

Draft
FINDING OF NO SIGNIFICANT IMPACT
For

**CONSTRUCTION AND OPERATION OF A NEW
METHUEN READINESS CENTER
METHUEN, MASSACHUSETTS
MASSACHUSETTS ARMY NATIONAL GUARD**

Introduction

The Massachusetts Army National Guard (MAARNG) prepared an Environmental Assessment (EA) to identify and evaluate potential environmental effects from replacing the existing Methuen Armory facility to meet the MAARNG mission, readiness, and training requirements. The project will support the MAARNG's new force structure, and enable the planned relocation of two MAARNG units to the facility: The HQ 101st Engineer Battalion; and C Company, 126th Brigade Special Troops Battalion will replace Battery B, 102nd Field Artillery Battalion, which was previously stationed at the Armory.

The existing Armory building was constructed in 1913, which is inadequate in size (7,000 sf footprint), and does not meet current Anti-Terrorism/Force Protection (AT/FP) requirements. The Armory building has significant deficiencies, which includes outdated heating, ventilation, mechanical, plumbing and electrical systems. The Armory building also has inadequate training, administrative and storage spaces and lacks adequate classrooms, supply rooms, arms vaults, showers, kitchen facilities and parking areas. It does not meet current ARNG construction standards for armories set forth in PAM 415-12, *Army National Guard Facilities Allowances*. It cannot accommodate the ongoing modernization and reorganization of the MAARNG.

The MAARNG prepared the EA in accordance with the National Environmental Policy Act (NEPA, 42 USC § 4321 to 4370e), the Council on Environmental Quality Regulations for Implementing the Procedural Provisions of NEPA (CEQ Regulations, 40 CFR Parts 1500-1508), and *Environmental Analysis of Army Actions* (32 CFR Part 651).

1. Description of Proposed Action and Alternatives

The MAARNG evaluated four alternatives: three build alternatives and one No-Action alternative, relative to their ability to achieve the stated purpose of the project. Each of the three build alternatives would enable the MAARNG to meet, to varying degrees, the stated purpose for the project.

Proposed Action Alternative: The Proposed Action Alternative is the MAARNG's Preferred Alternative and fully meets the purpose and need for the project. The Proposed Action consists of the construction of a new 2-story Readiness Center (approx. 64,000 SF) in the center of the propose site, which is located behind the existing armory building. Construction activities

include the construction of an assembly hall, administrative, training and support space, kitchen, maintenance bays, storage facility, and demolition of the existing Motor Vehicle Storage Building (MVSB). The appropriate architectural scale will be compatible with the existing Armory building and be achieved through detailing with proportions of materials (matching brick veneer) compatible with the existing Armory. The proposed project will feature paved parking spaces, force protection features; an entrance gate, and chain link fence to control the perimeter.

Alternatives Considered. In addition to the Proposed Action Alternative, the MAARNG analyzed three other alternatives:

Alternative A: This alternative includes redevelopment of the entire Methuen Armory site. This includes rehabilitation of the two-story portion of the existing armory building by demolishing the top story portion of the Armory building and MVSB. A new, freestanding rectangular Readiness Center would be constructed consisting of a combination of 1 and 2-story. The new structure would contain an assembly hall, administrative, training, support, and classroom spaces. Since the Armory structure is only setback approximately 40 feet from Route 110, it will occupy a major portion of the 148-foot AT/FP setback area. Therefore, this alternative does not meet MILCON funding eligibility requirements, severely limiting the ability of this alternative to meet the purpose and need for the project.

Alternative B: This alternative includes the redevelopment of the entire Methuen Armory site. This alternative includes demolition of both the existing Armory building and MVSB. A more centrally located 2-story free-standing Readiness Center, containing an assembly hall, administrative, training, support, and class room spaces would be built. A smaller occupied portion of the new Readiness Center would be located in the 148-foot AT/FP setback. This alternative better meets the criteria noted above than Alternative A, but does not meet MILCON funding eligibility requirements, severely limiting the ability of this alternative to meet the purpose and need for the project.

No-Action Alternative: The MAARNG evaluated a No-Action alternative, not constructing a new Readiness Center. This alternative would not satisfy the MAARNG's purpose and need that currently exists. The No-Action alternative serves as a baseline for comparison of environmental effects of the action alternatives and cannot be eliminated from analysis under the CEQ NEPA regulations [40 CFR §1502.14(d)].

2. Environmental Analysis

Based on the analysis contained in this EA, it has been determined that the known and potential impacts of the Proposed Action Alternative on land use, air quality, noise, geology and soils, water resources, biological resources, cultural resources protection of children socioeconomic, environmental justice, infrastructure, and hazardous and toxic materials will not be significant. Alternative A does not fully meet project evaluation criteria and Alternative B proposes greater cultural resource impacts, which could be mitigated and not be more significant, than the Proposed Action Alternative.

Mitigation: To mitigate for the necessary demolition of the historic MVSB, the MAARNG will undertake an archival photographic recordation of the building. The MAARNG is committed to upholding the intent of the National Historic Preservation Act and also desires the preservation of the architectural features of the Armory building. The MAARNG and the Massachusetts Historical Commission (MHC) have developed a Memorandum of Agreement (MOA) to mitigate the significant adverse effects of the project upon the MVSB. This MOA, dated December 05, 2009 and attached to the final EA in Appendix B, details the specific mitigation measures that MAARNG will complete prior to MVSB demolition and new Readiness Center construction.

The proposed project will occur within the 100-year flood plain of the Merrimack River. MAARNG will ensure compensatory storage to off-set floodplain filling caused by the project to comply with the Massachusetts Wetlands Protection Act (WPA). See Massachusetts Department of Environmental Protection WPA Form 5, Order of Conditions, dated April 17 2008 attached to the EA at Appendix B.

To comply with the requirements of Executive Order 11988, Floodplain Mangement, the MAARNG obtained a floodplain waiver from the National Guard Bureau (NGB) for construction of the proposed Readiness Center in a floodplain.

In addition, MAARNG stormwater management features (including Best Management Practices), have been designed into the project in order to limit post-development run-off from the site to no greater than pre-development levels, thus avoiding direct alteration to environmental resource areas.

3. Regulations

The Proposed Action will not violate: NEPA, its regulations promulgated by the CEQ, 32 CFR Part 651, *Environmental Analysis of Army Actions*, or any other federal; state, including the Massachusetts Environmental Policy Act (MEPA) [301 CMR 11.00] and WPA [310 CMR 10.00]; or local environmental regulations.

4. Commitment to Implementation

The NGB and MAARNG affirm their commitment to implement this EA in accordance with NEPA. Implementation is dependent on funding. The MAARNG and the NGB's Environmental Programs, Training, and Installations Divisions will ensure that adequate funds are requested in future years' budgets to achieve the goals and objectives set forth in this EA.

5. Public Review and Comment

The MAARNG held a public meeting in August 2003 to review potential historical and cultural resource issues with the MHC and the Methuen Historical Commission at the Methuen Armory. Agency and public input on the Proposed Action was obtained during the MEPA review of the project and during the public site walk in 2004 where the potential historic and floodplain issues were reviewed. The MEPA process provided an opportunity for Federal, State, and local authorities, as well as area residents, to comment on the proposed project. A MEPA certificate was issued by Massachusetts Executive Office of Energy and Environmental Affairs (EEA) on August 9, 2004 which indicated that this review was complete.

The MAARNG held another public meeting in February 2007 to provide the MHC, City of Methuen Planning staff, and Methuen Historical Commission with an update on the project status and the Proposed Action. On April 16, 2007, the MAARNG filed a Notice of Project Change (NPC) with MEPA for a second regulatory and public review of the project due to a delay in the project schedule and reduction in the size of the proposed Readiness Center (down from approx. 98,000 GSF), which also noted the potential historic and floodplain issues. A MEPA certificate was issued by EEA on May 25, 2007, that indicated this review was complete. Additional public meetings were held on March 6, 2008 and April 3, 2008 by the Methuen Conservation Commission and an Order of Conditions for the project was issued under the Massachusetts Wetlands Protection Act on April 17, 2008.

Copies of the Final EA and draft Finding of No Significant Impact will be made available for review and public comment at the Nevins Memorial Library in Methuen on the date listed in the public notices. Comments can be sent to Mr. Keith Driscoll, MAARNG Environmental Office, 50 Maple Street, Milford, MA 01757 (508) 233-6512.

6. Draft Finding of No Significant Impact

After careful review of the EA, I have concluded that implementation of the Proposed Action would not generate significant controversy or have a significant impact on the quality of the human or natural environment. Per 32 CFR Part 651, the Final EA and draft FNSI will be made available for a 30-day public review and comment period. Once any public comments have been addressed and if a determination is made that the proposed action will have no significant impact, the FNSI will be signed and the action will be implemented. This analysis fulfills the requirements of NEPA and the CEQ Regulations. An Environmental Impact Statement will not be prepared, and the National Guard Bureau is issuing this Finding of No Significant Impact.

Date

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