SUMMARY OF SCENARIO ENVIRONMENTAL IMPACTS **[TABS FINAL VERSION]**

SCENARIO #MED-0057R **TITLE: MED-0057R CLOSE BROOKS CITY BASE, TX**

GENERAL DESCRIPTION: Description applies to Army action only.

1) Realign the Non-medical chemical Biological Defense Development and Acquisition from Brooks City Base, TX to Edgewood Chemical Biological Center, Aberdeen Proving Ground, MD.
2) Realign the Army Medical Research Detachment from Brooks City Base to Fort Sam Houston (Army Institute of Surgical Response)

Notes:

1) Approximately 30 personnel moving to Aberdeen Proving Ground, MD with approximately 4,500 SF of MILCON
2) Approximately 30 personnel moving to Fort Sam Houston, TX with approximately 26,000 SF of MILCON

ANALYST: _____ **LAST UPDATE: 25 APRIL 2005**

Env Resource Area	*# 1 Gaining* Installation Assessment Inst Name: Ft. Sam Houston	Analyst Comments (& data source(s) that drive assessment)
Air Quality	Ft Sam Houston is in an Attainment area for all NAAQS, but operating permit for VOCs has no room for additional VOC emissions. Addition of operations/new construction at the receiving installation will require New Source Review permitting and permit modifications. A more detailed emission analysis will be required to determine regulatory impact of new activities.	#213 –In Attainment for all criteria pollutants #212-No exceedences reported #211 – No exceedences reported or projected assuming 1% increase in personnel at Fort Sam Houston, however no room on permit for additional VOC emissions. #220 – Holds 1 Minor Operating Permit (Natural Minor) #218 – No mission impact indicated
Cultural/Archeological/Tribal Resources	344 Archeological sites and 895 historic properties listed, with no restrictions on operations and/or training. 4 non-local tribes assert interest in archeological/sacred sites. Due to planned construction and interest from non-local tribes, a potential impact may occur as a result of time delays and negotiated restrictions. Potential impact may occur since resources must be evaluated on a case-by-case basis, thereby causing increased delays and costs. Due to interest from non-local tribes, a potential impact may occur as a result of increased time delays and negotiated restrictions.	#229-No limitations to fee simple ownership #233- 80% of installation has been surveyed for cultural resources #235 –895 Historic props identified #230 – 344 arch resources reported on installation w/no restrictions (Camp Bullis) #231 – No Native People sites identified #236 – No Prog. Agreement with SHPO #234 – 4 non-local tribes assert interest, in formal consultation #232 – Areas with high archaeological potential identified. ISR2-No adverse impact to mission
Dre dgi ng	No impact	Dredging is not part of the proposal and there are no impediments to dredging.
Land Use Constraints/Sen sitive Resource Areas	No impact	#30 – 1,176 BA available – 1.4 acres required (based on 0.2% of 1 small administrative building) #201 – No constraints reported #256 – No Sensitive Resource Areas identified CERL – High encroachment projected

Marine Mammals	No impact	No marine areas near installation.
Noise	No impact	#239 –No noise contours off installation.
Threatened& Endangered Species/Critical Habitat	5 Threatened Species exist on installation: Golden Checked warbler, Black-capped vireo, Madla's cave meshweaver, Rhadine exilis, Rhadine infernalis. Restrictions preclude noise and smoke within 100 meters of Golden Checked warbler and Black-capped vireo, and 100 meter restrictions around cave openings for Madla's cave meshweaver, Rhadine Exilis, and Rhadine Infernalis. Additional operations may further impact threatened / endangered species leading to additional restrictions on training or operations. Due to the amount of new construction, an Endangered Species Planning Level Survey will likely be required.	#259 – 5 TES species with impact to range areas. Species are Golden Checked warbler, Black-capped vireo, Madla's cave meshweaver, Rhadine exilis, Rhadine infernalis. #260 – No critical habitat identified #261 – 3 Biological Opinions; 1 imposes restrictions on water pumped from Edwards aquifer. #262 – No development restrictions reported. #263 No candidate species; ISR2 shows no impact #264 – No candidate species/habitat reported
Waste Management	No impact.	#269 –Installation has RCRA Subpart X OB/OD Permit #265- Has RCRA TSD facility. #272 – Not a permitted solid waste disposal facility
Water Resources	Installation is located over or in the recharge zone of sole-source aquifer, which may result in future regulatory limitations on training activities. Water quality is impaired by pollutant loadings. Current operations may contribute to impaired water quality. Significant mitigation measures to limit releases may be required to reduce impacts to water quality and achieve US EPA water quality standards.	#276 – Installation located over a sole-source aquifer #278 – McCarren Amend does not apply #293 –Water use restrictions have been reported (2000, 2002) – water conservation #824/825 indicates adequate water avail. IREM –potable water infrastructure can support approx. 143,000 more people-scenario adds 184 personnel #279 –Installation does discharge to impaired waterway but does not impair waterway #282 – No Industrial wastewater treatment system #291-3 On Military Installation Govt Owned Plants for potable water #2972 On Military Installation Govt Owned Plant, 1 Off Military Installation Publicly Owned Plant for sewage treatment
Wetlands	No impact	#251- Survey completed 9/99. #257 – 1% of installation has restricted wetlands

SUBJECT: SUMMARY OF SCENARIO ENVIRONMENTAL IMPACTS (CONTINUED);
SCENARIO #MED-0057R

Env Resource Area	*#2 Gaining* Installation Assessment Inst Name: Aberdeen Proving Ground	Analyst Comments (& data source(s) that drive assessment)
Air Quality	Impact Expected. APG is currently over threshold limits for NOx and close to exceeding VOC threshold and in non-attainment for ozone 8-hour. Addition of operations and personnel may exceed major source thresholds for NOx and VOCs. Added operations will require New Source Review permitting and Air Conformity Analysis.	#213, 219 – In non-attainment for Ozone (EPA web site confirms non-attainment for Ozone 8-hour) #211 – Projected to exceed Major Source thresholds for Nox. #220 – Holds 2 Major Operating Permits (SIC code 9711) #222 – Emissions Credit Trading program available for NOx and VOCs #218 – No restrictions to operations reported due to air quality requirements
Cultural/Archeological/Tribal Resources	No Impact. 78 Historic properties, 5 archeological resources identified to date and areas with high archeological potential, but no restrictions to mission reported. A very limited portion of the installation has been surveyed for cultural resources; therefore, the extent of the cultural resources on the installation and impacts to those resources is uncertain. Sufficient unconstrained acres available and planned construction is very small.	#233- A very limited portion of the installation has been surveyed for cultural resources (<5%) therefore the extent of cultural resources on the installation and impacts to these resources is uncertain. #235 – 78 Historic properties identified #229 – No known limitations to fee-simple ownership #230 – 5 archaeological resources known on installation; no restrictions reported #231 – Native People sites identified #236 – No Programmatic Agreement with SHPO #201 – Operations are not restricted due to cultural/archaeological/tribal resources however, these resources were identified. #234 – 5 tribes have asserted interest in burial/sacred sites; in contact, but no formal consultation yet. #232 – Areas with high archaeological potential identified.
Dredging	No Impact.	#227 – If new unit/activity requires dredging, then dredging may not be able to occur in the short term due to known dredging impediments. #226 – If the new unit/activity requires dredging, then UXO and endangered species surveys may be required.

Land Use Constraints/Sensitive Resource Areas	No Impact. Four SRAs identified but cause no restrictions.	#30 – 2,863 buildable acres reported, approximately 1.4 acres required. (based on approximately 0.2% of a Small Admin Organizations) #201 - Constraints listed include (4) limited ability to accept new or different missions due to availability of unconstrained land, (5) altered, modified or re-routed flight operations and/or flight patterns and (6) altered, modified or re-routed ground operations. #256 – 4 Sensitive Resource Areas identified but cause no restrictions CERL Encroachment Study – Moderate Encroachment Projected
Marine Mammals/Marine Resources/ Marine Sanctuaries	No impact.	#248, #250, #252, #253 - No restrictions #249 – TES listed include Shortnosed Sturgeon (*Accipenser brevorostrum)* (restricting Poole's Island Shoal waters around island) and Bald Eagle (*Haliaeetus leucocephalus*), (restricting Poole's Island areas near nest sites, APG Shoreline & Areas near nest sites- affecting 17.2 acres of installation)
Noise	No impact. No noise expected to be generated by this proposal.	#239 – 235,848 acres of Noise Zone 2 extend outside installation, which is moderately encroached by development. #202 – Installation has published noise abatement procedures for main installation and training range but not for auxiliary airfield.

Threatened& Endangered Species/Critical Habitat	Installation has Federally listed species (Shortnosed Sturgeon, Bald Eagle), that affect 17.2 acres of the installation and restricts night time flying operations (protection buffers around nests) on 7.9% of installation. Additional operations may further impact threatened/endangered species leading to additional restrictions on training or operations.	#249 – TES listed include Shortnosed Sturgeon (*Accipenser brevorostrum)* (restricting Poole's Island Shoal waters around island) and Bald Eagle (*Haliaeetus leucocephalus*), (restricting Poole's Island areas near nest sites, APG Shoreline & Areas near nest sites- affecting 17.2 acres of installation) #259 – TES listed include Shortnosed Sturgeon (*Accipenser brevorostrum)* and Bald Eagle (*Haliaeetus leucocephalus*). The Bald Eagle has delayed operations due to protection of buffers around nests during nesting season on approximately 7.9% of installation. #260 – No critical habitat identified #261 – Biological Opinion for Bald Eagle restricts range operations #262 – Development restrictions reported. Eagles: Existing Biological Opinions have limited impacts as they impose a monitoring responsibility primarily; some sites are protected. The ongoing Biological Assessment and subsequent Opinion will include an incidental take statement and some mitigation limits for some of the SOCOM training functions is expected. The extent of the limits is unclear, as the BA is still in development. Sturgeon: APG has a BA and BO from NOAA containing no limitations. APG is to coordinate with them if specific projects pose a risk. #263, #264 – No candidate species/habitat reported #201 - TES have restricted operations by limiting night flying times.
Waste Management	No impact.	#269 – Interim RCRA Subpart X OB/OD Permit, Permit has been submitted #265- Installation is a permitted hazardous waste RCRA Treatment Storage and Disposal (TSD) facility. #272 – Not a permitted solid waste disposal facility

Water Resources	No Impact.	#276 – Installation not located over a sole-source aquifer #278 – McCarren Amendment does not apply #293 – Potable water restrictions in FY99 (33 days), FY01 (134 days) and FY02 (147 days). Source restrictions to prevent exceeding withdrawal permits, FY99 (9% of time restriction in place), FY01 (37%), FY02 (40%) from CHPPM Water Resources Report. #291 – Installation uses one Gov't owned on-installation plant and one publically owned off-installation plant for potable water. IREM indicates remaining capacity for potable water to support 33,500 more personnel #279 –Installation discharges to impaired waterway; nutrient discharges from installation further impair waterway but is not a source of potable water. #297 – Two Sewage treatment plants on site; 1 gov't owned, 1 privatized. #282 – Industrial Gov't owned wastewater treatment system located on installation. #822, 824, 825, 826, ISRII – no restrictions reported Final Stat Packages- Scenario increases current population by approximately 3%
Wetlands	No impact.	#251- Survey completed 04/92. #257 – Wetlands affect 0.3% of range and installation each but do not restrict operations.

SUBJECT: SUMMARY OF SCENARIO ENVIRONMENTAL IMPACTS (CONTINUED);
SCENARIO # MED-0057R

Env Resource Area	*Losing* Installation Assessment Inst Name: Not an Army Installation	Analyst Comments (& data source(s) that drive assessment)
Air Quality	N/A	Environmental assessment for losing installation to be completed by Air Force.
Cultural/Archeological/Tribal Resou	N/A	Environmental assessment for losing installation to be completed by Air Force.
Dredg-ing	N/A	Environmental assessment for losing installation to be completed by Air Force.
Land Use Constraints/Sensitive	N/A	Environmental assessment for losing installation to be completed by Air Force.
Marine Mammals/Marine	N/A	Environmental assessment for losing installation to be completed by Air Force.
Noise	N/A	Environmental assessment for losing installation to be completed by Air Force.
Threatened& Endangered	N/A	Environmental assessment for losing installation to be completed by Air Force.
Waste Management	N/A	Environmental assessment for losing installation to be completed by Air Force.
Water Resources	N/A	Environmental assessment for losing installation to be completed by Air Force.
Wetlands	N/A	Environmental assessment for losing installation to be completed by Air Force.

SUBJECT: SUMMARY OF SCENARIO ENVIRONMENTAL IMPACTS (CONTINUED);

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IMPACTS OF COSTS

Env Resource Area	Gaining Installations **Inst Name: Fort Sam Houston, Aberdeen Proving Ground**	Losing Installation **Inst Name: Not an Army Installation**
Environmental Restoration*	None	NA
Waste Management	None	NA
Environmental Compliance	Fort Sam Houston -Air Conformity Analysis/Permit Modifications -$25K-$75K - New Source Review Analysis - $100K - $500K -Develop Programmatic Agreement -$10K -Tribal gov't-to-gov't consultation -$500-$2K per meeting -Realignment NEPA at gaining base since less than 1000 people -$100K (EA) -Endangered Species Management - $20K - $2M -Install Best Management Practices to protect impaired waterways and reduce non-point source runoff from training areas and ranges -$100K-$3M Aberdeen Proving Ground -Air Conformity Analysis - $25K-$75K -New Source Review Analysis and Permitting - $100K-$500K -Endangered Species Management (includes monitoring) $20K-$2M -Realignment NEPA (EA) for less than 1,000 people - $100K	NA
COBRA Costs:	Fort Sam Hoston: -Air Conformity Analysis -$50K -New Source Review - $100K -Realignment NEPA at gaining base -$100K (EA) based on moving pop of 30 pers Aberdeen Proving Ground: -Air Conformity Analysis - $50K -New Source Review - $100K -NEPA (EA) - $100K based on moving 30 pers.	NA