

Draft Environmental Assessment
Demolition of Underutilized, Excess, and Obsolete Facilities
Naval Base Kitsap Bangor
Silverdale, Washington



July 2014

Naval Facilities Engineering Command Northwest
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Silverdale, WA 98315

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Naval Base Kitsap Bangor
Silverdale, Washington



July 2014

LEAD AGENCY: United States Department of the Navy

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ABSTRACT:

This environmental assessment (EA) evaluates the potential environmental impacts associated with the United States Department of the Navy's proposed action to demolish six excess, deteriorating buildings, associated railway structures, and 45 boxcars located primarily in an area known as the Segregation Area at Naval Base Kitsap Bangor. Four of the buildings proposed for demolition have been determined eligible for inclusion in the National Register of Historic Places. The Proposed Action is needed to eliminate maintenance costs, reduce excess energy use, and avoid health and safety hazards associated with aged and deteriorating structures. This EA analyzes the potential effects on the environment of Alternative 1 (Preferred Alternative) and the No Action Alternative. The following resource areas have been analyzed in detail in the EA: hazardous materials and waste and cultural resources.

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ACRONYMS AND ABBREVIATIONS

ACM	asbestos-containing material
APE	area of potential effects
BMPs	Best Management Practices
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CNIC	Commander, Navy Installations Command
CY ³	Cubic Yards
DAHP	Department of Archeology and Historic Preservation
DoD	Department of Defense
DRMO	Defense Reutilization Marketing Office
EA	Environmental Assessment
EHW	Explosives Handling Wharf
EIS	Environmental Impact Statement
EO	Executive Order
FONSI	Finding of No Significant Impact
Ft	feet
Ft ³	square feet
IBD	inhabitable building distance
LBP	lead-based paint
MOA	Memorandum of Agreement
NAVBASE	Naval Base
NAVFAC NW	Naval Facilities Engineering Command Northwest
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NRHP	National Register of Historic Places
OPNAVINST	Chief of Naval Operations Instruction
OU	operable unit
PCB	polychlorinated biphenyl
PRR	Pile Repair and Replacement
PWIA	Public Works Industrial Area
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
ROI	region of influence
SECNAV	Secretary of the Navy
SHPO	State Historic Preservation Officer
U.S.	United States
USC	United States Code
USEPA	United States Environmental Protection Agency
WAC	Washington State Administrative Code

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Executive Summary

Proposed Action

The United States Department of the Navy (Navy) proposes to demolish six vacant or underutilized buildings that are excess and deteriorating structures (buildings 6034, 6035, 6036, 6037, 6409, and 1461), one concrete railcar platform, two blast barriers located between the buildings on the platform, two segments of an earthen berm, pavement and approximately 5,600 lineal feet (ft) of railroad track and ties. The Proposed Action would also dispose of 45 boxcars. The Navy would make four of these boxcars available for donation to appropriate heritage groups for historical conservation purposes. These four boxcars are identified as USN61-01973, USN61-01977, USN61-01981 and USN61-01982 and have been determined to be free of asbestos containing materials (ACMs). The remaining 41 boxcars would be disposed of and the metals from the boxcars recycled, following abatement of ACMs.

The Proposed Action is located primarily in an area known as the Segregation Area, which is comprised of buildings 6034, 6035, 6036, and 6037, 35 boxcars, railcar platform, blast barriers, two segments of an earthen berm, and railroad track line and ties. Building 6409 and two railcars are located immediately south of the Segregation Area, while building 1461 is located east of the Segregation Area in an area known as the Public Works Industrial Area (PWIA). Eight railroad boxcars proposed for disposal are located approximately ½ mile south of the Segregation Area.

The proposed demolition of six buildings and disposal of 45 boxcars would result in a footprint reduction on NAVBASE Kitsap Bangor of approximately 21,870 square feet (ft²) of building footprint and 22,000 ft² of boxcar space. The Navy estimates that the Proposed Action would result in an estimated annual savings of \$48,700 through cost avoidance associated with operations and maintenance of the buildings.

Purpose of and Need for the Proposed Action

The purpose of the Proposed Action is to comply with the Department of Defense (DoD) Installation Strategic Plan and the Commander, Navy Installation Command (CNIC) Demolition Footprint Reduction Program. The need for the Proposed Action is to eliminate excess buildings and structures, their associated maintenance costs, reduce excess energy use, and avoid health and safety hazards associated with aged and deteriorating structures.

Existing Conditions

Buildings 6034, 6035, 6036, and 6037, and the railroad boxcars are located in the Segregation Area on Naval Base Kitsap Bangor. When Naval Ammunition Depot Bangor was built in 1944, the Segregation Area was used to sort munitions and inert materials off-loaded from railroad cars. The Segregation area is located at the intersection of Trident Boulevard and Trigger Avenue. The Segregation Area covers approximately 6.6 acres and includes the sorting buildings, a railcar platform, earth barricades, boxcars, railroad tracks, existing roads, and a gravel parking lot. Lands surrounding the Segregation Area are forested. There is one drainage ditch west of the site, but there are no wetlands within the Segregation Area. The Hood Canal shoreline is approximately one mile west of the Segregation Area. The buildings are currently vacant, and while most of the railroad boxcars are empty, some have abandoned materials in them. Buildings 6034, 6035, 6036, and 6037 have been determined eligible for inclusion in the National Register of Historic Places (NRHP).

Building 1461 is located at the corner of Silverside Road and Scorpion Avenue, approximately 1,300 ft east of the Segregation Area. Building 1461 is in a developed area surrounded by existing roads and paved parking lots. The building was built in 1959 and once used as a sandblast facility for railcars. The building is now vacant. There are no streams or wetlands on or near this project site.

Building 6409 is a small concrete-masonry-unit block building located immediately south of the Segregation Area. The building was constructed in 1945 and is approximately 170 ft². It is currently used for storage of asbestos abatement equipment such as vacuums, personnel protective equipment, and

plastic wrap. The existing equipment stored in the building would be removed by the Navy prior to demolition.

Alternatives Considered

Alternatives currently being considered include Alternative 1 (Preferred Alternative) and the No Action Alternative. Alternatives were selected based upon the following selection criteria: 1) eliminating facilities that have environmental or safety hazards; 2) reducing facility operating and maintenance costs; and, 3) reducing the Navy inventory of excess facilities.

Under Alternative 1 (Preferred Alternative), the Navy would demolish buildings 6034, 6035, 6036, 6037, 6409, and 1461, railcar platform, two blast barriers, two segments of an earthen berm, pavement and approximately 5,600 lineal feet (ft) of railroad track and ties. The Navy would also dispose of 45 World War II-era railroad boxcars, four of which would be made available for donation to appropriate nonprofit heritage groups for historical conservation purposes. Upon completion of the proposed demolition, disturbed areas would be backfilled with clean soil and revegetated with native vegetation and grass (as is the case for the Segregation Area facilities and bldg 6409) or resurfaced with asphalt (as is the case for bldg 1461).

Under the No Action Alternative, the proposed demolition of six vacant buildings, the earthen berms, a concrete platform, and railroad line and disposal of 45 World War II-era railroad boxcars would not take place. NAVBASE Kitsap Bangor would not be consistent with the DoD Installation Strategic Plan and the CNIC Demolition Footprint Reduction Program. Instead, the Navy would continue to retain degraded, hazardous, and excess facilities. The No Action Alternative does not meet the purpose and need described above, but is carried forward in the EA to provide a baseline against which to measure environmental impacts of the Proposed Action.

The Navy considered three additional action alternatives which included revitalization of buildings 6034, 6035, 6036, 6037, 6409, and 1461, the relocation of all buildings, and layaway (which would delay the decision to demolish all facilities but also provide time for identifying potential adaptive reuse at a later time). The three alternatives: revitalization, relocation and layaway, did not meet the Navy's purpose and need and therefore were not carried forward for environmental analysis.

Summary of Environmental Resources Evaluated in the EA

Council on Environmental Quality (CEQ) regulations and Navy regulations implementing the National Environmental Policy Act (NEPA), state that an Environmental Assessment (EA) should address only those resource areas potentially subject to effects. In addition, the level of analysis should be commensurate with the anticipated level of environmental effects. Accordingly, the following resources have been analyzed in this EA: Hazardous Materials and Waste and Cultural Resources. Because potential impacts were considered to be negligible or nonexistent, the following resources were not evaluated in this EA: American Indian Traditional Resources, Archeological Resources, Geological Resources, Biological Resources, Water Resources, Land Use, Utilities and Infrastructure, Noise, Transportation, Air Quality, Aesthetics/Visual Resources, Environmental Justice, Socioeconomics, Public Health.

Summary of Potential Environmental Consequences of the Action Alternatives

Hazardous Materials and Waste. Building demolition work would occur in older buildings and railroad boxcars known to contain hazardous materials including asbestos, lead based paint, mercury, and polychlorinated biphenyls (PCBs). Prior to the proposed demolition of the buildings and disposal of the boxcars, the Navy would abate ACMs from the buildings and boxcars. All demolition materials tested and confirmed to be hazardous waste would be removed, stored, and disposed of in accordance with all applicable laws and regulations. The Navy will prepare and implement a Demolition Plan, Environmental Protection Plan, Safety Plan (including Activity Hazard Analysis), Asbestos Abatement Plan, Lead

Abatement Plan, and Waste Management Plan to address hazardous materials and waste in the buildings and the boxcars, as appropriate.

The Proposed Action is located within two distinct contaminated sites, referred to as operable units (OU) 2 and OU-8, which are on the United States Environmental Protection Agency (USEPA) Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) National Priorities List of contaminated areas requiring environmental investigation and cleanup. The Segregation Area buildings 6034, 6035, 6036, 6037, as well as building 6409 are located within OU-2, while building 1461 is located within OU-8.

A 1991 CERCLA Record of Decision (ROD) for OU-2 documents the Navy's decision to cleanup contamination by a combination of contaminated soil excavation to a depth of 15 ft; installation of an infiltration barrier, and groundwater remediation. The Segregation Area is not within the area where contaminated soil was identified and remediated. All elements of the remedy were completed by 1997. There is evidence of residual contamination in the shallow aquifer and institutional controls have been put in place to include: groundwater use prohibition, land use restrictions and issuance of excavation permits.

A 2000 CERCLA ROD for OU-8 documents the Navy's decision to cleanup contamination by a combination of groundwater containment and remediation, soil remediation via vapor extraction and bioventing, and cessation of consumption of groundwater. All elements of the remedy were completed by 2004 and soil sampling in the Public Works Industrial Area has verified that the soil has been sufficiently remediated to meet Ecology's cleanup levels down to a depth of 15 ft.

Demolition activities in the Segregation Area, building 6409, and building 1461 would include removal of concrete floors to the subgrade, which would have incidental contact with soil. It would also include localized excavation to a depth of five feet to remove utilities. There is no known soil contamination within proposed demolition areas in the Segregation Area, building 6409, and building 1461. Excavation is not expected to come in contact with or impact groundwater. Demolition activities would follow the institutional controls and guidelines to ensure conformance with the RODs for OU-2 and OU-8.

With the use of best management practices; implementation of the Demolition Plan, Environmental Protection Plan, Safety Plan (including Activity Hazard Analysis), Asbestos Abatement Plan, Lead Abatement Plan, and Waste Management Plan; and conformance with the RODs for OU-2 and OU-8, no significant impacts due to hazardous materials and waste are anticipated under the Proposed Action.

Cultural Resources. The Navy determined that buildings 6034, 6035, 6036, and 6037 are eligible for inclusion in the NRHP. The proposed demolition of these facilities constitutes an adverse effect under the National Historic Preservation Act of 1966 (as amended). The Navy initiated consultation with the State Historic Preservation Officer (SHPO) on December 21, 2012. Stipulations that address the adverse effects have been defined through the consultation process and are outlined in a draft Memorandum of Agreement (MOA) between the Navy and the SHPO (Appendix A). The Navy made the draft MOA available to the public for review and comment from August 23, 2013 to September 4, 2013 with a notice of availability published in the local newspaper (Kitsap Sun). One comment from the public was received, which was a request for a map depicting the APE. The Navy responded by providing the requestor a map of the APE.

In accordance with the MOA, the Navy would implement the following stipulations as part of the Proposed Action:

- In consultation with the SHPO and prior to demolition, the Navy shall contact HistoryLink.org to develop an essay about the NAVBASE Kitsap Bangor Segregation Area. Once completed, the essay shall be downloaded to HistoryLink.org, the state's free on-line encyclopedia of Washington history.

- The Navy will document historic buildings, structures and objects in the Segregation Area, including: Buildings 6034, 6035, 6036, 6037, a representative 40-ton boxcar, a representative 50-ton boxcar, the earthen berm, railroad tracks and objects associated with the Segregation Area.
- The Navy will dispose of boxcars and miscellaneous railroad objects (switches, gears, etc.) through the Defense Reutilization and Marketing Office (DRMO) for potential acquisition by appropriate heritage groups for preservation.
- In the event heritage groups are not capable of acquiring boxcars, prior to demolition the Navy will record the representative 50-ton and 40-ton boxcars in their existing three-dimensional setting.
- The Navy will submit a draft report to the SHPO that will evaluate the eligibility of the Shelton-Bangor Railroad using National Register criteria and identify elements that would be contributing to the eligibility.
- Upon completion of the draft eligibility evaluation report of the Shelton-Bangor Railroad, the Navy in consultation with the SHPO, ACHP, and interested parties will develop a Programmatic Agreement with the goal of managing the identified historic properties.

With implementation of the stipulations specified in the MOA, the Proposed Action would not result in significant impacts to cultural resources.

Public Involvement

The Navy has made the Draft EA available for public review and comment from July dd, 2014 to July dd, 2014. Comments received and responses are provided in Appendix B.

Conclusion

Implementation of the Proposed Action would not result in significant impacts and does not constitute a “major federal action significantly affecting the quality of the human environment” when considered individually or cumulatively in context of NEPA, including both direct and indirect impacts. Therefore, this EA supports a Finding of No Significant Impact for the Proposed Action and the preparation of an Environmental Impact Statement is not required.

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CHAPTER 1.0

PURPOSE AND NEED FOR THE PROPOSED ACTION

1.1 INTRODUCTION

The United States (U.S.) Department of the Navy (Navy) has prepared this Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code [USC] §4321-4370h), as implemented by the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508); Navy regulations for implementing NEPA (32 CFR Part 775); and Chief of Naval Operations Instruction (OPNAVINST) 5090.1D, *Environmental Readiness Program*.

The Navy proposes to demolish six vacant or underutilized buildings that are excess and deteriorating structures, one concrete railcar platform, two blast barriers, two segments of an earthen berm, pavement, approximately 5,600 lineal feet (ft) of railroad track and ties, and 45 World War II-era railroad boxcars located on Naval Base (NAVBASE) Kitsap Bangor. Buildings proposed for demolition include buildings 6034, 6035, 6036, 6037, 6409, and 1461. Upon completion of the proposed demolition, disturbed areas would be backfilled with clean soil and revegetated with native vegetation and grass (as is the case for the Segregation Area facilities and bldg 6409) or resurfaced with asphalt (as is the case for bldg 1461).

This EA will be reviewed by the Navy, who will make a determination regarding the Proposed Action and whether a finding of no significant impact (FONSI) or an environmental impact statement (EIS) is appropriate. There are no cooperating agencies for the Proposed Action.

1.2 LOCATION

Naval Base (NAVBASE) Kitsap Bangor is located along Hood Canal, approximately 20 miles west of Seattle, Washington in Kitsap County (Figure 1-1). The base provides berthing and support services to Navy submarines and other Fleet assets. The base encompasses approximately 7,000 acres including developed lands (military, industrial, residential, commercial, and recreational uses), forested lands, and brush and shrub lands, with 4.5 miles of waterfront along the eastern shoreline of Hood Canal.

The Proposed Action is located on NAVBASE Kitsap Bangor primarily in what is known as the Segregation Area, denoting the area where munitions were sorted and segregated for placement into individual bunkers for storage. Two additional buildings are located within ½ mile of the Segregation Area. Four buildings located within the Segregation Area have been determined eligible for inclusion in the National Register of Historic Places (NRHP).

1.3 PURPOSE AND NEED FOR THE PROPOSED ACTION

The purpose of the Proposed Action is to comply with the Department of Defense (DoD) Installation Strategic Plan and the Commander, Navy Installation Command (CNIC) Demolition Footprint Reduction Program. The need for the Proposed Action is to eliminate excess buildings and structures, their associated maintenance costs, reduce excess energy use, and avoid health and safety hazards associated with aged and deteriorating structures.

With the exception of building 6409, the buildings and boxcars are not currently used and none of the buildings are required to support current or foreseeable operations on NAVBASE Kitsap Bangor. Demolition of buildings 6034, 6035, 6036, 6037, 6409, 1461, and the boxcars would save the Navy an estimated \$48,700 annually to operate and maintain approximately 21,870 square feet (ft²) of building footprint and 22,000 ft² of boxcar space (U.S. Navy 2010a).

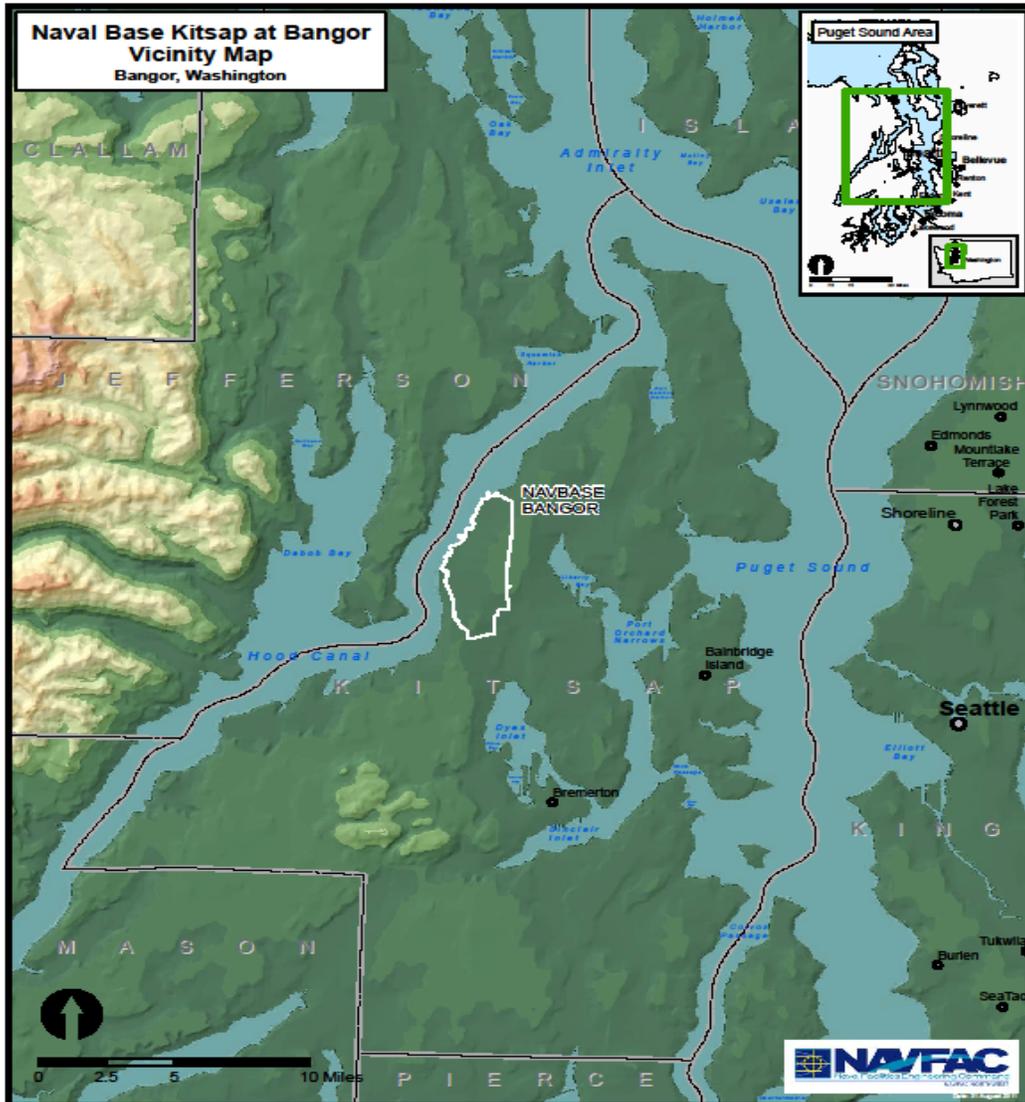


Figure 1-1 Vicinity Map

1.4 SCOPE OF THE ENVIRONMENTAL ANALYSIS

The environmental analysis presented in this EA focuses on the specific environmental resources and topics that could reasonably be affected by the Proposed Action or alternatives. Only those resources with a potential for effects were included in the EA analysis. The environmental resource areas analyzed in detail in this EA are hazardous materials and waste, and cultural resources.

The following resources were not carried forward for analysis in this EA, as potential impacts were considered to be negligible or non-existent:

American Indian Traditional Resources - NAVBASE Kitsap Bangor is adjacent to and includes portions of the Hood Canal, which are within the Usual and Accustomed grounds and stations of the Skokomish Tribe, Port Gamble S'Klallam Tribe, Jamestown S'Klallam Tribe, Lower Elwha Klallam Tribe, and Suquamish Tribe. This upland project would have no effect to traditional resources or traditional cultural properties because it would not change any tribe's access to exercise tribal treaty rights and it would not reduce or degrade harvestable marine resources.

Archaeological Resources - The proposed demolitions are in areas classified as having “low resource probability” for archaeological deposits according to the NAVBASE Kitsap Bangor Archaeological Probability Areas survey map (Lewarch et al. 1993). Additionally, the proposed demolitions are in areas too heavily disturbed to contain intact archaeological deposits. Therefore, no impacts to archaeological resources are anticipated.

Geological Resources – Demolition activities would involve limited soil disturbance from removal of concrete foundations and flooring and from excavation to a depth of approximately 5 ft in localized areas to remove utilities. However, all areas subject to demolition, which are located in developed industrial areas, would be backfilled with clean soil and revegetated with native vegetation and grass (as is the case for the Segregation Area facilities and bldg 6409) or resurfaced with asphalt (as is the case for bldg 1461). As such, there would be no increase in soil erosion from the Proposed Action. The demolition of the buildings would also reduce the potential impacts to these old structures due to earthquakes, slope failure, and liquefaction of soils. Therefore, the Proposed Action would have no impacts to geological resources.

Biological Resources - Demolition activities would occur in previously developed and disturbed areas where existing vegetation is re-growth of both native and invasive species of grasses, shrubs, and trees. Minor tree clearing and trimming may be required to provide adequate space for demolition activities. Some shrubbery surrounding each structure would be removed during demolition. No wetlands are present in the project area.

In accordance with Section 7 of the Endangered Species Act, the Navy has determined that implementation of the Proposed Action would have no effect on species or critical habitat listed under the Endangered Species Act. The Proposed Action would occur in previously disturbed areas, and would not impact any unique or sensitive biological resources. Therefore, impacts to biological resources would be negligible.

Water Resources - Surface waters in the project area are limited to a single drainage ditch along the west side of the Segregation Area. Demolition activities, including removal of underground utilities up to 5 ft below the surface, are not expected to disturb groundwater. Removal of impervious roof surfaces and the concrete rail platform would decrease stormwater runoff. Implementation of the Proposed Action would have negligible impacts to water resources.

Land Use - Following demolition, the building sites would be backfilled with clean soil and revegetated with native vegetation and grass (as is the case for the Segregation Area facilities and bldg 6409) or resurfaced with asphalt (as is the case for bldg 1461). No new land uses are proposed on the sites. Therefore, the Proposed Action would have no impacts to land use.

Utilities and Infrastructure - The Proposed Action would include removal of existing utilities that serve the six buildings scheduled for demolition and no new utility service would be required after demolition. Therefore, there would be no impact to utilities.

Noise - Sounds originating from temporary construction sites as a result of construction activity between the hours of 7:00 a.m. and 10:00 p.m. are exempt from the State of Washington and Kitsap County maximum permissible environmental noise levels for receiving properties (WAC Chapter 173-60 and Kitsap County Code 10.28). Noise generated during demolition would be temporary (occurring only during construction) and would occur only between the hours of 7:00 a.m. and 10:00 p.m.; and is therefore exempt. There would be no long term change in the noise environment on NAVBASE Kitsap Bangor with implementation of the Proposed Action. Therefore, noise impacts from the Proposed Action would be negligible.

Transportation - The volume of traffic would temporarily increase during demolition activities. Two excavators, one loader and a three to four haul trucks completing up to six round trips per day would be required to implement the Proposed Action. Construction debris would be transferred off-base to a federal and state approved disposal and recycling facility. The demolition of the buildings would take an

estimated six months to complete, depending on contractor schedules and weather. Recycling and removal of the railcars for conservation could be done within the same six months, but may take longer depending on funding schedules. The number of vehicles for demolition would be negligible when compared to existing numbers of DoD vehicles or contractors arriving and leaving the facility. Therefore, impacts to transportation would be negligible.

Air Quality - Effects on air quality from the implementation of the Proposed Action would be negligible due to the classification of attributed air sources and the attainment designation of Kitsap County in relation to the National Ambient Air Quality Standards. As described in 40 CFR Part 51, Determining Conformity of General Federal Actions to State or Federal Implementation Plans (the "General Conformity Rule"), all federal actions occurring in air basins designated in nonattainment or in a maintenance area must conform to an applicable implementation plan. Since Kitsap County is designated an attainment area for all criteria pollutants, the General Conformity Rule does not apply. The activities associated with the Proposed Action are limited to mobile sources and sources excluded from Notice of Construction requirements per Puget Sound Clean Air Agency Regulation I Article 6.03; therefore, New Source Review and Prevention of Significant Deterioration requirements do not apply.

Aesthetics/Visual Resources - The project site is within the boundaries of the base and not visible from any public viewpoints. There would be no impacts to aesthetics.

Environmental Justice and Socioeconomics - The Proposed Action would occur entirely within the boundaries of NAVBASE Kitsap Bangor, specifically within a developed, industrial area of the base. The Proposed Action would not impact the economic baseline of employment at the installation or in Kitsap County. The Proposed Action would be in compliance with Executive Order (EO) 12898 and EO 13045 as no low income, children, or minority communities exist at the project site or immediate vicinity, and there would not be a disproportionately high and adverse effect on schools, children, or local communities.

Public Health - The Proposed Action is located in an industrial area within NAVBASE Kitsap Bangor, where public access is restricted. There are no family housing, playgrounds or children's schools within 0.80 miles of the demolition areas and the public, including children, would not have access to the proposed demolition sites. The Navy would remove and manage all hazardous materials in accordance with applicable laws and regulations. Therefore, the activities described under the Proposed Action would have a negligible impact on health and safety of the public, children, construction contractors, and Navy employees with adherence to construction safety standards.

1.5 RELEVANT LAWS AND REGULATIONS

The Navy has prepared this EA integrating federal and state laws, statutes, regulations, and policies that are pertinent to the implementation of the Proposed Action including, but not limited to:

- CEQ Regulations for Implementing NEPA
- Clean Air Act (42 USC §7401 *et seq.*)
- National Historic Preservation Act (16 USC 470 *et seq.*)
- EO 13175, *Consultation and Coordination with Indian Tribal Governments*
- Secretary of the Navy (SECNAV) Instruction 11010.14A, *Department of Navy Policy for Consultation with Federally Recognized Indian Tribes*
- Comprehensive Environmental Response, Compensation, and Liability Act (42 USC § 9601 *et seq.*)
- Resource Conservation and Recovery Act (42 USC § 6901 *et seq.*)
- EO 12088, *Federal Compliance with Pollution Control Standards*
- EO 12898, *Federal Actions to Address Environmental Justice in Minority and Low-income Populations*
- EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*

1.6 PUBLIC INVOLVEMENT

Public Review of the Draft EA – The Navy has made the Draft EA available for public review and comment from July XX, 2014 to July XX, 2014 with a notice of availability (NOA) published in the local newspaper (Kitsap Sun). The Draft EA was also posted on the internet for review and comment. A summary of comments received, as well as the Navy’s responses, is provided in Appendix B of the Final EA.

Release of the Final EA and Decision Document - The Final EA and decision document will be made available to the public. The NOA will be posted in the local newspaper and the Final EA and decision document will be posted on the internet.

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CHAPTER 2.0 PROPOSED ACTION AND ALTERNATIVES

2.1 PROPOSED ACTION

Under the Proposed Action the Navy would demolish six vacant or underutilized buildings that are excess and deteriorating structures (buildings 6034, 6035, 6036, 6037, 6409, and 1461), one concrete railcar platform, two blast barriers located between the buildings on the platform, two segments of an earthen berm, pavement, and approximately 5,600 lineal ft of railroad track and ties. The Proposed Action would also dispose of 45 boxcars. The Navy would make four of these boxcars available for donation to appropriate heritage groups for historical conservation purposes, while 41 boxcars would be disposed of and the metals from the boxcars recycled. The proposed demolition of six buildings and disposal of 45 boxcars would result in a footprint reduction on NAVBASE Kitsap Bangor of approximately 21,870 ft² of building footprint and 22,000 ft² of boxcar space.

The Proposed Action is located primarily in an area known as the Segregation Area, which is comprised of buildings 6034, 6035, 6036 and 6037, 35 boxcars, railcar platform, blast barriers, two segments of an earthen berm, and railroad track line that extends through openings in the earthen berm. Building 6409 and two railcars are located immediately south of the Segregation Area, while building 1461 is located in an area known as the Public Works Industrial Area (PWIA). Eight railroad boxcars proposed for disposal are located approximately ½ mile south of the Segregation Area (Figure 2-1).

2.1.1 Segregation Area Buildings and Structures

Construction of the Segregation Area began in 1944 to enable the US Navy to meet the trans-shipment requirements for sustained offensive against Japan in the Pacific Theater during World War II. The Segregation Area and its associated facilities served as a receiving center where ammunition was sorted and sent to appropriate storage facilities. It also readied ammunition coming out of storage facilities for trans-shipment to the Pacific Theater. These facilities are now vacant and have been determined as excess. As discussed in detail in Section 3.2, Cultural Resources, the individual buildings in the Segregation Area have been determined eligible for inclusion in the NRHP.

Buildings 6034, 6035, 6036, and 6037

Buildings 6034, 6035, 6036, and 6037 were all built in 1944 and are one-story, rectangular, concrete buildings with corrugated transite hip roofs. The buildings were converted to warehouses in the mid-1980's. The north end of building 6035 housed a Mercury Accumulation Area where florescent light bulbs containing mercury were destroyed. By 2011, the buildings' functions had been relocated and currently remain vacant. The buildings are intact and sit on a concrete platform with rail lines on their east and west sides. Figure 2-2 provides photographs of the exteriors of each building. The square footage of each of these buildings is provided below:

- Building 6034 – 4,800 ft²
- Building 6035 – 9,800 ft²
- Building 6036 – 4,200 ft²
- Building 6037 – 1,400 ft²

Structures

The railcar platform, blast barriers, earthen berm and railroad tracks are also located within the Segregation Area. The Segregation Area buildings sit on top of the railcar platform, a concrete structure covering approximately 54,400 ft² and approximately 3.5 ft high. The purpose of the platform was to facilitate loading and offloading of materials from the railcars to the buildings. There are two blast barriers located on the platform: one between buildings 6035 and 6036, and the other between buildings

6035 and 6037. The blast barriers are cast in place concrete structures, approximately one ft thick and 15 ft high, each filled with approximately 100 cubic yards (yd³) of soil. The purpose of the blast barriers was to isolate an incident and reduce casualties should an incident happen while handling munitions. An earthen berm surrounds the Segregation Area. The berm has two openings at the north end and two openings at the south end to allow rail ingress and egress to buildings 6034, 6035, 6036, and 6037. Each segment of berm is approximately 3,100 ft², 17 ft high, and contains up to 1,000 yd³ of earthen fill. The berm has concrete retaining walls where the berms open for ingress and egress of the rail lines. There are approximately 5,600 lineal ft of railway track and ties. The track and ties consist of two parallel sets of tracks on both the east and west sides of the platform extending approximately 200 ft north and 200 ft south of the Segregation Area.



Blast barrier between Buildings 6035 and 6036

2.1.2 **Boxcars**

NAVBASE Kitsap Bangor has 45 World War II era boxcars, all of which are proposed for disposal. Thirty-five boxcars are located within the Segregation Area, two boxcars are located immediately south of the Segregation Area (adjacent to building 6409), and eight boxcars are located approximately ½ mile south of the Segregation Area (Figure 2-1).



Earthen Berm with Retaining Wall and Rail Platform

The boxcars were built between 1941 and 1945 and when the Shelton Bangor railroad became operational in January 1945, the boxcars were used to transport ammunition. More

recently, the boxcars have been used as storage facilities for miscellaneous materials; however, these materials have largely become abandoned. The boxcars are made of high grade steel and copper and come in two lengths – either 40.5 ft in length or 50.5 ft in length, but have standard heights and widths of roughly 10 ft. The total area of boxcar space proposed for disposal is approximately 22,000 ft².

Over time the boxcars have become degraded and are no longer safe for use on rail lines. The majority of the boxcars have asbestos-containing black mastic vapor seals applied to the ceiling. All of these vapor seals are in some level of disrepair. Under the Proposed Action, all ACMs would be abated from the boxcars prior to disposal.

As part of the Proposed Action, the Navy would make four boxcars available for donation to appropriate heritage groups for historical conservation purposes. These four boxcars are identified as USN61-01973, USN61-01977, USN61-01981 and USN61-01982 and have been determined to be free of ACMs. While the remaining 41 boxcars would be disposed of, all of the metals from the boxcars would be recycled, following abatement of hazardous waste.



Boxcars

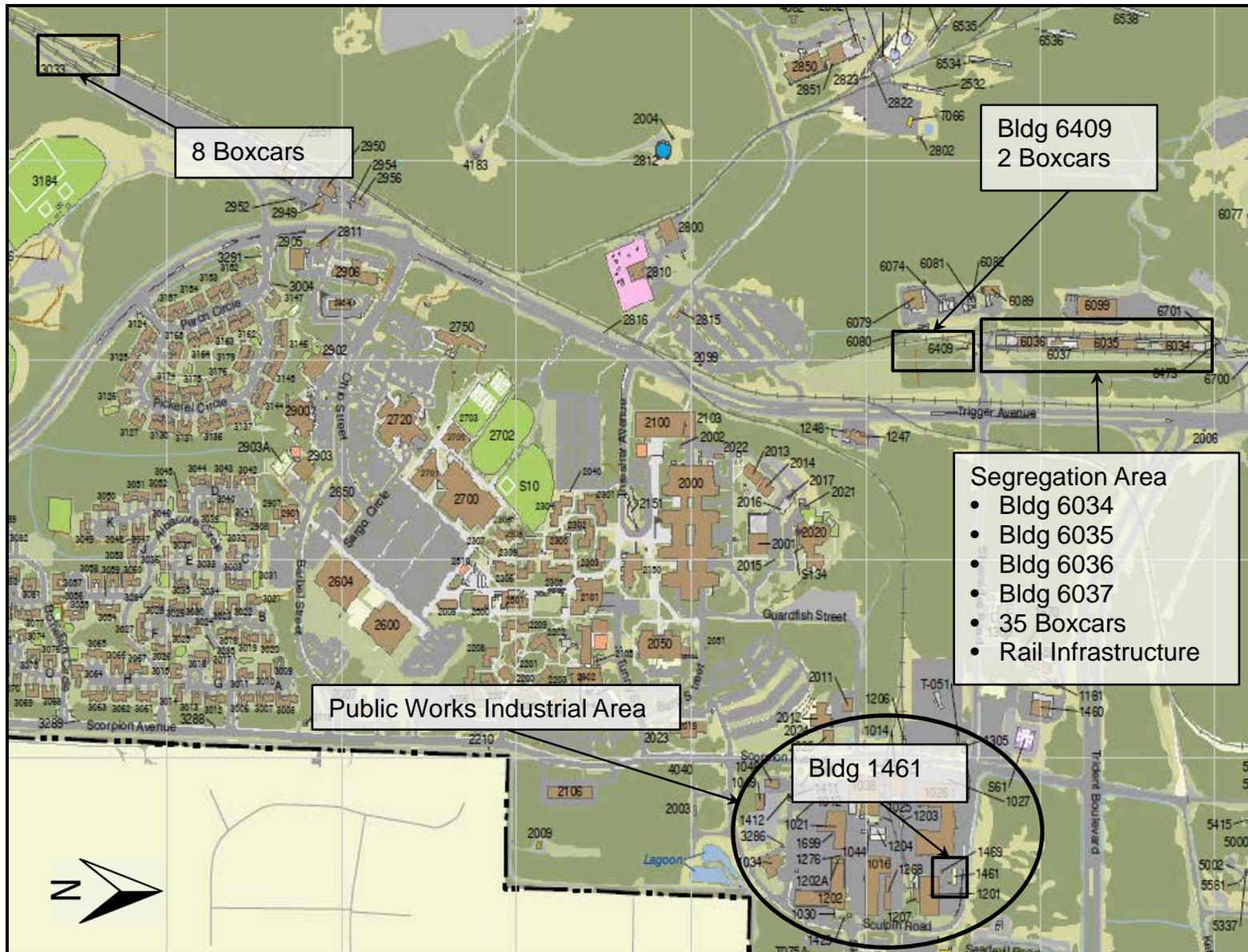


Figure 2-1 Location of Proposed Action

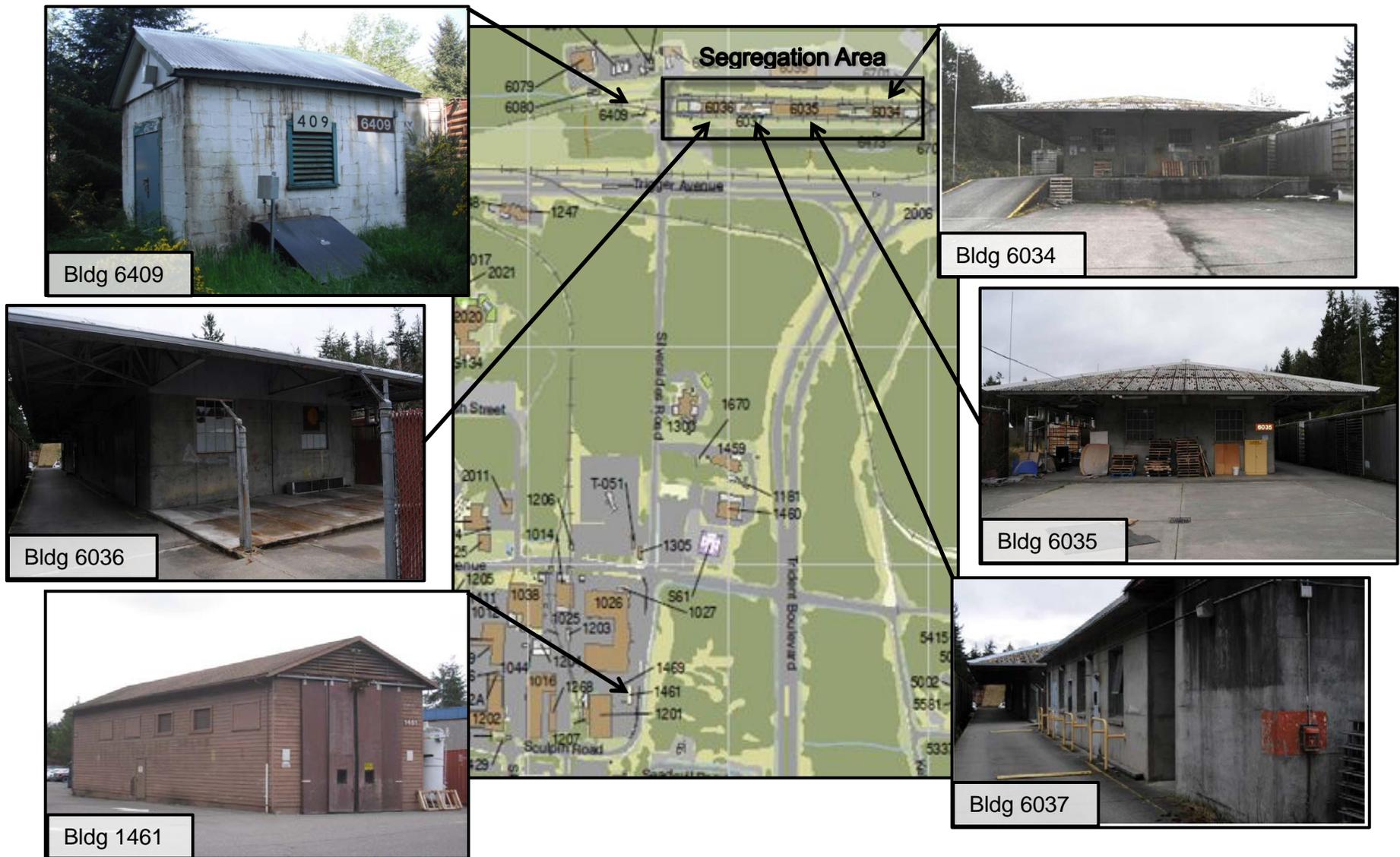


Figure 2-2 Buildings Proposed for Demolition

2.1.3 Building 1461

Building 1461 is a one-story wood frame building with a front-gabled asphalt-shingle roof, wood drop siding, and concrete foundation. The building is approximately 1,500 ft². It was constructed in 1959, and historically used as a railroad sandblasting facility. Rail tracks are embedded into the concrete slab floor and run the entire length of the building at center-line. The building is vacant and no longer used for any purpose. Figure 2-2 provides a photograph of the building exterior.

2.1.4 Building 6409

Building 6409 is a small concrete-masonry-unit block building located south of the building 6034-6037 site. The building was constructed in 1945 and is approximately 170 ft². It is currently used for storage of asbestos abatement equipment such as vacuums, personnel protective equipment, and plastic wrap. The existing equipment stored in the building would be removed by the Navy prior to demolition. There is an existing steam trench along the east edge of the building that would remain. Figure 2-2 provides a photograph of the building exterior.

2.2 DEVELOPMENT OF REASONABLE ALTERNATIVES AND SELECTION CRITERIA

NEPA's implementing regulations provide guidance on the consideration of alternatives to a federally proposed action and require rigorous exploration and objective evaluation of reasonable alternatives. Only those alternatives determined to be reasonable require detailed analysis. When evaluating potential action alternatives for the Proposed Action, the Navy's goal was to balance its mission and operational requirements while minimizing environmental impacts. Potential alternatives that meet the purpose and need were evaluated against the following selection criteria:

1. Eliminating facilities that have environmental or safety hazards.
2. Reducing facility operating and maintenance costs.
3. Reducing the Navy inventory of excess facilities.

2.3 ALTERNATIVES CONSIDERED BUT ELIMINATED FROM FURTHER ANALYSIS

The Navy considered three alternatives that were eliminated from further analysis because they did not fulfill one or more of the selection criteria.

2.3.1 Revitalization/Reuse

The Navy would demolish buildings 1461, and rehabilitate buildings 6034, 6035, 6036, 6037, and 6409. The revitalization involves renovation and re-use or continued use of the facilities. This alternative would meet the Navy's goal to balance the preservation of historic heritage with the objective of maximizing land use efficiency if a feasible and appropriate use can be identified for the facility.

Buildings 6034, 6035, 6036, 6037, and 6409 are located within the inhabitable building distance (IBD) arc of the Missile Assembly Building, which restricts occupancy and use of these buildings. IBDs are the minimum permissible distance between a Potential Explosives Site and an inhabited building. An inhabited building is any structure, other than an explosives operating building, which is used in whole or in part for human habitation or place of assembly. IBDs provide protection against serious injuries or death. Because these facilities are located within the IBD of the Missile Assembly Building, the Navy determined these buildings are not suitable for reuse. The Navy rejected this alternative because it would not eliminate environmental or safety hazards, nor would it reduce the Navy's inventory of excess facilities.

In addition, specific reuse was not identified for the WW II-era railroad boxcars. The Navy has determined these boxcars are excess to its mission requirements on NAVBASE Kitsap Bangor. The boxcars are considered underutilized/excess because their capacity for use is limited by their deteriorating condition and the nature of their structure. The Navy rejected the Revitalization/Reuse alternative because

there is not an identified need for the boxcars. This alternative is not carried forward as it would not eliminate environmental or safety hazards, nor would it reduce the Navy inventory of excess facilities.

2.3.2 Relocation of Buildings

This alternative involves the relocation of Buildings 6034, 6035, 6036, 6037, 6409, and 1461 to a new location. Since the structures of Buildings 6034, 6035, 6036, and 6037 are reinforced concrete constructed upon the concrete railcar platform, they are not suitable for relocation or salvage value.

Building 1461 is a steel frame building with a front-gabled asphalt-shingle roof, wood drop siding, and concrete foundation. Building 6409 is a brick frame building with a metal roof, no siding and a concrete foundation. However, both buildings are in deteriorated structural condition and it would not be practicable to relocate. The annual operating cost of these buildings is a combined total of approximately \$49,000 (U.S. Navy 2010a). The Navy rejected the Relocation alternative as it would not eliminate environmental or safety hazards, nor would it reduce the Navy inventory of excess facilities, or reduce costs.

2.3.3 Layaway

The Layaway alternative would defer the Navy's decision to demolish a facility for a period of time, generally ten years. A Layaway alternative can be appropriate under certain conditions, 1) facilities for which a potential use is identified (e.g., foreseeable within the next ten years), and 2) facilities that are currently subject to land use or facility use constraints that could change in the future to allow reuse. However, since no potential specific reuse was identified for any of the assets, the Navy rejected the layaway alternative because it would not reduce the Navy inventory of excess facilities and deferring this decision by ten years would not eliminate facilities that have environmental and safety hazards.

2.4 ALTERNATIVES CARRIED FORWARD

This EA analyzes the potential effects on the environment of Alternative 1 and the No Action Alternative. As discussed in Section 2.3, the Navy considered other potential alternatives to meet the purpose and need, however no other reasonable action alternatives were identified. Therefore, only two alternatives are carried forward in this analysis.

2.4.1 Alternative 1 - Demolition of Buildings and Disposal of World War II - era Railroad Boxcars (Preferred Alternative)

Proposed Components of Alternative 1

Under Alternative 1, the Navy would:

- Demolish buildings 6034, 6035, 6036, 6037, 1461, and 6409, the concrete platform, two blast barriers, railroad track and ties, and the two earthen berm segments located within the Segregation Area, and remove pavement located at both the south and north ends of the Segregation Area. All building demolition would remove the floor slabs and foundations, foundation walls, footings and reinforcements. The concrete sides and ends of the two earthen berm segments would be removed and the earthen fill would be graded across the site after all other demolition activities have occurred.
- With the exception of the existing steam trench, remove all underground and above ground civil, electrical, and mechanical utilities serving the facilities, including piping and conduit, back to the distribution isolation valve or nearest manhole/transformer/circuit breaker, cap the utility line, and document the location of each cap.
- Restore and re-grade the Segregation Area and building 6409 footprint, backfill with clean soil where necessary, and plant grass and native vegetation.

- Regrade and resurface with asphalt the former building 1461 footprint to match the existing parking areas.
- Approximately 3,850 tons of construction and demolition debris would be generated during demolition. This total was estimated using a total nonresidential demolition debris generation rate of 158 pounds/square feet (USEPA 2009). Non-hazardous waste and debris would be hauled off of the site to an approved disposal facility. Hazardous waste would be handled, stored, and disposed of in accordance with applicable federal, state, and local requirements including Washington State *Occupational Health Standards, Safety Standards for Carcinogens* (Chapter 296-62 Washington Administrative Code (WAC)) and Washington State Dangerous Waste Regulations (WAC Chapter 173-303).
- Abate asbestos containing materials from all railroad boxcars.
- Dispose of 45 railroad boxcars.
 - Four boxcars (USN61-01973, USN61-01977, USN61-01981 and USN61-01982) would be made available for donation to appropriate heritage groups for historical conservation purposes. Testing has determined these boxcars are free of ACMs.
 - Forty-one boxcars would be destroyed and the metal from the boxcars recycled.

Project Schedule

Work Window. Noise generating construction activities would not occur between the hours of 10:00 p.m. and 7:00 a.m.

Project Duration. Demolition of the buildings is expected to take approximately six months to complete and is anticipated to begin in late fall of 2014. The disposition of the railcars may take longer, depending on funding schedules.

2.4.2 No Action Alternative

Under the No Action Alternative, the proposed demolition of six vacant buildings, the earthen berms, a concrete platform, and railroad line and disposal of 45 World War II-era railroad boxcars would not take place. NAVBASE Kitsap Bangor would not be consistent with the DoD Installation Strategic Plan and the CNIC Demolition Footprint Reduction Program. Instead, the Navy would continue to retain degraded, hazardous, and excess facilities.

The No Action Alternative would not meet the purpose and need for the Proposed Action but represents the baseline condition against which potential consequences of the Proposed Action can be compared. As required by CEQ guidelines, the No Action Alternative is carried forward for analysis in this EA.

2.5 BEST MANAGEMENT PRACTICES AND AVOIDANCE & MINIMIZATION MEASURES

Implementation of the Proposed Action would include the following best management practices to avoid or minimize any potential environmental impacts.

- All pollutants, including waste materials, would be handled and disposed of in a manner that does not cause contamination of stormwater. The contractor will be required to obtain a stormwater permit from Washington Department of Ecology (Ecology).
- All wastes products present at the construction site would be managed per federal, state regulations and NAVBASE Kitsap Bangor instructions.
- Maintenance and repair of heavy equipment and vehicles involving oil changes, hydraulic system drain-down, solvent and de-greasing cleaning operations, fuel tank drain-down and removal, and other activities that could result in discharge or spillage of pollution to the ground or into storm

water runoff would be conducted using spill prevention measures, such as drip pans, impermeable berms, and accessible spill response materials.

- Any spills would be handled according to Commander, Navy Region Northwest Instruction 5090.1C, *Oil and Hazardous Substance Integrated Contingency Plan* and reported in accordance with the Plan.
- Storm water would be managed according to Ecology's 2012 Stormwater Management Manual for Western Washington.
- The Navy will ensure the preparation and implementation of a Demolition Plan, Environmental Protection Plan, Safety Plan (including Activity Hazard Analysis), Asbestos Abatement Plan, and a Lead Abatement Plan per U.S. Army Corps of Engineers EM 385-1-1, *Safety and Health Requirements Manual*.

CHAPTER 3.0 AFFECTED ENVIRONMENT & ENVIRONMENTAL CONSEQUENCES

This chapter presents baseline data for the affected environment and an assessment of the potential impacts, or environmental consequences that could result from implementation of the proposed action. The following resources are evaluated in this chapter: hazardous materials and wastes, and cultural resources.

3.1 HAZARDOUS MATERIALS & WASTE

Hazardous materials and wastes are substances that have the potential to pose a substantial threat to human health and/or the environment. Hazardous materials are any materials that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may pose a substantial hazard to human health or the environment. A hazardous material becomes waste when it is not appropriate for further use, or when regulations determine that the material has become waste. Most typically, hazardous materials become waste once the decision has been made to dispose of the materials. Hazardous wastes are defined as solid waste, or combination of solid wastes, that because of quantity, concentration, or physical, chemical or infectious characteristics may:

- Cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible or incapacitating reversible, illness.
- Pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of or otherwise managed.

Regulatory Overview

Hazardous materials and wastes are identified and regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA) and the Emergency Planning and Community Right-to-Know Act. Commander, Navy Region Northwest Instruction 5090.3 also provides guidance for the management of hazardous materials and wastes at Naval Base Kitsap. Waste may be classified due to characteristics such as toxicity, reactivity, ignitability, or corrosiveness or it may be listed as hazardous in 40 CFR 263, *Standards Applicable to Transporters of Hazardous Waste*. A substance is considered toxic if it contributes significantly to an increase in mortality, serious irreversible illness or incapacitating reversible illness.

RCRA (42 USC § 6901 et seq.) regulates the management of solid and hazardous waste. Under subtitle C, RCRA has two general paths to protecting human health and the environment: (1) preventing environmental problems by ensuring that wastes are well managed from “cradle to grave,” reducing the amount of waste generated, conserving energy and natural resources; and (2) cleaning up environmental problems caused by mismanagement of wastes. RCRA provides that the U.S. Environmental Protection Agency (USEPA) may delegate authority to states to regulate hazardous waste under state law in lieu of RCRA. Irrespective of USEPA-delegated hazardous waste authority, state hazardous waste substantive and procedural requirements, including the requirement to obtain state permits, are applicable to Navy facilities under the Federal Facilities Compliance Act.

EO 12088, *Federal Compliance with Pollution Control Standards*, and DoD Instruction 4715.6 require that hazardous materials and hazardous waste management procedures be developed and implemented by all military departments.

3.1.1 Existing Conditions

The materials and potential wastes of concern for the Proposed Action include Asbestos Containing Materials (ACMs); Lead Base Paint (LBP); Polychlorinated Biphenyls (PCBs); petroleum, oils, and lubricants; and mercury that may be directly associated with the buildings and boxcars. In addition, the locations of the proposed demolition are within two Operable Units (OU) included on the CERCLA

National Priorities List of contaminated areas requiring environmental investigations and potential cleanup (40 CFR Part 300).

Asbestos-Containing Materials (ACMs)

From the mid-1940s to the late 1970s asbestos and ACMs were used extensively to fireproof, insulate, soundproof, and decorate. Asbestos is still used in many products and is often not listed on product labels or Material Safety Data Sheets. The Navy conducted asbestos surveys on buildings 6034, 6035, 6036, 6037, 6409, and 1461 and the boxcars. The buildings were found to contain ACMs (Skookum 2011). Asbestos containing black mastic was found in all but four of the boxcars. The four railcars that are free of ACMs are USN61-01973, USN61-01977, USN61-01981, and USN61-01982.

Lead Based Paint (LBP)

Lead is a common component in renovation and demolition debris from older buildings. It is most often found in interior and exterior painted wood, siding, window frames and plaster, and lead pipes or copper pipes with lead solder. It is less common in new construction wastes. Most buildings constructed before 1960 contain heavily leaded paint. Buildings constructed as late as 1978 also may contain lead based paint (Ecology 2009).

Lead pipe or solder can be found in all but the most recently constructed buildings. The Navy conducted lead surveys on buildings 6034, 6035, 6036, 6037, 6409, and 1461 and the boxcars. The buildings and boxcars were found to contain LBP (Skookum 2011).

Mercury

The Mercury Education and Reduction Act of 2003 banned the sale of mercury-containing thermometers, and switches. Although phased out, mercury is still commonly found in older temperature and pressure-measuring devices, clocks, switches, and other items. All fluorescent lamps and certain other bulbs also contain mercury.

The Navy conducted a visual inspection of buildings 6034, 6035, 6036, 6037, 6409 and 1461, which failed to detect any materials that were capable of containing high levels of mercury (Skookum 2011). However, based on the age of the buildings, it is possible that the buildings could have some fluorescent lighting and mercury-containing switches and thermostats. In addition, the north end of building 6035 housed a Mercury Accumulation Area, where fluorescent light bulbs containing mercury were destroyed. A mercury survey was performed in this area, and while mercury vapors were detected, they were well below the Occupational Safety and Health Administration's permissible exposure limits (U.S. Navy 2011).

Polychlorinated Biphenyls (PCBs)

PCBs are regulated under the Toxic Substances Control Act of 1976 (40 CFR Part 761) and exist in two potential locations: electrical transformers and fluorescent light ballasts. PCBs were used as coolants and lubricants in transformers manufactured between 1929 and 1977. PCBs may also be present in the small capacitor in fluorescent light ballasts manufactured through 1979 (USEPA 1979).

The Navy conducted a visual inspection of buildings 6034, 6035, 6036, 6037, 6409 and 1461, which failed to detect any PCB-containing light ballasts (Skookum 2011). However, based upon the construction dates of buildings, it is possible that PCB-containing light ballasts or other building materials (cable and wire insulation, fluorescent lamps, etc.) could be present.

Contaminated Sites

The Proposed Action is located within two distinct contaminated sites, referred to as operable units (OU) 2 and OU-8, which are on the USEPA CERCLA National Priorities List of contaminated areas requiring environmental investigation and cleanup. The Segregation Area buildings 6034, 6035, 6036, 6037, as well as building 6409 are located within OU-2, while building 1461 is located within OU-8.

OU-2

OU-2 consists of Site F, a former wastewater lagoon and overflow ditch that was primarily used in the 1960s and 1970s for the disposal of wastewater produced during the demilitarization of ordnance items in the adjacent Segregation Area facilities. Demilitarization of ordnance during this period was accomplished using steam cleaning and/or steam melt-out procedures, which ultimately drained to the unlined wastewater lagoon. As a result soil and groundwater were found to be contaminated with TNT (2,4,6-trinitrotoluene), RDX (Hexahydro-1,3,5-trinitro-1,3,5-triazone), DNT (2,4 and 2,6-dinitrotoluene), 1,3,5-trinitrobenzene, 1,3-dinitrobenzene, manganese, nitrates and nitrites.

A 1991 CERCLA Record of Decision (ROD) for OU-2 documents the Navy's decision to cleanup contamination by a combination of contaminated soil excavation to a depth of 15 ft; installation of an infiltration barrier, and groundwater remediation. The Segregation Area is not within the area where contaminated soil was identified and remediated. The ROD, which was developed in cooperation with the USEPA and Ecology, was modified in 1994 to clarify the method for groundwater treatment (U.S. Navy, USEPA, and Ecology 1994). All elements of the remedy were completed by 1997. There is evidence of residual contamination in the shallow aquifer below the old wastewater lagoon and institutional controls have been put in place to include: groundwater use prohibition, land use restrictions and issuance of excavation permits.

OU-8

OU-8 consists of approximately 150 acres of land and is located in the southeastern corner of NAVBASE Kitsap Bangor. It encompasses the Public Works Industrial Area (including bldg 1461) and the off base residential community along Mountain View Road between Clear Creek Road and the NAVBASE Kitsap Bangor boundary. Historic practices involving steam cleaning, paint shop stormwater drainage, and leaking underground storage tanks caused soil and groundwater contamination with benzene, DCA (1, 2-dichloroethane), DCE (1, 1 dichloromethane), EDB (1, 2-dibromoethane), and toluene.

A 2000 CERCLA ROD for OU-8 documents the Navy's decision to cleanup contamination by a combination of groundwater containment and remediation, soil remediation via vapor extraction and bioventing, and cessation of consumption of groundwater (U.S. Navy, USEPA, and Ecology 2000). All elements of the remedy were completed by 2004 and soil sampling in the Public Works Industrial Area has verified that the soil has been sufficiently remediated to meet Ecology's cleanup levels down to a depth of 15 ft (U.S. Navy 2010b).

3.1.2 Environmental Consequences

Impacts involving hazardous materials and waste are considered significant if the storage, use, transportation, or disposal of these substances would impact human health or present ecological risks. Significance is based on toxicity and risk associated with transportation and storage, and disposal of hazardous materials.

Alternative 1

Prior to the proposed demolition of the buildings and disposal of the boxcars, the Navy would abate ACMs from the buildings and boxcars. All demolition materials tested and confirmed to be hazardous waste would be removed, stored, and disposed of in accordance with all applicable laws and regulations, including the Resource Recovery and Conservation Act, Washington Administrative Code 173-303, and Commander, Navy Region Northwest Instruction 5090.3. During demolition, all suspect materials not previously tested and confirmed to be non hazardous would be handled, stored and disposed of as hazardous waste. The Navy will prepare and implement a Demolition Plan, Environmental Protection Plan, Safety Plan (including Activity Hazard Analysis), Asbestos Abatement Plan, Lead Abatement Plan, and Waste Management Plan to address hazardous materials and waste in the buildings and the boxcars. The plans would indicate method of removal, handling, and disposal, as appropriate, of hazardous waste

to prevent exposure of workers and Base personnel to health and safety risks. Hazardous waste generated during demolition would be disposed of off-site at a facility licensed to receive the waste in accordance with Washington State Dangerous Waste Regulations (WAC-173-303).

Demolition activity would involve short-term use of heavy construction equipment. Hazardous materials associated with operation of heavy equipment include fuels, petroleum, oils, lubricants, and hydraulic fluids. Equipment would be operated to avoid and minimize spills or leaks. In the event of accidental spills or leaks, the Navy will follow Commander, Navy Region Northwest Instruction 5090.1C, *Integrated Contingency Plan* to minimize potential impacts to human health and the environment.

Demolition activities in the Segregation Area, building 6409, and building 1461 would include removal of concrete floors to the subgrade, which would have incidental contact with soil. It would also include localized excavation to a depth of five feet to remove utilities. There is no known soil contamination within proposed demolition areas in the Segregation Area, building 6409, and building 1461. Excavation is not expected to come in contact with or impact groundwater. Demolition activities would follow the institutional controls and guidelines to ensure conformance with the RODs for OU-2 and OU-8. These controls and guidelines include prohibition of the use of groundwater and receipt of excavation permits prior to ground disturbing activities. Additionally, the revegetation of the Segregation Area and building 6409 footprint and resurfacing of the building 1461 footprint with asphalt would be consistent with the land use restrictions of the RODs.

With the use of best management practices and implementation of the Demolition Plan, Environmental Protection Plan, Safety Plan (including Activity Hazard Analysis), Asbestos Abatement Plan, Lead Abatement Plan, and Waste Management Plan, and conformance with the RODs for OU-2 and OU-8, no significant impacts due to hazardous materials and waste are anticipated under Alternative 1.

No Action Alternative

Under the No Action Alternative, demolition of the buildings would not occur and therefore hazardous waste or materials such as lead and asbestos would remain on site. There would be no change to, and no significant impact from, hazardous materials and waste with implementation of the No Action Alternative.

3.2 CULTURAL RESOURCES

Cultural resources consist of prehistoric and historic districts, sites, buildings, landscapes, structures, artifacts, or any other physical evidence of human activity considered important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. Cultural resources can be divided into three major categories: archaeological resources, architectural resources, and traditional cultural properties.

Archaeological Resources (prehistoric and historic), are locations where human activity measurably altered the earth or left deposits of physical remains (e.g. stone flakes, arrowheads, or bottles). Archaeological resources can include campsites, trails, dumps, habitation sites, logging camps, cooking hearths, tool fragments, trash piles, and a variety of other features.

Architectural Resources include standing buildings, dams, canals, bridges, cemeteries, landscapes, and other built-environment resources of historic or aesthetic significance.

Traditional Cultural Properties can include archaeological resources, buildings, neighborhoods, prominent topographic features, and natural resources that Native Americans and other ethnic groups consider essential for the continuance of traditional cultures.

As discussed in Section 1.4, the Proposed Action does not have the potential to effect archaeological resources and traditional cultural properties. As such, only architectural resources are carried forward for analysis in this section.

Regulatory Overview

Under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, federal agencies must consider impacts to historic properties associated with all proposed undertakings. Procedures for assessing adverse effects to cultural resources are set forth in 36 CFR Part 800, *Procedures for Protection of Historic Properties*, and OPNAVINST 5090.1D. Architectural resources generally must be more than 50 years old to be considered under the NHPA. However, more recent properties, such as Cold War era buildings less than 50 years of age, may warrant protection if they are “exceptionally important.” To be considered as an historic property, architectural resources must meet one or more criteria as defined in 36 CFR 60.4, *National Register of Historic Places, Criteria for Evaluation*, for inclusion on the National Register of Historic Places (NRHP). These criteria include association with an important event, association with a famous person, properties that embody the distinctive characteristics of a type, period, or method of construction, or that have yielded, or may be likely to yield information important in prehistory or history on the local, state, or national level. Resources must also possess integrity (i.e., their important historic features must still be present and recognizable). Additionally, the primary NRHP criteria consideration for properties less than 50 years of age is Criteria Consideration G: properties that have achieved exceptional significance within the past 50 years.

3.2.1 Existing Conditions

The Area of Potential Effects (APE) for cultural resources is the geographic area or areas within which an undertaking (project, activity, program or practice) may cause changes in the character or use of any historic properties present. The APE is influenced by the scale and nature of the undertaking and may be different for different kinds of effects caused by the undertaking. The APE for this project includes the area known as Segregation Area at NAVBASE Kitsap Bangor, which is comprised of buildings 6034, 6035, 6036 and 6037, 35 boxcars, railcar platform, two blast barriers, two segments of an earthen berm, pavement and the railroad track extending approximately 200 feet beyond the openings in the earthen berm. The APE also includes the footprint of buildings 6409 and 1461, as well as the areas around two railcars (adjacent to building 6409) and eight railcars located approximately ½ mile south of the Segregation Area (Figure 3-1).

Segregation Area and Boxcars

The Segregation Area at NAVBASE Kitsap Bangor consists of buildings 6034, 6035, 6036, and 6037, concrete railcar platform, two blast barriers, earthen berm, boxcars, pavement and railroad tracks. The Segregation Area is associated with the construction of Naval Magazine Bangor (now referred to as NAVBASE Kitsap Bangor) and the role it played in meeting the trans-shipment requirements for sustained offensive against Japan in the Pacific Theater during World War II. The Allied war strategy changed from one of a defensive strategy to that of an offensive strategy in 1944. By 1944, the Allied forces had gained the initiative on all fronts. Existing ammunition shipping facilities were inadequate to sustain the offensive necessary to defeat Japan. NAVBASE Kitsap Bangor was constructed to meet this need, with the railroad constructed to tie it directly to the country’s main rail lines. The Segregation Area and its associated facilities served as a receiving center where ammunition was sorted and sent to appropriate storage facilities. It also readied ammunition coming out of storage facilities for trans-shipment to the Pacific Theater (Sackett 2011).

Buildings 6034, 6035, 6036, and 6037 comprise the Sorting Buildings of the Segregation Area and were all built in 1944. The buildings were designed by Chicago-based architects Shaw, Naess, and Murphy and Seattle-based engineer M. O. Sylliaasen. They were constructed by Sound-Kiewit Co., Seattle. These buildings have rectangular footprints constructed of reinforced concrete that sit on top of a concrete platform. An earthen berm approximately 12 ft in height surrounds buildings 6034, 6035, 6036, and 6037 and has two openings at the south end as well as two openings at the north end to allow railway ingress and egress to the buildings. The intent of the berm was to act as a barricade in the event of an explosion.

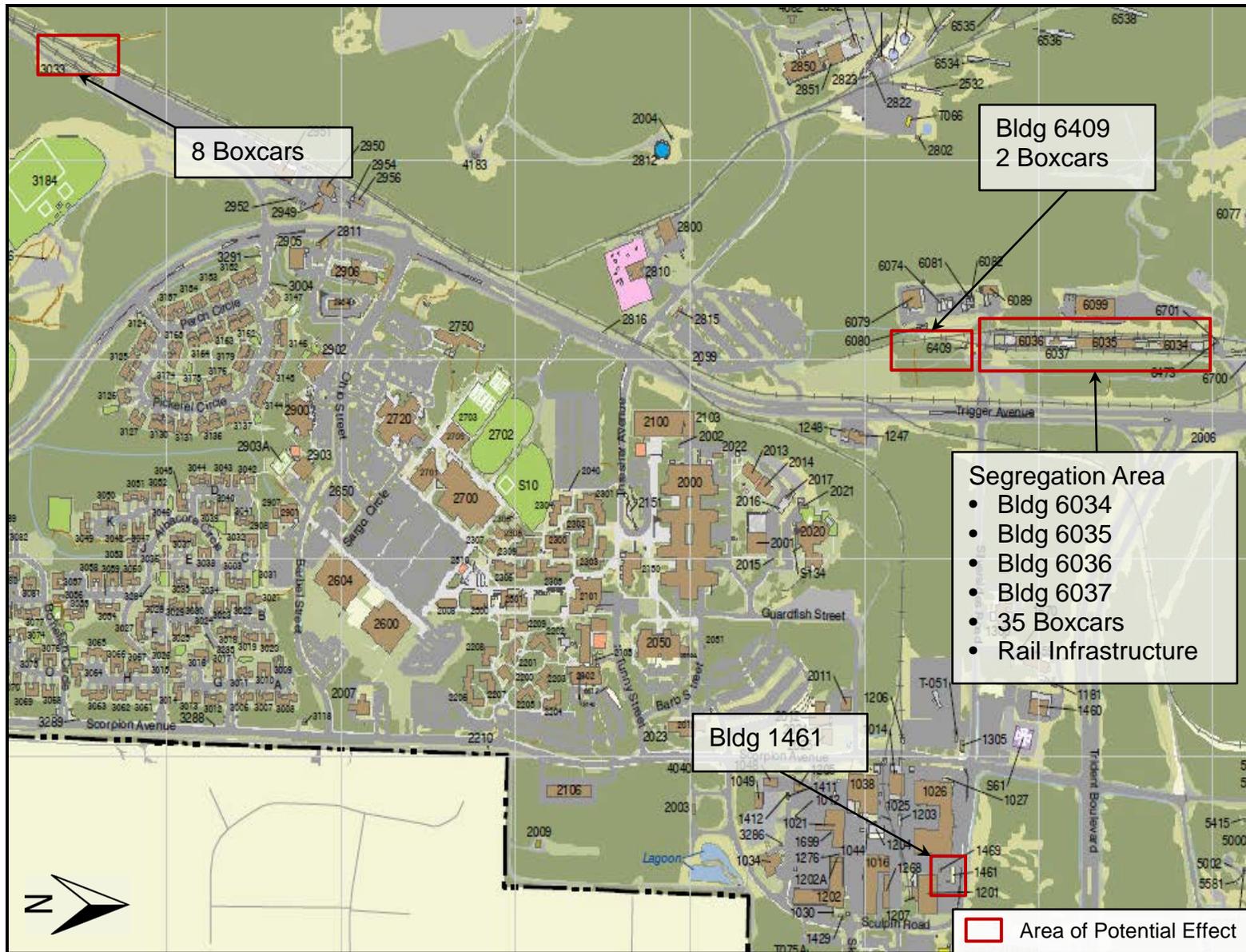


Figure 3-1 Area of Potential Effects

The boxcars were built between 1941 and 1945. When the Shelton Bangor railroad became operational in January 1945, the boxcars were used to transport ammunition. More recently, the boxcars have been used as storage facilities. The boxcars come in two lengths – either 40.5 ft in length or 50.5 ft in length, but have standard heights and widths of roughly 10 ft. 35 boxcars are located within the Segregation Area, two boxcars are located just outside of the Segregation Area (adjacent to building 6409), and eight boxcars are located approximately ½ mile south of the Segregation Area (Figure 3-1).

The Navy has determined that the Segregation Area Sorting Buildings (buildings 6034, 6035, 6036, and 6037) are eligible for inclusion in the NRHP. Based on a draft report, the Navy has determined the eligibility to apply under Criterion A for the role they played in meeting the requirements for a sustained offensive against Japan in the Pacific Theater and also under Criterion C for the engineering logistics to reach operation in a short period of time. In a letter dated January 29, 2013 the State Historic Preservation Officer (SHPO) concurred with the Navy's determinations (Appendix A).

Building 6409

Building 6409 is a small utility building located south of and outside of the Segregation Area berm, east of the railroad tracks. The rectangular building features a front-gabled, corrugated metal roof and concrete foundation. The concrete-block construction is exposed with exception of vertical board cladding and a wood cornice in the gabled roof ends. The original wood framing remains around modern double metal doors. The building has no windows, but rather wood vents in window-like wood-framed openings. A ground-level hatch is located on the northwest side of the building providing access to a concrete-lined crawl space housing steam utilities.

The building was constructed in 1945, probably associated with the World War II activities of the Segregation Area and railroad. It was likely added to provide a separate storage area for flammables, outside of the earthen berm, but in close proximity to the railroad loading facilities. The Navy has determined that the building is not eligible for inclusion in the NRHP because it did not play a significant role in meeting the requirements for a sustained offensive against Japan in the Pacific Theater, nor does the building reflect important architectural or design standards. In a letter dated July 24, 2013 the SHPO concurred with the Navy's determination (Appendix A).

Building 1461

Building 1461 is a one-story wood frame building with a front-gabled asphalt-shingle roof, wood drop siding, and concrete foundation. The building was constructed in 1959, and historically used as a railroad sandblasting facility. A 3 ft x 3 ft recess is set in the concrete slab floor of the northwest quadrant of the building. The recess is assumed to be 4 ft deep, and is currently filled with sand and debris. Rail tracks are embedded into the concrete slab floor and run the entire length of the building at center-line. The Navy has determined building 1461 is not eligible for listing in the NRHP. In a letter dated January 29, 2013 the SHPO concurred with the Navy's determination (Appendix A).

3.2.2 Environmental Consequences

In accordance with 36 CFR 800.5 an action results in an effect to an NRHP-eligible resource when it alters the resource characteristics that qualify it for inclusion in the register. An adverse effect occurs when the undertaking directly or indirectly alters any of these characteristics in a manner that would diminish the property's integrity. Examples of direct impacts can include physical destruction, damage, or alteration of a resource; alteration of the character of the surrounding environment that contributes to the resource's eligibility; introduction of visual, audible, or atmospheric intrusions out of character with the resource or its setting; and neglect of the resource resulting in its deterioration or destruction; or sale of the property.

An adverse effect under the NHPA is considered to be an adverse impact under NEPA. Consultation and mitigation under NHPA can resolve an adverse effect in accordance with 36 CFR 800.8(c)(1)(v) to a less

than significant impact. Potential impacts to cultural resources as a result of the Proposed Action or alternatives are described below.

Alternative 1

Alternative 1 would include ground disturbing activity to the extent necessary to demolish buildings 6034, 6035, 6036, 6037, 6409, and 1461 and to remove existing infrastructure including buried utilities, building foundations, rail ties, two blast barriers, and portions of an earthen berm. The Navy would also dispose of 45 boxcars, four of which would be made available for donation to appropriate nonprofit heritage groups for historical conservation purposes. Representatives of the Foss Waterway Seaport and the Toppenish Northern Pacific Railway Museum have expressed interest in the boxcars and coordination with these groups continues.

The Navy has determined that demolition of buildings 6034, 6035, 6036, and 6037 would have an adverse effect on properties eligible for inclusion on the NRHP. Buildings 6409 and 1461 are not eligible for inclusion on the NRHP and their demolition would not have an adverse effect.

The Navy initiated consultation with the Skokomish Tribe, Port Gamble S'Klallam Tribe, Jamestown S'Klallam Tribe, Lower Elwha Klallam Tribe, and Suquamish Tribe on November 9, 2012, requesting concurrence with the APE and determination of effects under Section 106 of the NHPA (Appendix A). The Navy received a letter from the Lower Elwha Klallam Tribe who did not object to the APE or determination of effects and deferred to the Suquamish Tribe and Skokomish Tribe regarding cultural resources (Appendix A). The Suquamish Tribe also concurred with the Navy's APE and determination of effects. The Skokomish Tribe made an inquiry to clarify the location of the proposed work.

The Navy initiated consultation with the SHPO on December 21, 2012 (Appendix A). On January 29, 2013, the SHPO concurred with the Navy's determination that the project, as proposed, would have an adverse effect to buildings 6034, 6035, 6036, and 6037 (Appendix A). Stipulations that address the adverse effects have been defined through the consultation process and are outlined in a draft Memorandum of Agreement (MOA) between the Navy and the SHPO (Appendix A).

The Navy made the draft MOA available to the public for review and comment from August 23, 2013 to September 4, 2013 with a notice of availability published in the local newspaper (Kitsap Sun). One comment from the public was received, which was a request for a map depicting the APE. The Navy responded by providing the requestor a map of the APE.

In accordance with the MOA, the Navy would implement the following stipulations as part of the Proposed Action:

- In consultation with the SHPO and prior to demolition, the Navy will contact HistoryLink.org to develop an essay about the Bangor Segregation Area. Once completed, the essay shall be downloaded to HistoryLink.org, the state's free on-line encyclopedia of Washington history. The narrative shall address the history and significance of the buildings, boxcars, the earthen berm, railroad tracks and associated objects as they related to development of NAVBASE Kitsap Bangor and its role in World War II.
- The Navy will document historic buildings, structures and objects in the Segregation Area, including: Buildings 6034, 6035, 6036, 6037, a representative 40-ton boxcar, a representative 50-ton boxcar, the earthen berm, railroad tracks and objects associated with the Segregation Area, following DAHP Level II Mitigation Documentation Requirements. Prior to demolition, a draft of all documentation shall be completed, reviewed and accepted by DAHP within 30 days of receipt from the Navy.
- The Navy will dispose of boxcars and miscellaneous railroad objects (switches, gears, etc.) through the Defense Reutilization and Marketing Office (DRMO) for potential acquisition by appropriate heritage groups for preservation. Acquisition of railroad objects will be in accordance with DRMO disposal process. Any boxcars identified for possible preservation will be emptied

and all hazardous material removed prior to their removal from the Segregation Area. Boxcars and railroad objects not selected for preservation will be disposed of.

- In the event heritage groups are not capable of acquiring boxcars, prior to demolition the Navy will record the representative 50-ton and 40-ton boxcars in their existing three-dimensional setting using videography, prior to their disposal. Copies of the video will be provided to DAHP.
- The Navy will submit a draft report to the SHPO that will evaluate the eligibility of the Shelton-Bangor Railroad using National Register criteria and identify elements that would be contributing to the eligibility.
- Upon completion of the draft eligibility evaluation report of the Shelton-Bangor Railroad, the Navy in consultation with the SHPO, ACHP, and interested parties will develop a Programmatic Agreement with the goal of managing the identified historic properties. The Programmatic Agreement will focus on the continued operation of the railroad while maintaining its historic character.

With implementation of the stipulations specified in the MOA, Alternative 1 would not result in significant impacts to cultural resources.

No Action Alternative

Under the No Action Alternative, the demolition of the buildings and disposal of boxcars, as well as ground disturbing activities would not occur. No properties eligible for inclusion in the NRHP would be directly affected. Although significant impacts to cultural resources are not anticipated, the implementation of the No Action Alternative would require continued maintenance to avoid an adverse effect from failure to maintain properties eligible for inclusion in the NRHP.

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CHAPTER 4.0
CUMULATIVE IMPACTS

CEQ regulations implementing the procedural provisions of NEPA define cumulative impacts as:

“...the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.” (40 CFR 1508.7).

Each resource, ecosystem, and human community must be analyzed in terms of its ability to accommodate additional effects, based on its own time and space parameters. Therefore, cumulative effects analysis normally would encompass a region of influence (ROI) or geographic boundaries beyond the immediate area of the Proposed Action, and a time frame including past actions and foreseeable future actions, to capture these additional effects.

For the Proposed Action to have a cumulatively significant impact to an environmental resource, two conditions must be met. First, the combined effects of all identified past, present, and reasonably foreseeable projects, activities, and processes on a resource, including the effects of the Proposed Action, must be significant. Second, if there is a significant cumulative impact, the Proposed Action must make an appreciable contribution to that significant cumulative impact.

In order to analyze cumulative effects, an ROI must be identified for which effects of the Proposed Action and other past, present, and reasonably foreseeable actions would occur. For purposes of the cumulative effects analysis, the ROI consists of NAVBASE Kitsap Bangor.

4.1 PAST, PRESENT, AND REASONABLY FORESEEABLE PROJECTS

The Navy has made an effort to identify and evaluate projects that occurred within the last five years, are on-going, or are reasonably foreseeable within the next five years that would have similar and potentially additive/cumulative effects to those of the Proposed Action. Past, present, and reasonably foreseeable future projects in the ROI that could have similar and potentially additive/cumulative effects to those of the Proposed Action are briefly described in Table 4-1. Projects with measureable contributions to impacts within the ROI for a resource area were included in the cumulative analysis.

Table 4-1. Past, Present, and Reasonably Foreseeable Future Projects at NAVBASE Kitsap Bangor and the ROI

<i>Project</i>	<i>Project Description</i>	<i>Project Timeframe</i>		
		<i>Past</i>	<i>Present</i>	<i>Future</i>
Demolish Building 1013	In 2009, the Navy completed demolition of Bldg 1013 at NAVBASE Kitsap Bangor. Bldg 1013, which was built in 1976 and had approximately 7,321 ft ² , and had been damaged beyond repair due to flooding. This building has been determined ineligible for inclusion in the NRHP.	X		

**Table 4-1. Past, Present, and Reasonably Foreseeable Future Projects
 at NAVBASE Kitsap Bangor and the ROI**

Project	Project Description	Project Timeframe		
		Past	Present	Future
Renovate Building 1004	In late 2014, the Navy plans to renovate bldg 1004, Navy Veterinary Clinic. The building was built in 1944 and has had major remodel work in 1968. The project will bring the facility into compliance with American Animal Hospital Association guidelines as well make critical structural repairs. This building has been determined ineligible for inclusion in the NRHP.		X	
Explosive Handling Wharf 1 (EHW-1) Maintenance	Maintenance over multiple years to replace deteriorated piles; the most recent phase installed 29 30-inch steel piles. The Navy is planning to replace 4 concrete piles with 4 concrete filled steel piles in 2015. Phased repair of this structure is expected to continue until 2024. This structure has been determined eligible for inclusion in the NRHP.	X	X	X
K/B Docks Pile Replacement	Replacement of 5 deteriorated timber piles with new timber piles at the K/B Docks is planned for 2015. K/B Docks has been determined eligible for inclusion in the NRHP.			X
Explosive Handling Wharf 2 (EHW-2)	The project includes construction of a new Explosives Handling Wharf; upland road; an abutment where the trestles connect to the shore; and an upland construction staging area. Approximately 20 existing facilities and/or structures in proximity to the structure will be modified or demolished; these existing facilities have been determined not eligible for inclusion in the NRHP. Four new buildings are being constructed to house the functions of some of the buildings that are being demolished or vacated. Construction included new structures within the viewshed of properties eligible for inclusion in the NRHP.	X	X	X
Pile Repair and Replacement Program	Under the Pile Repair and Replacement Program, the Navy plans to repair or replace structurally unsound piles at various Navy installations in the Puget Sound areas over a five year period beginning July 2017. At NAVBASE Kitsap Bangor many of the structures where piles may be replaced, including K/B Docks, Delta Pier, and EHW-1, have been determined eligible for inclusion in the NRHP.			X

4.2 ASSESSMENT OF CUMULATIVE IMPACTS BY RESOURCES

4.2.1 Hazardous Materials and Waste

Alternative 1

Implementation of the past and present actions listed in Table 4-1 have all involved the use of hazardous materials during construction and/or generated hazardous waste from maintenance and demolition/renovation activities. For each of these projects, the Navy implemented Best Management Practices, similar to those listed in Section 2.5 of this EA to prevent risks to human health and impacts to the environment from hazardous materials and waste. These measures included:

- All pollutants, including waste materials, handled and disposed of in a manner that does not cause contamination of stormwater.
- All wastes products present at the construction site managed per federal, state regulations and NAVBASE Kitsap Bangor instructions.
- Maintenance and repair of heavy equipment and vehicles involving oil changes, hydraulic system drain-down, solvent and de-greasing cleaning operations, fuel tank drain-down and removal, and other activities that could result in discharge or spillage of pollution to the ground or into storm water runoff would be conducted using spill prevention measures, such as drip pans, impermeable berms, and accessible spill response materials.
- All spills handled according to Commander, Navy Region Northwest Instruction 5090.1C, *Oil and Hazardous Substance Integrated Contingency Plan* and reported in accordance with the Plan.
- Preparation and implementation of Demolition Plans, Environmental Protection Plans and Safety Plans (including Activity Hazard Analysis).
- Preparation and implementation of Asbestos Abatement Plans and Lead Abatement Plans per U.S. Army Corps of Engineers EM 385-1-1, *Safety and Health Requirements Manual*, as appropriate.

As detailed in Section 3.1.2, implementation of Alternative 1 would include abatement of asbestos from the buildings and railroad boxcars, as well as removal and disposal of hazardous waste associated with building demolition. Demolition activity would involve short-term use of heavy construction equipment. Hazardous materials associated with operation of this heavy equipment include fuels, petroleum, oils, lubricants, and hydraulic fluids. There is no known soil contamination within proposed demolition areas; however, demolition activities within OU-2 and OU-8 would follow the institutional controls and guidelines to ensure conformance with the RODs for these operable units. With the use of best management practices and implementation of the Demolition Plan, Environmental Protection Plan, Safety Plan (including Activity Hazard Analysis), Asbestos Abatement Plan, Lead Abatement Plan, and Waste Management Plan, and conformance with the RODs for OU-2 and OU-8, no significant impacts due to hazardous materials and waste are anticipated under Alternative 1.

Therefore, implementation of Alternative 1 combined with the past, present, and reasonably foreseeable future projects, would not result in significant adverse impacts to hazardous materials and waste. The long-term beneficial effect would be the reduction of buildings on NAVBASE Kitsap Bangor that contain asbestos containing materials, lead based paints, mercury and PCBs.

No Action Alternative

Under the No Action Alternative, the demolition of the buildings and disposal of boxcars would not occur. This alternative would not result in a change to any existing hazardous materials and waste and would therefore, not contribute to cumulative impacts for this resource.

4.2.2 Cultural Resources

Alternative 1

Prior to implementation of the past and present actions listed in Table 4-1, the Navy reviewed potential cultural resources in and adjacent to the project areas and addressed potential adverse impacts in consultation with the SHPO as required under Section 106 of the NHPA. Building 1013 was determined by the Navy to be ineligible for inclusion in the NRHP. The EHW-1 Pier is eligible for inclusion in the NRHP due to its Cold War context, and repairs to EHW-1 are being completed with that historical context in mind. Building 1004 was also determined by the Navy to be ineligible for inclusion in the NRHP. Construction of EHW-2 resulted in new structures being placed within viewshed of EHW-1. The Navy determined that the EHW-2 construction would not have an adverse effect on this property. For each of these projects, the SHPO concurred with the Navy's determinations that implementation of the project would not have adverse effects on properties eligible for inclusion in the NRHP.

Future projects, including pier repairs under the Pile Repair and Replacement (PRR) Program are currently in their early assessment stages, and the cultural resources are not yet known. However, as the PRR Program moves forward in the planning process, the Navy will evaluate the action in accordance with the NHPA and consult with the SHPO as required.

While Alternative 1 would have an adverse effect to buildings eligible for inclusion in the NRHP, these effects would be addressed with implementation of stipulations outlined in the draft MOA (Appendix A). Therefore, implementation of Alternative 1 combined with the past, present, and reasonably foreseeable future projects, would not result in significant adverse impacts to cultural resources.

No Action Alternative

Under the No Action Alternative, the demolition of the buildings and disposal of boxcars would not occur. This alternative would have no impacts to cultural resources and would therefore, not contribute to cumulative impacts for this resource. Although significant impacts to cultural resources are not anticipated, the implementation of the No Action Alternative would require continued maintenance to avoid an adverse effect from failure to maintain properties eligible for inclusion in the NRHP.

CHAPTER 5.0
OTHER CONSIDERATIONS REQUIRED BY NEPA

5.1 POSSIBLE CONFLICTS BETWEEN THE PROPOSED ACTION AND THE OBJECTIVES OF FEDERAL, STATE, LOCAL, AND REGIONAL LAND USE PLANS, POLICIES, AND CONTROLS

Table 5-1 summarizes how the Proposed Action would be in compliance or avoid conflicts with federal, state, and local regulations, plans and policies.

Table 5-1. Principal Federal and State Laws Applicable to the Proposed Action

Federal, State, Local, and Regional Land Use Plans, Policies, and Controls	Status of Compliance
National Environmental Policy Act (NEPA) (42 USC §4321 et seq.); CEQ NEPA implementing regulations (40 CFR 1500-1508; Navy procedures for Implementing NEPA ((32 CFR Part 775 and OPNAVINST 5090.1D)	Preparation of this EA has been conducted in compliance with NEPA and in accordance with CEQ regulations and the Navy’s NEPA procedures.
Clean Air Act (42 USC §7401 et seq.)	The USEPA has established NAAQS for seven pollutants. NAVBASE Kitsap Bangor is located in Kitsap County which is an attainment area. A formal conformity determination is not required. Emissions for the Proposed Action would come from temporary, mobile sources and would be well below applicable thresholds. As a result, the project would comply with the requirements of the Clean Air Act, as amended.
National Historic Preservation Act (Section 106, 16 USC 470 et seq.)	The NHPA requires federal agencies to identify, evaluate, inventory, and protect NRHP resources (or resources that are potentially eligible for listing in the NRHP on properties that they control (16 USC 470h-2). The Navy has determined that implementation of the Proposed Action would have an adverse effect on properties eligible for inclusion on the NRHP. The Navy has consulted with the Washington SHPO under Section 106 of the NHPA and jointly developed a Draft MOA that stipulates how the Navy will address the adverse effects of demolishing these historic properties (Appendix A).
Consultation and Coordination with Indian Tribal Governments (EO 13175) and Department of the Navy Policy for Consultation with Federally Recognized Indian Tribes (SECNAV Instruction 11010.14A)	NAVBASE Kitsap Bangor is adjacent to and includes portions of the Hood Canal, which are within the Usual and Accustomed grounds and stations of the Skokomish Tribe, Port Gamble S'Klallam Tribe, Jamestown S'Klallam Tribe, Lower Elwha Klallam Tribe, and Suquamish Tribe. This upland project would have no effect to traditional resources because it would not change the tribe's access to exercise tribal treaty rights and it would not reduce or degrade harvestable marine resources. As the Proposed Action would not have a significant effect on tribal treaty rights or resources, consultation was not required.

Table 5-1. Principal Federal and State Laws Applicable to the Proposed Action

Federal, State, Local, and Regional Land Use Plans, Policies, and Controls	Status of Compliance
Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC § 9601 et seq.)	The Proposed Action is located within two contaminated sites, referred to as operable unit (OU) -2 and OU-8. Demolition activities in the Segregation Area, building 6409, and building 1461 would include removal of concrete floors to the subgrade, which would have incidental contact with soil. It would also include localized excavation to a depth of five feet to remove utilities. There is no known soil contamination within proposed demolition areas in the Segregation Area, building 6409, and building 1461. Excavation is not expected to come in contact with or impact groundwater. Demolition activities would follow the institutional controls and guidelines to ensure conformance with the RODs for OU-2 and OU-8. These controls and guidelines include prohibition of the use of groundwater and receipt of excavation permits prior to ground disturbing activities. Additionally, the revegetation of the Segregation Area and building 6409 footprint and resurfacing of the building 1461 footprint with asphalt are consistent with the land use restrictions of the RODs.
Resource Conservation and Recovery Act (RCRA) (42 USC § 6901 et seq.)	RCRA regulates the management of solid and hazardous waste. The materials and potential wastes of concern under the Proposed Action include ACMs, LBP, PCBs, and mercury and have been found within many of the buildings and boxcars proposed for demolition. With the use of best management practices and implementation of the Demolition Plan, Environmental Protection Plan, Safety Plan (including Activity Hazard Analysis), Asbestos Abatement Plan, Lead Abatement Plan, and Waste Management Plan, the Proposed Action would be in conformance with RCRA.
EO 12088, Federal Compliance with Pollution Control Standards	EO 12088, dated 13 October 1978, requires federal facilities to comply with all applicable pollution control standards. EO 12088 calls for all executive agencies to cooperate with the USEPA, state, interstate, and local agencies in accomplishing these tasks. Pollution control standards in place would comply with but are not limited to, those specified in the Toxic Substances Control Act, Clean Water Act, RCRA, and CAA.
EO 12898, Federal Actions to Address Environmental Justice in Minority and Low-income Populations	No disproportionately high or adverse impacts to minority and low-income populations would be expected from the Proposed Action.
EO 13045, Protection of Children from Environmental Health Risks and Safety Risks.	The Proposed Action is located entirely within the NAVBASE Kitsap Bangor. Access to the site would be restricted during demolition. The demolition of buildings and structures would not cause environmental health risks and safety risks, such as products and substances that children could come in contact with or ingest, that may disproportionately affect children.

5.2 IRREVERSIBLE OR IRRETRIEVABLE COMMITMENT OF NATURAL OR DEPLETABLE RESOURCES

Resources that are irreversibly or irretrievably committed to a project are those that are used on a long-term or permanent basis. This includes the use of non-renewable resources such as metal and fuel, and other natural or cultural resources. These resources are irretrievable in that they would be used for this project when they could have been used for other purposes. Human labor is also considered an irretrievable resource. Another impact that falls under this category is the unavoidable destruction of natural resources that could limit the range of potential uses of that particular environment.

Implementation of the Proposed Action would involve the consumption of fuel, oil, and lubricants for demolition vehicles. Human energy invested in demolition, recovery of metals and concrete would be irretrievably lost. Implementation of the Proposed Action would not result in significant irreversible or irretrievable commitment of resources.

5.3 RELATIONSHIP BETWEEN LOCAL SHORT-TERM USE OF THE HUMAN ENVIRONMENT AND MAINTENANCE AND ENHANCEMENT OF LONG-TERM NATURAL RESOURCE PRODUCTIVITY

The NEPA process requires an analysis of the relationship between a project's short-term impacts on the environment and the effects that these impacts may have on the maintenance and enhancement of the long-term productivity of the affected environment. Impacts that narrow the range of beneficial uses of the environment are of particular concern. This refers to the possibility that choosing one development option reduces future flexibility in pursuing other options, or that giving over a parcel of land or other resources to a certain use often eliminates the possibility of other uses being performed at that site.

Demolition activities would cause short-term disturbance. In the long-term, the area would be enhanced aesthetically by demolishing underutilized and deteriorating facilities. Once demolished, the sites would be backfilled with clean soil and revegetated with native vegetation and grass (as is the case for the Segregation Area facilities and bldg 6409) or resurfaced with asphalt (as is the case for bldg 1461). The Proposed Action would not result in any impacts that would reduce environmental productivity or permanently narrow the range of beneficial uses of the environment.

5.4 MEANS TO MITIGATE AND/OR MONITOR ADVERSE ENVIRONMENTAL IMPACTS

Demolition activity proposed under the Proposed Action would not result in any significant adverse environmental impacts with implementation of the following measures to avoid, minimize and/or mitigate impacts:

- In accordance with the Memorandum of Agreement between the Navy and SHPO, the Navy will implement the following stipulations as part of the Proposed Action:
 - In consultation with the SHPO and prior to demolition, the Navy shall contact HistoryLink.org to develop an essay about the NAVBASE Kitsap Bangor Segregation Area. Once completed, the essay shall be downloaded to HistoryLink.org, the state's free on-line encyclopedia of Washington history.
 - The Navy will document historic buildings, structures and objects in the Segregation Area, including: Buildings 6034, 6035, 6036, 6037, a representative 40-ton boxcar, a representative 50-ton boxcar, the earthen berm, railroad tracks and objects associated with the Segregation Area.
 - The Navy will dispose of boxcars and miscellaneous railroad objects (switches, gears, etc.) through the DRMO for potential acquisition by appropriate heritage groups for preservation. Any boxcars identified for possible preservation will be emptied and all hazardous material removed prior to their removal from the Segregation Area. Boxcars and railroad objects not selected for preservation will be disposed of.

- In the event heritage groups are not capable of acquiring boxcars, prior to demolition the Navy will record the representative 50-ton and 40-ton boxcars in their existing three-dimensional setting using videography, prior to their disposal.
- The Navy will submit a draft report to the SHPO that will evaluate the eligibility of the Shelton-Bangor Railroad using National Register criteria and identify elements that would be contributing to the eligibility.
- Upon completion of the draft eligibility evaluation report of the Shelton-Bangor Railroad, the Navy in consultation with the SHPO, ACHP, and interested parties will develop a Programmatic Agreement with the goal of managing the identified historic properties.

As required by OPNAV M-5090.1, section 10-3.6, Appendix C provides a comprehensive list of all mitigation requirements associated with the proposed action.

5.5 ANY PROBABLE ADVERSE ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED AND ARE NOT AMENABLE TO MITIGATION

The analysis in this EA demonstrates that the Proposed Action would not result in any significant impacts; therefore, there are no probable adverse environmental effects that cannot be avoided or are not amenable to mitigation.

CHAPTER 6.0 REFERENCES

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**CHAPTER 7.0
PERSONS AND AGENCIES CONTACTED**

The following agencies, organizations, and individuals were contacted during preparation of this EA.

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APPENDIX A AGENCY CORRESPONDENCE

NATIONAL HISTORIC PRESERVATION ACT, SECTION 106 CONSULTATION LETTERS

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**MEMORANDUM OF
AGREEMENT BETWEEN
COMMANDER, NAVY REGION
NORTHWEST AND
THE WASHINGTON STATE HISTORIC PRESERVATION OFFICER**

Subj: DEMOLITION OF UNITED STATES NAVY RAILROAD MUNITIONS
SORTING COMPLEX NAVAL BASE KITSAP - BANGOR,
WASHINGTON

WHEREAS, Commander, Navy Region Northwest (hereinafter the "Navy") proposes to conduct demolition activities (hereinafter the "Undertaking") involving railroad buildings/structures on Naval Base Kitsap - Bangor; and

WHEREAS, the Navy has determined that the proposed demolition activities constitute an Undertaking that has the potential to cause effects on historic properties and is subject to review under Section 106 of the National Historic Preservation Act (NHPA) 16 United States Code (U.S.C.) 470f, and its implementing regulations, 36 Code of Federal Regulations (CFR) § 800; and

WHEREAS, the Navy has established the area of potential effect (APE) for the Undertaking as defined at 36 CFR § 800.16(d) as the six buildings, railroad boxcars, earthen berms, railroad track, and all associated railroad facilities as further depicted in Appendix A; and

WHEREAS, the Navy has completed Section 106 identification of historic properties and has determined that the Undertaking may adversely affect properties listed in or eligible for listing in the National Register of Historic Places; and

WHEREAS, the Navy and the Washington State Historic Preservation Officer (SHPO) have agreed that Buildings 6034, 6035, 6036, and 6037 meet the criteria for inclusion in the National Register of Historic Places (NRHP), as defined by 36 CFR § 800.16(1); and

WHEREAS, the Navy has developed this Memorandum of Agreement (MOA) pursuant to 36 CFR § 800.6(2)(c) and has consulted with the SHPO; and

WHEREAS, on 13 September 2013, the Navy notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect

Subj: DEMOLITION OF UNITED STATES NAVY RAILROAD MUNITIONS
SORTING COMPLEX NAVAL BASE KITSAP - BANGOR,
WASHINGTON

determination with specified documentation and on 20 September 2013, the Council chose not to participate pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, the Navy has also allowed for comments from the general public and other interested parties through the National Environmental Policy Act (NEPA) process during a public review and comment period and considered all comments received; and

WHEREAS, the Navy has consulted with the following tribes, Skokomish, Port Gamble S'Klallam, Jamestown S'Klallam, Lower Elwha Klallam, Suquamish who expressed no concerns about the Undertaking.

NOW, THEREFORE, the Navy and the SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

The Navy shall ensure that the following measures are carried out:

I. MITIGATION MEASURES

A. In consultation with the SHPO and prior to demolition, the Navy shall contact HistoryLink.org to develop an essay about the Naval Base (NAVBASE) Kitsap - Bangor Segregation Area. Once completed, the essay shall be uploaded to HistoryLink.org, the state's free on-line encyclopedia of Washington history. The narrative shall address the history and significance of the buildings, boxcars, earthen barricades, railroad tracks, and associated objects as they related to development of NAVBASE Kitsap - Bangor and its role in World War II.

B. The Navy shall dispose of boxcars and miscellaneous railroad objects (switches, gears, etc.) through the Defense Reutilization and Marketing Office (DRMO) for potential acquisition to appropriate heritage groups for preservation. Acquisition of railroad objects will be in accordance with DRMO disposal process. Any boxcars successfully obtained by the heritage groups will be emptied and all necessary hazardous material abatement will have occurred prior to their removal

Subj: DEMOLITION OF UNITED STATES NAVY RAILROAD MUNITIONS
SORTING COMPLEX NAVAL BASE KITSAP - BANGOR,
WASHINGTON

from the Segregation Area. Boxcars and railroad objects not selected for preservation will be disposed of.

C. In the event heritage groups are not capable of acquiring boxcars, prior to demolition, the Navy will record the representative 50-ton and 40-ton boxcars in their existing three-dimensional setting using videography, prior to their disposal. Copies of the video shall be provided to the Department of Archaeology and Historic Preservation (DAHP).

D. The Navy will submit a draft report to the SHPO that will evaluate the eligibility of the Shelton-Bangor Railroad using National Register criteria and identify elements that would be contributing to the eligibility.

E. Upon completion of Stipulation D, the Navy in consultation with the SHPO, ACHP, and interested parties will develop a Programmatic Agreement with the goal of managing the identified historic properties. The Programmatic Agreement will focus on the continued operation of the railroad while maintaining its historic character.

F. The Navy shall document historic buildings, structures, and objects in the Segregation Area, including: Buildings 6034, 6035, 6036, 6037, a representative 40-ton boxcar, a representative 50-ton boxcar, earthen barricades, railroad tracks, and objects associated with the Segregation Area, following DAHP Level II Mitigation Documentation Requirements. Prior to demolition, a draft of all documentation shall be completed, reviewed and accepted by DAHP within 30 days of receipt from the Navy. Copies of the documentation shall be provided to the DAHP and any other interested/appropriate organizations.

II. REPORTING REQUIREMENTS

The Navy shall submit a report to the SHPO within twelve (12) months of the effective date of this MOA and every twelve (12) months thereafter until the mitigation measures in Stipulation I are completed or this MOA is terminated. The report(s) shall list a summary of the status of the undertaking and a status of each of the mitigation measures.

Subj: DEMOLITION OF UNITED STATES NAVY RAILROAD MUNITIONS
SORTING COMPLEX NAVAL BASE KITSAP - BANGOR,
WASHINGTON

III. REVIEW

The SHPO may elect to review the activities carried out pursuant to the MOA. The Navy will cooperate with the SHPO in carrying out their review responsibilities.

IV. DISPUTE RESOLUTION

A. The Navy shall consult with the SHPO over any written SHPO objection regarding proposed or completed Navy actions over which either Signatory Party has jurisdiction.

B. If after initiating notification and engaging in consultation with the Navy, either Signatory Party determines that the objection cannot be resolved, the Navy shall forward all relevant documentation, to include the Navy's proposed response to the ACHP.

C. Within thirty (30) calendar days after receipt of all relevant documentation, the ACHP shall exercise one of the following options;

1. Concur with the Navy's proposed response; or
2. Provide recommendations on the Navy's proposed response. The Navy shall consider the recommendations before making a final decision on how to proceed; or
3. Determine that further consultations will not be productive and recommend termination. If only partial termination results, then the provisions under Stipulation VIII: Termination will be followed for those specific portions of the MOA that are affected and the remaining Stipulations will remain in effect. If full termination is recommended, then the provisions under Stipulation VIII: Termination will be followed.

V. STAFF QUALIFICATIONS

All work required to meet Stipulations of this MOA will be carried out by or under the supervision of an architect, architectural historian, historian, historical architect, or preservation planner meeting the minimum standards as identified

Subj: DEMOLITION OF UNITED STATES NAVY RAILROAD MUNITIONS
SORTING COMPLEX NAVAL BASE KITSAP - BANGOR,
WASHINGTON

in the Secretary of the Interior's Professional Qualification Standards (48 CFR 44716).

VI. ANTI-DEFICIENCY ACT

A. The Anti-Deficiency Act, 31 U.S.C. § 1341, prohibits federal agencies from incurring an obligation of funds in advance of or in excess of available appropriations. Accordingly, the Signatory Parties agree that any requirement for obligation of funds arising from the terms of this MOA shall be subject to the availability of appropriated funds for that purpose, and that the Stipulations contained in this MOA shall not be interpreted to require the obligation or expenditure of funds in violation of the Anti-deficiency Act.

B. If compliance with the Anti-Deficiency Act alerts or impairs the Navy's ability to implement the Stipulations of this MOA, the Navy shall consult with the Signatory Parties. If an amendment is necessary, the provisions of Stipulation VII: Amendment shall be followed.

VII. AMENDMENT

A. Either Signatory Party may propose an amendment.

B. The amendment process starts when a Signatory notifies the other Signatory Parties in writing requesting an amendment. The notification will include the proposed amendments and the reasons supporting them. The Signatory Parties involved shall consult to consider any proposed amendment.

C. An amendment shall not take effect until it has been agreed to and executed by all Signatory Parties.

VIII. TERMINATION

Any Signatory Party of this MOA may terminate it in part or in whole by providing thirty (30) days notice to the other parties, providing that the parties will consult during the period prior to termination to seek agreement on amendments or other actions that will avoid termination. In the event of full termination, all Signatory Parties will comply with 36 CFR § 800 regarding individual projects included in the Undertaking. In the event, only a portion of the MOA is terminated, the remainder of the

Subj: DEMOLITION OF UNITED STATES NAVY RAILROAD MUNITIONS
SORTING COMPLEX NAVAL BASE KITSAP - BANGOR,
WASHINGTON

Stipulations will remain in effect and the MOA will be amended to reflect the change in accordance with the provisions of this Stipulation.

IX. TERM OF THIS MOA

This MOA shall become effective upon execution by all Signatory Parties and shall remain in effect until the Undertaking and all mitigation measures are completed or for five (5) years or terminated earlier in accordance with the provision of Stipulation VIII: Termination, whichever comes first. If at the end of three (3) months prior to the end of the five (5) years, the measures in Stipulation I have not been performed or Stipulations of this MOA have not been met, the Signatory Parties will review the MOA to determine if it needs to be extended, amended or allowed to terminate.

SIGNATORY PARTIES

All the undersigned Signatory Parties certify that they have full authority to represent and bind their respective agency for the purpose of entering into this MOA.

DEPARTMENT OF THE NAVY

REVIEWED AND CONCUR:

THOMAS A. ZWOLFER, CAPT, USN
Commanding Officer
Naval Base Kitsap

Date: _____

APPROVED:

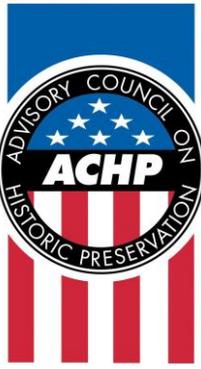
B. BOLIVAR, Rear Admiral (Sel), USN
Commander
Navy Region Northwest

Date: _____

WASHINGTON STATE HISTORIC PRESERVATION OFFICER

ALLYSON BROOKS, PhD
Washington State Historic Preservation Officer

Date: _____



Preserving America's Heritage

September 20, 2013

Mr. T. A. Zwolfer
Captain, U.S. Navy
Commanding Officer
Naval Base Kitsap
120 South Dewey Street
Bremerton, WA 98314-5020

Ref: *Proposed Demolition of Buildings 6034, 6035, 6036, 6037, and Boxcars at Naval Base Kitsap Bangor, Silverdale, Washington 590 – Ser PRB4/01545*

Dear Mr. Zwolfer:

On September 13, 2013, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on properties listed on and eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800) does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer, Tribal Historic Preservation Officer, or another party, we may reconsider this decision. Additionally, should circumstances change, and you determine that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR 800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Washington State Historic Preservation Officer (SHPO) and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions, please contact Kelly Fanizzo at 202-606-8507, or via email at kfanizzo@achp.gov.

Sincerely,

Raymond V. Wallace
Historic Preservation Technician
Office of Federal Agency Programs



DEPARTMENT OF THE NAVY

**NAVAL BASE KITSAP
120 SOUTH DEWEY ST
BREMERTON, WA 98314-5020**

5090

Ser PRB4/01545

13 Sep 13

Reid Nelson, Director
Advisory Council on Historic Preservation
Old Post Office Building
1100 Pennsylvania Avenue, NW, Suite 803
Washington, D.C. 20004

Dear Mr. Nelson:

**SUBJECT: PROPOSAL TO DEMOLISH BUILDINGS ON NAVAL BASE KITSAP
BANGOR, SILVERDALE, WASHINGTON**

The Navy proposes to demolish buildings 6034, 6035, 6036, 6037, and 43 World War II - era railroad boxcars located on Naval Base (NAVBASE) Kitsap Bangor, Silverdale, Washington. The purpose of this letter is to solicit the Advisory Council on Historic Preservation interest in participating in the development of a Memorandum of Agreement (MOA) to address affects of the proposed undertaking. A draft MOA is attached; the Washington Department of Archeology and Historic Preservation has participated in the development of the draft MOA to date.

The purpose of the proposed undertaking is to reduce the building footprint at NAVBASE Kitsap Bangor. The proposed action complies with Commander, Navy Installations Command Demolition Footprint Reduction Program and the 2007 Defense Installations Strategic Plan that established a program to eliminate excess and obsolete Department of Defense facility inventories.

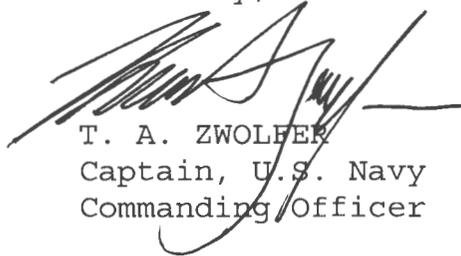
The proposed undertaking includes demolition of buildings 6034, 6035, 6036, 6037, including the barricades, platform and railroad track and 43 World War II-era railroad boxcars. The Navy no longer has a need for the buildings or boxcars therefore, renovation and re-use is not a practicable alternative. The buildings were constructed in 1944 and were the Sorting Buildings in the Segregation Area of Navy Ammunition Depot Bangor. The buildings were designed by Chicago-based architects Shaw, Naess, and Murphy and engineer M.O. Sylliaasen. They were constructed by Sound-Kiewit Co., Seattle. They are

SUBJECT: PROPOSAL TO DEMOLISH BUILDING ON NAVAL BASE KITSAP
BANGOR, WASHINGTON

eligible for inclusion in the National Register of Historic
Places.

We look forward to receiving your interest in participating
in the preparation of an MOA to address the effects on the
proposed undertaking within 30 days of receipt of this letter.
Please direct inquiries to Ms. Shaleen Kessler. She can be
reached by telephone at 360-396-5221 or by e-mail at
shaleen.kessler@navy.mil.

Sincerely,



T. A. ZWOLFER
Captain, U.S. Navy
Commanding Officer

Enclosures: 1. Draft Memorandum of Agreement



July 24, 2013

Capt. P. M. Dawson
Commanding Officer
Naval Base Kitsap
120 South Dewey St.
Bremerton, WA 98314-5020

In future correspondence please refer to:

Log: 012913-03-USN

Property: Demolition of USN RR Munitions Sorting Complex Building 6409

Re: NOT Eligible

Dear Capt. Dawson:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced property has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

Research indicates that the above referenced property is not currently listed in the Washington Heritage Register or National Register of Historic Places. The referenced property is NOT ELIGIBLE for the National Register of Historic Places under criterion C. As a result of this finding, further contact with DAHP is not necessary on actions involving this structure. However, if additional information on the property becomes available, or if any archaeological resources are uncovered during construction, please halt work in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. Should you have any questions, please contact me.

Sincerely,

Russell Holter
Project Compliance Reviewer
(360) 586-3533
russell.holter@dahp.wa.gov





DEPARTMENT OF THE NAVY

NAVAL BASE KITSAP
120 SOUTH DEWEY ST
BREMERTON, WA 98314-5020

5090
Ser PRB4/01186
15 Jul 13

Allyson Brooks, PhD
State Historic Preservation Officer
Department of Archaeology & Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: REQUEST FOR CONCURRENCE ON DETERMINATION OF
ELIGIBILITY AND EFFECT FOR BUILDING 6409 AT NAVAL BASE KITSAP,
BANGOR SILVERDALE, WA

DAHP LOG: 012913-03-USN

The Navy has previously consulted with your office on a proposed project to demolish buildings at Naval Base (NAVBASE) Kitsap Bangor, including building 1461, and all rail facilities in and around the segregation area. Since the previous consultation, it has been found that a determination of eligibility for the National Register of Historic Places (NRHP) has not been completed for building 6409, the Flammable Storage Building. This letter is to initiate consultation on the determination of eligibility for Building 6409 to the National Register of Historic Places (NRHP) and the effect of its proposed demolition.

Building 6409 is a small utility building located south of and outside of the Bangor segregation area and east of the railroad tracks. The rectangular building features a front-gabled, corrugated metal roof and concrete foundation. The concrete-block construction is exposed with exception to vertical board cladding and a wood cornice in the gabled roof ends. The original wood framing remains around modern double metal doors. The building has no windows, but rather wood vents in window-like wood-framed openings. A ground-level hatch is located on the northwest side of the building providing access to a concrete-lined crawl space housing steam utilities.

The building was constructed in 1945, after completion of the nearby segregation area and railroad. It was likely added to provide a separate storage area for flammable materials, away

SUBJECT: REQUEST FOR CONCURRENCE ON DETERMINATION OF
ELIGIBILITY AND EFFECT FOR BUILDING 6409 AT NAVAL BASE
KITSAP, BANGOR SILVERDALE, WA

from the ammunition storage facilities on the installation. The building retains a fairly high level of integrity. Under Criteria A and B, the Building 6409 is not associated with any significant events or historically significant people. The architecture of the building does not qualify it under Criteria C, and it is not likely to yield information important to prehistory or history under Criteria D.

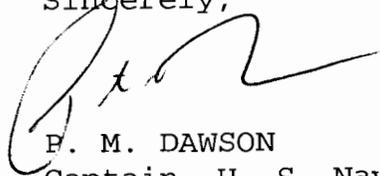
The Navy recommends that the Flammables Storage Building (Building 6409) is not eligible for the NRHP due to its lacking individual significance or distinctive architectural character.

As such, the Navy finds that the proposed demolition of Building 6409 warrants a determination of *no historic properties affected*.

A new Historic Inventory Report for Building 6409 has been prepared in the Department of Archaeology and Historic Preservation Historic Property Inventory database and is included in the enclosures.

We look forward to receiving your concurrence with the Navy's recommendation for building 6409. Please direct inquiries to Amanda Bennett, at (360)476-6613 or manda.j.bennett@navy.mil.

Sincerely,



F. M. DAWSON
Captain, U. S. Navy
Commanding Officer

Enclosures: 1. 1945 Location Map
2. 2003 Location Photo
3. HPI Report

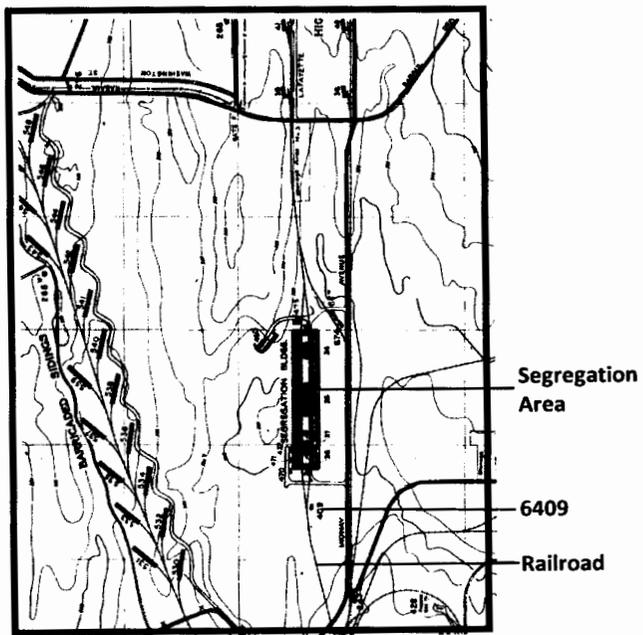


Figure 1: Building 6409 Location, 1945 Site Map

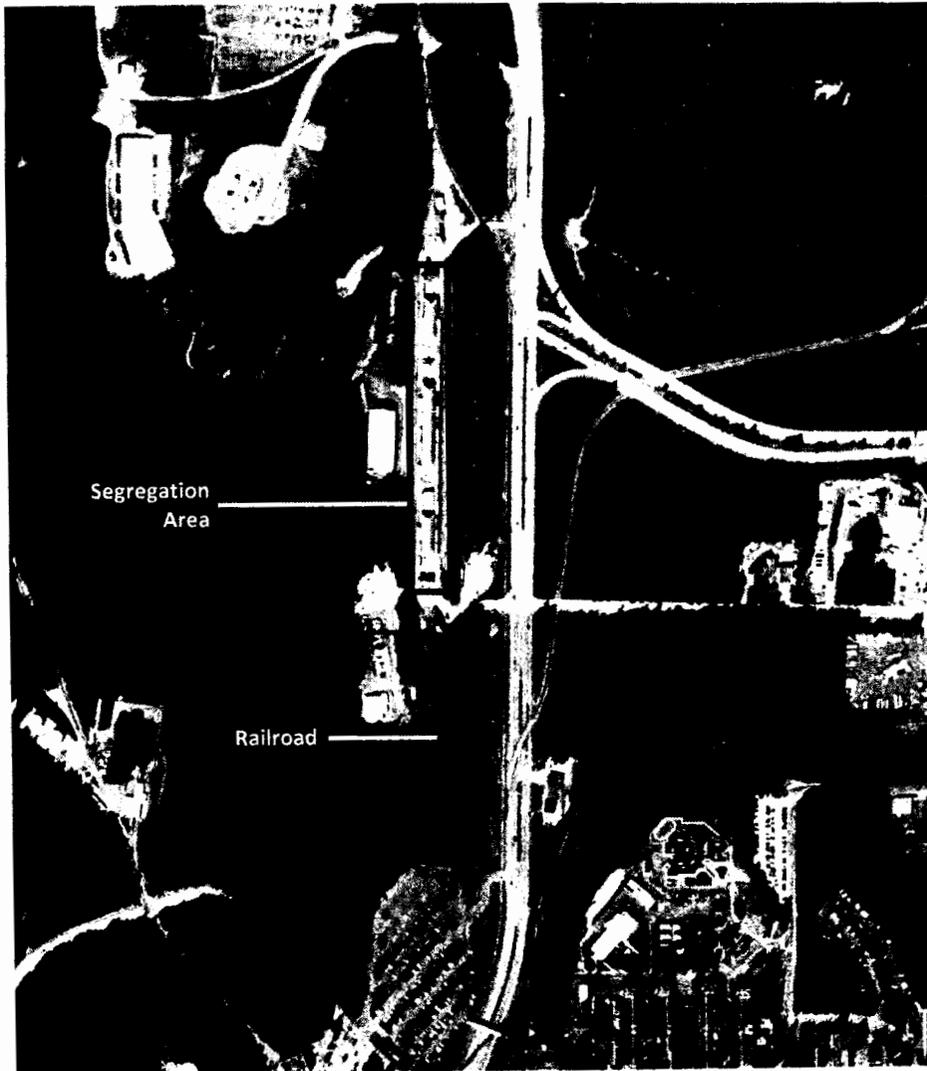


Figure 2: Building Location, 2003 Aerial



Historic Inventory Report

Location

Field Site No. **DAHP No.**
Historic Name: Flammable Storage Building
Common Name: Building 6409
Property Address: 0000 Trigger Avenue, Silverdale, WA 98315
Comments:
Tax No./Parcel No. 322601-1-008-2007
Plat/Block/Lot
Acreage 587.25
Supplemental Map(s)

Township/Range/EW	Section	1/4 Sec	1/4 1/4 Sec	County	Quadrangle
T26R01E	32	NW	SW	Kitsap	POULSBO

Coordinate Reference

Easting: 1100090
Northing: 871119
Projection: Washington State Plane South
Datum: HARN (feet)

Identification

Survey Name: Bangor Building 6409 - Demolition of the Sorting Complex **Date Recorded:** 05/14/2013
Field Recorder: Amanda Bennett
Owner's Name: Dept. of Navy
Owner Address: NBK Bangor
City: Silverdale **State:** WA **Zip:** 98315
Classification: Building
Resource Status: **Comments:**
Survey/Inventory
Within a District? No
Contributing? No
National Register:
Local District:
National Register District/Thematic Nomination Name:
Eligibility Status: Not Determined - SHPO
Determination Date: 1/1/0001
Determination Comments:



Historic Inventory Report

**Description of
Physical
Appearance:**

Building 6409 is a small, concrete-block utility building located south of the Bangor Sorting Complex's earthen barricades, east of the railroad tracks. The rectangular building features a front-gabled corrugated metal roof and concrete foundation. The concrete-block construction is exposed with exception to vertical board cladding and a wood cornice in the gabled roof ends. The original wood framing remains around modern double metal doors. The original double doors, shown in 1959 as-built drawings, were 5-panel wood doors. The building has no windows, but rather wood vents in window-like wood-framed openings. A ground-level hatch is located on the northwest side of the building providing access to a concrete-lined crawl space housing steam and possibly water utilities.

**Major
Bibliographic
References:**

Hardlines Design Company

2011 Architectural Inventory and Evaluation of Naval Base Kitsap Bangor – Part 1: Upper Base. Prepared by Roy Hampton and Maria Gissendanner for Naval Facilities Engineering Command Atlantic. On file at Naval Facilities Engineering Command Northwest Environmental Office, Naval Base Kitsap Bangor.
1959 Flammable Storehouse Building 409, NAD Bangor, plans and elevations. Bureau of Ordnance, Department of the Navy, U. S. Naval Ammunition Depot, Bangor, Washington. On file at Naval Undersea Warfare Center, Keyport.

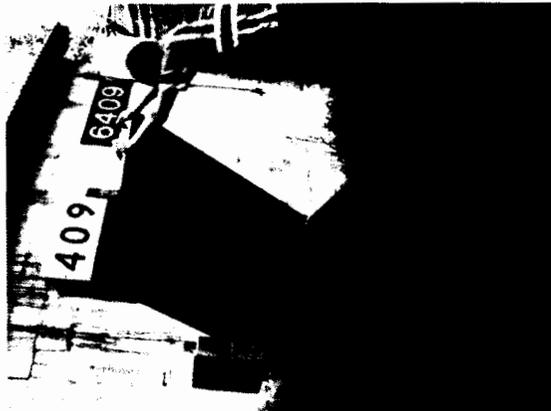
Photos



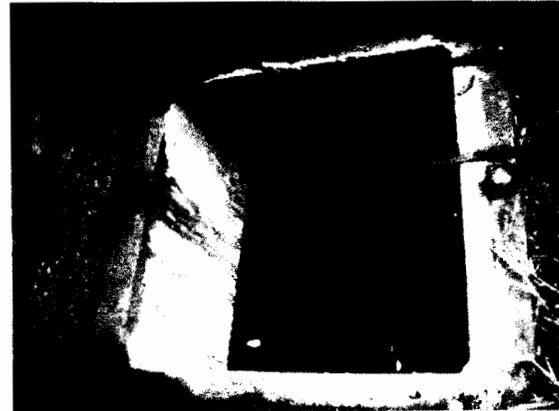
Building 6409, northeast oblique, looking southwest.
2013



Building 6409, east facade, viewing west.
2013



Steam system access hatch on north side of Building 6409.
2013



View of steam system in access hatch north of Building 6409.
2013

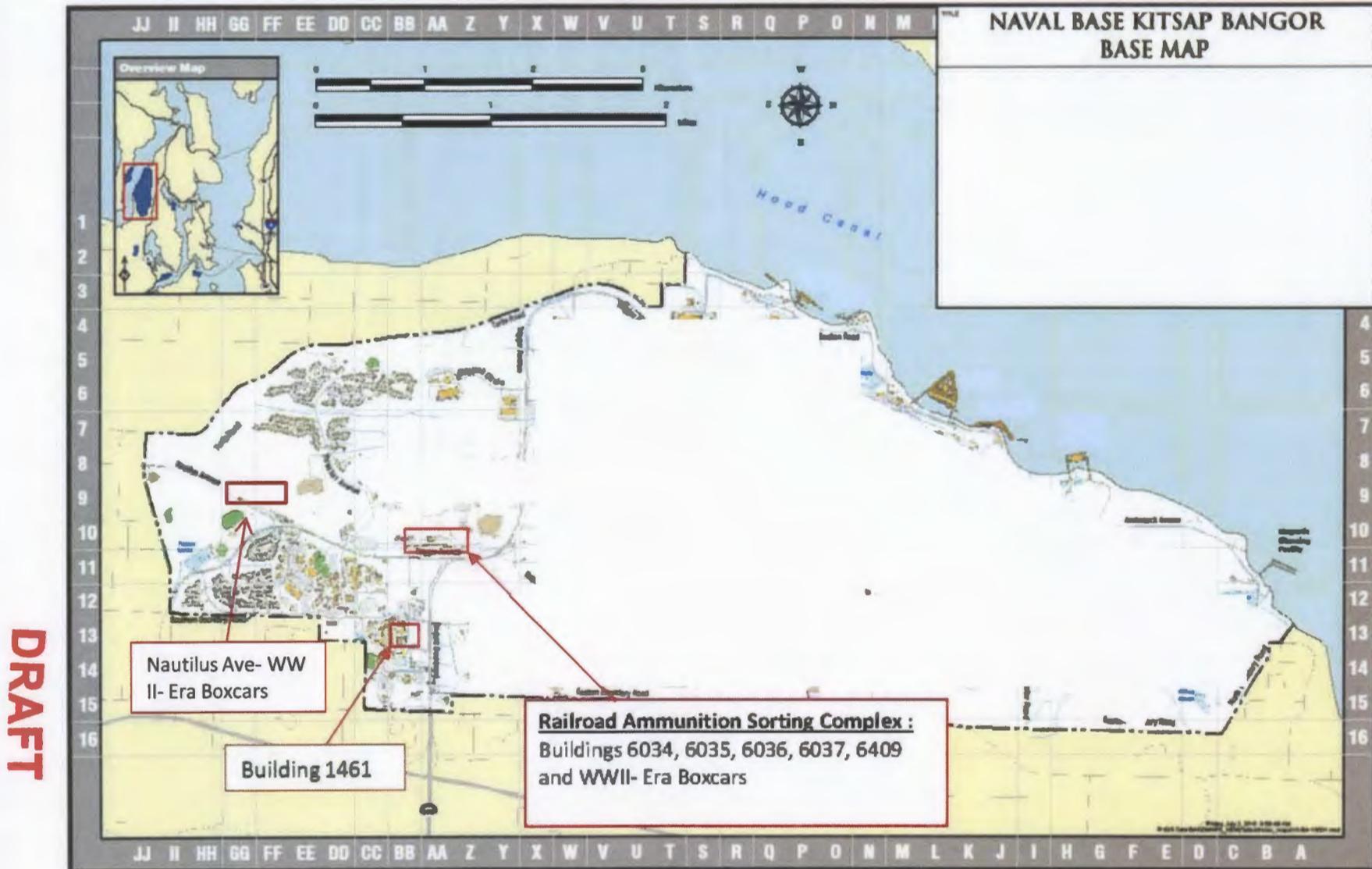


Historic Inventory Report

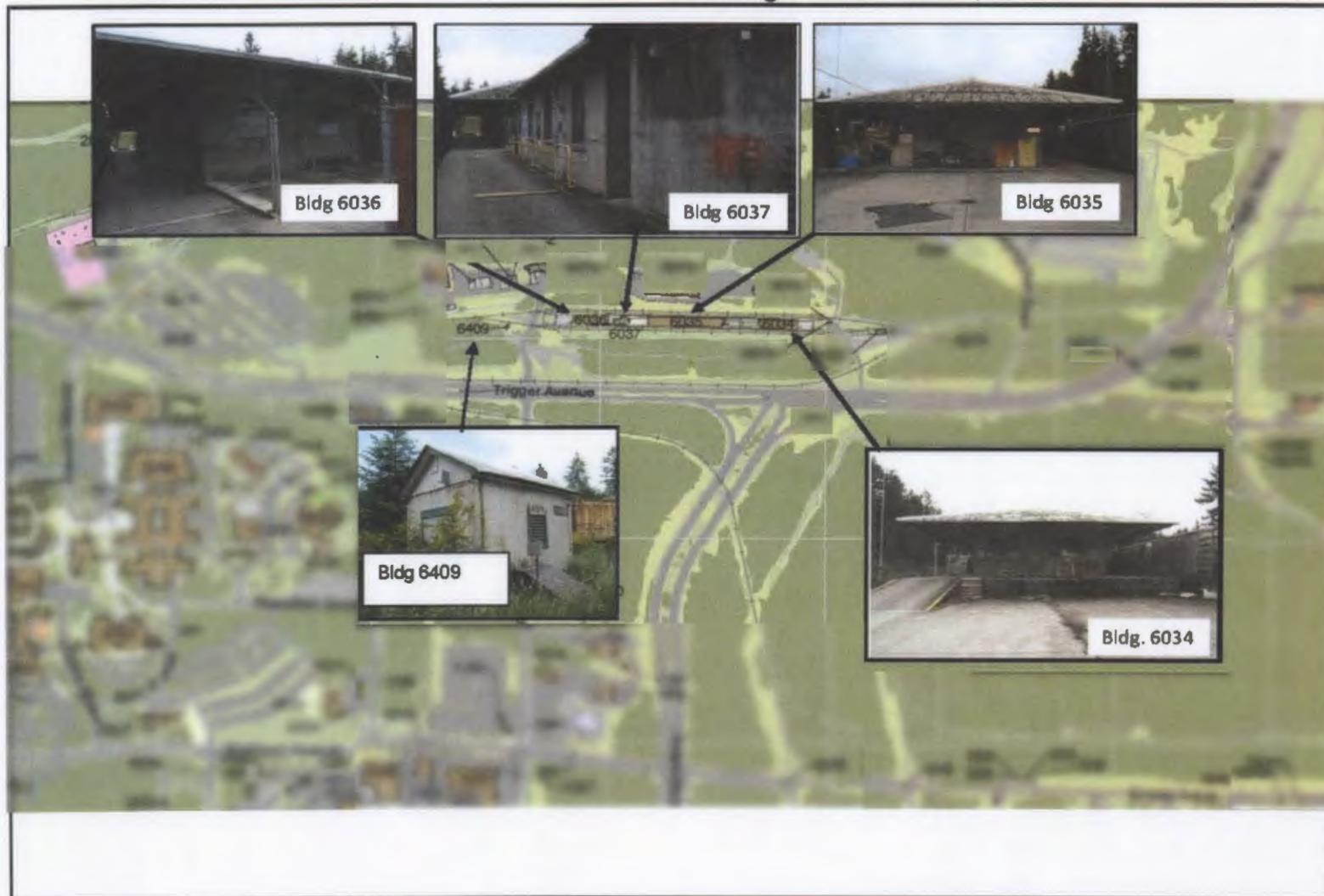


View of Building 6409 (left) from the Sorting Complex entrance, viewing north.
2013

Proposed Demolition Site: Railroad Ammunition Sorting Complex & Building 1461



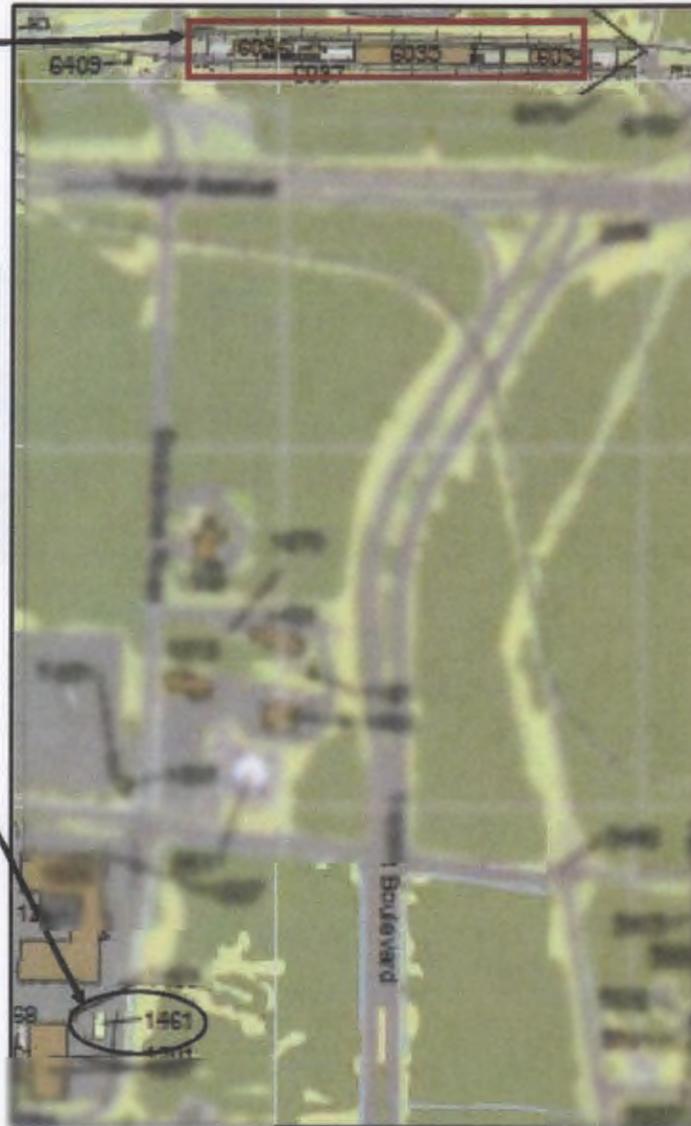
Proposed Demolition Site: Railroad Ammunition
Sorting Complex.
Buildings 6034- 6037, 6409



DRAFT

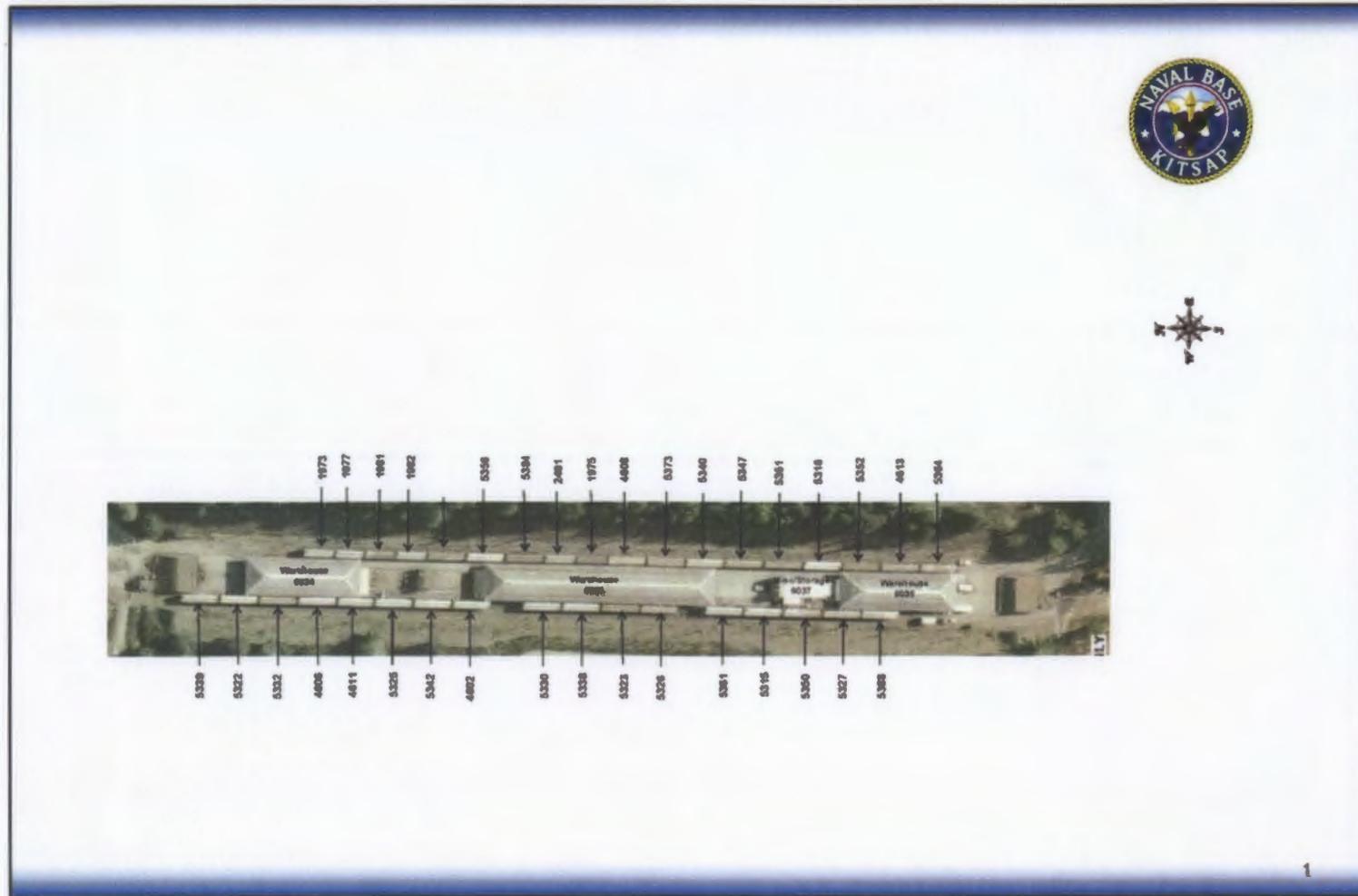
Proposed Demolition Site: Railroad Ammunition Sorting complex and Building 1461

Railroad
Ammunition
Sorting Complex



DRAFT

Proposed Demolition Site: Railroad Ammunition Sorting Complex
35 WW II-era Boxcars



DRAFT

January 29, 2013

Capt. P. M. Dawson
Commanding Officer
Naval Base Kitsap
120 South Dewey St.
Bremerton, WA 98314-5020

In future correspondence please refer to:

Log: 012913-03-USN
Property: Demolition of USN RR Munitions Sorting Complex
Re: ADVERSE Effect

Dear Capt. Dawson:

Thank you for contacting the Department of Archaeology and Historic Preservation (DAHP). We have reviewed the materials you provided for this project. On behalf of the State Historic Preservation Officer (SHPO), we concur with your determination that the project, as proposed, will have an Adverse Effect on the US Navy Railroad, a linear resource determined eligible for the National Register of Historic Places and the Ammunition Sorting Complex which constitutes a historic district.

We have reviewed the draft Memorandum of Agreement (MOA), proposed by the Navy, to address this Adverse Effect and have the following comments:

- Prior to executing the MOA, the Navy shall address (in a letter to the SHPO) how strategies to avoid, or otherwise minimize, adverse effects were considered as alternatives to demolition per 36CFR800.6(a).
- It should be stated that the SHPO wishes the documentation, stipulated in the agreement, be completed prior to the demolition of the structures affected by the undertaking.
- Development of an Integrated Cultural Resource Management Plan for the National Register eligible USN RR. In consultation with the SHPO and other interested parties, the final plan shall be adopted by the Navy and integrated into the long-range planning at NBK-Bangor.
- A representative sample of the two types of boxcar (50-ton and 40-ton), located at NBK-Bangor, be documented with a DAHP intensive level inventory form and to Historic American Engineering Record standards prior to their ultimate disposition. Two of the boxcars (one of each type) should be retained at NBK-Bangor for interpretation purposes. One possible location these could be displayed is the vicinity of Sculpin Circle where other railroad related items are currently being kept. The historic narrative of the boxcars, the Munitions Segregation Yard, and the USN RR should be provided to HistoryLink to be added to the State encyclopedia. A detailed plan needs to be created which outlines the deaccession of the boxcars. A alternative strategy should be identified in the event that none of the non-profits are capable of acquiring boxcars. The

Navy shall encourage the Seabees, Naval Reservists, and interested personnel in assisting the non-profit groups with the logistics of relocating the boxcars.

- Building 1461, though not individually eligible for the National Register, needs to be included in the broader context document being drafted by the US Navy regarding the railroad.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4) and the survey report when it is available. These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800.

Thank you for the opportunity to review and comment. If you have any questions, please contact me.

Sincerely,



Russell Holter
Project Compliance Reviewer
(360) 586-3533
russell.holter@dahp.wa.gov

Cc: Dennis Lewarch (Suquamish)
Kris Miller (Skokomish)
Chris Runner (US Navy)





DEPARTMENT OF THE NAVY

NAVAL BASE KITSAP
120 SOUTH DEWEY ST
BREMERTON, WA 98314-5020

5090
Ser PRB4/01167
21 Dec 12

Allyson Brooks, PhD
State Historic Preservation Officer
Department of Archaeology & Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

**SUBJECT: PROPOSAL TO DEMOLISH RAILROAD FACILITIES AT NAVAL
BASE KITSAP BANGOR, SILVERDALE, WA**

The Navy proposes to demolish several railroad facilities at Naval Base (NAVBASE) Kitsap Bangor and requests your concurrence with the Area of Potential Effects (APE) and determination of effects under Section 106 of the National Historic Preservation Act.

The proposed project would demolish the sandblast facility (building 1461) and all rail facilities in and around the segregation yard, including buildings 6034, 6035, 6036, 6037, 6409, the rail lines, lightning towers, street lights, blast walls, earthen berms, loading platform and paved roadway. Forty-four World War II era boxcars would also be disposed, or donated to a museum. After demolition of the sandblast facility, the site would be paved to match the surrounding area. The segregation yard lies between two parallel vegetated earthen berms. Following of the demolition of the segregation yard, topsoil will be spread on the project site and the 4.2 acre area planted with native vegetation.

Construction of NAVBASE Kitsap Bangor began in 1944 as a transshipment point for munitions to support the invasion of Japan. As part of the new facility development, a rail line from Shelton to Bremerton and Bangor was constructed for transport of munitions. Railcars loaded with munitions were brought to the Bangor segregation yard. By the 1980s, Bangor had been converted to a strategic submarine base; the rail line from Shelton was occasionally used to transport weapons, but the sorting yard was no longer used. The sandblast facility was constructed between the end of the Korean conflict and the beginning of the Vietnam conflict and was used for railroad car

SUBJECT: PROPOSAL TO DEMOLISH RAILROAD FACILITIES AT NAVAL BASE
KITSAP BANGOR, SILVERDALE, WA

maintenance. Railcar maintenance is no longer performed at the facility; the rail tracks leading up to the facility have been removed and it is used for recycling operations.

The APE is defined as the footprint of the existing facilities down to a depth of three feet below ground surface. The APE also includes the area around seven railcars that are located approximately ½ mile south of the Segregation Area. These railcars will be offered to museums or disposed, but there will be no ground disturbance at this site. Please refer to enclosure 1.

The sandblast facility (building 1461) is a utilitarian industrial facility of common design and its use was not a mission critical function. The Navy has determined the facility is not eligible for inclusion the National Register of Historic Places (NRHP), and that its demolition warrants a *No Historic Properties Affected* determination.

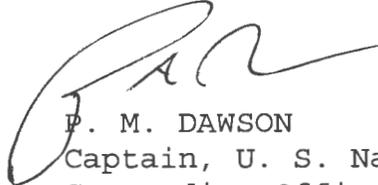
The segregation yard, notably buildings 6034, 6035, 6036 and 6037, served as facilities to sort munitions and inert materials off loaded from railroad cars for placement in ammunition storage facilities that are located approximately ¼ of a mile north. The Navy has determined that the segregation yard buildings are eligible for inclusion in the NRHP. The Washington Department of Archeology and Historic Preservation has stated buildings 6034, 6035 and 6036 are eligible for inclusion in the NRHP (DAHP Log 030911-56-USN). The Navy finds that demolition of these buildings warrants a determination of *Historic Properties Adversely Affected*.

The Navy proposes to mitigate the demolition of the segregation yard by developing pictorial and drawing files of the structures. The Navy also proposes to remove the asbestos insulation from railcars and make them available for donation to a railroad museum. As part of the mitigation for donating the railroad turntable at NAVBASE Kitsap Bremerton to a museum, the Navy has contracted to develop a comprehensive evaluation of the Shelton-Bremerton-Bangor rail line (DAHP Log 02111-02-USN). A draft Memorandum of Agreement is enclosed to initiate consultation on appropriate stipulations to address the adverse effect this project has on the eligible properties.

SUBJECT: PROPOSAL TO DEMOLISH RAILROAD FACILITIES AT NAVAL BASE
KITSAP BANGOR, SILVERDALE, WA

We look forward to receiving your concurrence with the Navy's definition of the APE and determination of *Historic Properties Adversely Affected*, and any comment you have on the draft MOA. Please direct inquiries to Mr. Greg Leicht. He can be reached at (360)315-5411 or gregory.leicht@navy.mil.

Sincerely,



P. M. DAWSON
Captain, U. S. Navy
Commanding Officer

Enclosures: 1. Area of Potential Effect
2. Draft Memorandum of Agreement

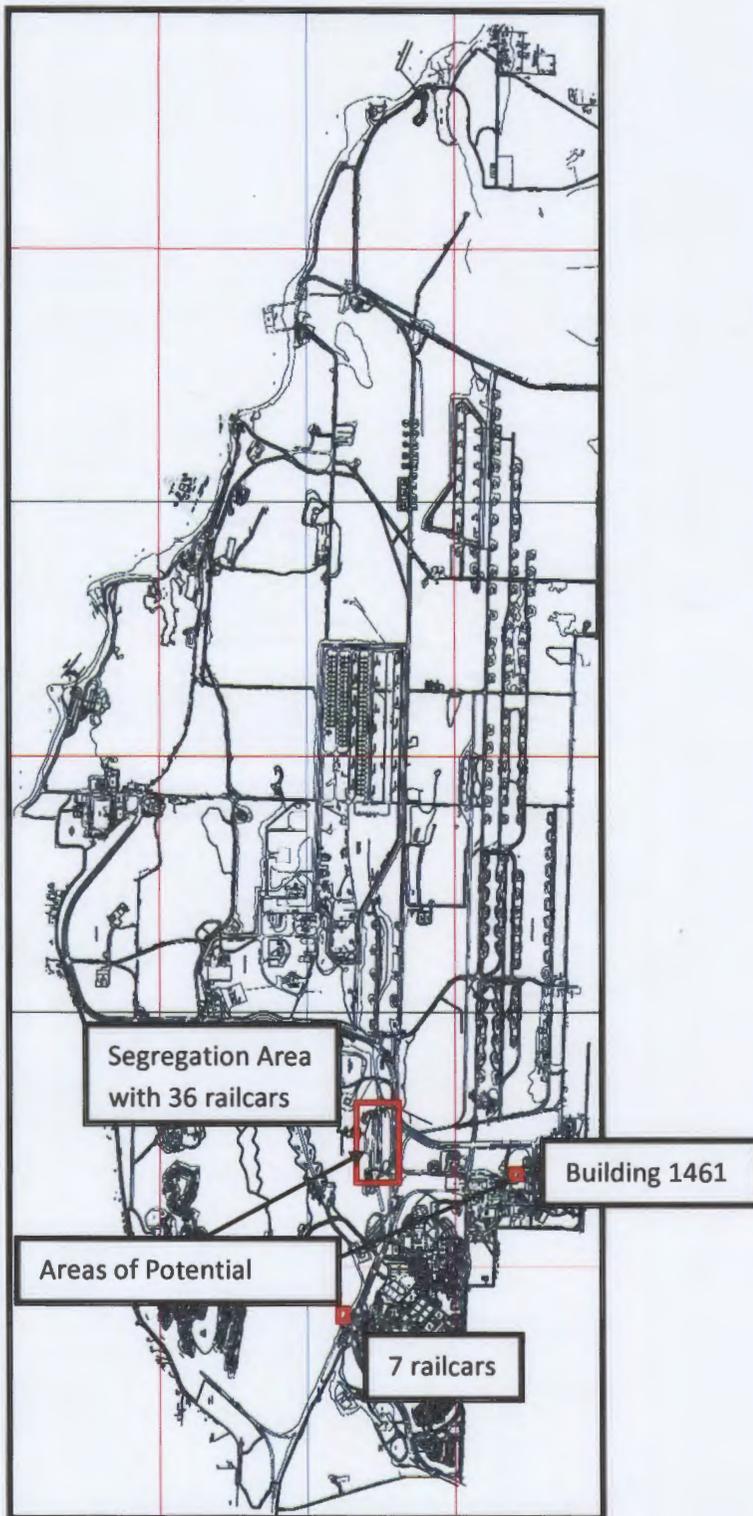


Figure 1: Site location/Area of Potential Effect

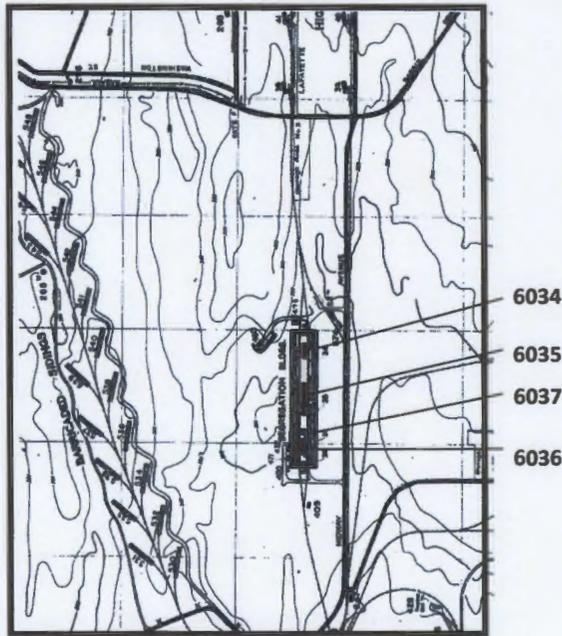


Figure 2: Segregation Area and Sorting Buildings, 1945 Site Map

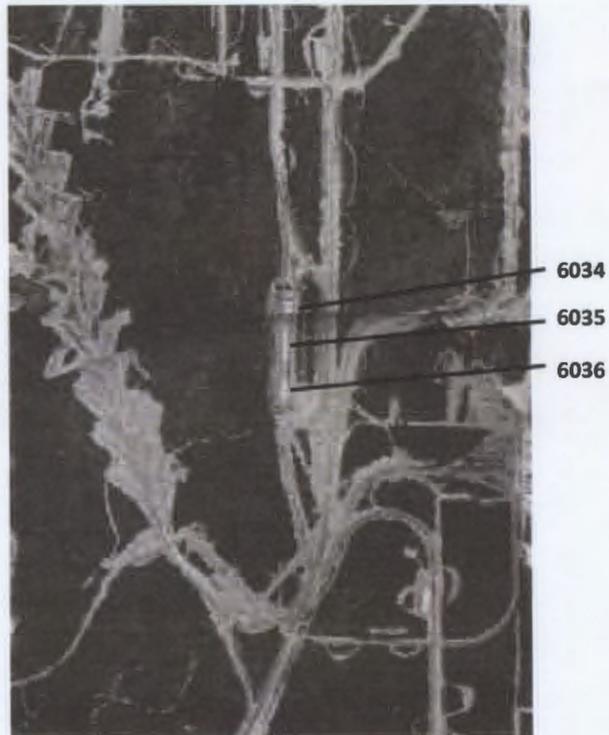


Figure 3: Segregation Area, 1948 Aerial



Figure 4: Segregation Area, 2003 Aerial

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APPENDIX B PUBLIC INVOLVEMENT

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APPENDIX C MITIGATION AND MONITORING

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Mitigation and Monitoring

Table C-1 provides a comprehensive list of all mitigation requirements associated with the proposed action, as required by OPNAV M-5090.1, section 10-3.6.

Table C-1 Mitigation and Monitoring

Mitigation Measure Title and Description	Origin of Measure (EA, BO, MOA, CWA Permit, etc.)	Anticipated Benefit	Criteria for Evaluating Effectiveness	Responsible Party	Estimated Completion Date
<u>MOA Measure A.</u> In consultation with the SHPO and prior to demolition, the Navy shall contact HistoryLink.org to develop an essay about the Naval Base Kitsap Bangor Segregation Area.	Draft MOA between the Navy and SHPO	Increased public awareness of the heritage of NAVBASE Kitsap Bangor and the role of the Segregation Area during World War II.	SHPO concurrence with documentation of properties eligible for inclusion in the National Register of Historic Places.	The Navy will be responsible for completing this mitigation measure.	In accordance with the MOA, the Navy will contact HistoryLink.org and begin development of an essay prior to start of demolition.
<u>MOA Measure B.</u> The Navy shall dispose of boxcars and miscellaneous railroad objects (switches, gears, etc.) through the Defense Reutilization and Marketing Office (DRMO) for potential acquisition to appropriate heritage groups for preservation.	Draft MOA between the Navy and SHPO	Preservation of World War II era boxcars which demonstrate the heritage of NAVBASE Kitsap Bangor and its role in World War II.	Acquisition of railroad objects will be in accordance with DRMO disposal process.	The Navy will be responsible for completing this mitigation measure.	Prior to the start of demolition, the Navy will complete an Agreement with DRMO which details the disposal process.
<u>MOA Measure C.</u> In the event heritage groups are not capable of acquiring boxcars, the Navy will record the two representative 50-ton and 40-ton boxcars in their existing three-dimensional setting using videography.	Draft MOA between the Navy and SHPO	Preservation of NRHP eligible properties per DAHP recordation standards for archival purposes.	SHPO concurrence with documentation of properties eligible for inclusion in the National Register of Historic Places.	The Navy will be responsible for completing this mitigation measure.	If required, three dimensional documentation will be completed prior to disposal of the two representative boxcars.

Table C-1 Mitigation and Monitoring

Mitigation Measure Title and Description	Origin of Measure (EA, BO, MOA, CWA Permit, etc.)	Anticipated Benefit	Criteria for Evaluating Effectiveness	Responsible Party	Estimated Completion Date
<u>MOA Measure D.</u> The Navy will submit a draft report to the SHPO that will evaluate the eligibility of the Shelton-Bangor Railroad using National Register criteria and identify elements that would be contributing to the eligibility.	Draft MOA between the Navy and SHPO	Determination of eligibility, and the contributing factors for eligibility, of the Shelton -Bangor railroad.	SHPO concurrence with documentation of properties eligible for inclusion in the National Register of Historic Places.	The Navy will be responsible for completing this mitigation measure.	The Navy will submit a draft report within one year from the start of demolition.
<u>MOA Measure E</u> Upon completion of Stipulation D, the Navy in consultation with the SHPO, ACHP, and interested parties will develop a Programmatic Agreement with the goal of managing the identified historic properties. The Programmatic Agreement will focus on the continued operation of the railroad while maintaining its historic character.	Draft MOA between the Navy and SHPO	Preservation of the historic character of the Shelton – Bangor Railroad, while facilitating continued operation of the Railroad.	Signed Programmatic Agreement between the Navy and SHPO.	The Navy will be responsible for completing this mitigation measure.	The Navy will submit a draft Programmatic Agreement to the SHPO within three years from the start of demolition.
<u>MOA Measure F.</u> The Navy shall document historic buildings, structures and objects in the Segregation Area, including: Buildings 6034, 6035, 6036, 6037, a representative 40-ton boxcar, a representative 50-ton boxcar, earthen barricades, railroad tracks and objects associated with the Segregation Area.	Draft MOA between the Navy and SHPO	Preservation of NRHP eligible properties per DAHP recordation standards for archival purposes.	SHPO concurrence with documentation of properties eligible for inclusion in the National Register of Historic Places.	The Navy will be responsible for completing this mitigation measure.	The Navy will complete a draft document prior to the start of demolition.

