

Record of Environmental Consideration (REC)

To (Environmental Officer): _____

From (Proponent): _____

Project Title: _____

Brief description:

Anticipated date of proposed action (mm/yyyy): _____/_____

Anticipated Action (months): _____

Reason for using a REC (choose one):

- a. Adequately covered in the *Programmatic Environmental Assessment for the U.S. Army Materiel Command Building Demolition Program*, as supplemented by the *Supplemental Programmatic Environmental Assessment for Energetics-Contaminated Facilities in Support of the U.S. Army Materiel Command Building Demolition Program*, dated _____ as applicable.
- b. Adequately covered in the *Supplemental Programmatic Environmental Assessment for Energetics-Contaminated Facilities in Support of the U.S. Army Materiel Command Building Demolition Program*, dated _____.
- c. Categorically excluded under the provisions of CX (___)(___), 32 CFR Part 651, Appendix B (and no extraordinary circumstances, as defined in 32 CFR 651.29(b)(1)-(14), exist) because:

Date

Project Proponent

Date

Installation Environmental Coordinator

**ENVIRONMENTAL CHECKLIST FOR AMC BUILDING DEMOLITION UNDER THE FACILITIES
REDUCTION PROGRAM (FRP) AND LAYAWAY INDUSTRIAL FACILITIES (LIF) PROGRAM**

Complete this checklist for activities proposed under the Army Materiel Command (AMC) Building Demolition Program. Its purpose is to determine whether individual facility removal actions are covered under the Programmatic Environmental Assessment (PEA) for the AMC Building Demolition Program or the Supplemental Programmatic Environmental Assessment (SPEA) for the AMC Building Demolition Program. The answers provided in part B of this checklist indicate either compliance with the PEA and SPEA, the LIF Program, or other demolition programs or the need for additional documentation. If the applicable sections of the checklist have been completed and indicate that the Proposed Action qualifies for coverage under the PEA, a Record of Environmental Consideration can be prepared for the action and the action can proceed. If the checklist indicates the need for additional analysis, or if the Proposed Action is not otherwise covered under the PEA, then the need for further National Environmental Policy Act (NEPA) analysis will need to be assessed.

The resource areas reviewed and discussed in the PEA/SPEA must be assessed individually for each proposed building demolition action. The checklist includes all resource areas included in the PEA: land use, aesthetics and visual resources, airspace, air quality, noise, soils, water resources, wetlands, biological resources, cultural resources, socioeconomics (including environmental justice and the protection of children), traffic and transportation systems, utilities, and hazardous materials and hazardous waste. Resource areas eliminated from further consideration in the PEA—land use, aesthetics and visual resources, airspace, and socioeconomics—are included in the checklist to capture the effects of any building demolition actions to which the resource areas are relevant.

PART A BACKGROUND INFORMATION

1. Project name: _____
2. Project description: _____
3. Project location: _____
4. Project manager: _____
5. Phone number: _____
6. Email address: _____
7. Project contact (if different from project manager): _____
8. Proposed project start date and duration: _____
9. Date this checklist was completed: _____
10. **Compliance with the PEA/SPEA.** The following must be true to use the PEA/SPEA as the NEPA analysis for the proposed building demolition action: Is the Proposed Action part of the AMC Building Demolition Program?
 YES NO

Comments:

11. Stand-alone or Umbrella Project.

The Proposed Action can either be the demolition of a single building (i.e., a stand-alone project) or include the demolition of more than one facility but be considered a single project and be permitted collectively (i.e., an umbrella project).

Is this a stand-alone project? YES NO

If yes, respond to each of the statements in part B (below) as they pertain to the individual facility to be removed.

Comments:

Is this an umbrella project? YES NO

If yes, respond to each of the statements in part B (below) as they pertain to the project that includes all the facilities to be removed under the Proposed Action.

Comments:

PART B ENVIRONMENTAL RESOURCE ANALYSIS

Upon completion of the proposed building demolition action and any associated follow-on activities (e.g., site revegetation), which of the following statements would be true and which would be false?

If any of the following statements are false for the proposed project, then additional analysis under NEPA could be required.

B.1. Review of Resource Areas Eliminated from Further Consideration

B.1.1. Land Use

a. The action will not create a land use incompatibility. TRUE FALSE

If FALSE, please explain.

b. The action will comply with the installation's land use plan (if applicable). TRUE FALSE

If FALSE, please explain.

B.1.2. Aesthetics and Visual Resources

a. The action will not adversely affect a valued scenic view or sensitive aesthetic or visual resource. TRUE FALSE

If FALSE, please explain.

b. The action will comply with the installation's design guide (if applicable). TRUE FALSE

If FALSE, please explain.

B.1.3. Airspace

a. The action will not violate any airspace regulation. TRUE FALSE

If FALSE, please explain.

B.1.4. Socioeconomics, Environmental Justice, and Protection of Children

a. The action will not cause a long-term loss or displacement of recreational opportunities and resources. TRUE FALSE

If FALSE, please explain.

b. The action will not exceed the Rational Threshold Value (RTV) (obtained using the Army's EIFS model) or historical precedent for past economic fluctuation for employment and regional income (as estimated by an acceptable economic model such as IMPLAN or REMI). TRUE FALSE

If FALSE, please explain.

c. The action will not have a disproportionate adverse economic, social, or health impact on a minority or low-income population. TRUE FALSE

If FALSE, please explain.

d. The action will not create a disproportionate environmental health or safety risk to children. TRUE FALSE

If FALSE, please explain.

B.2. Review of Other Resource Areas

B.2.1. Air Quality

a. The action will not violate the installation's air operating permit. TRUE FALSE

If FALSE, please explain. _____

If the use of best management practices (BMPs) cannot bring the emissions within regulatory limits, contact the state air quality agency for further assistance.

b. No new or modified stationary sources of air pollutants would be established at any AMC installation as part of the Proposed Action. TRUE FALSE

If FALSE, please explain. _____

Each AMC installation would obtain the required air permits based on the remediation method used to destroy energetic compounds.

c. Burning the facility in place (i.e., thermal destruction) is not required. TRUE FALSE

If FALSE, please explain. _____

If burning is required, obtain an open burn permit that allows burn-in-place building demolition and conduct an air quality analysis using the U.S. Environmental Protection Agency's approved regulatory model, AERMOD, or equivalent modeling program to ensure compliance.

d. The demolition project will not remove more than 1 million gross square feet per year in a nonattainment area. TRUE FALSE

If FALSE, please explain. _____

Estimate the total emissions of criteria pollutants for the project to determine whether they will still be less than *de minimis*. If not, consider dividing the project into separate phases that can be accomplished over multiple years.

B.2.2. Noise

- a. The project will not have demolition activities within 800 feet of the installation boundary for more than 1 year. TRUE FALSE

If FALSE, please explain. _____

Determine the distance from the project site to the nearest noise-sensitive receptor (e.g., church, school). If the distance is more than 800 feet, the project can proceed. If it is less than 800 feet, consider dividing the project into phases with quiet periods between the phases or using BMPs to minimize off-post noise.

- b. The project will not have blasting activities for which a blast management plan that addresses noise and vibration is needed. TRUE FALSE

If FALSE, please explain. _____

Ensure that the population potentially affected by the noise is informed of when blasting activities will occur, what level of noise and vibration they might experience, and how to contact the installation to report damage.

B.2.3. Soils and Water Resources

- a. The action will be permitted under a construction general stormwater permit and an approved erosion and sediment control plan (for actions that will result in total ground disturbance of 1 acre or more). TRUE FALSE

If FALSE, please explain. _____

Ground-disturbing activities that disturb less than 1 acre total do not need coverage under a construction general stormwater permit. Actions that disturb 1 acre or more must be permitted; contact the state agency to obtain a permit.

- b. The action will not violate a National Pollutant Discharge Elimination System (NPDES) stormwater permit. TRUE FALSE

If FALSE, please explain. _____

Contact the state water quality agency to determine how surface waters and stormwater runoff can be controlled sufficiently to ensure that no NPDES permits are violated.

- c. The action will not occur within a floodplain. TRUE FALSE

If FALSE, please explain. _____

Executive Order (EO) 11988, *Floodplain Management*, requires federal agencies to avoid to the extent possible adverse impacts on floodplains and to avoid direct and indirect support of floodplain development when a practicable alternative exists. Because the proposed project involves removing a structure from a floodplain, compliance with the EO is not an issue. To ensure safety during the project, schedule it outside a time when flooding might occur and ensure that the ground is stabilized before flooding occurs.

- d. The action will not cause an exceedance of a Total Maximum Daily Load (TMDL). TRUE FALSE

If FALSE, please explain. _____

Contact the state water quality agency to determine how to protect the affected surface water sufficiently to ensure that the TMDL is not exceeded.

- e. The action will not cause a change in the impairment status of a surface water. TRUE FALSE

If FALSE, please explain. _____

Contact the state water quality agency to determine how to protect the affected surface water sufficiently during project activities to minimize any impairment.

- f. The action will not require a Clean Water Act (CWA) section 401 water quality certification. TRUE FALSE

If FALSE, please explain. _____

Obtain a CWA section 401 water quality certification if required by the state agency.

- g. The action will not occur in a coastal zone and require a Coastal Zone Management Act (CZMA) federal consistency determination. TRUE FALSE

If FALSE, please explain. _____

If the action occurs in a coastal zone and requires a CZMA federal consistency determination, one must be prepared and submitted to the state coastal zone management agency.

B.2.4. Biological Resources and Wetlands

- a. The action will not adversely affect a federal or state protected plant or animal species. TRUE FALSE

If FALSE, please explain. _____

Contact the appropriate agency (U.S. Fish and Wildlife Service, National Marine Fisheries Service, or state wildlife agency) for species-specific guidance. Consider scheduling the project outside the animal's breeding and nesting season or relocating a plant to an appropriate location.

- b. The action will comply with installation-specific tree replacement and other natural resources protection policies. TRUE FALSE

If FALSE, please explain. _____

Contact the installation natural resources manager for guidance on complying with natural resources protection policies.

<p>c. The action will not cause the unpermitted loss or destruction of more than 1 acre of jurisdictional wetlands. <input type="checkbox"/> TRUE <input type="checkbox"/> FALSE</p> <p>If FALSE, please explain. _____</p> <p>Complete a wetland delineation of the project site. Obtain a CWA section 404 permit from the U.S. Army Corps of Engineers. If permitted, you might have to mitigate any wetland loss to ensure compliance with the permit.</p>
<p>B.2.5. Cultural Resources</p>
<p>a. The action will not result in the demolition of a building or structure that is included in the Program Comments for Cold War Era Unaccompanied Personnel Housing, World War II and Cold War Era (1939–1974) Ammunition Storage Facilities; or for World War II and Cold War Era (1939–1974) Army Ammunition Production Facilities and Plants. <input type="checkbox"/> TRUE <input type="checkbox"/> FALSE</p> <p>If FALSE, please explain. _____</p> <p>Consult the installation integrated cultural resources management plan's (ICRMP's) building inventory to determine the National Register of Historic Places (NRHP) status of the building(s) to be demolished.</p>
<p>b. The action will not result in the demolition of buildings or structures that are eligible for or listed on the NRHP not covered by a program comment or by the World War II Temporary Buildings Programmatic Agreement. <input type="checkbox"/> TRUE <input type="checkbox"/> FALSE</p> <p>If FALSE, please explain. _____</p> <p>Consult the installation ICRMP's building inventory to determine the NRHP status of the building(s) to be demolished.</p>
<p>c. The action will not adversely affect a historic district that is eligible for or listed on the NRHP. <input type="checkbox"/> TRUE <input type="checkbox"/> FALSE</p> <p>If FALSE, please explain. _____</p> <p>Section 106 compliance must be initiated with the State Historic Preservation Office (SHPO). Consult the installation's ICRMP and/or consult with the SHPO for further guidance on how to proceed.</p>
<p>B.2.6. Traffic and Transportation Systems</p>
<p>a. The demolition project will not create any long-term road closures or traffic delays. <input type="checkbox"/> TRUE <input type="checkbox"/> FALSE</p> <p>If FALSE, please explain. _____</p> <p>Reroute construction traffic to minimize impacts on the surrounding road network. Contact the state transportation agency for guidance on how to minimize impacts on the road network.</p>
<p>B.2.7. Utilities</p>
<p>a. The action will not cause an exceedance of the existing capacity of an element of infrastructure. <input type="checkbox"/> TRUE <input type="checkbox"/> FALSE</p> <p>If FALSE, please explain. _____</p> <p>Impose temporary restrictions on use of the utility (e.g., water, electricity) wherever possible on the installation to avoid an exceedance. Determine what conservation measures can be used to minimize project use of the utility.</p>
<p>b. The action will not violate a regulatory limit of any infrastructure system. <input type="checkbox"/> TRUE <input type="checkbox"/> FALSE</p> <p>If FALSE, please explain. _____</p> <p>Contact the appropriate state agency to determine whether an exception to the limit can be made.</p>
<p>B.2.8. Hazardous Substances and Hazardous Waste</p>
<p>a. The action will not disturb known or create new contaminated sites that would be subject to regulatory control—including soil contamination, underground storage tanks, spills, and burial pits within the area that would be disturbed during the proposed demolition. <input type="checkbox"/> TRUE <input type="checkbox"/> FALSE</p> <p>If FALSE, please explain. _____</p> <p>Coordinate with the installation Environmental Affairs Division to ensure that site assessments (record searches, soil gas surveys, monitoring well documentation, or other sample results) that could indicate the presence of contamination within the footprint of the proposed demolition have been thoroughly reviewed.</p>
<p>b. The building and ancillary structures to be demolished are absent of hazardous substances and wastes (i.e., asbestos-containing materials, lead-based paint, polychlorinated biphenyls, explosive residues, radioactive material, and other regulated materials) or the project has been permitted by the state to proceed with one or more known hazardous substances in place. <input type="checkbox"/> TRUE <input type="checkbox"/> FALSE</p> <p>If FALSE, please explain. _____</p> <p>Coordinate with the installation Environmental Affairs Division to determine whether abatement or remediation is necessary.</p>
<p>c. The action will not cause a violation of a law or regulation governing hazardous substances or wastes or an installation hazardous waste permit. <input type="checkbox"/> TRUE <input type="checkbox"/> FALSE</p> <p>If FALSE, please explain. _____</p> <p>Coordinate with the installation Environmental Affairs Division and regulatory agencies as necessary.</p>

d. The building being addressed is not the subject of an ongoing environmental investigation, remediation, demolition, or restoration in accordance with the Comprehensive Environmental Response, Compensation and Liability Act and Resource Conservation and Recovery Act.

TRUE FALSE

If FALSE, please explain. _____

e. All potential impacts attributable to hazardous materials and hazardous wastes are adequately addressed in the PEA and/or the SPEA.

TRUE FALSE

If FALSE, please explain. _____

Coordinate with the installation Environmental Division to identify and initiate any additional NEPA requirements.