

RECORD OF ENVIRONMENTAL CONSIDERATION

1 **PROJECT TITLE:** Integrated Cultural Resources Management Plan Update

2 **PROJECT NUMBER/IJO Number:** N/A

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4 **PROPONENT OF THE ACTION:** US Army Garrison Fort Belvoir

5 **DESCRIPTION OF THE ACTION:** US Army Garrison Fort Belvoir has prepared and is
6 proposing to implement an update to the installation's Integrated Cultural Resources
7 Management Plan (ICRMP) in accordance with Army Regulation (AR) 200-1.

8 The updated ICRMP defines the substantive and procedural steps Fort Belvoir takes to operate
9 its cultural resources management program. The document describes specific procedures for
10 project coordination, planning, and compliance within the larger framework of the installation's
11 operations and mission. The ICRMP is intended to be a tool for personnel at Fort Belvoir whose
12 responsibilities include the planning and management of projects that may affect cultural
13 resources and must comply with historic preservation laws and regulations.

14 In support of these objectives, the Fort Belvoir ICRMP (1) provides a summary overview of the
15 mission and history of the installation (2) provides an inventory of archaeological and
16 architectural resources listed or eligible for listing in the National Register and those that
17 potentially may be eligible for listing (3) includes appropriate prehistoric and historic contexts
18 for the installation (4) identifies and summarizes applicable cultural resources management
19 legislation, regulations, standards, and guidelines (5) identifies general types of undertakings and
20 specific planned undertakings developed as part of the Real Property Master Plan update that
21 may affect cultural resources at Fort Belvoir (6) describes Fort Belvoir's current administrative,
22 operation, and maintenance procedures as they relate to cultural resources (7) recommends
23 strategies and specific goals for managing, maintaining, and treating cultural resources in
24 compliance with federal cultural resources management laws and regulations and DoD
25 regulations (8) contains standard operating procedures (SOP) for internal installation
26 coordination and external consultation for undertakings that may affect cultural resources and (9)
27 provides installation-specific recommendations that help identify appropriate treatment options
28 for archaeological and architectural resources.

29 **ANTICIPATED DATE AND/OR DURATION OF THE PROPOSED ACTION:** The
30 strategies and goals defined in the updated ICRMP are anticipated to be implemented at various
31 times between 2014 and 2019.

32 **IT HAS BEEN DETERMINED THAT THE ACTION (CHOOSE ONE):**

33 1. Is covered by an existing EA; EIS; *EA for US Army Garrison Fort Belvoir,*
34 *Virginia, Integrated Cultural Resources Management Plan, February 2001.*

35 2. Is categorically excluded under the provisions of 32 CFR 651 Subpart D & Appendix
36 B.

RECORD OF ENVIRONMENTAL CONSIDERATION

37 The environmental assessment (EA) prepared for the 2001 ICRMP evaluated the potential
38 impacts of implementing the plan and found that it would not result in significant impacts on the
39 quality of the environment. Therefore, a Finding of No Significant Impact (FNSI) was signed. In
40 accordance with 32 CFR 651.5(g), it has been determined that the 2001 EA adequately evaluates
41 the potential impacts of implementing an ICRMP and no substantial changes in the proposed
42 action are relevant to environmental concerns. The 2001 ICRMP EA and FNSI are available
43 upon request, from the Fort Belvoir Department of Public Works (DPW), Environmental and
44 Natural Resources Division.

45 A brief summary of anticipated effects is provided below to further document the lack of
46 potential for significant impacts.

47 **Land Use and Plans:** The Fort Belvoir ICRMP Update was prepared in parallel with the Fort
48 Belvoir Real Property Master Plan Update. Key elements of the master plan update incorporated
49 in the ICRMP include the 20 planning districts defined for Main Post and the Fort Belvoir North
50 Area, the historic preservation restrictions applicable within each district, and the list of short-
51 term projects presented in the master plan. The integration of both documents ensures that
52 actions recommended or mandated by the ICRMP update are consistent with the Real Property
53 Master Plan Update and have no potential to result in adverse land use impacts. For those areas
54 not covered by the Real Property Master Plan Update (Mark Center, Rivanna Station, Tysons
55 Corner and Suitland communication towers, Davison Field Outer Marker, and Humphreys
56 Engineer Center [HEC]), the ICRMP Update recommends no actions that could have an effect
57 on land use. Similarly, the ICRMP Update has no potential to adversely affect land use outside
58 Fort Belvoir.

59 **Socioeconomics:** The Fort Belvoir ICRMP has no potential to affect local or regional
60 demography or the facilities that serve the local or regional populations (e.g., schools, emergency
61 services). Some of the actions recommended or mandated by the ICRMP update would likely be
62 performed by private consultants and contractors, which would generate small positive direct and
63 indirect economic impacts. However, in the context of the Washington, DC metropolitan area
64 economy, these positive impacts would be very small. None of the actions recommended or
65 mandated in the Fort Belvoir ICRMP Update has any potential to disproportionately affect
66 Environmental Justice communities protected under Executive Order (EO) 12898 or the health
67 and welfare of children, protected under EO 13045.

68 **Cultural Resources:** The Fort Belvoir ICRMP defines the goals and strategies of the Fort
69 Belvoir cultural resources management program to maintain good stewardship of the historic
70 properties under Fort Belvoir's control consistent with the post's military mission. The ICRMP
71 outlines how Fort Belvoir will comply with applicable historic preservation laws and regulations,
72 including but not limited to Section 106 and Section 110 of the National Historic Preservation
73 Act, and avoid, minimize, or mitigate the effects of its actions on resources listed or eligible for
74 listing in the National Register of Historic Places. Thus, by definition, implementation of the
75 ICRMP Update would not result in adverse impacts to cultural resources.

76 **Transportation and Traffic:** The Fort Belvoir ICRMP does not recommend or mandate any
77 actions that could significantly adversely affect transportation and traffic on or off the post.

RECORD OF ENVIRONMENTAL CONSIDERATION

78 While historic preservation activities such as building rehabilitation or archaeological surveys
79 may generate some vehicle trips to and from the site, given the small scale and temporary
80 character of these activities, there is no potential for these impacts to be more than negligible.

81 **Air Quality:** None of the actions recommended or mandated by the Fort Belvoir ICRMP has any
82 potential to result in significant emissions of air pollutants. At most, some historic preservation
83 activities such as building rehabilitation or archaeological surveying may result in emissions
84 from vehicular traffic (from trips to and from the sites), construction activities, or ground
85 disturbance. These emissions would be very small, localized, and temporary, with no potential to
86 result in significant short- or long-term air quality impacts. Fort Belvoir is located in a non-
87 attainment area for the following criteria pollutants: ozone and particulate matter 2.5 microns or
88 smaller in diameter (PM_{2.5}). None of the actions recommended or mandated by the ICRMP have
89 the potential to result in emissions that would exceed the *de minimis* thresholds applicable under
90 the General Conformity requirements of the Clean Air Act. Some goals, such as analyzing the
91 energy efficiency of historic buildings and developing solutions to improve it while maintaining
92 the historic integrity of the buildings, may result in long-term positive, though small, impacts on
93 air quality.

94 **Noise:** Similarly, none of the actions recommended or mandated by the Fort Belvoir ICRMP has
95 potential to result in significant increases in ambient noise levels. Some activities, such as
96 building rehabilitation or archaeological surveys, may cause temporary noise from the operation
97 of equipment and of vehicles traveling to and from the site. However, given the scale of such
98 projects, these impacts, in addition to being temporary, would be small, localized, and
99 insignificant.

100 **Geology, Topography, and Soils:** The only actions recommended or mandated by the Fort
101 Belvoir ICRMP that could affect these resources are those actions involving ground disturbance,
102 which would mostly consist of archaeological surveys or archaeological site maintenance.
103 Archaeological surveys generally involve limited disturbance from shovel testing. Most test pits
104 are quickly backfilled with the excavated material. Only major excavations (for instance those
105 requiring the use of such equipment as backhoes to remove a layer of fill or surveys covering a
106 large area containing the remnants of one or more buildings or collection of buildings) could
107 have the potential to result in some soil erosion. In such cases, erosion and sedimentation control
108 measures would be put in place, as appropriate (e.g., covering stockpiled soils; erecting
109 sedimentation barriers) for the duration of the excavation. For excavations disturbing more than
110 2,500 square feet, a stormwater pollution plan would be prepared in accordance with the Virginia
111 Stormwater Program (9 VAC 25-870). Following the end of the excavation campaign, the area
112 would generally be backfilled with the excavated material and the site would be consolidated and
113 planted, as appropriate. Thus, any short-term impacts would be minimal and there would be no
114 long-term impacts. Additionally, the large-scale archaeological excavations that may raise such
115 concerns would be very rare, if they occur at all. Measures to consolidate known archaeological
116 sites that may be deteriorating due to erosion, an action identified in the ICRMP, would result in
117 long-term positive impacts, though these impacts would be very small. Similarly, the changes in
118 local topography that could result from such activities would be very small and insignificant.

RECORD OF ENVIRONMENTAL CONSIDERATION

119 **Water Resources:** Implementation of the ICRMP has no potential to directly affect water
120 resources at Fort Belvoir. Indirect impacts could occur from erosion and sedimentation
121 associated with ground-disturbing activities, especially since many archaeological sites are
122 located near bodies of water, but as described in the previous paragraph, such impacts would be
123 minimal, short-term, and occur rarely if at all. Archaeological investigations or the maintenance
124 of known archaeological sites within jurisdictional wetlands may require permitting under
125 Section 404 of the Clean Water Act. The ICRMP is integrated with the Fort Belvoir Integrated
126 Natural Resources Management Plan (INRMP) and applicable regulatory requirements would be
127 identified in the scoping and planning stages of archaeological investigations and complied with.
128 Given the scale and character of most archaeological surveys or site maintenance activities, there
129 is no potential for impacts to be more than negligible. Because, as noted above, many
130 archaeological sites are located near bodies of water, archaeological activities may commonly
131 occur in the 100-year floodplain. However, these activities have no potential to result in
132 permanent, noticeable changes to topography and floodplain elevations. The potential
133 maintenance and consolidation of known archaeological sites subject to erosion may result in
134 some minor local changes in elevation if soils are replenished and consolidated, but not on such a
135 scale as to affect floodways or flood levels.

136 **Biological Resources:** Implementation of the ICRMP has minimal potential to affect biological
137 resources. Archaeological investigations would generally occur within undeveloped areas of the
138 post. Therefore, they may result in the temporary disturbance and displacement of mobile
139 animals while some vegetation (mostly grasses, small bushes, or saplings) and non-mobile or
140 slow-moving ground-dwelling animals may be unavoidably destroyed. However, the scale,
141 character, and short duration of most archaeological surveys ensure that such potential impacts
142 would remain very small and localized, with no repercussions at the species level. Integration
143 with the INRMP and the Fort Belvoir natural resources management program would ensure that
144 potential effects to the small whorled pogonia (*Isotria medeoloides*), the only Endangered
145 Species Act-listed species known to occur at Fort Belvoir, and the Virginia state-threatened
146 wood turtle (*Glyptemys insculpta*), also documented on Fort Belvoir, are identified early in the
147 project scoping process and avoided.

148 **Hazardous Substances:** Implementation of the goals and strategies presented in the ICRMP
149 would have no adverse effect pertaining to hazardous substances. Because of the age of the
150 buildings, rehabilitation or maintenance activities conducted in historic buildings in accordance
151 with the ICRMP may require disturbing asbestos-containing materials (ACM) or lead-based
152 paints (LBP). The potential for such impacts would be assessed during the planning process for
153 those activities. ACM and LBP would be removed and disposed of in accordance with applicable
154 laws and regulations. Similarly, archaeological investigations in areas that are known to, or may
155 contain, contaminated soils or groundwater would be conducted in a manner that avoids risks to
156 workers and the environment. If this is not feasible, contaminated areas would be avoided.

RECORD OF ENVIRONMENTAL CONSIDERATION

SIGNATURE OF PREPARER:

PHONE NUMBER:

DATE:

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NAME OF ENVIRONMENTAL OFFICER (PRINT/TYPE):

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