

# ENVIRONMENTAL CHECKLIST FOR PROGRAMMATIC ENVIRONMENTAL ASSESSMENT FOR REAL PROPERTY MASTER PLANS ON U.S. ARMY INSTALLATION MANAGEMENT COMMAND GARRISONS

## INTRODUCTION

This checklist supports referencing the *Programmatic Environmental Assessment for Real Property Master Plans on U.S. Army Installation Management Command Garrisons* (PEA) and the associated Finding of No Significant Impact (FONSI).

The purpose of this checklist is to ensure that actions proposed by U.S. Army Installation Management Command (IMCOM) garrisons comply with the National Environmental Policy Act of 1969 (NEPA) (Title 42 of the *United States Code* Section 4321), the Council on Environmental Quality (CEQ) NEPA regulations (Title 40 of the *Code of Federal Regulations* [C.F.R.] Parts 1500–1508), and the Army’s NEPA implementing regulation (32 C.F.R. Part 651), *Environmental Analysis of Army Actions*.

The checklist facilitates consideration of environmental effects of IMCOM garrisons developing, adopting, implementing, and updating Real Property Master Plans (RPMPs) and their component documents using a standardized process in accordance with Department of Defense and Army guidance and encourages community partner participation in that process. It also provides a framework for identifying installation-specific NEPA requirements.

The terms “IMCOM garrisons,” “IMCOM installations,” “garrisons,” and “installations” apply only to Army installations or joint bases managed by Headquarters, IMCOM. IMCOM installations located outside the United States and its territories are not subject to NEPA.

## USING THIS CHECKLIST

The RPMP PEA should be used by any IMCOM garrison considering a proposed action to (1) adopt a new or updated RPMP component document or (2) implement a project in the RPMP or any of its component documents. If an installation-specific proposed action is outside the scope of the PEA, additional NEPA analysis will be required.

IMCOM installations wanting to tier from the RPMP PEA and associated FONSI should use this checklist to determine whether reliance on the PEA—and possibly other NEPA analyses and one or more categorical exclusions [CXs]—is appropriate or if additional NEPA analysis is needed before implementing a proposed action. When completing the

checklist, garrison personnel might need to consult multiple subject matter experts to ensure careful and informed consideration of all potential impacts.

Based on the responses in the checklist, a garrison must complete the appropriate NEPA documentation as follows:

- If the garrison responds “no” to each checklist item, no further NEPA analysis would appear to be required. The proposed action would qualify for a record of environmental consideration (REC), indicating that the analysis in the PEA has adequately addressed the action. If any CXs apply, the REC should cite them.
- If the garrison responds “yes” or “maybe” to any checklist item, the garrison could reconsider the proposed action to determine if it can be altered to avoid the effect on the resource and the answer changed to “no.” If, upon investigation of each “yes” and “maybe” response, the installation determines that no further environmental analysis is required and that a REC is appropriate, it should maintain documentation of the results of the investigation with the REC and completed checklist.
- If the garrison responds “yes” or “maybe” to any checklist item and the impact(s) cannot be avoided, additional environmental analysis might be required as part of an installation-level NEPA process. The garrison should consider all previous NEPA documentation prepared for the installation and whether Environmental Assessments for RPMPs at other garrisons have addressed the same issue(s).

If the garrison concludes that additional NEPA analysis is necessary, it must prepare the documentation before any irreversible and irretrievable commitments of resources are made for the proposed action. The installation-specific NEPA document can focus on resource areas for which “yes” was checked and tier from the RPMP PEA for resource areas for which the response was “no.”

If the garrison determines that no further NEPA analysis is required, it should prepare a REC reflecting that determination. If it is relying on the RPMP PEA or any other NEPA analyses, the REC should cite 32 C.F.R. § 651.12(a)(2): “action is adequately covered within an existing EA or EIS,” name the applicable analysis (e.g., the PEA) and associated FONSI or Record of Decision, and state where the cited NEPA document(s) can be accessed. If the garrison is relying on this PEA, at least in part, the completed checklist should be attached. If any CXs apply, the REC should also include those citations. Lastly, the REC should discuss any specific issues that prompted modification or special consideration of the proposed action (e.g., the items for which the initial response was “yes” or “maybe”).

## ADDITIONAL REGULATORY REQUIREMENTS

This checklist is designed to assist IMCOM garrisons in identifying the documentation required to meet NEPA requirements. Requirements under other federal and state environmental laws, ordinances, and regulations also must be met, as applicable. Those requirements may include resource-specific consultations with other federal, state, and Tribal governments and agencies—such as consulting with the U.S. Fish and Wildlife Service (USFWS) (or National Oceanic and Atmospheric Administration [NOAA] Fisheries for marine species) under the Endangered Species Act (ESA) or a State Historic Preservation Officer (SHPO) under the National Historic Preservation Act (NHPA)—or completing NEPA-like requirements of the state in which the garrison is located.

<b>Resource Area and Questions</b>	<b>Check the appropriate response:</b>
<b>Air Quality</b>	
Would the proposed action result in a National Ambient Air Quality Standards attainment area becoming a nonattainment area?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action produce emissions within a nonattainment or maintenance area that exceeded the General Conformity Rule <i>de minimis</i> (of minimal importance) threshold values established in 40 C.F.R. § 93.153(b)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action generate nationally substantial greenhouse gas emissions by producing more than 75,000 tons of carbon dioxide equivalent from non-exempt sources per year?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
<b>Biological Resources</b>	
<i>Note:</i> All required USFWS and/or NOAA Fisheries informal or formal consultation must be completed prior to implementing a proposed action.	
Would the proposed action result in an unpermitted take of a federally protected species (e.g., under the ESA, Migratory Bird Treaty Act, Marine Mammal Protection Act, and Bald and Golden Eagle Protection Act)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action result in detrimental alteration of USFWS-designated critical habitat?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe

<b>Resource Area and Questions</b>	<b>Check the appropriate response:</b>
Would the proposed action result in local extirpation of a sensitive non-federally listed species?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action have a substantial detrimental effect on the amount or diversity of common native wildlife or plant communities?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action have a high probability of increasing the spread of nonnative or invasive species?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
<b>Cultural Resources</b>	
<p><i>Note:</i> All required NHPA Section 106 consultation with the SHPO, Advisory Council on Historic Preservation (ACHP), federally recognized Native American Tribes (Tribes), including Native Alaskans or Native Hawaiians, and other relevant consulting parties must be completed prior to the approval of the expenditure of any federal funds on the undertaking. Proposed projects requiring ground disturbance in areas not yet surveyed for cultural resources would require a survey prior to construction beginning.</p>	
Would the proposed action result in NHPA-defined adverse effects, as defined by the NHPA, on a historic property listed or eligible for listing on the NRHP that are not resolved through a Memorandum of Agreement with the SHPO, and possibly with the ACHP?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action create conditions that would stop the traditional use of sacred or ceremonial sites or resources by a Tribe or Tribes without discussions on a government-to-government level with the affected Tribe(s)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
<b>Earth Resources</b>	
Would the proposed action induce waterborne soil erosion resulting in sedimentation that would violate federal or state water quality laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action induce windborne soil erosion that would violate federal or state air quality laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action expose people or structures to substantial earth-related hazards by locating structures on a geologic unit or soil that is unstable or that would become unstable as a result of the project, potentially resulting in a landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe

<b>Resource Area and Questions</b>	<b>Check the appropriate response:</b>
<b>Hazardous Materials and Waste</b>	
Would the proposed action expose people or substantially increase their risk of exposure to hazardous substances, including explosives, without adequate protection?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action substantially increase the risk of spills or releases of hazardous substances?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action disturb restoration sites or the progress of cleanup activities at those sites so that adverse effects on human health or the environment could result?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action conflict with established land-use controls?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action result in noncompliance with applicable federal, state, or local laws or regulations; or with permits related to hazardous materials and waste?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
<b>Human Health and Safety</b>	
Would the proposed action substantially increase human exposure to a health hazard or safety risk?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action result in noncompliance with or a violation of laws and regulations governing human health and safety?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
<b>Land Use</b>	
Would the proposed action substantially conflict with established land uses in the area or create a major land-use incompatibility?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action physically divide an established community?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action be inconsistent with adopted land-use control plans that required regulatory agency acceptance, to include land-use controls for restoration sites and habitat conservation plans to protect endangered species?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
<b>Noise</b>	
Would the proposed action result in a violation of an applicable noise ordinance?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe

<b>Resource Area and Questions</b>	<b>Check the appropriate response:</b>
Would the proposed action site incompatible land uses near existing on- or off-installation noise-sensitive receptors?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action result in the location of new noise-sensitive receptors in incompatible noise environments (i.e., noise zones II or III; reference Army Regulation 200-1, Chapter 14)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
<b>Socioeconomics</b>	
<i>Note:</i> Under NEPA, significant socioeconomic impacts by themselves do not require that an environmental impact statement be prepared unless the action also will have natural or physical environmental impacts (40 C.F.R. § 1508.14).	
Would the proposed action result in substantial gains or losses in population that would exceed historic rates of growth or decline?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action result in a decrease in jobs that substantially raises the regional unemployment rates?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action result in a substantial change in the housing market such as severe housing shortages or surpluses?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action result in a substantial increase in need for public services (e.g., fire protection, law enforcement, schools)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action result in a substantial long-term loss or displacement of recreational opportunities and resources?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
<p>Would the proposed action result in disproportionately high and adverse environmental or human health impacts to an identified minority or low-income population per Executive Order (EO) 12898, <i>Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations</i>?</p> <p><i>Note:</i> Refer also to the CEQ's 1997 <i>Environmental Justice Guidance Under NEPA</i>.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe

<b>Resource Area and Questions</b>	<b>Check the appropriate response:</b>
<p>Would the proposed action result in a disproportionately high and adverse environmental health or safety risk to an identified population of children per EO 13045, <i>Protection of Children from Environmental Health Risks and Safety Risks</i>, such as the increase in a child's risk of exposure to an environmental hazard (through contact, ingestion, or inhalation) or the risk of potential substantial harm to the safety of children?</p>	<p><input type="checkbox"/> Yes   <input type="checkbox"/> No   <input type="checkbox"/> Maybe</p>
<b>Transportation and Traffic</b>	
<p>Would the proposed action substantially increase traffic congestion or delays for an extended period of time?</p>	<p><input type="checkbox"/> Yes   <input type="checkbox"/> No   <input type="checkbox"/> Maybe</p>
<p>Would the proposed action substantially increase transportation safety hazards due to an RPMP project design feature?</p>	<p><input type="checkbox"/> Yes   <input type="checkbox"/> No   <input type="checkbox"/> Maybe</p>
<p>Would the proposed action overwhelm existing parking capacity?</p>	<p><input type="checkbox"/> Yes   <input type="checkbox"/> No   <input type="checkbox"/> Maybe</p>
<b>Utilities</b>	
<p>Would the proposed action exceed the available capacity of existing utilities and supporting infrastructure without an appropriate plan to provide the additional needed capacity?</p>	<p><input type="checkbox"/> Yes   <input type="checkbox"/> No   <input type="checkbox"/> Maybe</p>
<p>Would the proposed action cause long term or frequent disruption of utility service on- or off-installation?</p>	<p><input type="checkbox"/> Yes   <input type="checkbox"/> No   <input type="checkbox"/> Maybe</p>
<p>Would the proposed action violate regulatory or permit limits related to utilities (e.g., by creating a wastewater discharge greater than that allowed by an existing permit)?</p>	<p><input type="checkbox"/> Yes   <input type="checkbox"/> No   <input type="checkbox"/> Maybe</p>
<b>Water Resources</b>	
<p>Note: Projects might require one or more permits and approvals, including National Pollutant Discharge Elimination System (NPDES) permits, Clean Water Act Section 401 and 404 permits, and a Coastal Zone Management Act Federal Consistency Determination.</p>	
<p>Would the proposed action cause an exceedance of a total maximum daily load?</p>	<p><input type="checkbox"/> Yes   <input type="checkbox"/> No   <input type="checkbox"/> Maybe</p>
<p>Would the proposed action cause a detrimental change in the impairment status of a surface water?</p>	<p><input type="checkbox"/> Yes   <input type="checkbox"/> No   <input type="checkbox"/> Maybe</p>

<b>Resource Area and Questions</b>	<b>Check the appropriate response:</b>
Would the proposed action result in an unpermitted direct impact on a water of the United States?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action result in the unpermitted loss or destruction of more than 1 acre of jurisdictional wetlands?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action cause erosion and sedimentation that would violate water quality laws or the terms of a NPDES stormwater permit?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
<b>Public Involvement</b>	
Would the proposed action be of interest to the off-post community such that additional public involvement efforts should be conducted?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
Would the proposed action be environmentally controversial?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
<b>General</b>	
Would the proposed action involve any extraordinary circumstances that are not captured in the responses above that might necessitate additional analysis?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe
<b>Cumulative Effects</b>	
Are there other actions underway or proposed whose effects—when combined with the potential effects of implementing the proposed plan—could have a significant adverse cumulative effect on human health or the environment?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Maybe