CRREL 97465

Draft Environmental Assessment for Proposed Building and Land Acquisition at Fort Wadsworth, New York



October 1994

GATEWAY NATIONAL RECREATION AREA
STATEN ISLAND UNIT
26 MILLER FIELD
STATEN ISLAND, NEW YORK 10306

DRAFT
ENVIRONMENTAL ASSESSMENT
FOR
PROPOSED BUILDING AND LAND ACQUISITION
AT FORT WADSWORTH
STATEN ISLAND, NEW YORK

Prepared For:

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October 1994

Printed on Recycled Paper

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INTRODUCTION

This Environmental Assessment (EA) documents the results of a study of the potential for environmental effects of a proposed action by the U.S. Army Reserve Command. The proposed action is the acquisition and use of buildings and land at U.S. Naval Station - New York, Fort Wadsworth on Staten Island, New York.

This study was conducted in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended [42 United States Code, 4321 et Seq.], the Council of Environmental Quality regulations [40 Code of Federal Regulations, 1500-1508], and the Army Regulation 200-2. The purpose of this study was to determine whether or not the proposed action posed potential for significant effects on the environment, and would thereby warrant more detailed study of possible impacts, mitigation, or alternative courses of actions.

A Preliminary Assessment Screening (PAS) field inspection was made concurrently with the inspection made for this EA document. That PAS provides input to this EA, and is incorporated here by reference. The PAS also complies with the requirements of AR 200-1, "Environmental Protection Enhancement" and supplemental guidance. The PAS is publicly available upon request from the U.S. Army Reserve Command, Atlanta, Georgia.

1.0 PURPOSE AND NEED FOR ACTION

Naval Station New York, Fort Wadsworth is being closed. Several Army Reserve Units presently lease buildings and land from the Navy at Fort Wadsworth. To continue conducting training for these units, the Army needs to take action to secure appropriate facilities.

In addition, several other Army Reserve units currently lease facilities elsewhere in New York City. These leases will expire within the next few years. That Army Reserve will need to take action to secure appropriate facilities for those units also.

2.0 ALTERNATIVES INCLUDING THE PROPOSED ACTION

2.1 Alternative 1. No Action at Fort Wadsworth. Under this alternative, the U.S. Army Reserve Command (USARC) would not acquire land and buildings at Fort Wadsworth. The result would be that several Army Reserve units stationed at Fort Wadsworth would be forced to secure facilities and train elsewhere due to closure of the Naval Station New York in August of 1994. In addition, several other Reserve units currently operating in leased facilities in other parts of New York City would remain in those facilities for now, but would soon need to take action to secure long-term facilities.

2.2 Alternative 2. The Proposed Action. This alternative consists of acquiring and renovating five buildings and acquiring two parking areas at Fort Wadsworth (Exhibit 1). These buildings would provide facilities for Army Reserve units which are now operating out of leased facilities, such as those in the Bronx and in Queens. Currently there is an Armed Forces Reserve Center on 9 acres of Fort Wadsworth.

Generally, the proposed use for buildings USARC wishes to acquire would be very similar to their current use, administration, classroom training, and public works. There would be fewer weekday personnel than there is currently and weekend staffing levels would drop to roughly 330 Reservists. In addition, Reservists would use the facility for drills three weekends a month instead of one weekend a month. Units that could be relocated to Fort Wadsworth under this proposal include the following:

Fort Wadsworth -- Naval Station New York Force Structure Data

UNIT	CURRENT FACILITY	LOCATION	FY 94 STRENGTH	FULL-TIME STRENGTH	FY 99 STRENGTH
920th TC Co	**Caven Point USARC**	Jersey City, NJ	175	6	172
716th QM Co	Caven Point USARC	Jersey City, NJ	0	6	163
HHC, 411th Engr Bde	Caven Point USARC	Jersey City, NJ	0	28	136
305th Engr Det	Caven Point USARC	Jersey City, NJ	0	2	15
320th Chem Co	Caven Point USARC	Jersey City, NJ	0	8	141
Totals			**175**	**50**	**627**
320th Chem Brigade	McDonald USARC	Jamaica, NY	134	8	0
340th MP Co	McDonald USARC	Jamaica, NY	176	6	0
Totals			**310**	**14**	**0**
HHC, 353 CA Cmd	Patterson USARC	Bronx, NY	142	31	0
Totals			**142**	**31**	**0**
411th EN BDE	Floyd Bennett USARC	Brooklyn, NY	132	18	0
305th EN DET	Floyd Bennett USARC	Brooklyn, NY	15	2	0
HHC, 99th Sig Bn	Floyd Bennett USARC	Brooklyn, NY	42	12	0
Totals			**189**	**32**	**0**
HHC, 24th MI BN	Fort Wadsworth AFRC	Staten Island, NY	53	12	63
DET A, 24th MI	Fort Wadsworth AFRC	Staten Island, NY	40	4	37
DET B, 24th MI	Fort Wadsworth AFRC	Staten Island, NY	40	6	37
DET C, 24th MI	Fort Wadsworth AFRC	Staten Island, NY	40	5	37
DET D, 24th MI	Fort Wadsworth AFRC	Staten Island, NY	40	5	37
DET E, 24th MI	Fort Wadsworth AFRC	Staten Island, NY	40	5	37
DET F, 24th MI	Fort Wadsworth AFRC	Staten Island, NY	40	5	37

DET G, 24th MI	Fort Wadsworth AFRC	Staten Island, NY	40	5	37
HHC, 353d CA Cmd	Fort Wadsworth AFRC	Staten Island, NY	0	31	142
340th MP Co	Fort Wadsworth AFRC	Staten Island, NY	0	6	176
Totals			**333**	**84**	**640**
Totals			**1149**	**211**	**1267**

The properties under consideration for transfer from the U.S. Naval Station - New York to the U.S. Army Reserve Command are listed below and shown on Exhibit 1.

Building 208 **Historical Use:** Building 208 is a four story, 51,014 square foot building constructed in 1961. Reportedly, this building was used as a barracks and the Chaplain School.

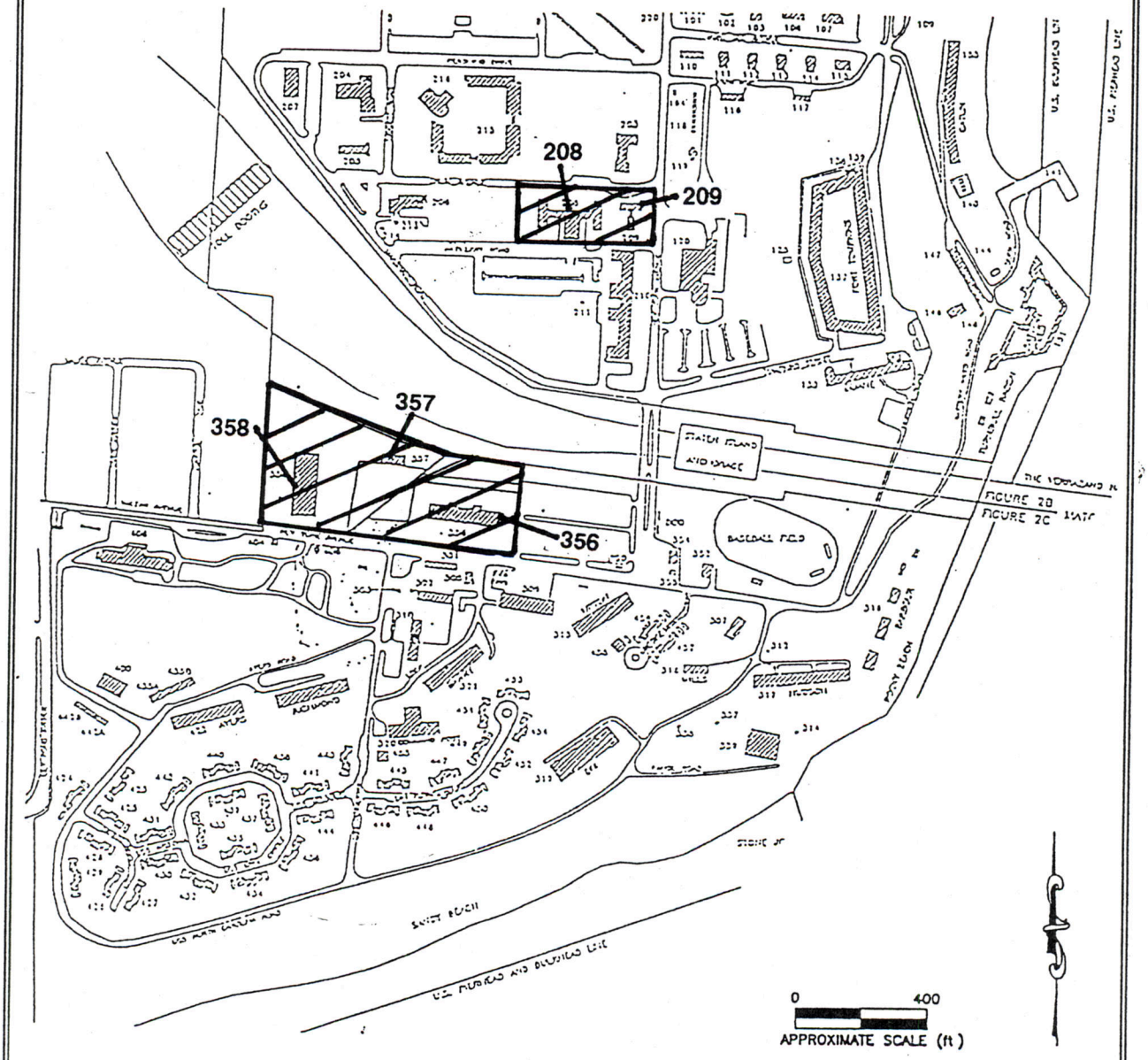
Current Use: The two story administrative building contains of offices and classrooms. Much of building 208 is unused, except for portions currently occupied by the U.S. Department of Interior.

Proposed Use: This building would be used by the Army Reserve for classroom training.

Building 209 **Historical Use:** Building 209 is a 4,786 square foot building consisting of one story and a basement. It was constructed in 1961 and used as a barracks until it was converted to use for the Navy Exchange Command (NEXCOM). NEXCOM used building 209 as a main computer center.

Current Use: Building 209 is currently unoccupied, but numerous computers, printers, telephones, and other related equipment are stored there. This computer equipment will be transferred with the building to the new tenant.

Exhibit 1. Army Reserve's Proposed Acquisition of Buildings at Fort Wadsworth Naval Station - NY



Draft Environmental Assessment
Fort Wadsworth, NY
Prepared by
The Mangi Environmental Group, Inc.
Falls Church, VA
October 1994

Source: Site Plan, Fort Wadsworth Naval Station - New York

December 1993

Proposed Use: The Army Reserve would use building 209 for administrative purposes.

Building 356 **Historical Use:** Building 356 was constructed in 1974 and consists of 36,500 square feet. The past use of this facility is unknown.

Current Use: The Armed Forces Reserve Center is a two story building with a basement, divided between the Army Reserve and the Navy Reserve. It is used for office space, classrooms, drill halls, and supply storage.

Proposed Use: The Army Reserve would use building 356 for administration and support.

Building 357 **Historical Use:** Building 357 was constructed in 1977 and consists of 3,041 square feet. The past use is unknown.

Current Use: The Organizational Maintenance Shop is a one story building used for offices. This building also has a repair area. A small interior hazardous waste satellite accumulation area was observed inside. The facility does not currently change oil.

Proposed Use: This building would be used by the Army Reserve for motor pool maintenance and repair.

Building 358 **Historical Use:** Building 358 was constructed in 1990 and consists of 27,391 square feet.

Current Use: The Public Works Building has many areas used for the repair and maintenance of vehicles. This building consists of a pesticide mixing area; a battery room intended for battery storage; a parts storage area for tires, hoses, and small auto parts; a mechanical room used for oil storage; and a boiler room.

Proposed Use: This building would be used by the Army Reserve for public works and motor pool maintenance.

2.3 Alternative 3. Under this alternative USARC would obtain land and construct new facilities elsewhere for the units currently using the Reserve Center at Fort Wadsworth and leasing buildings throughout New York City.

2.4 Alternative 4. Under this alternative USARC would lease facilities elsewhere.

3.0 ENVIRONMENTAL ANALYSIS

This section conforms to CEQ's NEPA regulations requiring environmental documents to be brief, analytic, and simply presented. The cause-effect matrix below, shows the findings of the environmental team by identifying links between proposed Reserve activities and their possible impact on the environment at and around Fort Wadsworth. This matrix lists environmental components across the top and the activities to be included in the proposed action down the side.

The environmental team has examined all potential impacts generated by the proposed action on all of the environmental components listed across the top of this matrix. The environmental components in the matrix that correspond to the cells marked with Xs warrant further study in this EA, and are discussed within this document. Unmarked cells in this matrix and their corresponding environmental components have also been studied, but the environmental team has determined that these environmental components (i.e., utilities, ionizing radiation, income, etc.) will not be affected by the proposed action and are not further discussed in this EA.

Potential Cause - Effects Linkage Matrix

ACTIVITIES INCLUDED IN THE PROPOSED ACTION	Air	Water	Soils	Wetlands	Vegetation	Wildlife	Threatened and Endangered species	Bio-diversity	Land Use	Housing	Utilities	Ionizing Radiation	Non-Ionizing Radiation	Waste Disposal	Hazardous Materials	Transportation	Parking	Mass Transportation	Minerals	Fossil Fuels	Employment	Income	Fiscal Demand	Demographic Composition	Controversy	Educational Resources	Law Enforcement	Fire Risk	Hospital	Recreation	Public Risk	Noise	Archeological Resources	Paleontological Resources	Historic Resources	Native American Cultural Resources	Aesthetics
Administration				❖			❖		❖						❖										❖										❖		❖
Classes				❖			❖		❖						❖										❖										❖		❖
Storage of Hazardous Materials																															❖						
Vehicle and Equipment Maintenance				❖			❖		❖																❖												❖

❖ = Resources analyzed.

3.1 Background

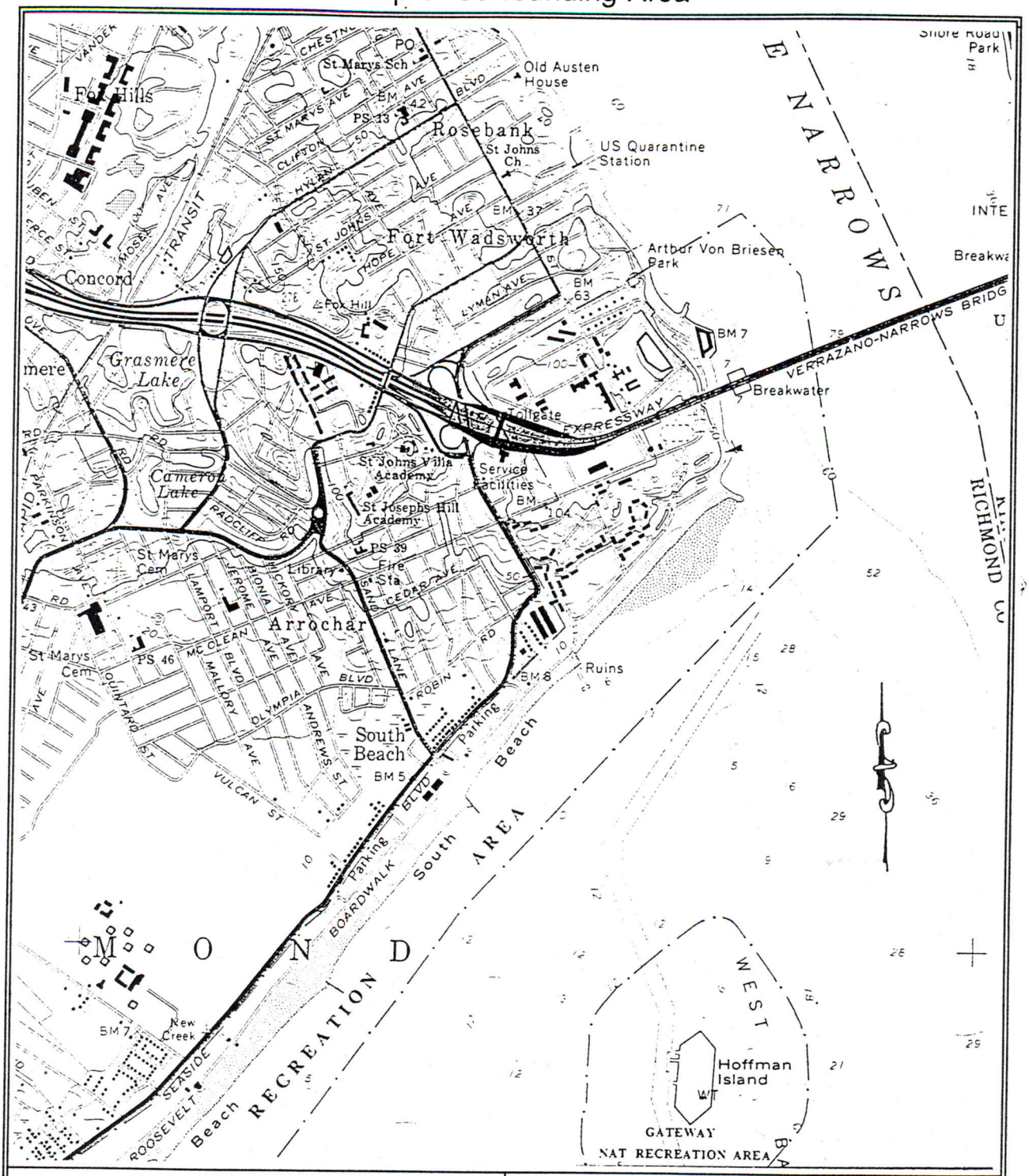
Fort Wadsworth is located on eastern Staten Island at the base of the Verrazano-Narrows Bridge, bisected by Interstate 278, and adjacent to a portion of New York Bay called The Narrows to the east (see Exhibit 2). Fort Wadsworth is comprised of 226 acres of land occupied by 83 buildings and structures. These include: historic Fort Tompkins and Battery Weed; 13 stone gun emplacements (batteries); family housing (447 units); Recreation Center; Chapel; Army and Navy Reserve Center; administrative offices; motor pool; Public Works Building; commissary; and mess hall (see Exhibit 3). There is also a motor pool area between Buildings 357 and 358 where vehicles are stored. The area surrounding the facility is virtually all developed and is dominated by single-family housing.

When Fort Wadsworth was transferred to the Navy in the 1980s, Congress established the requirement that when the Department of Defense (DOD) no longer had a mission for Fort Wadsworth it would be transferred to the Department of Interior's Park Service for its Gateway project. The Gateway National Recreation Area is a series of parks located around the historic ocean gateways to the New York City area. The Park service is currently working with a local Base Re-use Committee to formulate plans for future use of Fort Wadsworth. However, the future land uses adjacent to the proposed reserve enclave cannot be predicted.

The environmental team has screened the potential for impacts to all relevant environmental components such as land use, air quality, water quality, waste disposal, noise, transportation, cultural resources, utilities, socioeconomics, and ecology, but has limited the discussions in this document to only potential effects of the proposed action.

The potential effects at Fort Wadsworth associated with the transfer of property from the U.S. Naval Station to USARC include:

Exhibit 2. General Site Map of Surrounding Area



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Falls Church, VA
October 1994

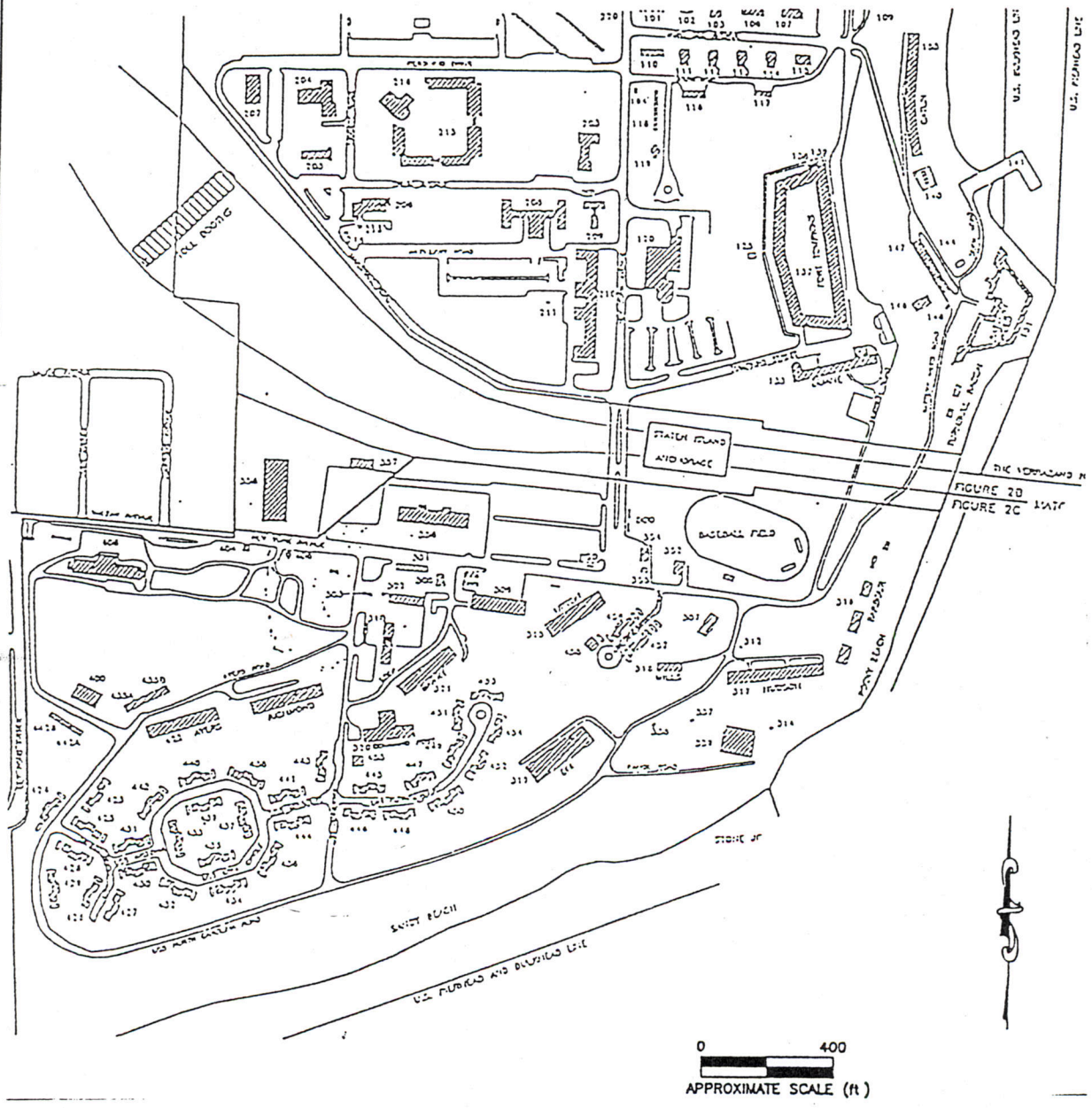
Source: The Narrows Quadrangle, NY - NJ

Prepared by U.S. Department of Interior
Geological Survey

1966 and photorevised 1981

SCALE 1:24 000

Exhibit 3. Site Plan, Fort Wadsworth Naval Station - New York



Draft Environmental Assessment
Fort Wadsworth, NY
Prepared by
The Mangi Environmental Group, Inc.
Falls Church, VA
October 1994

Source: Site Plan, Fort Wadsworth Naval Station - New York

Prepared by EA Engineering, Science & Technology, Newburgh, NY

December 1993

- Potential controversy with political and civic organizations interested in the re-use of Fort Wadsworth as a park. These interested parties include Staten Island residents, the New York City mayor's office, the Base Re-use Committee, and the Department of Interior. This controversy boils down to a land use issue;
- Potential controversy with adjacent property owners residing behind Building 358;
- Potential human health effects associated with asbestos and lead paint in buildings, and contaminated soil near an unearthed underground storage tank (UST);
- Possible permitting issues for the storage and disposal of hazardous waste.

3.2 Potential Governmental, Civic, and Political Controversy. Some past and present governmental, civic, and political controversy, and the potential for the continuation of such controversy clearly exists. It is exhibited by the land use and land transfer history of Fort Wadsworth subject to the Gateway National Recreational Area Act, and the past and continuing litigation over the failure of first the Department of the Army (Army) and now the Department of the Navy (Navy) to transfer all of Fort Wadsworth, as originally delineated under the Act, to the Department of Interior (DOI) for recreational purposes. This section examines the existing situation, the potential environmental effects of the proposed action as they relate to the fueling of controversy, and the possible mitigation of these environmental "controversy" effects.

3.2.1 Existing Situation. Fort Wadsworth may have been continuously garrisoned by the Army longer than any other military post. According to experts it is one of the best surviving specimens of pre-Civil War American coastal forts and it probably ranks high among the world's examples of military architecture of the early 19th

century. Additionally, as an "island" of open space in the highly urbanized New York area, it has significant potential for recreation, as witnessed by its inclusion in the Gateway National Recreation Area Act.

Under the Gateway National Recreation Area Act, DOI may acquire land within the boundaries originally mapped by the National Park Service, as directed in the Act by Congress, through a number of means. Here, it would involve the transfer from the Navy to DOI, provided the Navy concurs with the transfer. However, the Gateway Act does not *require* this federal property to be transferred to DOI, it only *allows* such transfers.

Other Federal armed forces legislation, encourages and allows transfers of land without compensation, from one armed force to another (Pub. L. Nos. 84-1028 (1956), 85-861 (1958)). After the passage of the Gateway Act, in the late 1970's, the Army began to phase out its activities at Fort Wadsworth, and, in 1979, it expressed an intention to transfer all but twelve acres of the Fort to the Secretary of the Interior. Prior to the intended transfer, however, the Department of Defense directed the Army to retain an additional twenty-eight acres for military housing purposes. Accordingly, the Army offered only 186 acres to the Secretary of the Interior. The Secretary rejected this offer with the suggestion that the Army retain and care for Fort Wadsworth until the entire site became available for transfer.

Thereafter, the Navy decided to relocate its Naval Resale Exchange Store headquarters from a deteriorating Brooklyn warehouse to a ten-acre parcel of land at Fort Wadsworth. Upon learning of the Navy's decision, a national environmental group, the Natural Resources Defense Council (NRDC) sued DOI to prevent the transfer of the ten-acre parcel to the Navy and to compel the Secretary of the Interior to accept all excess Fort Wadsworth property. NRDC argued that, once the Army no longer needed Fort Wadsworth land to support Army uses existing in 1972, the Gateway Act required the Army to transfer the land to the Secretary of the Interior

for inclusion in the recreation area. The United States District Court for the Eastern District of New York held that the Army's transfer of land to the Navy was lawful under the Gateway Act, and the Second Circuit court of Appeals upheld the district court.

On August 24, 1994, DOI published a notice in the *Federal Register* modifying the boundary of Fort Wadsworth under the Act, removing approximately one-third of the originally designated land from the Gateway National Recreational Area map, and therefore from consideration for inclusion in the Gateway National Recreation Area. The land removed from consideration included approximately one million square feet of contemporary building space, constructed after the passage of the Gateway Act, and which DOI therefore did not consider suitable for recreational purposes.

On that same day, Staten Island Borough President Guy V. Molinari and Congresswoman Susan Molinari, who represents Staten Island, sued DOI, contending that the removal of the Fort Wadsworth land from the Staten Island unit of the Gateway National Recreational Area map, and therefore from consideration for inclusion in the Gateway National Recreation Area, violated several federal statutes, including the Gateway Act. In the lawsuit, the plaintiffs requested that the court invalidate the DOI land transfer, require the land to be included in the recreation area, and not allow DOI to transfer the land removed to any other federal agency other than the National Park Service. This lawsuit is still pending.

The land that is the subject matter of this lawsuit includes the five buildings that the Army Reserve has proposed to use for its operations on Staten Island. Thus, as evidenced by lawsuits brought by civic and political interests, there has been and continues to be controversy surrounding the land involved in the action that is the subject matter of this EA.

3.2.2 Potential Effects. Potential outcomes and effects of the ongoing controversy over transfer of the five buildings to the Army Reserve for use as a training center could include: (1) temporary injunctive relief in favor of the plaintiff, which would result in an indeterminate delay in the establishment of the Army Reserve facility; (2) judgment in favor of the plaintiffs granting permanent injunctive relief, which could result in the Army Reserve having to find an alternative site for its facility (and would be the equivalent of the "no action" alternative for this site); (3) failure of the court to grant injunctive relief to the plaintiff, which would allow the Army Reserve facility to proceed, but without a positive outcome of the case assured; (4) judgment in favor of the defendant DOI, which would allow the Army Reserve facility to proceed. It is also possible that the Army Reserve could be added to the litigation, if it goes ahead with the project. The plaintiffs may move the court to add the Army Reserve as a necessary party, and the court may grant this motion.

However, if the court decides that the new DOI boundary stands, a potential land use conflict could arise between the Army Reserve and the National Park Service. However, the impact of conflicting land use between military and park uses may not necessarily be significant if mitigated properly. One concern, although not likely significant, is the aesthetic impact from these potential conflicting land uses.

3.2.3 Possible Mitigation of Effects. This potential land use conflict and the aesthetic issue associated with this project can be mitigated. Such mitigation would include screening all of the military buildings from park users. Such screening would be achieved by implementing landscape design solutions which use a mixture of visual buffers (screening fences) and landscape materials which complement the aesthetics of the surrounding park. Visual buffers and local plant species would be selected in coordination with the National Park Service so there will be a unity of design throughout the entirety of Fort Wadsworth. Additionally, direct coordination between the Army Reserve and the Department of Interior will occur to alleviate any other

potential land use conflicts which may arise in the future between military and park land uses.

3.3 Potential Controversy with Residents Adjacent to Building 358

3.3.1 Existing Conditions. A residential area consisting of single-family detached houses borders the rear of Building 358, Public Works. Building 358 is used for vehicle maintenance. There are currently numerous vehicles stored in the parking lots that surround Building 358. An opaque fence and landscape plantings are established between the residential area and Building 358.

3.3.2 Potential Effects. There is potential controversy with property owners residing adjacent to Building 358. Incompatible land use is at the core of this controversy. If Building 358, Public Works, is transferred from the Navy to the U.S. Army Reserve Command, adjacent property owners may have concerns. Although the Army Reserve activities are not noticeably different from current activities, adjacent residents may believe that Reserves and their activities do not make good neighbors. As discussed earlier, Reserve activities will remain virtually the same under this proposal, but the frequency of them is likely to change. For example, Reservist activities will generate the same amount of noise as always, but the noise will occur on more weekends. Residents may consider the increased frequency of activities and related noise to be significant. We do not know how likely this controversy could be, but it is reasonably foreseeable that it could arise. These concerns about consequences may only be perceived, but the concerns of residents should be addressed. when & by whom?

3.3.3 Possible Mitigation of Effects. The U.S. Army Reserve Command would take several steps to mitigate potential effects. Such actions will include the following:

- Initiate dialogue with adjacent property owners to discuss the proposed action and its possible impacts. Open discussion of the issues and perceived impacts of proposed actions often reduces misperceptions by concerned parties;

- Augment the existing buffer with more intensive and aesthetically pleasing landscaping and the possible use of some form of noise abatement;

- Schedule maintenance activities at times amenable to all parties involved;

- Refrain from using the pull-down garage doors on the west side of Building 358;

- Keep all vehicle storage and maintenance activities to the east of Building 358.

3.4 Historic Preservation and Cultural Resources

3.4.1 Existing Conditions. According to the New York State Historic Preservation Office (SHPO), Fort Tompkins and Battery Weed are the only structures at Fort Wadsworth listed on the National Register of Historic Places. Several other structures at Fort Wadsworth may meet the criteria to be placed on the National Register of Historic Places including Batteries Hudson, Dix, Upton, Barry, Richmond, Ayers, and Catlin, which are not located within the project area. Buildings 208, 209, 356, 357, and 358 were all built after 1960, are less than fifty years old, and therefore are not eligible for the Register of Historic Places.

3.4.2 Potential Effects. According to SHPO, buildings 208, 209, 356, 357, and 358 are not listed or eligible for the National Register of Historic Places. The New York SHPO stated in a consultation letter, dated 23 September 1994 (Appendix 1), "it is the SHPO's opinion that transfer of buildings 208, 209, 356, 357, and 258 to the U.S. Army Reserve will have No Effect upon cultural resources in or eligible for inclusion in he National Register of Historic Places."

3.4.3 Possible Mitigation of Effects. No mitigation is required since buildings 208, 209, 356, 357, and 358 are not listed or eligible for the National Register of Historic Places.

3.5 Wetlands

3.5.1 Existing Conditions. According to the U.S. Department of Interior's National Wetland Inventory Map (Exhibit 4) some intertidal wetlands exist on Fort Wadsworth at the edge of the Lower Bay, more than a half of mile from the buildings to be acquired by the Army Reserve. However, no wetlands are located on or near the property the Army Reserve wishes to acquire.

3.5.2 Potential Effects. Since there are no mapped wetlands near the buildings the Army Reserve wishes to acquire and since the buildings will continue to be used for classroom training no significant impacts to wetlands are likely.

3.5.3 Possible Mitigation of Effects. No mitigation is necessary.

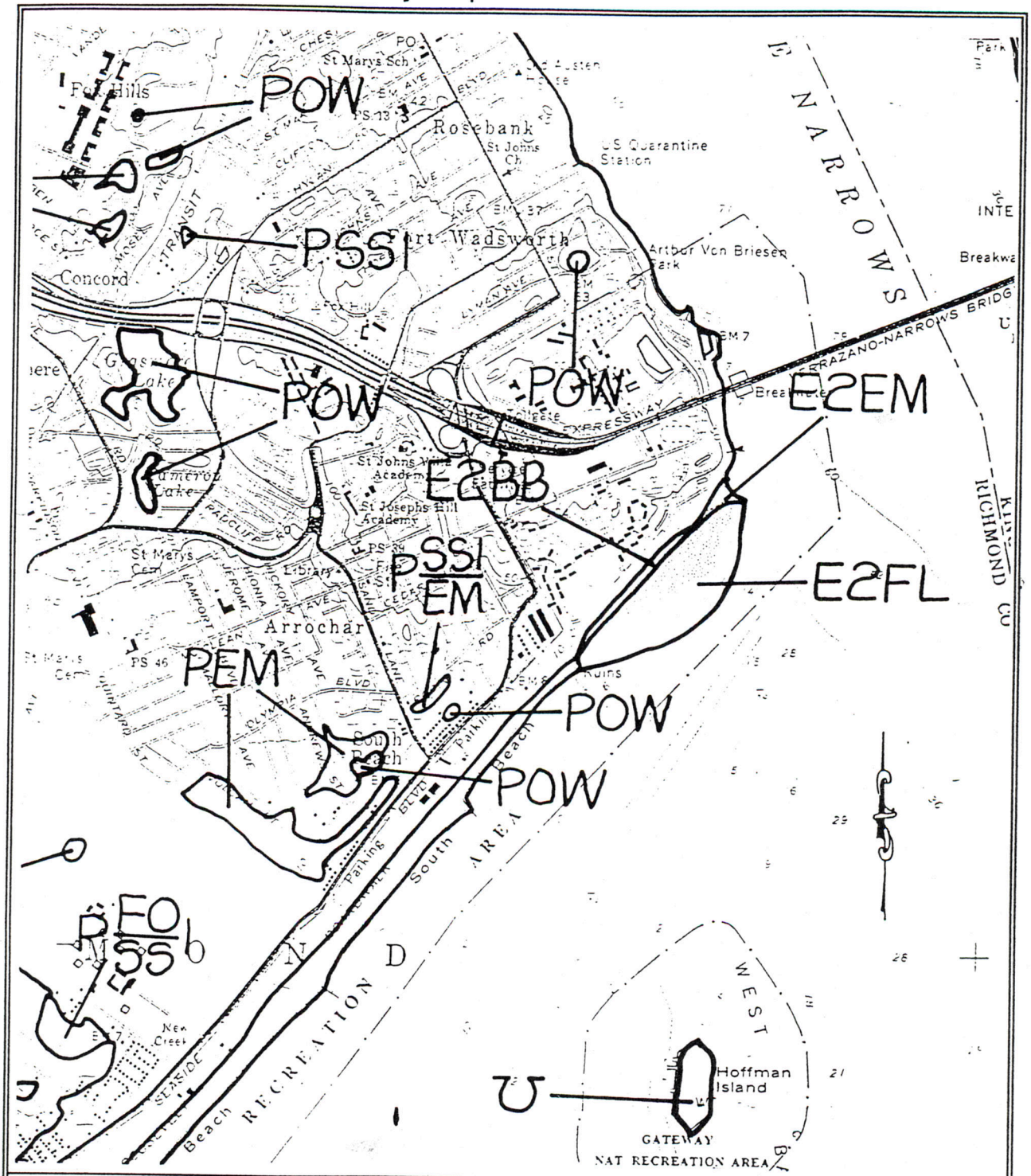
3.6 Threatened and Endangered Species

3.6.1 Existing Conditions. According to the U.S. Fish and Wildlife Service in a letter dated 3 October 1994 (See Appendix 1), "Except for occasional transient individuals, no Federally listed or proposed endangered species under our jurisdiction are known to exist in the project impact area. Therefore, no Biological Assessment or further Section 7 consultation under the Endangered Species Act is required."

3.6.2 Potential Effects. No impacts to threatened and endangered species is likely.

3.6.3 Mitigation of Effects. No mitigation is necessary.

Exhibit 4. Wetland Inventory Map



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Falls Church, VA
October 1994

Source: The Narrows Quadrangle, NY -NJ
Prepared by U.S. Department of the Interior
Geological Survey
1966 and photorevised 1981
Overlay: Wetland Inventory Map
Prepared by U.S. Department of the Interior Fish and Wildlife Service

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3.7 Asbestos in Buildings

3.7.1 Existing Conditions. According to the *Pre-Final Community Environmental Response Facilitation Act Report Naval Station - New York, Fort Wadsworth Staten Island, New York,* an asbestos survey was conducted at the non-housing component of Fort Wadsworth. Asbestos was found in buildings USARC is interested in acquiring. Damaged, accessible, friable asbestos-containing materials are to be removed from buildings where these materials are present. Removal is scheduled to begin in 1994.

3.7.2 Potential Effects. There could be potential human health effects to Reserve personnel and others who occupy buildings where asbestos is found, since asbestos has been linked to some types of cancer.

3.7.3 Possible Mitigation of Effects. Although the U.S. Navy has said it would remove accessible, friable asbestos-containing materials starting in 1994, no signs of this removal are apparent at this time (September 1994) USARC will follow up to ensure the removal is complete.

3.8 Underground Storage Tanks

3.8.1 Existing Conditions. Underground storage tanks (USTs) exist within Fort Wadsworth. The Navy reportedly has followed state and Federal procedures for UST removal at Fort Wadsworth. One UST was recently excavated approximately thirty feet southwest of building 209. According to Lt. Pat Hamilton, facility engineer, this excavation site was the location of a former UST, which was reportedly removed by the Navy a week prior to the PAS inspection. The capacity of the UST was approximately 6,000 gallons and constructed of steel. The site escorts for the PAS team were unable to report the age of the UST. According to Mr. Ken Johnson, the facility manager, the former UST was utilized during the Navy's presence at Fort Wadsworth to heat building 208 with No. 6 fuel oil, until the

building changed to a natural gas heating system. According to Lt. Pat Hamilton, the New York Department of Environmental Conservation (DEC) was notified to inspect the UST and subsurface soils upon its removal. However, due to staffing constraints, an inspector was not available to observe the tank removal procedure. Lt. Pat Hamilton believes that the levels detected were insignificant for pursuing remediation. The New York Department of Environmental Conservation (DEC) will make a final determination of the condition of the UST adjacent to building 209. This will be completed after the Navy provides documentation regarding tank tightness of remaining USTs and abandonment procedures of unused USTs. Lt. Pat Hamilton believes that all information regarding USTs at Fort Wadsworth will be submitted by October of 1994, and the determination for action by the DEC will be completed within two months following submittal of this information.

The PAS team recommends that USARC obtain a copy of the final State determination regarding the status of the USTs. Until this information is obtained, more sampling would be necessary to determine the extent of the subsurface contamination for a higher level of confidence. However, the DEC's decision regarding UST contamination near Building 209 may determine that existing levels of contamination are insignificant and therefore do not require further sampling.

3.8.2 Potential Effects. Leaking USTs can cause fires or explosions that threaten human safety. Leaking USTs can also contaminate nearby ground water. In addition, DEC may require some soil remediation near the UST adjacent to building 209.

3.8.3 Possible Mitigation of Effects. USARC will conduct further investigations to ensure that the UST adjacent to building 209 did not leak, and will determine if the soil near building 209 requires remediation.

3.9 Hazardous Waste Permits

3.9.1 Existing Conditions. The Navy, as the current landlord of Fort Wadsworth, has the permitting responsibility under the Resources Conservation and Recovery Act for storage and disposal of hazardous materials and hazardous wastes.

3.9.2 Potential Effects. Storage and disposal of hazardous material and waste may require the Reserves to secure their own appropriate permits from EPA and the State. Such permits could take significant time to obtain. Until they are obtained, routine Reserve unit operations involving hazardous materials such as solvents could be constrained.

3.9.3 Possible Mitigation of Effects. The USARC will have to investigate whether or not treatment, storage, and disposal permits will be required for the Reserves after the U.S. Navy vacates Fort Wadsworth. If permits are required, USARC will have to apply early so treatment, storage, and disposal are not an issue if USARC acquires the proposed facilities.

3.10 Air Quality and Pollution Prevention

This action will meet the general conformity requirements of Section 176 (c) of the Clean Air Act. This provision requires all Federal actions to conform to State Implementation Plans for reducing air pollution. The proposed acquisitions at Fort Wadsworth will not result in any new air emissions. The emissions from the Reservists' vehicles driving to and from their drills will essentially be the same at this time; substantially, the same number of Reservists' vehicles will be driven within the metropolitan area. The only change will be the location of the drill site within the Fort Wadsworth area.

A January 1993 Council on Environmental Quality memorandum on NEPA and pollution prevention emphasizes that NEPA is the original pollution prevention law. The entire

structure of NEPA compliance was designed with the goal of preventing, eliminating, and minimizing environmental degradation. Compliance with the procedures and the goals of NEPA effectively contributes to the reduction of pollution in Federal activities.

There are three pollution prevention measures which Reserve units can employ in implementing a proposed alternative at Fort Wadsworth: implement an installation spill prevention control and countermeasures (SPCC) plan; implement a carpooling or busing program to reduce air emissions from privately owned vehicles; and implement a recycling program for solid waste generation streams such a paper, cans, and glass.

4.0 SUMMARY

The uses that USARC is proposing for the five buildings at Fort Wadsworth are not noticeably different from current uses on the base. Buildings used for administrative and support activities today would continue that use; buildings used for vehicle maintenance would continue to be used for vehicle maintenance; and the motor pool area would continue to be used for vehicle storage. Although uses of property at Fort Wadsworth are likely to be unchanged, the frequency and times of the day and week that such properties are used may change under USARC's proposal.

There are no environmental impacts—such as impacts on wetlands and protected species—related to the USARC's acquisition of property at Fort Wadsworth. However, there are potential impacts related to community controversy and politics, hazardous materials, and permitting, which will not be significant when mitigation is implemented.

The assessment conducted by the environmental team indicates that community controversy and politics may have the greatest impact on the acquisition of facilities at Fort Wadsworth. However, these impacts can be mitigated through proper screening using fences and landscape materials. Furthermore, open dialogue with interested parties and political leaders could also help to alleviate controversy. The best vehicle for such a dialogue will be through

the Base Re-use Committee. If friable asbestos is removed from buildings at Fort Wadsworth, asbestos exposure may not be an issue, but USARC will follow up on the removal of asbestos by the U.S. Navy to ensure it is removed properly. The extent of soil contamination near the unearthed UST near building 209 will also be further investigated to increase the Army Reserve's level of confidence that the surrounding soil is not contaminated. Lastly, hazardous waste permitting issues must be fully addressed to ensure that no impact arises from USARC not having proper permits when it acquires the property.

Although most potential cumulative effects are unclear if USARC acquires property at Fort Wadsworth, cumulative impacts could occur. It is not possible to estimate future cumulative impacts of proposed Reserve activities. The present and future baseline to which incremental effects of a proposed action would normally be added is yet to be known; one reason is because a community base re-use plan does not yet exist. However, if DOI uses Fort Wadsworth for the Gateway project and the Reserves use Fort Wadsworth for training on the weekends, cumulative effects could result. Such cumulative effects include shortage of parking spaces, increased congestion on roads leading to Fort Wadsworth, and activity conflicts between the Park Service and the Reserves. Cumulative impacts from other future activities in and around Fort Wadsworth are impossible to predict at this time. However, these cumulative impacts can be mitigated when they arise.

5.0 SUMMARY OF RECOMMENDATIONS

After careful evaluation of all relevant issues, the U.S. Army Reserve Command proposes to acquire land and buildings at Fort Wadsworth on Staten Island, New York. Analysis of this alternative along with subsequent mitigation in this EA, indicate that there should be no significant environmental impacts. A Finding of No Significant Impact (FNSI) is found in Appendix 2. Accordingly, preparation of an Environmental Impact Statement (EIS) is not required.

6.0 REFERENCES

Advisory Council on Historic Preservation. Section 106 Step-by-Step. Washington, D.C.: Advisory Council on Historic Preservation, 1986.

Gateway National Recreation Area Act, Pub. L. 92-592 (October 27, 1972), 16 U.S.C. §§ 460cc-460cc-4.

Horne Engineering and Environmental Services, Inc.: Alexandria, VA. Preliminary Assessment Screening For Proposed Building and Land Acquisition Fort Wadsworth, New York. March 1994

Kilma, Don L. Integrating The Requirements For NEPA and the National Historic Preservation Act. Washington, DC: Advisory Council on Historic Preservation. References.

Molinari v. Babbitt, CV 94 4003, U.S. District Court for the Eastern District of New York (Complaint filed August 24, 1994).

NRDC v. Marsh, 836 F.2d 87, 88 (2d Cir. 1987), 568 F. Supp. 1387, 1392-93 (E.D.N.Y. 1983).

National Park Service Revision of Park Boundary *Federal Register* Notice, (August 24, 1994).

Navy, Department of the, Northern Division, Naval Facilities Engineering Command. Pre-Final Community Environmental Response Facilitation Act Report Naval Station-New York Fort Wadsworth Staten Island, New York. Lester, Pennsylvania: Department of the Navy Northern Division, 1994.

7.0 LIST OF PREPARERS

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APPENDIX 1

Agency Recommendation Letters

United States Department of the Interior

FISH AND WILDLIFE SERVICE
3817 Luker Road
Cortland, New York 13045

October 3, 1994

Mr. Richard N. Seiden, AICP
Senior Environmental Planner
The Mangi Environmental Group, Inc.
701 W. Broad Street, Suite 205
Falls Church, VA 22046

Dear Mr. Seiden:

This responds to your letter of August 29, 1994, requesting information on the presence of endangered or threatened species in the vicinity of the Fort Wadsworth Naval Station on Staten Island, Richmond County, New York.

Except for occasional transient individuals, no Federally listed or proposed endangered or threatened species under our jurisdiction are known to exist in the project impact area. Therefore, no Biological Assessment or further Section 7 consultation under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) is required with the U.S. Fish and Wildlife Service (Service). Should project plans change, or if additional information on listed or proposed species becomes available, this determination may be reconsidered. A compilation of Federally listed and proposed endangered and threatened species in New York is enclosed for your information.

The above comments pertaining to endangered species under our jurisdiction are provided pursuant to the Endangered Species Act. This response does not preclude additional Service comments under the Fish and Wildlife Coordination Act or other legislation.

The Federally listed endangered shortnose sturgeon *(Acipenser brevirostrum)*, as well as listed marine mammals, may be found in waters near the project area. These species are under the jurisdiction of the National Marine Fisheries Service. You should contact Mr. Douglas W. Beach, National Marine Fisheries Service, Habitat Conservation Branch, One Blackburn Drive, Gloucester, Massachusetts 01930-2298.

For additional information on fish and wildlife resources or State-listed species, we suggest you contact:

New York State Department
of Environmental Conservation
Region 2
47-40 21st Street
Long Island City, NY 11101
(718) 482-4900

New York State Department
of Environmental Conservation
Wildlife Resources Center - Information Serv.
New York Natural Heritage Program
700 Troy-Schenectady Road
Latham, NY 12110-2400
(518) 783-3932

If you have any questions regarding this letter, contact Tom McCartney at (607) 753-9334.

Sincerely,

Mark W. Clough

ACTING FOR

David A. Stilwell
Acting Field Supervisor

Enclosure

cc: NYSDEC, Long Island City, NY (Regulatory Affairs)
NYSDEC, Latham, NY
COE, New York, NY
NMFS, Gloucester, MA
EPA, Chief, Marine & Wetlands Protection Branch, New York, NY

FEDERALLY LISTED AND PROPOSED ENDANGERED AND THREATENED SPECIES IN NEW YORK

Common Name	Scientific Name	Status	Distribution
FISHES			
Sturgeon, shortnose*	*Acipenser brevirostrum*	E	Hudson River & other Atlantic coastal rivers
REPTILES			
Turtle, green*	*Chelonia mydas*	T	Oceanic summer visitor coastal waters
Turtle, hawksbill*	*Eretmochelys imbricata*	E	Oceanic summer visitor coastal waters
Turtle, leatherback*	*Dermochelys coriacea*	E	Oceanic summer resident coastal waters
Turtle, loggerhead*	*Caretta caretta*	T	Oceanic summer resident coastal waters
Turtle, Atlantic ridley*	*Lepidochelys kempii*	E	Oceanic summer resident coastal waters
BIRDS			
Eagle, bald	*Haliaeetus leucocephalus*	E	Entire state
Falcon, peregrine	*Falco peregrinus*	E	Entire state - re-establishment to former breeding range in progress
Plover, piping	*Charadrius melodus*	E T	Great Lakes Watershed Remainder of coastal New York
Tern, roseate	*Sterna dougallii dougallii*	E	Southeastern coastal portions of state
MAMMALS			
Bat, Indiana	*Myotis sodalis*	E	Entire state
Cougar, eastern	*Felis concolor couguar*	E	Entire state - probably extinct
Whale, blue*	*Balaenoptera musculus*	E	Oceanic
Whale, finback*	*Balaenoptera physalus*	E	Oceanic
Whale, humpback*	*Megaptera novaeangliae*	E	Oceanic
Whale, right*	*Eubalaena glacialis*	E	Oceanic
Whale, sei*	*Balaenoptera borealis*	E	Oceanic
Whale, sperm*	*Physeter catodon*	E	Oceanic
MOLLUSKS			
Snail, Chittenango ovate amber	*Succinea chittenangoensis*	T	Madison County
Mussel, dwarf wedge	*Alasmidonta heterodon*	E	Orange County - lower Neversink River

* Except for sea turtle nesting habitat, principal responsibility for these species is vested with the National Marine Fisheries Service.

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FEDERALLY LISTED AND PROPOSED ENDANGERED AND THREATENED SPECIES IN NEW YORK (Cont'd)

Common Name	Scientific Name	Status	Distribution
BUTTERFLIES			
Butterfly, Karner blue	*Lycaeides melissa samuelis*	E	Albany, Saratoga, Warren, and Schenectady Counties
PLANTS			
Monkshood, northern wild	*Aconitum noveboracense*	T	Ulster, Sullivan, and Delaware Counties
Pogonia, small whorled	*Isotria medeoloides*	E	Entire state
Swamp pink	*Helonias bullata*	T	Staten Island - presumed extirpated
Gerardia, sandplain	*Agalinis acuta*	E	Nassau and Suffolk Counties
Fern, American hart's-tongue	*Phyllitis scolopendrium* var. *americana*	T	Onondaga and Madison Counties
Orchid, eastern prairie fringed	*Platanthera leucophea*	T	Not relocated in New York
Bulrush, northeastern	*Scirpus ancistrochaetus*	E	Not relocated in New York
Roseroot, Leedy's	*Sedum integrifolium* ssp. *Leedyi*	T	West shore of Seneca Lake
Amaranth, seabeach	*Amaranthus pumilus*	T	Atlantic coastal plain beaches

E=endangered T=threatened P=proposed

Region 5 - 05/07/93 - 2 pp.

OFFICE OF PARKS · RECREATION · HISTORIC PRESERVATION
NEW YORK STATE
Joan K. Davidson
Commissioner

New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
Peebles Island, PO Box 189, Waterford, New York 12188-0189 518-237-8643

September 23, 1994

Mr. Richard N. Seiden, AICP
Senior Environmental Planner
The Mangi Environmental Group, Inc.
701 West Broad Street, Suite 205
Falls Church, Virginia 22046

Dear Mr. Seiden:

Re: NPS/ARMY
Transfer 5 Bldgs to Army
Fort Wadsworth
Staten Island, Richmond County
94PR2043

Thank you for your letter of September 19th providing further information on the buildings at Fort Wadsworth proposed for transfer to the Army Reserve. The State Historic Preservation Office (SHPO) has reviewed this proposal in accordance with Section 106 of the National Historic Preservation Act of 1966 and the relevant implementing regulations and offers the following comment.

Based upon this review, it is the SHPO's opinion that the transfer of buildings 208, 209, 356, 357 and 358 to the U.S. Army will have No Effect upon cultural resources in or eligible for inclusion in the National Register of Historic Places.

If you have any questions or comments on this matter, please contact me at (518) 237-8643, ext. 280.

Sincerely,

James Warren

James Warren
Program Analyst
Field Services Bureau

JPW:gc

cc: Marie Rust, NPS

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OFFICE OF PARKS · RECREATION · HISTORIC PRESERVATION
NEW YORK STATE
Joan K. Davidson
Commissioner

New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
Peebles Island, PO Box 189, Waterford, New York 12188-0189
518-237-8643

September 9, 1994

Mr. Richard N. Seiden, AICP
Senior Environmental Planner
The Mangi Environmental Group, Inc.
701 West Broad Street, Suite 205
Falls Church, Virginia 22046

Dear Mr. Seiden:

Re: NPS
Fort Wadsworth Management Plan
Staten Island, Richmond County
94PR1212

Thank you for your letter of August 30th requesting the comments of the State Historic Preservation Office (SHPO) with regard to the proposed acquisition by the U.S. Army Reserve of Buildings 208, 209, 356, 357 and 358, Fort Wadsworth, Staten Island. In accordance with Section 106 of the National Historic Preservation Act of 1966 and the relevant implementing regulations, we provide the following comment.

The above referenced buildings have not been evaluated for their eligibility for inclusion in the National Register of Historic Places. Please provide original photographs and dates on construction for each building for our evaluation.

Included within the Fort Wadsworth complex are Fort Tompkins and Battery Weed, both listed in the National Register of Historic Places. In addition, numerous structures dating from the early to mid-nineteenth century remain which undoubtedly meet the criteria for NR listing, including batteries Hudson, Dix, Upton, Barry, Richmond, Ayers and Catlin.

Please note that Fort Wadsworth is proposed, in whole or part, for transfer to the National Parks Service for incorporation into the Gateway National Recreation Area. We suggest you contact Ms. Marie Rust, Regional Director, National Park Service, North Atlantic Regional Office, 15 State Street, Boston, Massachusetts 02109-3572 to coordinate this proposal with the National Park Service.

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If you have any questions or comments on this matter, please contact me at (518) 237-8643, ext. 280.

Sincerely,

James Warren
Program Analyst
Field Services Bureau

JPW:gc

cc: Marie Rust, NPS