. *Physics*. Worth Publishers. New York, New York.

LAND USE COMPATIBILITY

The primary tool used for construction of and utilization of military operations is compatible land use planning. The Operational Noise Management Plan (ONMP) is designed to protect the installation's mission from encroachment by off-post noise-sensitive land uses. The ONMP requires quantification of the existing and future noise environment; coordination with state, regional, and local planning and zoning agencies; and exploration of possible measures to reduce noise impacts. The US Army Public Health Command (USAPHC) is planning to prepare a statewide ONMP for OKARNG facilities.

The USAPHC uses mathematical noise modeling and computer simulation to assess and predict noise arising from their activities in the form of "noise zone" maps. The noise zones provide guidance on whether noise-sensitive land uses, such as residential housing, schools, hospitals, and churches, would be "compatible" or "incompatible" land uses in those areas. They also provide general guidance on what proportion of the existing population in that zone might be "highly annoyed" by the noise generated.

Chapter 14 of AR 200-1 defines land use compatibility concerning environmental noise for DA activities. The following provides a description of each noise zone as set forth in AR 200-1.

Noise Zone I – All areas around a noise source where the DNL is less than 65 dBA or 62 dBC, and peak sound level is less than 87 dBP. Residential and other noise sensitive land uses are considered "compatible" with the noise environment in this zone. Typically, less than 15 percent of the population is expected to be "highly annoyed" by the noise in this zone.

Noise Zone II – An area where the DNL is between 65 and 75 dBA, between 62 and 70 dBC, or the peak sound level is between 87 and 104 dBP. Development within this noise zone should be normally limited to activities such as industrial, manufacturing, transportation, and resource production. Residential and other noise-sensitive land uses are considered "normally incompatible" with the noise environment in this zone and between 15 percent and 39 percent of the affected population is typically expected to be "highly annoyed."

Noise Zone III – An area around a noise source where the DNL is greater than 75 dBA or 70 dBC, or the peak sound level is greater than 104 dBP. Residential and other noise-sensitive land uses are deemed "incompatible" with the noise environment in Noise Zone III, and that noise-sensitive activities should therefore not be conducted therein. Typically, more than 39 percent of the population in this zone is expected to be "highly annoyed" by the noise.

NOISE LIMITS FOR LAND USE COMPATIBILITY					
Noise Zone	**Population Highly Annoyed**	**Acceptability for Noise Sensitive Land Use**	**Small Arms and Transportation ADNL**	**Large Arms CDNL**	**Small Arms Peak**
Zone I	<15%	Acceptable	<65 dBA	<62 dBC	<87 dBP
Zone II	15%-39%	Normally Unacceptable	65-75 dBA	63-70 dBC	87-104 dBP
Zone III	>39%	Unacceptable	>75 dBA	>70 dBC	>104 dBP
LUPZ	9%-15%	N/A	60-65 dBA	57-62 dBC	N/A

TOPOGRAPHY, GEOLOGY, AND SOILS

Geologic resources of an area typically consist of surface and subsurface materials and their inherent properties. Geologic factors influencing the ability to support structural development are seismic properties (for example, potential for subsurface shifting, faulting or crustal disturbance), soil stability, and topography. Soils are unconsolidated materials overlying bedrock or other parent material. Soils play a critical role in both the natural and human environment. Soil structure, elasticity, strength, shrink-swell potential and erodibility determine the ground's ability to support man-made conservation practices, structures and facilities. Soils are typically described in terms of complex type, slope, physical characteristics and relative compatibility or constraining properties with regard to types of land use and/or construction activities.

Prime farmlands are monitored by the NRCS to ensure preservation of agricultural lands that are of statewide or local importance. Soils designated as prime farmland are capable of producing high yields of various crops when managed using modern farming methods. Designation of such lands is based on soil type present.

Hydric soils are defined by the National Technical Committee for Hydric Soils (NTCHS) as soils that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part (Federal Register 1995). These soils are either saturated or inundated long enough during the growing season to support the growth and reproduction of hydrophytic vegetation.

FLOODPLAINS

Floodplains generally are areas of low, level ground present on one or both sides of a stream channel that are subject to either periodic or infrequent inundation by flood waters. Floodplains are typically the result of lateral erosion and deposition that occurs as a river valley is widened. High water tables and flooding are associated with floodplains. Inundation dangers associated with floodplains have prompted federal, state, and local legislation limiting the development in these areas to recreation, agriculture, and preservation activities. Floodplains are regulated by the Federal Emergency Management Agency (FEMA) with standards outlined in 44 CFR Part 60.3.

*EO 11988 (*Floodplain Management*) requires agencies to assess the effects that their actions may have on floodplains and to consider alternatives to avoid adverse effects and incompatible development on floodplains.*

WETLANDS

The US Army Corps of Engineers (USACE) and the USEPA define wetlands as:

> "Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas."

Both federal and state laws and regulations protect waters of the state, which includes wetlands. The CWA is the primary law protecting US waters. Section 404 of the CWA (33 USC §1344) prevents the discharge of dredged or fill material into waters of the United States without a permit from the USACE. Generally, whenever a Section 404 permit is required, a Section 401 Water Quality Certification (WQC) issued by the State of Oklahoma is also required.

EO 11990 (*Protection of Wetlands*) requires federal agencies to take action to minimize the destruction, loss or degradation of wetlands, and to conserve and enhance the beneficial values of wetlands.

CULTURAL RESOURCES

Cultural resources include sites, buildings, structures, or objects that may have significant archeological and historic values, or properties that may play a significant traditional role in a community's history, beliefs, customs, and practices. Cultural resources, thus, encompass a wide range of sites and buildings from prehistoric Native American campsites to Military buildings constructed during the Cold War, as well as traditional cultural properties still used today.

Sections 106 and 110 of the National Historic Preservation Act (NHPA, PL 89-655) provide the framework for federal review and protection of cultural resources, and to ensure that they are considered during federal project planning and execution. The implementing regulations for the Section 106 process (36 CFR Part 800) have been developed by the Advisory Council on Historic Preservation (ACHP). The Secretary of Interior maintains a National Register of Historic Places (NRHP) and sets forth significance criteria (36 CFR Part 60) for inclusion in the register. Cultural resources may be considered "historic properties" for the purpose of consideration by a federal undertaking if they meet NRHP criteria. Historic properties may be those that are formally placed in the National Register by the Secretary of the Interior, those that meet the criteria and are determined eligible for inclusion, and historic properties that are yet undiscovered but may meet eligibility criteria.

Archeological resources on federal lands are protected under the Archeological Resources Protection Act (PL 96-95). Native American human remains, burials, and associated burial goods are protected under Section 3(c) of the Native American Graves Protection and Repatriation Act (NAGPRA, PL 101-601), and its implementing regulations (43 CFR Part 10). These regulations also require federal officials to take reasonable steps to determine whether a planned activity may result in the excavation of human remains, funerary objects, sacred objects, or objects of cultural patrimony from federal lands (43 CFR Part 10.3(c)(1)).

The OKARNG implemented a statewide Integrated Cultural Resources Management Plan (ICRMP) in 2003. An ICRMP is a five-year plan required by AR 200-1 for compliance with applicable federal laws and regulations concerning cultural resources. The ICRMP is a component of the installation master plan and functions as a decision document for cultural resources management actions and specific compliance procedures. The plan's purpose is to integrate cultural resources requirements with ongoing mission activities so that the availability of mission-essential properties and acreage is maintained and compliance with requirements is achieved.

HAZARDOUS AND TOXIC MATERIALS AND WASTE (HTMW)

Hazardous materials are defined within several laws and regulations to have certain meanings. For this document, a hazardous material is any one of the following:

- any substance designated pursuant to Section 311(b)(2) 9A0 of the CWA
- any element, compound, mixture, solution, or substance designated pursuant to Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- any hazardous waste under the Resource Conservation and Recovery Act (RCRA) as defined below
- any toxic pollutant listed under the Toxic Substances Control Act (TSCA); any hazardous air pollutant listed under Section 122 of the CAA Amendments
- any imminently hazardous chemical substance or mixture with respect to which the USEPA Administrator has taken action pursuant to Subsection 7 of TSCA

Hazardous wastes are defined as any solid, liquid, contained gaseous or semi-solid waste, or any combination of wastes, which pose either a substantial present or potential hazard to human health or the environment, as determined by ignitable, corrosive, reactive, or toxic characteristics as defined in RCRA or are specifically listed in the law as an “F,” “K,” “P,” or “U” listed waste.

APPENDIX C

Memorandum of Understanding (MOU)
Between DoD and USFWS
To Promote the Conservation of Migratory Birds

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MEMORANDUM OF UNDERSTANDING
BETWEEN THE
U.S. DEPARTMENT OF DEFENSE
AND THE
U.S. FISH AND WILDLIFE SERVICE
TO PROMOTE THE CONSERVATION OF MIGRATORY BIRDS

This Memorandum of Understanding (MOU) is entered into between the U.S. Department of Defense (DoD) and the U.S. Fish and Wildlife Service (FWS) (hereinafter "the Parties").

A. Purpose and Scope

Pursuant to Executive Order 13186 (January 17, 2001), Responsibilities of Federal Agencies to Protect Migratory Birds, this MOU outlines a collaborative approach to promote the conservation of migratory bird populations.

This MOU does not address incidental take during military readiness activities, which is being addressed in a rulemaking in accordance with section 315 of the National Defense Authorization Act for Fiscal Year 2003 (Pub. L. 107-314, 116 Stat. 2458).

This MOU specifically pertains to the following categories of DoD activities:

(1) Natural resource management activities, including, but not limited to, habitat management, erosion control, forestry activities, agricultural outleasing, conservation law enforcement, invasive weed management, and prescribed burning;

(2) Installation support functions, including but not limited to, the maintenance, construction or operation of administrative offices, military exchanges, road construction, commissaries, water treatment facilities, storage facilities, schools, housing, motor pools, non-tactical equipment, laundries, morale, welfare, and recreation activities, shops, landscaping, and mess halls;

(3) Operation of industrial activities;

(4) Construction or demolition of facilities relating to these routine operations; and

(5) Hazardous waste cleanup.

This MOU identifies specific activities where cooperation between the Parties will contribute substantially to the conservation of migratory birds and their habitats. This MOU does not authorize the take of migratory birds.

B. Authorities

The Parties' responsibilities under the MOU are authorized by provisions of the following laws:

Alaska National Interest Lands Conservation Act of 1980 (16 USC 410hh-3233)
Bald and Golden Eagle Protection Act of 1940 (16 U.S.C. 668-668d)
Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.)
Fish and Wildlife Act of 1956 (16 U.S.C. 742 et seq.)
Fish and Wildlife Conservation Act of 1980 (16 U.S.C. 2901-2911)
Fish and Wildlife Coordination Act (16 U.S.C. 661-667)
Migratory Bird Conservation Act (16 U.S.C. 715-715d, 715e, 715f-715r)
Migratory Bird Treaty Act (16 U.S.C. 703-711)
National Environmental Policy Act of 1969 (42 U.S.C. 4321-4347)
Sikes Act Improvement Act of 1997 (16 USC 670a-670o)
Agreements to limit encroachments and other constraints on military training, testing, and operations (10 U.S.C. § 2684a)

C. Background

The Parties have a common interest in the conservation and management of America's natural resources. The Parties agree that migratory birds are important components of biological diversity and that the conservation of migratory birds will both help sustain ecological systems and help meet the public demand for conservation education and outdoor recreation, such as wildlife viewing and hunting opportunities. The Parties also agree that it is important to: 1) focus on bird populations; 2) focus on habitat restoration and enhancement where actions can benefit specific ecosystems and migratory birds dependent upon them; and 3) recognize that actions taken to benefit some migratory bird populations may adversely affect other migratory bird populations.

The DoD mission is to provide for the Nation's defense. DoD's conservation program works to ensure continued access to land, air, and water resources for realistic military training and testing while ensuring that the natural and cultural resources entrusted to DoD's care are sustained in a healthy condition.

The DoD is an active participant in international bird conservation partnerships including Partners in Flight (PIF) and the North American Bird Conservation Initiative (NABCI). Military lands frequently provide some of the best remaining habitat for migratory bird species of concern, and DoD plans to continue its leadership role in bird conservation partnerships.

Through the PIF initiative, DoD works in partnership with numerous Federal and State agencies and nongovernmental organizations for the conservation of migratory and resident birds and to enhance migratory bird survival. Through DoD PIF, a list of species of concern (see Definitions) has been developed for each Bird Conservation Region where DoD facilities occur, thus improving DoD's ability to evaluate any migratory bird conservation concerns on respective DoD lands.

Integrated Natural Resources Management Plans (INRMPs) offer a coordinated approach for incorporating habitat conservation efforts into installation management.

INRMPs are a significant source of baseline conservation information and conservation initiatives used when preparing National Environmental Policy Act (NEPA) documents for all DoD management activities. This linkage helps to ensure that appropriate conservation and mitigation measures are identified in NEPA documents and committed to, when appropriate, in final decision documents.

The DoD PIF program provides a framework for incorporating landbird, shorebird and waterbird habitat management efforts into INRMPs. DoD's strategy focuses on inventorying and long-term monitoring to determine changes in migratory bird populations on DoD installations. Effective on-the-ground management may then be applied to those areas identified as having the highest conservation value. DoD's PIF goal is to support the military's training and testing mission while being a vital and supportive partner in regional, national, and international bird conservation initiatives. DoD strives to implement cooperative projects and programs on military lands to benefit the health and well-being of birds and their habitats, whenever possible. The Department of Defense implements bird inventories and monitoring programs in numerous ways including Monitoring Avian Productivity and Survivorship (MAPS) and Next Generation Radar (NEXRAD) for studying bird movements in the atmosphere. DoD also maintains an integrated pest management (IPM) program designed to reduce the use of pesticides to the minimum necessary.

The mission of the FWS is to work with others to conserve, protect, manage, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people. The FWS is legally mandated to implement the provisions of the Migratory Bird Treaty Act (MBTA), which include responsibilities for population management (e.g., monitoring), habitat protection (e.g., acquisition, enhancement, and modification), international coordination, and regulation development and enforcement. The FWS also promotes migratory bird conservation through its coordination and consultation efforts with other entities.

Many FWS programs are involved in bird conservation activities, including:

1. The Division of Migratory Bird Management and Regional Migratory Birds and Habitat Programs serve as focal points in the United States for policy development and strategic planning, developing and implementing monitoring and management initiatives that help maintain healthy populations of migratory birds and their habitat, and providing continued opportunities for citizens to enjoy bird-related recreation.

2. The Division of Bird Habitat Conservation is instrumental in supporting habitat conservation partnerships through the administration of bird conservation grant programs and development of Joint Ventures that serve as major vehicles for implementing the various bird conservation plans across the country.

3. Ecological Services Field Offices across the country serve as the primary contacts for environmental reviews that include, when requested, projects developed by local military installations and DoD regional offices involving migratory bird issues. The Field Offices coordinate with the Regional Migratory Bird Offices, as necessary, during these reviews regarding permits

and overall migratory bird conservation coordination for DoD activities.

4. The Office of Law Enforcement is the principal FWS program that enforces the legal provisions of the MBTA .

The Parties agree this MOU shall be implemented to the extent permitted by law and in harmony with agency missions, subject to the availability of appropriations and budgetary limits.

D. <u>Responsibilities</u>

1. **Each Party shall**:

a. Emphasize an interdisciplinary, collaborative approach to migratory bird conservation in cooperation with other governments, State and Federal agencies, and non-federal partners within the geographic framework of the NABCI Bird Conservation Regions

b. Strive to protect, restore, enhance, and manage habitat of migratory birds, and prevent or minimize the loss or degradation of habitats on DoD-managed lands, by:

(1) Identifying and avoiding management actions that have the potential to adversely affect migratory bird populations, including breeding, migration, or wintering habitats; and by developing and implementing, as appropriate, conservation measures that would avoid or minimize the take of migratory birds or enhance the quality of the habitat used by migratory birds.;

(2) Working with partners to identify, conserve, and manage Important Bird Areas, Western Hemisphere Shorebird Reserve Network sites, and other significant bird conservation sites that occur on DoD-managed lands;

(3) Preventing or abating the pollution or detrimental alteration of the habitats used by migratory birds;

(4) Developing and integrating information on migratory birds and their habitats into outreach and education materials and activities; and

(5) Controlling the introduction, establishment, and spread of non-native plants or animals that may be harmful to migratory bird populations, as required by Executive Order 13112 on Invasive Species.

c. Work with willing landowners to prevent or minimize the loss or degradation of migratory bird habitats on lands adjacent or near military installation boundaries. This cooperative conservation may include:

(1) Participating in efforts to identify, protect, and conserve

important migratory bird habitats or other significant bird conservation sites and ecological conditions that occur in landscapes or watersheds that may be affected by activities on DoD lands;

(2) Developing and integrating information on migratory bird resources found on DoD lands into other partners' outreach and education materials and activities; and

(3) Using available authorities to enter into agreements with other Federal agencies, States, other governmental entities, and private conservation organizations to conserve and enhance habitat in a compatible manner so military operations are not restricted.

d. Promote collaborative projects such as:

(1) Developing or using existing inventory and monitoring programs, at appropriate scales, with national or regional standardized protocols, to assess the status and trends of bird populations and habitats, including migrating, breeding, and wintering birds;

(2) Designing management studies and research projects using national or regional standardized protocols and programs, such as MAPS to identify the habitat conditions needed by applicable species of concern, to understand interrelationships of co-existing species, and to evaluate the effects of management activities on habitats and populations of migratory birds;

(3) Sharing inventory, monitoring, research, and study data for breeding, migrating, and wintering bird populations and habitats in a timely fashion with national data repositories such as Breeding Bird Research and Monitoring Database (BBIRD), National Point Count Database, National Biological Information Infrastructure, and MAPS;

(4) Working in conjunction with each other and other Federal and State agencies to develop reasonable and effective conservation measures for actions that affect migratory birds and their natural habitats;

(5) Participating in or promoting the implementation of existing regional or national inventory and monitoring programs such as Breeding Bird Survey (BBS), BBIRD, Christmas Bird Counts, bird atlas projects, or game bird surveys (e.g., mid-winter waterfowl surveys) on DoD lands where practicable and feasible.

(6) Using existing partnerships and exploring opportunities for expanding and creating new partnerships to facilitate combined funding for inventory, monitoring, management studies, and research.

e. Provide training opportunities to DoD natural resources personnel on migratory bird issues, to include bird population and habitat inventorying,

monitoring methods, and management practices that avert detrimental effects and promote beneficial approaches to migratory bird conservation.

f. Participate in the Interagency Council for the Conservation of Migratory Birds to evaluate implementation of this MOU.

g. Promote migratory bird conservation internationally, as it relates to wintering, breeding and migration habitats of birds that breed on DoD lands.

h. Promote and undertake ecologically sound actions to curb the introduction in the wild of exotic or invasive species harmful to migratory birds.

2. **The Department of Defense Shall**:

a. Follow all migratory bird permitting requirements for non-military readiness activities that are subject to 50 CFR Parts 21.22 (banding or marking), 21.23 (scientific collecting), 21.26 (special Canada goose permit), 21.27 (special purposes), or 21.41 (depredation). No permit is required to take birds in accordance with Parts 21.43 - 21.47 (depredation orders).

b. Encourage incorporation of comprehensive migratory bird management objectives in the preparation of DoD planning documents, including Integrated Natural Resource Management Plans, Pest Management Plans, Installation Master Plans, NEPA analyses, and non-military readiness elements of Bird Aircraft Strike Hazard documents. Comprehensive planning efforts for migratory birds include PIF Bird Conservation Plans, the North American Waterfowl Management Plan, U.S. Shorebird Conservation Plan, and North American Waterbird Conservation Plan and associated regional plans where available.

c. Incorporate conservation measures addressed in Regional or State Bird Conservation Plans in INRMPs.

d. Consistent with imperatives of safety and security, allow the FWS and other partners reasonable access to military lands for conducting sampling or survey programs such as MAPS, BBS, BBIRD, International Shorebird Survey, and breeding bird atlases.

e. Prior to starting any activity that is likely to affect populations of migratory birds:

(1) Identify the migratory bird species likely to occur in the area of the proposed action and determine if any species of concern could be affected by the activity;

(2) Assess and document, through the project planning process, using NEPA when applicable, the effect of the proposed action on species of concern. Use best available demographic, population, or habitat

association data in the assessment of effects upon species of concern;

(3) Engage in early planning and scoping with the FWS relative to potential impacts of a proposed action, to proactively address migratory bird conservation, and to initiate appropriate actions to avoid or minimize the take of migratory birds.

f. Manage military lands and non-military readiness activities in a manner that supports migratory bird conservation, giving consideration to the following factors:

(1) Habitat protection, restoration, and enhancement. Military lands contain many important habitats for migratory birds. Some unique, sensitive, endangered and/or declining habitat types that may require special management attention include:

(a) Grasslands. Many native grassland communities require intensive management to maintain and restore vigor and species diversity and to provide habitat for migratory birds and other wildlife dependent on native grasslands. Grassland management and restoration tools include controlled burning, mowing, grazing, native species planting, and exotic plant removal. Many grasslands have evolved with a natural fire regime, and the management activities often emulate this fire regime.

(b) Riparian and wetland habitats. Military lands contain riparian and wetland habitats that may be critical for migratory birds. DoD will strive to prevent the destruction or degradation of wetlands and riparian vegetation, and also restore those habitats, when feasible, where they have been degraded.

(c) Coastal beach, salt marsh, and dune habitats. Military lands support some of the best remaining undisturbed coastal habitats. DoD will strive to protect, restore and prevent the destruction of coastal and island habitats that are important to breeding, migrating and wintering shorebirds, salt marsh land birds and colonial water birds.

(d) Longleaf pine ecosystem. Some of the best remaining examples of the longleaf pine ecosystem occur on military lands. Such habitats benefit from prescribed fire and other management measures which DoD regularly implements on thousands of acres in the Southeast. The DoD manages and will continue to manage this ecosystem to benefit and promote migratory bird conservation.

(2) Fire and fuels management practices. Fire plays an important role in shaping plant and animal communities and is a valuable tool in restoring habitats altered by decades of fire suppression. Fire management may include fire suppression, but also involves fire

prevention and fuels treatment, including prescribed burning and monitoring, to protect communities and provide for healthy ecosystems. Fire management planning efforts will consider the effects of fire management strategies on the conservation of migratory bird populations.

(3) Invasive Species and Aquatic Nuisance Species management practices. Invasive Species and Aquatic Nuisance Species are a threat to native habitats and wildlife species throughout the United States, including military lands. Efforts to control/contain these species must take into account both the impacts from invasive species and the effects of the control efforts on migratory bird populations. Invasive Species and Aquatic Nuisance Species that can threaten migratory birds and their habitats include, but are not limited to, exotic grasses, trees and weeds, terrestrial and aquatic insects and organisms, non-native birds, and stray and feral cats.

(4) Communications towers, utilities and energy development. Increased communications demands, changes in technology and the development of alternative energy sources result in impacts on migratory birds. DoD will review wind turbine and powerline guidelines published by FWS and the Avian Power Line Interaction Committee, respectively, and consult with FWS as needed, in considering potential effects on migratory birds of proposals for locating communications towers, powerlines or wind turbines on military lands. Construction of new utility and energy systems and associated infrastructure should be designed to avoid and minimize impacts on migratory bird populations. Existing utilities may also be considered for retrofitting to reduce impacts.

(5) Recreation and public use. The demand for outdoor recreational opportunities on public lands is increasing. Impacts on migratory birds may occur both through direct and indirect disturbances by visitors and through agency activities associated with providing recreational opportunities to visitors and installation personnel and morale facilities (e.g., facilities construction). DoD provides access to military lands for recreation and other public use, such as Watchable Wildlife and bird watching, where such access does not compromise security and safety concerns or impact migratory birds, other species, or their habitats.

Many conservation measures have been developed to benefit a variety of migratory bird species and their associated habitats. Some of these conservation measures may be directly applicable to DoD non-military readiness related activities; however, the appropriateness and practicality of implementing any specific conservation measure may have to be determined on a case-by-case basis. The FWS will work cooperatively with DoD in providing existing conservation measures and developing new ones as needed. Examples of some conservation measures may be found at http://www.partnersinflight.org/pubs/BMPs.htm for landbird

species.

g. Develop and implement new and/or existing inventory and monitoring programs, at appropriate scales, using national standardized protocols, to evaluate the effectiveness of conservation measures to minimize or mitigate take of migratory birds, with emphasis on those actions that have the potential to significantly impact species of concern.

h. Advise the public of the availability of this MOU through a notice published in the Federal Register.

i. In accordance with DoD INRMP guidance, promote timely and effective review of INRMPs with respect to migratory bird issues with the FWS and respective state agencies. During the INRMP review process, evaluate and coordinate with FWS on any potential revisions to migratory bird conservation measures taken to avoid or minimize take of migratory birds.

3. **The Fish and Wildlife Service Shall**:

a. Work with DoD by providing recommendations to minimize adverse effects upon migratory birds from DoD actions.

b. Through the Division of Migratory Bird Management, maintain a Web page on permits that provides links to all offices responsible for issuing permits and permit application forms for take of migratory birds.

c. Provide essential background information to the DoD when requested to ensure sound management decisions. This may include migratory bird distributions, status, key habitats, conservation guidelines, and risk factors within each BCR. This includes updating the FWS publication of *Birds of Conservation Concern* at regular intervals so it can be reliably referenced.

d. Work to identify special migratory bird habitats (i.e., migration corridors, stop-over habitats, ecological conditions important in nesting habitats) to aid in collaborative planning.

e. Through the Ecological Service Field Office, provide to DoD, upon request, technical assistance on migratory bird species and their habitats.

f. In accordance with FWS Guidelines for Coordination with DoD and Implementation of the 1997 Sikes Act (2005), work cooperatively with DoD in the development, review and revision of INRMPs.

g. Review and comment on NEPA documents and other planning documents forwarded by military installations.

E. <u>It is Mutually Agreed and Understood That:</u>

1. This MOU will not change or alter requirements associated with the MBTA, Endangered Species Act, NEPA, Sikes Act or other statutes or

legal authority.

2. The responsibilities established by this MOU may be incorporated into existing DoD actions; however, DoD may not be able to implement some responsibilities identified in the MOU until DoD has successfully included them in formal planning processes. This MOU is intended to be implemented when new actions are initiated as well as during the initiation of new, or revisions to, INRMPs, Pest Management Plans, and non-military readiness elements of Bird Aircraft Strike Hazard plans. It does not apply to ongoing DoD actions for which a NEPA decision document was finalized prior to, or within 180 days of the date this MOU is signed.

3. This MOU in no way restricts either Party from participating in similar activities with other public or private agencies, governments, organizations, or individuals.

4. An elevation process to resolve any dispute between the Parties regarding a particular practice or activity is in place and consists of first attempting to resolve the dispute with the DoD military installation and the responsible Ecological Services Field Office. If there is no resolution at this level, either Party may elevate the issue to the appropriate officials at the applicable Military Service's Chain of Command and FWS Regional Offices. In the event that there is no resolution by these offices, the dispute may be elevated by either Party to the headquarters office of each agency.

5. This MOU is neither a fiscal nor a funds obligation document. Any endeavor involving reimbursement, contribution of funds, or transfer of anything of value between the Parties will be handled in accordance with applicable laws, regulations, and procedures, including those for government procurement and printing. Such endeavors will be outlined in separate agreements that shall be made in writing by representatives of the Parties and shall be independently authorized by appropriate statutory authority.

6. The Parties shall schedule periodic meetings to review progress and identify opportunities for advancing the principles of this MOU.

7. This MOU is intended to improve the internal management of the executive branch and does not create any right or benefit, substantive or procedural, separately enforceable at law or equity by a party against the United States, its agencies or instrumentalities, its officers or employees, or any other person.

8. Modifications to the scope of this MOU shall be made by mutual consent of the Parties, through issuance of a written modification, signed and dated by both Parties, prior to any changes.

9. Either Party may terminate this instrument, in whole or in part, at any time before the date of expiration by providing the other Party with a written statement to that effect.

The principal contacts for this instrument are as follows:

Brian Millsap, Chief Division of Migratory Bird Management US Fish and Wildlife Service 4401 N. Fairfax Drive MS4107 Arlington, VA 22203	L. Peter Boice, Conservation Team Leader Office of the Secretary of Defense 1225 S. Clark St. Suite 1500 Arlington, VA 22202-4336

This MOU is executed as of the last date signed below and expires no later than five (5) years thereafter, at which time it is subject to review and renewal, or expiration.

F. Definitions

Action – a program, activity, project, official policy, rule, regulation or formal plan directly carried out by DoD, but not a military readiness activity.

Breeding Biology Research and Monitoring Database (BBIRD) - national, cooperative program that uses standardized field methodologies for studies of nesting success and habitat requirements of breeding birds (http://pica.wru.umt.edu/BBIRD/).

Breeding Bird Survey (BBS) – a standardized international survey that provides information on population trends of breeding birds, through volunteer observations located along randomly selected roadside routes in the United States, Canada and Mexico (http://www.mbr-pwrc.usgs.gov/bbs/bbs.html).

Bird Conservation Region – a geographic unit used to facilitate bird conservation actions under the North American Bird Conservation Initiative (http://www.manomet.org/USSCP/bcrmaps.html).

Birds of Conservation Concern – published by the FWS Division of Migratory Bird Management, refers to the list of migratory and non-migratory birds of the United States and its territories that are of conservation concern. The current version of the list Birds of Conservation Concern 2002 is available at (http://migratorybirds.fws.gov/reports/bcc2002.pdf).

Comprehensive Planning Efforts for Migratory Birds – includes Partners in Flight, North American Waterfowl Management Plan, U.S. Shorebird Conservation Plan, Western Hemisphere Shorebird Reserve Network, North American Waterbird Conservation Plan, and other planning efforts integrated through the North American Bird Conservation Initiative.

Conservation Measure – an action undertaken to improve the conservation status of one or more species of migratory birds. Examples include surveys and inventories, monitoring, status assessments, land acquisition or protection, habitat restoration, population manipulation, research, and outreach.

Conservation Planning – strategic and tactical planning of agency activities for the long-

term conservation of migratory birds and their habitats.

Council for the Conservation of Migratory Birds – an interagency council established by the Secretary of the Interior to oversee the implementation of Executive Order 13186.

Ecological Condition – the composition, structure, and processes of ecosystems over time and space. This includes the diversity of plant and animal communities, the productive capacity of ecological systems and species diversity, ecosystem diversity, disturbance processes, soil productivity, water quality and quantity, and air quality. Often referred to in terms of ecosystem health, which is the degree to which ecological factors and their interactions are reasonably complete and functioning for continued resilience, productivity, and renewal of the ecosystem.

Effect (adverse or beneficial) – "effects" and "impacts," as used in this MOU are synonymous. Effects may be direct, indirect, or cumulative, and refer to effects from management actions or categories of management actions on migratory bird populations, habitats, ecological conditions and/or significant bird conservation sites.

Important Bird Areas (IBAs) – a network of sites that provide essential habitat for the long-term conservation of birds. In the United States, the IBA network is administered by the American Bird Conservancy and the National Audubon Society. (http://www.audubon.org/nird/iba/)

Integrated Natural Resources Management Plan (INRMP) – an integrated plan based, to the maximum extent practicable, on ecosystem management that shows the interrelationships of individual components of natural resources management (e.g., fish and wildlife, forestry, land management, outdoor recreation) to military mission requirements and other land use activities affecting an installation's natural resources. INRMPs are required for all DoD installations with significant natural resources, pursuant to the Sikes Act Improvement Act.

International Shorebird Survey – a monitoring program started in 1974 to survey shorebirds (sandpipers, plovers, etc.) across the Western Hemisphere. (http://www.manomet.org/programs/shorebirds).

Management Action – an activity by a government agency that could cause a positive or negative impact on migratory bird populations or habitats. Conservation measures to mitigate potential negative effects of actions may be required.

Migratory Bird – any bird listed in 50 CFR §10.13, Code of Federal Regulations.

Military Readiness Activity – all training and operations of the Armed Forces that relate to combat, including but not limited to the adequate and realistic testing of military equipment, vehicles, weapons and sensors for proper operation and suitability for combat use.

Monitoring Avian Productivity and Survivorship (MAPS) – a program that uses the banding of birds during the breeding season to track the changes and patterns in the number of young produced and the survivorship of adults and young

(http://www.birdpop.org/maps.htm).

National Environmental Policy Act (NEPA) – a Federal statute that requires Federal agencies to prepare a detailed analysis of the environmental impacts of a proposed action and alternatives, and to include public involvement in the decision making process for major Federal actions significantly affecting the quality of the human environment 42 U.S.C. §4321, et. seq.

North American Bird Conservation Initiative (NABCI) – an initiative to align the avian conservation community to implement bird conservation through regionally-based, biologically driven, landscape-oriented partnerships across the North American continent. NABCI includes Federal agencies of Canada, Mexico and the United States, as well as most landbird, shorebird, waterbird, and waterfowl conservation initiatives (http://www.nabci-us.org).

North American Waterbird Conservation Plan – a partnership of Federal and State government agencies, non-governmental organizations, and private interests focusing on the conservation of waterbirds, primarily including marshbirds and inland, coastal, and pelagic colonial waterbirds (www.nacwcp.org/pubs/). The vision of the partnership is that the distribution, diversity and abundance of populations and breeding, migratory, and nonbreeding waterbirds are sustained throughout the lands and waters of North America, Central America, and the Caribbean.

North American Waterfowl Management Plan –a partnership of Federal and State agencies, non-governmental organizations, and private interests focusing on the restoration of waterfowl populations through habitat restoration, protection, and enhancement (http://birdhabitat.fws.gov/NAWMP/nawmphp.htm).

Partners in Flight (PIF) – a cooperative partnership program of more than 300 partners including Federal and State government agencies, non-governmental organizations, conservation groups, foundations, universities and industry focusing on the conservation of landbirds. DoD was an original signatory to the PIF Federal Agencies' MOA. (http://www.partnersinflight.org and http://www.dodpif.org).

Species of Concern – refers to those species listed in the periodic report *Birds of Conservation Concern;* priority migratory bird species documented in the comprehensive bird conservation plans (North American Waterbird Conservation Plan, U.S. Shorebird Conservation Plan, Partners in Flight Bird Conservation Plans); species or populations of waterfowl identified as high, or moderately high, continental priority in the North American Waterfowl Management Plan; listed threatened and endangered bird species in 50 CFR. 17.11; and MBTA listed game birds below desired population sizes.

Take – as defined in 50 C.F.R. 10.12, to include pursue, hunt, shoot, wound, kill, trap, capture, collect, or to attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect.

U.S. Shorebird Conservation Plan – an effort undertaken by a partnership of Federal and State government agencies, as well as non-governmental and private organizations to ensure that stable and self-sustaining populations of all shorebird species are restored

and protected (http://www.fws.gov/shorebird).

The Parties hereto have executed this agreement as of the date shown below.

Director US Fish and Wildlife Service	Assistant Deputy Under Secretary of Defense (Environment, Safety and Occupational Health) US Department of Defense
H Dale Hall 7/7/06 Signature Date	Alex Albert Beehler 7/31/06 Signature Date

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