ENVIRONMENTAL ASSESSMENT OF ENTRY CONTROL POINT UPGRADES FOR SCOTT AIR FORCE BASE, ILLINOIS

SEPTEMBER 2003

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14. ABSTRACT

Current entry control points (ECP) on Scott AFB do not meet the standards specified in Unified Facilities Criteria (UFC) 4-010-01, DOD Minimum Antiterrorism Standards for Buildings. AIL U.S. Department of Defense (DOD) installations are required to seek effective ways to minimize the likelihood of mass casualties from terrorist attacks against DOD personnel in the buildings in wbicb they work and live. While terrorists have many tactics available to them, they frequently use explosive devices when they target large numbers of DOD personnel. Most existing DOD buildings offer little protection from terrorist attacks. By applying the standards provided in UPC 4-010-01, Scott AFB would become a lesser target of opportunity for terrorists. Therefore, Scott AFB is proposing to modify existing structures and construct new access lanes and facilities at 1he main ECPs of Scott AFB that would improve gate security. personnel safety, and reduce traffic congestion while maintajning access control requirements to meet the standards specified in UFC 4-010-01 .

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FINDING OF NO SIGNIFICANT IMPACT (FONSI)

ENTRY CONTROL POINTS UPGRADES AT SCOTT AIR FORCE BASE, ILLINOIS

INTRODUCTION

The 375th Airlift Wing (375 AW) of the United States Air Force (USAF) has proposed to accomplish Entry Control Point (ECP) upgrades at Scott Air Force Base (AFB), Illinois. Scott AFB proposes to modify the three primary ECPs on the base to improve security and safety, as well as to reduce traffic congestion at the Shiloh, Belleville, and Mascoutah Gates. These Proposed Action and the No Action Alternative that were assessed in the attached Environmental Assessment (EA). Scott AFB is a USAF base under the Air Mobility Command (AMC) and is home of the 375 AW. The 375 AW supports two major headquarters: the U.S. Transportation Command and Headquarters AMC. The 375 AW supports Scott AFB by providing a responsive aeromedical airlift system to move eligible patients and operational support airlift for priority passengers and cargo; conducting all USAF C-9A qualification and instructor training; and providing all base support services to multiple tenant units on base.

PURPOSE OF AND NEED FOR THE PROPOSED ACTION

All U.S. Department of Defense (DOD) installations are required to seek effective ways to minimize the likelihood of mass casualties from terrorist attacks against DOD personnel in the buildings in which they work and live. While terrorists have many tactics available to them, they frequently use explosive devices when they target large numbers of DOD personnel. Most existing DOD buildings offer little protection from terrorist attacks. By applying the standards provided in Unified Facilities Criteria (UFC) 4-010-01, *DOD Minimum Antiterrorism Standards for Buildings*, Scott AFB would become a lesser target of opportunity for terrorists.

Current ECPs do not meet the standards specified in UFC 4-010-01. The need for the Proposed Action is to modify existing structures and construct new access lanes and facilities at the main ECPs of Scott AFB that would improve gate security, personnel safety, and reduce traffic congestion while maintaining access control requirements to meet the standards specified in UFC 4-010-01.

DESCRIPTION OF THE PROPOSED ACTION

Scott AFB proposes to modify three gate entrances to the base (Shiloh, Belleville, and Mascoutah Gates) and construction projects to improve security and safety and reduce traffic congestion.

NO ACTION ALTERNATIVES

Under the No Action Alternative, existing conditions would remain as is and none of the proposed projects would occur. If the No Action Alternative were carried forward there would be no change in or effects on air quality, geological resources, water resources, biological resources, hazardous materials and waste management, and infrastructure and utilities at

Scott AFB. However, safety of base personnel and visitors could be compromised and the ECPs at Scott AFB would be susceptible to potential terrorist attacks if the No Action Alternative were implemented.

ENVIRONMENTAL IMPACTS OF THE PROPOSED ACTION

Analysis of the Proposed Action indicates that the affected environment would not be significantly impacted by proceeding with the proposed ECP construction activities.

PUBLIC REVIEW AND INTERAGENCY COORDINATION

Federal, state, and local agencies listed in Appendix A of the EA were contacted for comment on the Proposed Action. Agency comments are included in this appendix and are addressed in the EA.

Based on the provisions set forth in the Proposed Action, all activities were found to comply with the criteria or standards of environmental quality and coordinated with the appropriate Federal, state, and local agencies. The EA and Draft FONSI were made available to the public for a 30-day review period. Additionally, copies of the EA and Draft FONSI were forwarded to Federal, state, and local agencies for review and comment. Public and agency comments have been addressed at the end of the review period prior to implementing the Proposed Action.

FINDING OF NO SIGNIFICANT IMPACT

After review of the EA prepared in accordance with the requirements of the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations, and Environmental Impact Analysis Process (EIAP), 32 Code of Federal Regulations 989, as amended, I have determined that the Proposed Action would not have a significant impact on the quality of the human or natural environment and, therefore, an Environmental Impact Statement (EIS) does not need to be prepared. This decision has been made after taking into account all submitted information, and considering a full range of practical alternatives that would meet project requirements and are within the legal authority of the USAF.

9/12/03

MARK S. SIME, Colonel, USAF
Vice Commander

Date

ABBREVIATIONS AND ACRONYMS

F	Degrees Fahrenheit
375 AW	375th Airlift Wing
375 CES/CEV	375th Environmental Flight
ACM	Asbestos Containing Material
AFB	Air Force Base
AFI	Air Force Instruction
AFOSH	Air Force Occupational and Environmental Safety, Fire Protection, and Health
AFPD	Air Force Policy Directive
AMC	Air Mobility Command
ANG	Air National Guard
AQCR	Air Quality Control Region
AT/FP	Anti-Terrorism/Force Protection
C&D	Construction and demolition
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CWA	Clean Water Act
CY	Calendar Year
DOD	U.S. Department of Defense
EA	Environmental Assessment
ECP	Entry Control Point
EIAP	Environmental Impact Analysis Process
EIS	Environmental Impact Statement
EO	Executive Order
ERP	Environmental Restoration Program
FAA	Federal Aviation Administration
FESOP	Federally Enforceable State Operations Permit
FIP	Federal Implementation Plan
FONSI	Finding of No Significant Impact
HAP	Hazardous Air Pollutant
HMMP	Hazardous Materials Management Process
HSWA	Hazardous and Solid Waste Amendments
ICRMP	Integrated Cultural Resource Management Plan
IICEP	Interagency and Intergovernmental Coordination for Environmental Planning
mg/m^3	milligrams per cubic meter
MSL	Mean sea level
MSW	Municipal Solid Waste
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxide(s)
NPDES	National Pollution Discharge Elimination System
NSR	New Source Review
O_3	Ozone
Pb	Lead
$PM_{2.5}$	Particulate Matter ≤ 2.5 microns in diameter
PM_{10}	Particulate Matter ≤ 10 microns in diameter
POL	Petroleum, Oil, and Lubricants
POV	Privately Owned Vehicle
ppm	parts per million
PSD	Prevention of Significant Deterioration
QD	Quantity Distance
RCRA	Resource Conservation and Recovery Act
SARA	Superfund Amendments and Reauthorization Act
sf	square foot
SIP	State Implementation Plans
SO_2	Sulfur Dioxide
tpy	tons per year
TSCA	Toxic Substances Control Act
TSP	Total Suspended Particulate
USEPA	U.S. Environmental Protection Agency
UFC	Unified Facilities Criteria
U.S.	United States
USAF	United States Air Force
U.S.C.	United States Code
$\mu g/m^3$	micrograms per cubic meter
VC	Visitor's Center
VOC	Volatile Organic Compound

COVER SHEET

ENVIRONMENTAL ASSESSMENT OF ENTRY CONTROL POINT UPGRADES FOR SCOTT AIR FORCE BASE, ILLINOIS

Responsible Agencies: U.S. Air Force (USAF), Air Mobility Command (AMC), and 375th Airlift Wing (375 AW), Scott Air Force Base (AFB), Illinois.

Affected Location: Scott AFB, Illinois

Report Designation: Environmental Assessment (EA)

Proposed Action: Modify and construct new Entry Control Points (ECP) at Scott AFB, which meet or exceed minimum antiterrorism standards.

Abstract: Current entry control points (ECP) on Scott AFB do not meet the standards specified in Unified Facilities Criteria (UFC) 4-010-01, *DOD Minimum Antiterrorism Standards for Buildings*. All U.S. Department of Defense (DOD) installations are required to seek effective ways to minimize the likelihood of mass casualties from terrorist attacks against DOD personnel in the buildings in which they work and live. While terrorists have many tactics available to them, they frequently use explosive devices when they target large numbers of DOD personnel. Most existing DOD buildings offer little protection from terrorist attacks. By applying the standards provided in UFC 4-010-01, Scott AFB would become a lesser target of opportunity for terrorists. Therefore, Scott AFB is proposing to modify existing structures and construct new access lanes and facilities at the main ECPs of Scott AFB that would improve gate security, personnel safety, and reduce traffic congestion while maintaining access control requirements to meet the standards specified in UFC 4-010-01.

Written comments and inquiries regarding this document should be directed to: Mr. Paul Schmidt, 375th CES/CEV, 701 Hangar Road, Building 56, Scott AFB, Illinois 62225.

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ENVIRONMENTAL ASSESSMENT OF ENTRY CONTROL POINT UPGRADES FOR SCOTT AIR FORCE BASE, ILLINOIS

AIR MOBILITY COMMAND
Environmental Planning Branch
507 Symington Drive
Scott Air Force Base, IL 62225-5022

SEPTEMBER 2003

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ENVIRONMENTAL ASSESSMENT OF ENTRY CONTROL POINT UPGRADES FOR SCOTT AIR FORCE BASE, ILLINOIS

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1. Purpose of and Need for the Proposed Action

1.1 Background

Scott Air Force Base (AFB) is a United States (U.S.) Air Force (USAF) base under the Air Mobility Command (AMC). Scott AFB is headquarters to the 375th Airlift Wing (375 AW). The 375 AW supports two major headquarters: the U.S. Transportation Command and Headquarters AMC. It also provides support for the Air Force Communications Agency, the Defense Information Technology Contracting Office, the 932nd Airlift Wing (Reserve), the Illinois Air National Guard (ANG)'s 126th Air Refueling Wing, and 30 other tenants. The 375 AW supports Scott AFB by providing a responsive aeromedical airlift system to move eligible patients and operational support airlift for priority passengers and cargo; conducting all USAF C-9A qualification and instructor training; and providing all base support services to multiple tenant units on base.

The events of September 11, 2001 significantly changed the nation's homeland security posture. Terrorism is a clear and present danger to the U.S. The USAF's heightened security posture is expected to remain in place indefinitely. As a result and in furtherance of anti-terrorism/force protection (AT/FP) objectives, AMC has proposed several changes to Scott AFB's perimeters, particularly the base's entry control points (ECP). At Scott AFB, initial AT/FP improvements would be realized through the modifications of the Shiloh Gate, Belleville Gate, and Mascoutah Gate.

The Environmental Assessment (EA) analyzes the 375 AW's Proposed Action and the No Action Alternative. If the analyses presented in the EA indicate that implementation of the Proposed Action would not result in significant environmental impacts, a Finding of No Significant Impact (FONSI) would be prepared. A FONSI briefly presents why a Proposed Action would not have a significant effect on the human environment and why an Environmental Impact Statement (EIS) is unnecessary. If significant environmental issues result that cannot be mitigated to insignificance, an EIS will be required, or the Proposed Action would be abandoned and no action would be taken.

Based on the analysis in the EA, the USAF, as the decision-maker, will decide whether there are significant adverse environmental impacts associated with the modification of the Shiloh Gate,

Belleville Gate and Mascoutah Gate on Scott AFB. Based on the review of the analysis, the USAF will either prepare a FONSI or recommend the analysis proceed to an EIS.

1.2 Purpose of the Proposed Action

All U.S. Department of Defense (DOD) installations are required to seek effective ways to minimize the likelihood of mass casualties from terrorist attacks against DOD personnel in the buildings in which they work and live. While terrorists have many tactics available to them, they frequently use explosive devices when they target large numbers of DOD personnel. Most existing DOD buildings offer little protection from terrorist attacks. By applying the standards provided in Unified Facilities Criteria (UFC) 4-010-01, *DOD Minimum Antiterrorism Standards for Buildings*, Scott AFB would become a lesser target of opportunity for terrorists.

The intent of the standards described in UFC 4-010-01 is to minimize the possibility of mass casualties in buildings or portions of buildings owned, leased, privatized, or otherwise occupied, managed, or controlled by or for DOD. These standards provide appropriate, implementable, and enforceable measures to establish a level of protection against terrorist attacks for all inhabited DOD buildings where no known threat of terrorist activity currently exists. While complete protection against all potential threats for every inhabited building is cost prohibitive, the intent of these standards can be achieved through prudent master planning, real estate acquisition, and design and construction practices.

1.3 Need for the Proposed Action

Current ECPs do not meet the standards specified in UFC 4-010-01. The need for the Proposed Action is to modify existing structures and construct new access lanes and facilities at the main ECPs of Scott AFB in order to improve gate security, personnel safety, and reduce traffic congestion while maintaining access control requirements to meet the standards specified in UFC 4-010-01.

1.4 Location

Scott AFB is located in Saint Clair County in the southwestern portion of Illinois, 6.5 miles south of the City of Shiloh, 8 miles east of the City of Belleville, and approximately 25 miles east of the Mississippi River (see Figure 1-1). The areas adjacent to the airfield consist of farmland to the north, west, and south of the base; whereas, wooded areas border the eastern edge of the base.

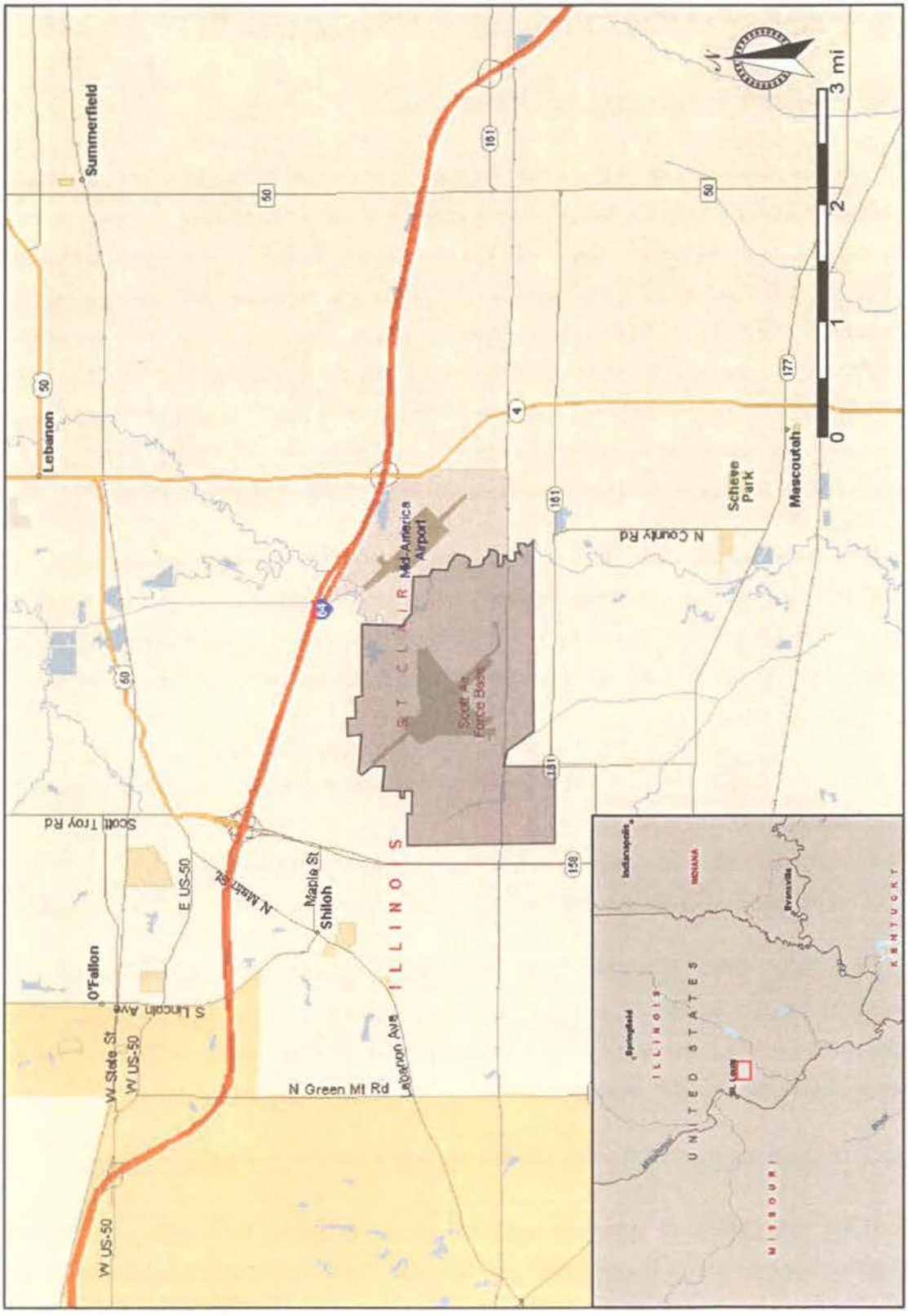

Figure 1-1. Scott AFB and Surrounding Area

1.5 Summary of Key Environmental Compliance Requirements

1.5.1 National Environmental Policy Act

The National Environmental Policy Act, commonly known as NEPA, is a Federal statute requiring the identification and analysis of potential environmental impacts of proposed Federal actions before those actions are taken. NEPA established the Council on Environmental Quality (CEQ) that is charged with the development of implementing regulations and ensuring agency compliance with NEPA. CEQ regulations mandate that all Federal agencies use a systematic interdisciplinary approach to environmental planning and the evaluation of actions that may affect the environment. This process evaluates potential environmental consequences associated with a proposed action and considers alternative courses of action. The intent of NEPA is to protect, restore, or enhance the environment through well-informed Federal decisions.

The process for implementing NEPA is codified in Title 40 Code of Federal Regulations (CFR) 1500-1508, *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act*. The CEQ was established under NEPA to implement and oversee Federal policy in this process. CEQ regulations specify the following must be accomplished when preparing an EA.

- Briefly provide evidence and analysis for determining whether to prepare an EIS or a FONSI
- Aid in an agency's compliance with NEPA when an EIS is unnecessary
- Facilitate preparation of an EIS when one is necessary

Air Force Policy Directive (AFPD) 32-70, *Environmental Quality*, states that the USAF will comply with applicable Federal, state, and local environmental laws and regulations, including NEPA. The USAF's implementing regulation for NEPA is *The Environmental Impact Analysis Process (EIAP)*, 32 CFR 989, as amended.

1.5.2 Integration of Other Environmental Statutes and Regulations

To comply with NEPA, the planning and decision-making process for actions proposed by Federal agencies involves a study of other relevant environmental statutes and regulations. The NEPA process, however, does not replace procedural or substantive requirements of other environmental statutes and regulations. It addresses them collectively in the form of an EA or

EIS, which enables the decision-maker to have a comprehensive view of major environmental issues and requirements associated with the Proposed Action. According to CEQ regulations, the requirements of NEPA must be integrated "with other planning and environmental review procedures required by law or by agency so that all such procedures run concurrently rather than consecutively."

The EA will examine potential effects of the Proposed Action and alternatives on six resource areas including air quality, geological resources, water resources, hazardous materials and waste management, infrastructure and utilities, and safety. The following paragraphs present examples of relevant laws, regulations, and other requirements that are often considered as part of the analysis.

Air Quality

The *Clean Air Act* (CAA) establishes Federal policy to protect and enhance the quality of the nation's air resources to protect human health and the environment. The CAA requires that adequate steps be implemented to control the release of air pollutants and prevent significant deterioration in air quality. The 1990 amendments to the CAA require Federal agencies to determine the conformity of proposed actions with respect to State Implementation Plans (SIP) for attainment of air quality goals.

Water Resources

The Clean Water Act (CWA) of 1977 (33 United States Code [U.S.C.] 1251, et seq.) establish Federal policy to restore and maintain the chemical, physical, and biological integrity of the nation's waters, and where attainable, to achieve a level of water quality that provides for the protection and propagation of fish, shellfish, and wildlife, and recreation in and on the water.

Executive Order (EO) 11988, Floodplain Management, requires Federal agencies to take action to reduce the risk of flood damage; minimize the impacts of floods on human safety, health, and welfare; and restore and preserve the natural and beneficial values served by floodplains. Federal agencies are directed to consider the proximity of their actions to or within floodplains. Where information is unavailable, agencies are encouraged to delineate the extent of floodplains at their site.

Infrastructure and Utilities

Infrastructure consists of the systems and physical structures that enable a population in a given area to sustain itself. Consideration of infrastructure is applicable to a proposed action or alternative where there may be an issue with respect to local capacities (e.g., utilities, transportation networks, energy) to provide the required support.

Safety

Air Force Instruction (AFI) 91-301, *Air Force Occupational and Environmental Safety, Fire Protection, and Health (AFOSH) Program*, implements AFPD 91-3, *Occupational Safety and Health*, by outlining the AFOSH Program. The purpose of the AFOSH Program is to minimize loss of USAF resources and to protect USAF personnel from occupational deaths, injuries, or illnesses by managing risks. In conjunction with the USAF Mishap Prevention Program (AFI 91-202), these standards ensure all USAF workplaces meet Federal safety and health requirements. This instruction applies to all USAF activities, including those of the AMC.

1.5.3 Interagency and Intergovernmental Coordination for Environmental Planning

NEPA requirements help ensure that environmental information is made available to the public during the decision-making process and prior to actions being taken. The premise of NEPA is that the quality of Federal decisions will be enhanced if proponents provide information to the public and involve the public in the planning process. The Intergovernmental Coordination Act and EO 12372, *Intergovernmental Review of Federal Programs*, require Federal agencies to cooperate with and consider state and local views in implementing a Federal proposal. AFI 32-7060 requires the USAF to implement a process known as Interagency and Intergovernmental Coordination for Environmental Planning (IICEP), which is used for the purpose of agency coordination and implements scoping requirements.

Through the IICEP process, Scott AFB will notify relevant Federal, state, and local agencies of the action proposed and provide them sufficient time to make known their environmental concerns specific to the action. The IICEP process provides Scott AFB the opportunity to cooperate with and consider state and local views in implementing the Federal proposal. Upon receipt, agency responses will be incorporated into the analysis of potential environmental impacts. Appendix A will include a copy of the IICEP letter mailed to the agencies for this action, the IICEP distribution list, and agency responses.

1.6 Introduction to the Organization of this Document

The affected environmental components encompassed by this EA include air quality, geological resources, water quality, hazardous materials and wastes management, infrastructure and utilities, and safety. The EA describes the Proposed Action and potential alternatives (Section 2.0), the affected environment as it currently exists (Section 3.0), and identifies probable environmental consequences and other impacts that might result from construction and operation of the proposed Port (Sections 4.0 and 5.0). Within Sections 4.0 and 5.0 of this EA, several aspects of the expected impacts are estimated in order to better describe them. The following elaborates on the nature of the characteristics that may relate to various impacts:

- ***Short-term or long-term.*** These characteristics are determined on a case-by-case basis and do not refer to any rigid time period. In general, short-term impacts are those that would occur only with respect to a particular activity or for a finite period. Long-term impacts are those that are more likely to be persistent and chronic.
- ***Direct or indirect.*** A direct impact is caused by a proposed action and occurs contemporaneously at or near the location of the action. An indirect impact is caused by a proposed action and might occur later in time or farther removed in distance but still be a reasonably foreseeable outcome of the action. Indirect impacts might include induced changes in existing conditions, or might be related to multiple resources (e.g., air, water, or other natural and social systems).
- ***Negligible, minor, moderate, or significant.*** These relative terms are used to characterize the magnitude of an impact. Negligible impacts are generally those that may be perceptible but, in their context, are not amenable to measurement because of their relatively minor character. Minor or moderate impacts are those that are more perceptible and, typically, more amenable to quantification or measurement. Significant impacts are those that, in their context and due to their intensity (severity), have the potential to meet the thresholds for significance set forth in CEQ regulations (40 CFR 1508.27), and, thus, warrant heightened attention and examination for potential means for mitigation in order to fulfill the policies set forth under NEPA.
- ***Adverse or beneficial.*** An adverse impact is one having negative, unfavorable, or undesirable outcomes on the man-made or natural environment. A beneficial impact is one having positive outcomes on the man-made or natural environment. A single

act might result in adverse impacts on one environmental resource and beneficial impacts on another resource.

2. Description of Proposed Action and Alternatives

2.1 Introduction

This section describes the Proposed Action and the No Action Alternative.

2.2 Proposed Action

AMC proposes to modify the three primary ECPs on Scott AFB to improve security and safety, and reduce traffic congestion at the Shiloh Gate, Belleville Gate, and Mascoutah Gate. The following sections describe the Proposed Action. The Patriots Landing Gate, located south of Belleville Gate, and Cardinal Creek Gate, located northeast of the base, are only open in exceptional situations otherwise they remain closed.

2.2.1 Modification of the Shiloh Gate

Background. The Shiloh Gate is located on the west side of the base off of State Route (SR) 158 (see Figure 2-1). Shiloh Gate is considered the Main Gate and provides access to vehicles with decals, visitors, and commercial vehicles. Between the hours of 6:00 a.m. to 6:00 p.m., commercial vehicles are directed to use the Mascoutah Gate. The Shiloh Gate currently has two inbound lanes with a maximum of three tandem checker positions per lane and two outbound lanes. The two outbound lanes are used as inbound lanes during peak hours. Peak hours for the Shiloh Gate are from 6:30 a.m. to 8:00 a.m. Shiloh Gate currently does not have a privately owned vehicle (POV), truck, and commercial vehicle inspection area. In addition, the vehicle turnaround area is beyond the gate entrance.

The Shiloh Gate operates 24-hours per day and receives an average of 2,200 inbound POV and other vehicles per peak hour. A gate security, safety, and capacity traffic engineering study was conducted in June 2002 to analyze the Shiloh Gate (SAFB 2002b). The engineering study identified that the Shiloh Gate experiences morning delays of 4 to 8 minutes per vehicle. During peak hours, a maximum of three Security Force's personnel are used to check identification per lane. The Shiloh Gate Visitor Center (VC) parking lot is currently too small to handle visitor capacity and occasionally overflows.

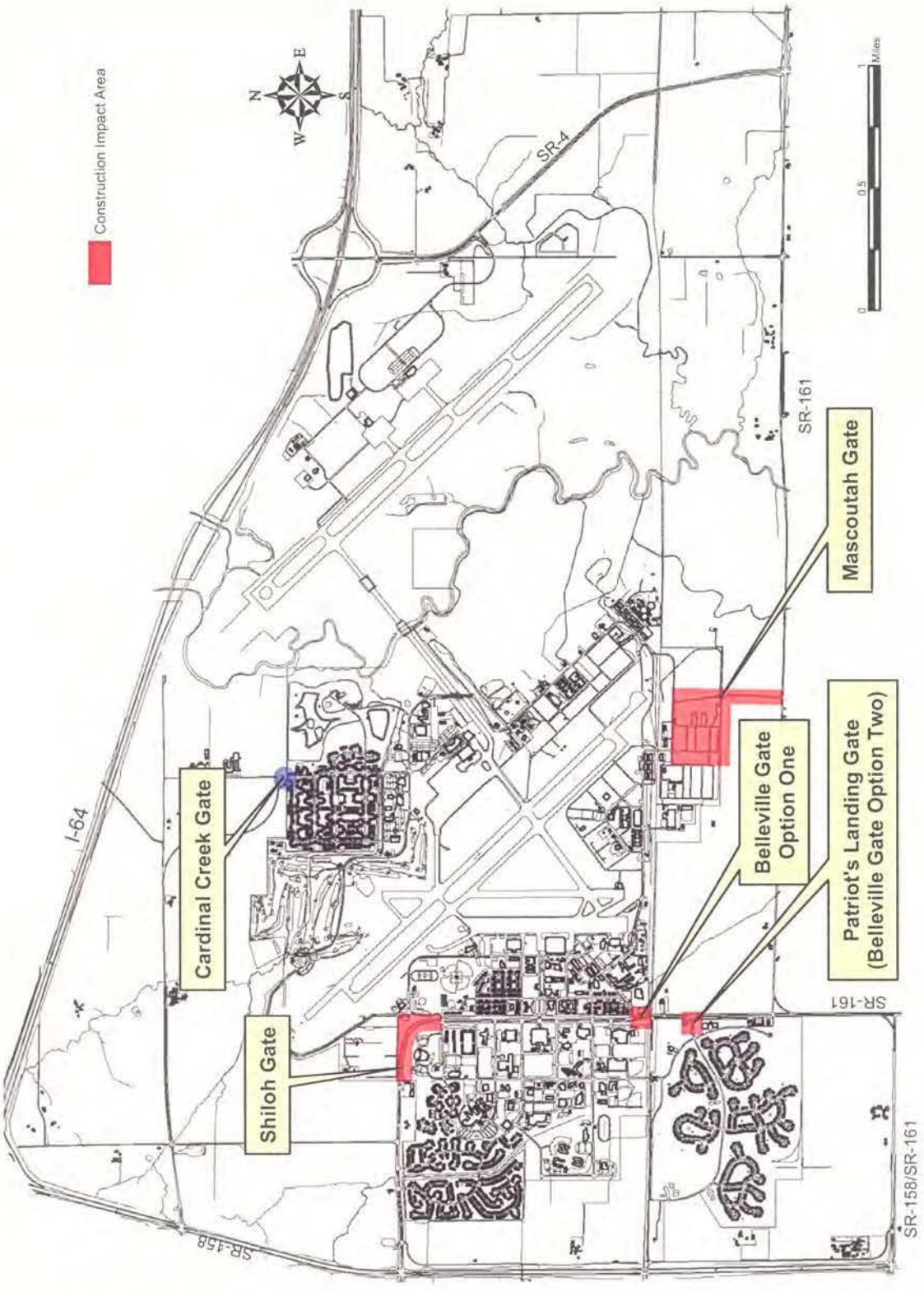

Figure 2-1. Location of Proposed Entry Control Point Upgrades on Scott AFB

Proposed Modifications for the Shiloh Gate. Under the Proposed Action, the following construction activities would be undertaken at the Shiloh Gate:

- Install a series of speed reduction signs.
- Construct four inbound processing lanes that are covered and equipped with raised islands and crash protection devices.
- Construct two outbound lanes.
- Construct stamped pavement effect through ECP.
- Construct turnaround capabilities before and after ECP.
- Demolish existing VC.
- Construct a new 1,991 square foot (sf) VC with parking for at least 30 vehicles.
- Construct a covered inspection area for visitors and random inspections
- Construct an architecturally compatible fence connecting the new VC and ECP.
- Construct an overwatch and vehicle arresting devices.

2.2.2 Modification of the Belleville Gate

Background. The Belleville Gate is located on the southwest side of the base, and provides access to vehicles with decals. Visitors are directed to use the Shiloh Gate and commercial vehicles are directed to use the Mascoutah Gate (see Figure 2-1). The Belleville Gate currently has two inbound lanes with a maximum of three tandem checker positions per lane and two outbound lanes. During peak hours, a maximum of three Security Force's personnel are used to check identification per lane. The Belleville Gate currently does not have a POV, truck, and commercial vehicle inspection area.

The Belleville Gate operates from 4:00 a.m. to 11:59 a.m. and receives an average of 1,000 inbound POV per peak hour. Peak hours for the Belleville Gate are from 6:30 a.m. to 8:00 a.m. A gate security, safety, and capacity traffic engineering study was conducted in June 2002 to analyze the Belleville Gate (SAFB 2002b). The engineering study identified that the Belleville Gate experiences morning delays of 6 to 7 minutes per vehicle and a queue length of 2,400 feet (approximately 80 vehicles per lane).

Proposed Modifications for the Belleville Gate. Under the Proposed Action, the following construction activities would be undertaken at the Belleville Gate:

- Construct three inbound processing lanes that are covered and equipped with raised islands and crash protection devices.
- Construct two outbound lanes.
- Construct stamped pavement effect through ECP.
- Construct turnaround capabilities before and after ECP.
- Construct a covered inspection area for random inspections.
- Construct an overwatch and vehicle arresting devices.
- Option 1: Locate ECP in the vicinity of the current location (see Figure 2-1).
- Option 2: Relocate ECP south of the proposed hospital complex (see Figure 2-1).

2.2.3 Modification of the Mascoutah Gate

Existing Conditions at the Mascoutah Gate. The Mascoutah Gate is located on the south side of the base, and provides access to commercial vehicles, buses, and authorized POVs. Visitors are directed to use Shiloh Gate, and vehicles with decals can use Shiloh Gate or Belleville Gate (see Figure 2-1). The Mascoutah Gate currently has one narrow inbound lane, with a two to three Security Force personnel conducting tandem inspection team during peak hours, and one narrow outbound lane. The Mascoutah Gate currently does not have a separate POV, truck, and commercial vehicle inspection area or a vehicle turnaround area. In addition, the gatehouse is currently too small to accommodate driver processing during peak hours.

The Mascoutah Gate hours of operation are from 6:00 a.m. to 6:00 p.m.. When this gate is closed, commercial vehicles are directed to the Shiloh Gate. A gate security, safety, and capacity traffic engineering study was conducted in June 2002 to analyze the Mascoutah Gate (SAFB 2002b). The engineering study identified that the Mascoutah Gate experiences average morning peak inbound volume of 130 vehicles, 68 percent of which are POVs. Delays in processing vary based on the inspection requirements.

Modifications Proposed for the Mascoutah Gate. The following construction activities were identified in the engineering study to improve safety at the Mascoutah Gate:

- Widen the gate opening from 22 feet to 34 feet.

- Replace the existing gravel and grassed inbound shoulder north of the gatehouse with 12 feet wide by 150 feet long paved shoulder.
- Construct gravel, circular truck turnaround area to the west of the gatehouse.
- Repair the existing flashing beacon over the gate roadway and operate the outbound beacon in a red flashing mode when the gate is open.
- Install a "Stop Ahead" sign prior to entering the gate.
- Expand pass-processing facilities for contractors.
- Construct three inbound processing lanes that are equipped with covered inspection areas and an under vehicle inspection pit.
- Construct one outbound lane.
- Construct turnaround capabilities before and after entry control point that is large enough to accommodate large trucks.
- Demolish existing gatehouse and construct a new gatehouse.
- Construct an overwatch and vehicle arresting devices.

2.3 No Action Alternative

Under the No Action Alternative, Scott AFB would continue to use the facilities and infrastructure at each base ECP in their current condition and configuration. There would be no change from the existing conditions at the installation. This alternative would not address the security, safety, and traffic congestion requirements of the AMC and Scott AFB, nor the standards specified in UFC 4-010-01.

2.4 Mitigation Measures/Best Management Practices

Mitigation measures would not be necessary for implementation of the Proposed Action. However, best management practices for specific resources would be implemented as part of the Proposed Action to further minimize environmental impacts. These best management practices are presented in Table 2-1, and are further detailed in Sections 3.0 and 4.0.

Table 2-1. Summary of Best Management Practices

Resource (Applicable EA Section)	Proposed Action Best Management Practices
Cultural Resources (Section 3.0)	If any archeological artifacts were to be exposed during construction, the construction activities would cease, as required by federal and AF regulations. Work would not resume until an archeological investigation is completed. The SHPO would be informed within 48 hours of any archeological artifacts discovery.
Air Quality (Section 4.1)	Construction contractors would apply water at the construction site to control fugitive dust emissions.
Geological Resources and Water Resources (Sections 4.2 and 4.3)	Construction contractors would use erosion and sedimentation control techniques such as silt fencing and temporary diversions to minimize erosion and sedimentation during construction.

3. Affected Environment

Section 3.0 describes the environmental and socioeconomic resources and conditions most likely to be affected by the proposed construction and demolition projects. This section provides information to serve as a baseline from which to identify evaluate environmental and socioeconomic changes likely to result from implementation of the Proposed Action. Baseline conditions represent current conditions. The potential environmental and socioeconomic impacts of the Proposed Action and No Action Alternative on the baseline conditions are described in Section 4.0.

In compliance with NEPA, CEQ guidelines, and 32 CFR Part 989, as amended, the description of the affected environment focuses on those resources and conditions potentially subject to impacts. Some environmental resources and conditions that are often analyzed in an EA have been omitted from this analysis. The following details the basis for such exclusions:

- **Land Use.** All activities associated with the Proposed Action would be consistent with present and foreseeable land use patterns at Scott AFB. Implementation of the Proposed Action would not significantly alter the existing land use at Scott AFB. Accordingly, the USAF has omitted detailed examination of land use.
- **Biological Resources.** Implementation of the Proposed Action does not involve permanent alterations to biological resources. Threatened or endangered species have not been observed in the location of the Proposed Action. No activity included in the Proposed Action would result in any damage to biological resources; therefore there would be no impact to biological resources at Scott AFB. Accordingly, the USAF has omitted detailed examination of biological resources.
- **Cultural Resources.** No cultural resources or artifacts have been identified in the area of the Proposed Action; therefore there would be no impact to cultural resources at Scott AFB. Accordingly, the USAF has omitted detailed examination of cultural resources. If an unexpected archaeological discovery occurs during construction, the unanticipated archeological discoveries as defined in the Scott AFB Integrated Cultural Resource Management Plan (ICRMP) would be followed. If archaeological properties are discovered, excavation and disturbance of the site would cease. The Cultural Resource Manager would be notified immediately. The Cultural Resource Manager would take actions to evaluate the discovery and, provide guidance to the project engineer on any

actions that should be taken to provide appropriate management treatment of the resource.

- **Noise.** Implementation of the Proposed Action does not involve permanent alterations to aircraft inventories, operations, or missions. No new permanent ground-based heavy equipment operations are included in the Proposed Action. No activity included in the Proposed Action would result in a situation where residences would be impacted by an increase to present ambient noise levels. Furthermore, noise produced by construction and demolition activities associated with the Proposed Action would not significantly affect sensitive receptors. Accordingly, the USAF has omitted detailed examination of noise.
- **Socioeconomics and Environmental Justice.** The Proposed Action does not involve any activities that would contribute to changes in socioeconomic resources. There would be no change in the number of personnel assigned to Scott AFB, therefore there would be no changes in area population or associated changes in demand for housing and services. Several small businesses outside the Shiloh Gate may realize a slight revenue decrease as a result of the disruption of traffic flow during construction activities. However, these decreases would be minor and temporary in nature. As a result, no significant impacts would be expected. Accordingly, the USAF has omitted detailed examination of socioeconomics.

3.1 Air Quality

3.1.1 Definition of Resource

Air quality in a given location is determined by the concentration of various pollutants in the atmosphere. National Ambient Air Quality Standards (NAAQS) are established by the United States Environmental Protection Agency (USEPA) for "criteria pollutants," including ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter equal to or less than 10 microns in diameter (PM_{10}), particulate matter equal to or less than 2.5 microns in diameter ($PM_{2.5}$), and lead (Pb). NAAQS represent maximum levels of background pollution in the ambient air that are considered safe, with an adequate margin of safety to protect public health and welfare (see Table 3-1).

Table 3-1. National Ambient Air Quality Standards

Pollutant	Standard Value		Standard Type
Carbon Monoxide (CO)			
8-hour Average	9 ppm[2]	(10 mg/m^3)[3,4]	Primary
1-hour Average	35 ppm	(40 mg/m^3)[3]	Primary
Nitrogen Dioxide (NO_2)			
Annual Arithmetic Mean	0.053 ppm	(100 µg/m^3)[3,5]	Primary & Secondary
Ozone (O_3)			
1-hour Average[1]	0.12 ppm	(235 µg/m^3)[3]	Primary & Secondary
8-hour Average	0.08 ppm	(157 µg/m^3)[3]	Primary & Secondary
Lead (Pb)			
Quarterly Average		1.5 µg/m^3	Primary & Secondary
Particulate ≤ 10 micrometers (PM_{10})			
Annual Arithmetic Mean		50 µg/m^3	Primary & Secondary
24-hour Average		150 µg/m^3	Primary & Secondary
Particulate ≤ 2.5 micrometers ($PM_{2.5}$)			
Annual Arithmetic Mean		15 µg/m^3	Primary & Secondary
24-hour Average		65 µg/m^3	Primary & Secondary
Sulfur Dioxide (SO_2)			
Annual Arithmetic Mean	0.03 ppm	(80 µg/m^3)[3]	Primary
24-hour Average	0.14 ppm	(365 µg/m^3)[3]	Primary
3-hour Average	0.50 ppm	(1300 µg/m^3)[3]	Secondary

Notes:

[1] The ozone 1-hour standard applies only to areas that were designated non-attainment when the ozone 8-hour standard was adopted in July 1997. The new 8-hour ozone standard is currently being contested in Federal court. No areas have been deemed non-attainment with the new 8-hour standard pending resolution of this case.

[2] ppm – parts per million

[3] Parenthetical value is an approximately equivalent concentration.

[4] mg/m3 – milligrams per cubic meter

[5] µg/m3 – micrograms per cubic meter

The CAA places most of the responsibility to achieve compliance with the NAAQS on the individual states and/or local agencies that have been delegated CAA authority by USEPA. This is achieved through a SIP, which is required under the CAA. The SIP is a compilation of goals, strategies, schedules, permitting programs, and enforcement actions that lead the state into compliance with all NAAQS. Any changes to the compliance schedule or plan must be incorporated into the SIP and approved by USEPA. Areas not in compliance with a standard can be declared "non-attainment areas" by USEPA or the appropriate state or local agency. Based on the severity of an area's non-attainment (i.e., number of times that ambient air quality exceeds the NAAQS), USEPA also categorizes non-attainment areas (e.g., marginal, serious, severe, extreme). Areas designated by USEPA as being in non-attainment for one or more of the seven

NAAQS may petition USEPA for re-designation as a maintenance area if they are able to demonstrate they have met the national standard for the three years preceding the re-designation request. At the time the state petitions USEPA for re-designation, it must also submit a revision of its SIP to provide for the maintenance of the applicable NAAQS for at least 10 years after re-designation ("maintenance plan") pursuant to CAA §175(A).

Under the General Conformity Rule, the CAA prohibits Federal agencies from performing projects that do not conform to a USEPA-approved SIP. In 1993, USEPA developed final rules for how Federal agencies must determine air quality conformity prior to implementing a proposed Federal action. Under these rules, certain actions are exempted from conformity determinations, while others are assumed to be in conformity if total project emissions are below *de minimis* levels established under 40 CFR Part 93.153. Total project emissions include both direct and indirect emissions caused by the Federal action.

The CAA and the CAA Amendments of 1990 also require states to permit "major" stationary sources. A major stationary source is a facility (i.e., plant, base, or activity) that emits more than 100 tons annually of any one criteria air pollutant, 10 tons per year (tpy) of a single hazardous air pollutant (HAP), or 25 tpy of any combination of HAPs. There are 188 listed HAPs regulated under the CAA. The purpose of the permitting rule is to establish regulatory control over large facilities or processes that routinely emit significant amounts of pollutants activities and to assess and monitor their impact upon local and regional air quality.

3.1.2 Existing Conditions

Climate. Southwestern Illinois has a continental climate with relatively hot, humid summers and moderately cold winters. The temperature extremes for this area can range from over 100 degrees Fahrenheit (°F) to -10 °F. Precipitation is usually heavier during spring and summer months than in fall and winter months. The mean annual snowfall is approximately 17 inches.

Regional Air Quality. The USEPA classifies the air quality in an air quality control region (AQCR) or in sub-areas of an AQCR according to whether the concentration of criteria pollutants in ambient air exceeds the primary or secondary NAAQS. All areas within each AQCR are therefore designated as either "attainment," "non-attainment," or "unclassified" for each of the six criteria pollutants. Attainment means that the air quality within an AQCR is better than the NAAQS, non-attainment indicates that air quality exceeds NAAQS, and an unclassifiable air

quality designation by USEPA means that there is not enough information to appropriately classify an AQCR, so the area is considered attainment.

The General Conformity Rule requires that any Federal action meet the requirements of a SIP or Federal Implementation Plan (FIP). More specifically, CAA Conformity is assured when a Federal action *does not*:

- Cause a new violation of a NAAQS
- Contribute to an increase in the frequency or severity of violations of NAAQS
- Delay the timely attainment of any NAAQS, interim progress milestones, or other milestones toward achieving compliance with the NAAQS

The conformity rule applies only to actions in non-attainment or maintenance areas and considers both direct and indirect emissions. The rule applies only to Federal actions that are considered "regionally significant" or where the total emissions from the action meet or exceed the *de minimis* thresholds. An action is regionally significant when the total non-attainment pollutant emissions exceed 10 percent of the AQCR's total emissions inventory for that non-attainment pollutant. If a Federal action meets the *de minimis* threshold requirements and is not considered regionally significant, then a full Conformity Determination is not required.

Scott AFB. Scott AFB is located within Saint Clair County, which is part of the Metropolitan St. Louis Interstate AQCR (IEPA 2003). This AQCR is currently designated as a non-attainment (moderate) area for O_3. The closest Metro East air-monitoring site to Scott AFB is located in East St. Louis. The St. Louis Clean Air Coalition, of which Scott AFB is a member, monitors O_3 levels and encourages actions to reduce emissions resulting in ozone formation.

Scott AFB is not required to operate under a Title V permit of the Clean Air Act Amendments since it has shut down its central heat plant and has installed individual facility boilers (SAFB 1999a). Scott AFB is currently operating under a Federally Enforceable State Operating Permit (FESOP). Under this new FESOP, Scott AFB would keep emissions from certain sources such as diesel storage facilities, jet fuel storage facilities, and emergency generators under levels established by the USEPA. If levels were exceeded, then the base would need to apply for a Title V permit.

According to Title I of the CAA Amendments, Scott AFB is required to conform to the provisions of the SIP. Conformity essentially means that federal agencies will not take actions

that further contribute to the degradation of regional air quality. This includes significant changes in stationary and mobile sources of air pollutants.

3.2 Geological Resources

3.2.1 Definition of Resource

An area's geological resources typically consist of surface and subsurface materials and their inherent properties. Principal factors influencing the ability of geological resources to support structural development are seismic properties (i.e., potential for subsurface shifting, faulting, or crustal disturbance), soil stability, and topography.

The term soil generally refers to unconsolidated materials overlying bedrock or other parent material. Soils play a critical role in both the natural and human environment. Soil depth, structure, elasticity, strength, shrink-swell potential, and erodibility determine a soil's ability to support man-made structures and facilities. Soils typically are described in terms of their series or association, slope, physical characteristics, and relative compatibility or constraints in regard to particular construction activities and types of land use.

Topography is defined as the relative position and elevations of the natural and/or man-made features of an area that describe the configuration of its surface. An area's topography is influenced by many factors, including human activity, seismic activity of the underlying geological material, climatic conditions, and erosion. Information about an area's topography typically encompasses surface elevations, slope, physiographic features (i.e., mountains, ravines, or depressions), and their influence on human activities.

3.2.2 Existing Conditions

Physiography. Scott AFB lies on the Springfield Plain subdivision of the Till Plains section of the Central Lowlands Physiographic Province. The base is located on the west end of the Silver Creek Valley basin that is characterized by generally flat to gently rolling hills. Scott AFB is in a closed basin of the Kaskaskia River.

Topography. The base land surface is generally level. The maximum surface elevation at Scott AFB is approximately 420 feet above mean sea level (msl) along the eastern boundary of the base within the Silver Creek floodplain. The elevation of Silver Creek east of the base is about 405 feet above msl.

The base lies within Seismic Zone IX, which contains the New Madrid Fault Zone. This fault zone extends from Cairo, Illinois on the Ohio River southward through New Madrid, Missouri. It is the most active seismic area east of the Rocky Mountains. The last major earthquake along this fault was in 1812 and measured more than 8.0 on the Richter scale. However, tremors are common, and on rare occasions, small quakes measuring 3.0 to 4.0 or more on the Richter scale occur along the New Madrid Fault (SAFB 1999a).

Geology. Saint Clair County rests primarily on Paleozoic sedimentary rocks and Cenozoic unconsolidated materials. Pennsylvanian Age bedrock lies approximately 85 feet below the surface and includes layers of shale, siltstone, sandstone, limestone, claystone, and coal. The Pennsylvanian strata are approximately 265 feet thick. Beneath the Pennsylvanian strata is the water-yielding Chesterian Series sandstone, which haves wells that yield 20 to 25 gallons per minute (SAFB 1999a). Glacial and alluvial deposits ranging in thickness from 50 feet to 125 feet dominate the surficial geology in this area.

Soils. The predominant soil types on Scott AFB are silt loams and silty clay loams, which occur to a depth of 16 inches. They have a moderately high water-holding capacity, moderate to high shrink-swell ratios, and moderate to high corrosive potentials. These soils are developed from tall grass prairie and mixed hardwood forest, and as a result, are quite fertile. The two primary soil associations on Scott AFB are the Herrick-Virden Association in upland areas and the Wakeland-Bonnie Association in bottomland forests along Silver Creek. A soil association is a landscape that has a distinctive pattern of soils in defined proportions. Soil erosion at Scott AFB is not a widespread problem because the topography of the base is relatively flat.

3.3 Water Resources

3.3.1 Definition of Resource

Water resources include surface water, groundwater, and floodplains. Evaluation identifies the quantity and quality of the resource and its demand for potable, irrigation, and industrial purposes.

Surface water resources consist of lakes, rivers, and streams. Surface water is important for its contributions to the economic, ecological, recreational, and human health of a community or locale. Storm water flows, which may be exacerbated by high proportions of impervious surfaces associated with buildings, roads, and parking lots, are important to management of surface water.

Storm water also is important to surface water quality because of its potential to introduce sediments and other contaminants into lakes, rivers, and streams.

Groundwater consists of subsurface hydrologic resources. It is an essential resource often used for potable water consumption, agricultural irrigation, and industrial applications. Groundwater typically may be described in terms of its depth from the surface, aquifer or well capacity, water quality, surrounding geologic composition, and recharge rate.

Floodplains are areas of low-level ground present along a river or stream channel. Such lands may be subject to periodic or infrequent inundation due to rain or melting snow. Risk of flooding typically hinges on local topography, the frequency of precipitation events, and the size of the watershed above the floodplain. Flood potential is evaluated by the Federal Emergency Management Agency, which evaluates the floodplain for 100- and 500-year flood events. Federal, state, and local regulations often limit floodplain development to passive uses such as recreational and preservation activities in order to reduce the risks to human health and safety.

3.3.2 Existing Conditions

Surface Water. The eastern boundary of Scott AFB is bounded by Silver Creek. Silver Creek is a tributary of the Kaskaskia River, which is a tributary to the Mississippi River. Ash Creek is on the west side of base and is a tributary to Loop Creek, which joins Silver Creek approximately 2.5 miles south of the base. North Ditch, South Ditch, and Mosquito Creek are on-base tributaries to Silver Creek.

Water flows from two drainage ditches on base into Silver Creek. One drainage is on the western side of the base and the other drainage is on the northern side of the base. Scott AFB drains approximately 60 percent of it surface water to Silver Creek and 40 percent to Ash Creek (SAFB 1999a). Ash Creek flows through the Galaxy and Shiloh housing areas on the west side of the base.

Groundwater. The groundwater system at Scott AFB generally flows from west to east. The groundwater levels range from 20 feet on the western side of the base to less than one foot on the eastern side of the base. Groundwater yields are generally too low to be a significant source of potable or irrigation water in the vicinity of Scott AFB (SAFB 1999a).

Floodplains. There are approximately 390 acres of floodplains along the Silver Creek drainage through Scott AFB. However, no new hydrologic studies have been conducted since various

modifications and structures have been built in the floodplain as a result of the Mid-America Airport Construction (SAFB 2002a).

3.4 Hazardous Materials and Wastes Management

3.4.1 Definition of Resource

Hazardous material is defined by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), and the Toxic Substances Control Act (TSCA), as any substance with physical properties of ignitability, corrosivity, reactivity, or toxicity that may cause an increase in mortality, a serious irreversible illness, incapacitating reversible illness, or pose a substantial threat to human health or the environment. Hazardous waste is defined by the Resource Conservation and Recovery Act (RCRA), which was further amended by the Hazardous and Solid Waste Amendments (HSWA), as any solid, liquid, contained gaseous, or semisolid waste, or any combination of wastes that poses a substantial present or potential hazard to human health or the environment.

Evaluation of hazardous materials and wastes focuses on underground storage tanks and aboveground storage tanks and the storage, transport, and use of pesticides and herbicides, fuels, and Petroleum, Oil, and Lubricants (POL). Evaluation may also extend to generation, storage, transportation, and disposal of hazardous wastes when such activity occurs at or near the project site of a proposed action. In addition to being a threat to humans, the improper release of hazardous materials and wastes can threaten the health and well being of wildlife species, botanical habitats, soil systems, and water resources. In the event of release of hazardous materials or wastes, the extent of contamination varies based on the type of soil, topography, and water resources.

Special hazards are those substances that may pose a risk to human health but are not regulated as contaminants under the hazardous waste statutes. Hazards of significance associated with the Proposed Action are asbestos and lead-based paint. The presence of special hazards or controls over them may affect, or be affected by, a proposed action. Information on special hazards describing their locations, quantities, and condition assists in determining the significance of a proposed action.

To protect habitats and people from inadvertent and potentially harmful releases of hazardous substances, DOD has dictated that all facilities develop and implement Hazardous Material Emergency Planning and Response Plans or Spill Prevention, Control, and Countermeasure Plans. Also, DOD has developed the Environmental Restoration Program (ERP), intended to facilitate thorough investigation and cleanup of contaminated sites located on military installations. These plans and programs, in addition to established legislation (i.e., CERCLA and RCRA) effectively form the "safety net" intended to protect the ecosystems on which most living organisms depend.

AFPD 32-70, Environmental Quality, establishes the policy that the Air Force is committed to environmentally-sound practices:

- Cleaning up environmental damage resulting from its past activities
- Meeting all environmental standards applicable to its present operations
- Planning its future activities to minimize environmental impacts
- Managing responsibly the irreplaceable natural and cultural resources it holds in public trust, and
- Eliminating pollution from its activities wherever possible.

AFPD 32-70 and the AFI 32-7000 series incorporates the requirements of all Federal regulations, other AFIs and DOD Directives for the management of hazardous materials, hazardous wastes and special hazards.

3.4.2 Existing Conditions

The 375th Environmental Flight at Scott AFB (375 CES/CEV) is responsible for the hazardous material and waste plans for the installation. In conformance with the policies established by AFPD 32-70, the 375 CES/CEV has developed plans and procedures to manage hazardous materials, hazardous wastes, and special hazards on the base.

Hazardous Materials. AFI 32-7086, *Hazardous Materials Management*, establishes procedures and standards that govern management of hazardous materials throughout the USAF. It applies to all USAF personnel who authorize, procure, issue, use, or dispose of hazardous materials, and to those who mange, monitor, or track any of those activities. The 375 AW manages hazardous materials in accordance with AFI 32-7086.

Hazardous materials are managed through a centralized base hazardous material (HAZMAT) Pharmacy using an Environmental Management Information System, which tracks acquisition and inventory control of hazardous materials as well as hazardous waste disposal and health and safety information (SAFB 2002a). This system complements existing regulations, instructions, supplements, and higher headquarters policies and procedures.

Hazardous Wastes. The 375 AW is currently revising the *Hazardous Waste Management Plan* (SAFB 2002a) as directed by AFI 32-7042, *Solid and Hazardous Waste Compliance.* The *Hazardous Waste Management Plan* provides guidance to Scott AFB personnel on handling, storage, and disposal of hazardous materials and implements the USEPA "cradle-to-grave" management control of hazardous waste.

Hazardous wastes generated at Scott AFB include spent solvents; photofixer; waste POL; waste cleaning compounds; and various forms of waste paint. The Scott AFB Hazardous Waste Management Program also handles universal waste, including batteries, pesticides, mercury thermostats, and mercury-containing lamps. Special wastes include potentially infectious medical wastes, industrial process wastes, and pollution control wastes. There are approximately 23 satellite accumulation points where for hazardous wastes are generated. There are an additional 23 satellite accumulation points on Scott AFB managed by the 126 ANG. Furthermore, the plan defines the waste accumulated and instructs base personnel on management procedures for the waste.

Asbestos. AFI 32-1052, *Facilities Asbestos Management,* provides direction for asbestos management at USAF installations. AFI 32-1052 requires installations to develop an asbestos management plan for the purpose of maintaining a permanent record of the status and condition of asbestos containing material (ACM) in installation facilities, as well as documenting asbestos management efforts. In addition, the instruction requires installations to develop an asbestos-operating plan detailing how the installation accomplishes asbestos-related projects. Asbestos is regulated by USEPA with the authority promulgated under the Occupational Safety and Health Act. Section 112 of the CAA regulates emission of asbestos fibers to ambient air. USEPA policy is to leave asbestos in place if disturbance or removal could pose a health threat.

The 375 AW fulfills the requirements of AFI 32-1052 with the *Scott AFB Asbestos Management Plan* (SAFB 2000a) and the *Asbestos Operations Plan* (SAFB 2000b). This plan specifies procedures for the removal, encapsulation, enclosure, and repair activities associated with ACM abatement projects. The objective of the plan is to reduce the potential of personnel exposure to

potentially hazardous levels of airborne asbestos fibers and assist in maintaining compliance with all Federal, state, and local asbestos regulations. According to the *Scott AFB General Plan* (SAFB 2002a), when ACM is removed as a result of renovations or building demolitions, the costs of ACM abatement are incorporated into the overall project costs.

Lead Based Paint. The Residential Lead-Based Paint Hazard Reduction Act of 1992, Subtitle B, Section 408 (commonly called Title X), passed by Congress on October 28, 1992, regulates the use and disposal of lead-based paint on Federal facilities. Federal agencies are required to comply with applicable Federal, state, and local laws and regulations relating to lead-based paint activities and hazards.

USAF policy and guidance establishes lead-based paint management at USAF facilities (USAF 1993). Additionally, the policy requires each installation to develop and implement a facility management plan for identifying, evaluating, managing, and abating lead-based paint hazards. The *Lead Based Paint Management Plan* (SAFB 1996) provides an understandable and easy-to-follow approach to lead-based paint management. It covers designation of duties, identification of hazards, testing procedures, abatement methods, training requirements, and protection of families and workers. In addition to addressing lead based paint concerns, the Lead Based Paint Management Plan also addresses lead exposure from other sources such as lead joints used in the potable water system and occupational exposure to lead through corrosion control, welding, and cable maintenance operations. Mitigation of lead based paint and other hazards, monitoring, and lead waste disposal are also discussed.

Pollution Prevention. AFI 32-7080, *Pollution Prevention Program*, implements the regulatory mandates in the Emergency Planning and Community Right-to-Know Act; Pollution Prevention Act of 1990; EO 12856, *Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements*; EO 12873, *Federal Acquisition, Recycling, and Waste Prevention*; and EO 12902, *Energy Efficiency and Water Conservation at Federal Facilities*. AFI 32-7080 prescribes the establishment of Pollution Prevention Management Plans. The 375 AW fulfills this requirement with the *Pollution Prevention Plan* (SAFB 2000c) and the *Hazardous Materials Management Process (HMMP)*. These plans ensure that Scott AFB maintains a waste reduction program and meets the requirements of the CWA, the National Pollution Discharge Elimination System (NPDES) permit program and Federal, state and local laws and regulations for spill prevention, control and countermeasures.

3.5 Infrastructure and Utilities

3.5.1 Definition of the Resource

Infrastructure consists of the systems and physical structures that enable a population in a specified area to function. Infrastructure is wholly human-made, with a high correlation between the type and extent of infrastructure and the degree to which an area is characterized as "urban" or developed. The availability of infrastructure and its capacity to support growth are generally regarded as essential to economic growth of an area. The infrastructure information provided below was obtained from the *Scott AFB General Plan* (SAFB 2002a) and provides a brief overview of each infrastructure component and comments on its existing general condition. The infrastructure components to be discussed in this section include transportation systems, utilities (electrical power, natural gas, and water supply), solid waste, and sanitary systems.

Solid waste management primarily concerns itself with the availability of landfills to support a population's residential, commercial, and industrial needs. Alternative means of waste disposal may involve waste-to-energy programs or incineration. In some localities, landfills are designed specifically for, and limited to, disposal of construction and demolition debris. Recycling programs for various waste categories (e.g., glass, metals, and papers) reduce reliance of landfills for disposal.

3.5.2 Existing Conditions

Solid Waste. Wastes disposed of in the solid waste stream at Scott AFB are expected to consist only of those materials that cannot be effectively recycled. This commonly includes paper towels and other sanitary wastes, food-soiled wrapping and packaging, most food wastes, plastic bags and wrappings, non-recyclable construction and demolition (C&D) wastes, and other miscellaneous non-recyclable materials from administrative, industrial, food-service, and retail operations.

C&D waste and non-recurring municipal solid waste (MSW) generated under contract are the responsibility of the contractor. C&D waste and non-recurring MSW generated under contract or by base personnel are recycled to the greatest extent possible. Contractors are required to report the quantities of recycled C&D waste. Specifications in these contracts require contractors to provide information regarding the disposition of the waste they generate.

Transportation. Scott AFB is located a few miles east of the convergence of several Interstate Highways (Highways 44, 55, 64, and 70). Interstate 64, located north of the base, provides east-west access to Scott AFB and interconnects the base with the interstate, state, and local road network. Illinois 161 and Illinois 177, located south of the base, also provide east-west access to the state and local system. Air Mobility Drive (Illinois 158), west of Scott AFB; and Illinois 4, east of the base, provide north-south mobility.

The region's light rail mass transit system, MetroLink, was recently extended to Southwestern Illinois College. The extension of the MetroLink from Southwestern Illinois College to the Mid-America Airport terminal at Interstate 64 and Illinois 4 was completed in 2003. This extension includes park-and-ride stations on the east side of Air Mobility Drive (Illinois 158) near the unaccompanied enlisted personnel housing area and at the Mid-America Airport terminal. The MetroLink Station at Air Mobility Drive includes a secure access gate on the east side of the station for Scott AFB personnel.

3.6 Safety

3.6.1 Definition of Resource

A safe environment is one in which there is no, or an optimally reduced, potential for death, serious bodily injury or illness, or property damage. Human health and safety addresses workers' health and safety during demolition and construction activities and facilities construction; and public safety during demolition and construction activities and during subsequent operations of those facilities.

Construction work site safety is largely a matter of adherence to regulatory requirements imposed for the benefit of employees and implementation of operational practices that reduce risks of illness, injury, death, and property damage. The health and safety of onsite military and civilian workers are safeguarded by numerous DOD and USAF regulations designed to comply with standards issued by the Occupational Safety and Health Administration and USEPA. These standards specify the amount and type of training required for industrial workers, the use of protective equipment and clothing, engineering controls, and maximum exposure limits for workplace stressors.

Scott AFB has areas on base that are constrained by quantity distance (QD) safety zones. These explosive clear zones are established to minimize risk and exposure to individuals from

explosives and explosive storage facilities. There are three QD safety zones on Scott AFB (SAFB 2002a).

3.6.2 Existing Conditions

All contractors performing construction activities at Scott AFB are responsible for following ground safety regulations and worker compensation programs and are required to conduct construction activities in a manner that does not pose any risk to its workers or base personnel. An industrial hygiene program addresses exposure to hazardous materials, use of personal protective equipment, and availability of Material Safety Data Sheets. Industrial hygiene is the responsibility of contractors, as applicable.

Contractor responsibilities are to review potentially hazardous workplace operations; to monitor exposure to workplace chemical (e.g., asbestos, lead, hazardous material), physical (e.g., noise propagation), and biological (e.g., infectious waste) agents; to recommend and evaluate controls (e.g., ventilation, respirators) to ensure personnel are properly protected or unexposed; and to ensure a medical surveillance program is in place to perform occupational health physicals for those workers subject to any accidental chemical exposures.

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4. Environmental Consequences

This section of the EA assesses potential environmental consequences associated with the Proposed Action. Environmental Consequences are addressed in the context of the scope of the Proposed Action as described in Section 2.0 and in consideration of the potentially affected environment as characterized in Section 3.0.

4.1 Air Quality

4.1.1 Evaluation Criteria

The Environmental Consequences to local and regional air quality conditions near a proposed Federal action are determined based upon the increases in regulated pollutant emissions relative to existing conditions and ambient air quality. Specifically, the impact in NAAQS "attainment" areas would be considered significant if the net increases in pollutant emissions from the Federal action would result in any one of the following scenarios:

- Cause or contribute to a violation of any national or state ambient air quality standard
- Expose sensitive receptors to substantially increased pollutant concentrations
- Represent an increase of ten percent or more in an affected AQCR emissions inventory
- Exceed any Evaluation Criteria established a SIP

The area including Scott AFB is designated as a moderate non-attainment for O_3 and is in attainment with current ambient air quality standards for all other criteria pollutants. Standard norms for non-attainment areas are described below.

Impacts to air quality in NAAQS "non-attainment" areas are considered significant if the net changes in project-related pollutant emissions result in any of the following scenarios:

- Cause or contribute to a violation of any national or state ambient air quality standard.
- Increase the frequency or severity of a violation of any ambient air quality standard.
- Delay the attainment of any standard or other milestone contained in the SIP.

With respect to the General Conformity Rule, impacts to air quality would be considered significant if the proposed Federal action would result in an increase of a non-attainment or maintenance area's emission inventory by ten percent or more for one or more non-attainment

pollutants, or if such emissions exceed *de minimis* threshold levels established in 40 CFR Part 93.153(b) for individual non-attainment pollutants or for pollutants for which the area has been re-designated as a maintenance area.

The *de minimis* threshold emission rates were established by USEPA in the General Conformity Rule in order to focus analysis requirements on those Federal actions with the potential to have "significant" air quality impacts. Table 4-1 presents these thresholds, by regulated pollutant. These *de minimis* thresholds are similar, in most cases, to the definitions for major stationary sources of criteria and precursors to criteria pollutants under the CAA's New Source Review (NSR) Program (CAA Title I). As shown in Table 4-1, *de minimis* thresholds vary depending upon the severity of the non-attainment area classification.

Table 4-1. Conformity *De Minimis* Emission Thresholds

Pollutant	Status	Classification	*De minimis* Limit (tpy)
Ozone (measured as Nitrogen Oxides (NO_x) or Volatile Organic Compounds (VOCs))	Non-attainment	Extreme	10
		Severe	25
		Serious	50
		Moderate/marginal (inside ozone transport region)	50 (VOCs)/100 (NO_x)
		All others	100
	Maintenance	Inside ozone transport region	50 (VOCs)/100 (NO_x)
		Outside ozone transport region	100
Carbon Monoxide (CO)	Non-attainment/ maintenance	All	100
Particulate Matter (PM_{10})	Non-attainment/ maintenance	Serious	70
		Moderate	100
		Not Applicable	100
Sulfur Dioxide (SO_2)	Non-attainment/ maintenance	Not Applicable	100
Nitrogen Oxides (NO_x)	Non-attainment/ maintenance	Not Applicable	100

Source: 40 CFR Part 93.153

In addition to the *de minimis* emission thresholds, Federal prevention of significant deterioration (PSD) regulations define air pollutant emissions to be significant if the source is within

10 kilometers of any Class I area, and emissions would cause an increase in the concentration of any regulated pollutant in the Class I area of 1 $\mu g/m^3$ or more (40 CFR Part 52.21(b)(23)(iii)).

4.1.2 Environmental Consequences

No long-term air quality impacts are expected from the Proposed Action. Regulated pollutant emissions from the Proposed Action would not contribute to or affect local or regional attainment status with NAAQS. The Proposed Action would generate air pollutant emissions as a result of grading, filling, compacting, and paving operations, but these emissions would be temporary and would not be expected to generate any off-site impacts.

The Proposed Action would not cause or contribute to any violation of any ambient air quality standard. Construction activities would generate total suspended particulate (TSP) and PM_{10} emissions as fugitive dust from ground disturbing activities (e.g., grading, demolition, soil piles, unpaved roads, etc.) and combustion of fuels in construction equipment. Fugitive dust emissions would be greatest during the initial site preparation activities and would vary from day-to-day depending on the construction phase, level of activity, and prevailing weather conditions. The quantity of uncontrolled fugitive dust emissions from a construction site is proportional to the area of land being worked and the level of construction activity.

Construction activities would result in emissions of criteria pollutants as combustion products from construction equipment as well as evaporative emissions from architectural coatings and asphalt paving operations and would be of a temporary nature.

During construction, emissions from the Proposed Action would produce slightly elevated short-term PM_{10} ambient air concentrations. However, the effects would be temporary and would fall off rapidly with distance from the proposed construction site.

Conformity. A screening level significance evaluation indicates that the Proposed Action would generate emissions below conformity *de minimis* limits. Because the emissions generated would be below *de minimis* levels, it is reasonable to assume that the temporary construction emissions caused by the Proposed Action would not cause a violation of the NAAQS. Total Proposed Action emissions are such that a full Conformity Determination would not be necessary.

Other Analyses: NAAQS and PSD Standards. Through comparison with other similar projects, best engineering judgment indicates that the Proposed Action would have a negligible effect on the ambient air quality in Saint Clair County. There are no PSD Class I areas within

10 kilometers (6.2 miles) of the Proposed Action. Therefore, no impacts to Class I areas are expected.

4.2 Geological Resources

4.2.1 Evaluation Criteria

Protection of unique geological features, minimization of soil erosion, and the siting of facilities in relation to potential geologic hazards are considered when evaluating Environmental Consequences of a proposed action on geological resources. Generally, impacts can be avoided or minimized if proper construction techniques, erosion control measures, and structural engineering design are incorporated into project development.

Analysis of Environmental Consequences on geological resources typically includes the following evaluation tools:

- Identification and description of resources that could potentially be affected
- Examination of a proposed action and the potential effects this action may have on the resource
- Assessment of the significance of Environmental Consequences
- Provision of mitigation measures in the event that potentially significant impacts are identified

4.2.2 Environmental Consequences

Under the Proposed Action, construction activities, such as grading, excavation, and re-contouring of the soil, would result in soil disturbance. Implementation of best management practices during construction would limit environmental consequences resulting from construction activities. Fugitive dust from construction activities would be minimized by watering and soil stockpiling, thereby reducing to negligible levels the total amount of soil exposed. Standard erosion control means (silt fencing, sediment traps, application of water sprays, and re-vegetation at disturbed areas) would also reduce environmental consequences related to those characteristics. Therefore, impacts on soils at the installation would not be significant.

The Proposed Action would not cause or create significant changes to the topography of the Scott AFB area. Therefore, no significant impact on regional or local topography or physiographic features would result from implementation of the Proposed Action.

4.3 Water Resources

4.3.1 Evaluation Criteria

Evaluation Criteria for water resources impacts are based on water availability, quality, and use; existence of floodplains; and associated regulations. A potential impact on water resources would be significant if it were to reduce water availability to existing users or interfere with the supply; create or contribute to overdraft of groundwater basins or exceed safe annual yield of water supply sources; adversely affect water quality or endanger public health by creating or worsening adverse health hazard conditions; threaten or damage unique hydrologic characteristics; or violate established laws or regulations that have been adopted to protect or manage water resources of an area. The impact of flood hazards on a proposed action is significant if such an action is proposed in an area with a high probability of flooding.

4.3.2 Environmental Consequences

Implementation of the Proposed Action is expected to have no adverse effects on water quality. The Proposed Action would cumulatively increase the impervious surface area and runoff on the installation. Adherence to proper engineering practices and applicable codes and ordinances would reduce storm water runoff-related impacts to a level of insignificance. Erosion and sediment controls would be in place during construction to reduce and control siltation or erosion impacts to areas outside of the construction site.

None of the activities associated with the Proposed Action would affect groundwater quality. The facility is designed to be slab-on-grade construction and intrusion into the subgrade would be minimal.

Floodplains. The Proposed Action does not involve construction activities in a floodplain and construction impacts would be kept as minimal as possible. Therefore, the Proposed Action would not have an adverse impact to floodplains on Scott AFB.

4.4 Hazardous Materials and Waste Management

4.4.1 Evaluation Criteria

Numerous local, state, and Federal laws regulate the storage, handling, disposal, and transportation of hazardous material and waste. The primary purpose of these laws is to protect public health and the environment. Environmental Consequences associated with hazardous material and waste would be significant if the storage, use, transportation, or disposal of these substances were to substantially increase the risk to human health or exposure to the environment.

4.4.2 Environmental Consequences

Hazardous Materials. Construction activities associated with the Proposed Action would require the use of certain hazardous materials such as paints, welding gases, solvents, preservatives, and sealants. It is anticipated that the quantity of products containing hazardous materials used during the construction of the ECPs would be minimal and their use would be of short duration. Contractors would be responsible for the management of hazardous materials, which would be handled in accordance with Federal and state regulations. Therefore, hazardous materials management at Scott AFB would not be impacted by the proposed construction activities.

Hazardous Waste. It is anticipated that the quantity of hazardous wastes generated from proposed construction activities would be negligible. Contractors would be responsible for the disposal of hazardous wastes in accordance with Federal and state laws and regulations. Construction of the proposed facilities would not impact the Scott AFB hazardous waste management program.

Asbestos and Lead-based Paint. Any ACM or lead-based paint encountered during demolition of buildings would be handled in accordance with established USAF policy and the *Asbestos Management Plan* (SAFB 2000a) or *Lead Based Paint Management Plan* (SAFB 1996). It is anticipated that the structures associated at Shiloh, Belleville, and Mascoutah Gates contain ACM and lead based paint. USAF regulations prohibit the use of ACM and lead-based paints for new construction. Specifications for new facilities would be in accordance with the USAF policies and regulations.

Pollution Prevention. It is anticipated that the Proposed Action would not impact the pollution prevention program at Scott AFB. Quantities of hazardous material and chemical purchases, off-

base transport of hazardous waste, disposal of MSW, and energy consumption would remain unchanged under with implementation of the Proposed Action. The Pollution Prevention Program at Scott AFB would accommodate the Proposed Action.

4.5 Infrastructure and Utilities

4.5.1 Evaluation Criteria

Impacts to infrastructure are evaluated on their potential for disruption or improvement of existing levels of service and additional needs for energy and water consumption, wastewater systems, and transportation patterns and circulation. Impacts may arise from physical changes to circulation, construction activities, introduction of construction-related traffic on local roads or changes in daily or peak-hour traffic volumes, and energy needs created by either direct or indirect workforce and population changes related to base activities.

4.5.2 Environmental Consequences

Solid Waste. In considering the basis for evaluating the significance of impacts on solid waste, several items are considered. These items include evaluating the degree to which the proposed construction projects could affect the existing solid waste management program and capacity of the area landfill.

Solid waste generated from the proposed construction activities would consist of a nominal amount of building materials such as solid pieces of concrete, metals (conduit, piping, and wiring), and lumber. Therefore, implementation of the Proposed Action at Scott AFB would not impact the solid waste management program at the base or the capacity of the area landfill.

Transportation Systems. The construction and demolition phase of the Proposed Action would require delivery of materials to and removal of debris from construction sites. Construction traffic would comprise a small percentage of the total existing traffic and many of the vehicles would be driven to and kept on-site for the duration of construction and demolition, resulting in relatively few additional trips. Furthermore, potential increases in traffic volume associated with proposed construction activity would be temporary. Heavy vehicles are frequently on base roads. Therefore the construction vehicles necessary for construction are not expected to have a heavy impact on base roads. All road and lane closures would be coordinated with 375 Transportation

Squadron and would be temporary in nature; therefore, no adverse impacts on transportation systems would be expected.

4.6 Safety

4.6.1 Evaluation Criteria

If implementation of the Proposed Action were to substantially increase risks associated with the safety of Scott AFB personnel, contractors, or the local community, or substantially hinder the ability to respond to an emergency, it would represent a significant impact. Furthermore, if implementation of the Proposed Action would result in incompatible land use with regard to safety criteria (e.g., height restrictions), impacts to safety would be significant. Impacts were assessed based on the potential effects of construction and demolition activities.

4.6.2 Environmental Consequences

Short-term, minor adverse effects would be expected. Implementation of the Proposed Action would slightly increase the short-term risk associated with construction contractors performing work at Scott AFB during the normal workday because the level of such activity would increase. Contractors would be required to establish and maintain safety programs. Projects associated with the Proposed Action would not pose a safety risk to base personnel or activities at the base. The proposed construction projects would enable 375 AW to meet future mission objectives at the base and conduct or meet mission requirements in a safe operating environment.

The Proposed Action would provide a positive impact to the base. Improving the security and upgrading the safety requirements at the ECPs of Scott AFB would reduce the potential of a terrorist attack and harm to base personnel and facilities.

4.7 No Action Alternative

Under the No Action Alternative, existing conditions would remain as is and none of the proposed projects would occur. If the No Action Alternative were carried forward there would be no change in or effects on air quality, geological resources, water resources, hazardous materials and waste management, and infrastructure and utilities at Scott AFB. However, the safety of base personnel and visitors could be compromised and the ECPs at Scott AFB would be susceptible to potential terrorist attacks if the No Action Alternative were implemented.

5. Cumulative and Adverse Impacts

Cumulative impacts on environmental resources result from incremental effects of proposed actions, when combined with other past, present, and reasonably foreseeable future projects in the area. Cumulative impacts can result from individually minor, but collectively substantial, actions undertaken over a period of time by various agencies (Federal, state, and local) or individuals. Informed decision-making is served by consideration of cumulative impacts resulting from projects that are proposed, under construction, recently completed, or anticipated to be implemented in the reasonably foreseeable future.

During the timeframe of the Proposed Action, the 375 AW would be constructing a temporary trailers and foundations for the relocation of the Scott Education Center and would be repairing the damaged portions of Building 3190. In addition, the 375 AW would be improving the storm water runoff along Scott Drive by installing piping, regrading the drainage area, and replacing lift stations. No significant impacts to the environment are anticipated from the Proposed Action in conjunction with these two projects.

5.1 Unavoidable Adverse Impacts

Unavoidable adverse impacts would result from implementation of the Proposed Action. None of these impacts would be significant.

Geological Resources. Under the Proposed Action, construction activities, such as grading, excavating, and recontouring of the soil, would result in soil disturbance. Implementation of best management practices during construction would limit Environmental Consequences resulting from construction activities. Standard erosion control means would also reduce Environmental Consequences related to these characteristics. Although unavoidable, impacts on soils at the base are not considered significant.

Hazardous Materials and Waste. The generation of hazardous materials and wastes are unavoidable conditions associated with the Proposed Action. However, the potential for these unavoidable situations would not significantly increase over baseline conditions and, therefore, are not considered significant.

Energy. The use of nonrenewable resources is an unavoidable occurrence, although not considered significant. The Proposed Action would require the use of fossil fuels, a

nonrenewable natural resource. Energy supplies, although relatively small, would be committed to the Proposed Action or No Action Alternative.

5.2 Compatibility of the Proposed Action and Alternatives with the Objectives of Federal, Regional, State, and Local Land Use Plans, Polices, and Controls

Impacts to the ground surface as a result of the Proposed Action would occur entirely within the boundaries of Scott AFB. Construction activities at the Shiloh Gate, Belleville Gate, and Mascoutah Gate would not result in any significant or incompatible land use changes on or off base. The proposed projects have been sited according to existing land use zones. Consequently, construction activities would not be in conflict with base land use policies or objectives. The Proposed Action would not conflict with any applicable off-base land use ordinances or designated clear zones.

5.3 Relationship Between Short-term Use and Long-term Productivity

Short-term uses of the biophysical components of man's environment include direct construction-related disturbances and direct impacts associated with an increase in population and activity that occurs over a period of less than 5 years. Long-term uses of man's environment include those impacts occurring over a period of more than 5 years, including permanent resource loss.

Several kinds of activities could result in short-term resource uses that compromise long-term productivity. Filling of wetlands or loss of other especially important habitats and consumptive use of high-quality water at nonrenewable rates are examples of actions that affect long-term productivity.

The Proposed Action would not result in an intensification of land use at Scott AFB and in the surrounding area. Development of the Proposed Action would not represent a significant loss of open space. The sites are designated as ECPs to the base and were not planned for use as open space. Therefore, it is anticipated that the Proposed Action would not result in any cumulative land use or aesthetic impacts. Long-term productivity of these sites would be increased by the development of the Proposed Action.

5.4 Irreversible and Irretrievable Commitments of Resources

The irreversible environmental changes that would result from implementation of the Proposed Action involve the consumption of material resources, energy resources, land, biological habitat, and human resources. The use of these resources is considered to be permanent.

Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the effects that use of these resources will have on future generations. Irreversible effects primarily result from use or destruction of a specific resource that cannot be replaced within a reasonable time frame (e.g., energy and minerals).

Material Resources. Material resources utilized for the Proposed Action include building materials (for construction of facilities), concrete and asphalt (for roads), and various material supplies (for infrastructure). Most of the materials that would be consumed are not in short supply, would not limit other unrelated construction activities, and would not be considered significant.

Energy Resources. Energy resources utilized for the Proposed Action would be irretrievably lost. These include petroleum-based products (such as gasoline and diesel), natural gas, and electricity. During construction, gasoline and diesel would be used for the operation of construction vehicles. During operation, gasoline would be used for the operation of private and government-owned vehicles. Natural gas and electricity would be used by operational activities. Consumption of these energy resources would not place a significant demand on their availability in the region. Therefore, no significant impacts would be expected.

Biological Habitat. The Proposed Action would result in a minimal loss of vegetation and wildlife habitat on proposed construction sites. Proposed construction is mostly occurring on already disturbed land.

Human Resources. The use of human resources for construction and operation is considered an irretrievable loss, only in that it would preclude such personnel from engaging in other work activities. However, the use of human resources for the Proposed Action represents employment opportunities, and is considered beneficial.

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6. List of Preparers

This EA has been prepared under the direction of Scott AFB. The individuals who contributed to the preparation of this document are listed below.

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B.S. Geology
Certificate of Water Quality Management
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7. References

IEPA 2003 Illinois Environmental Protection Agency (IEPA). 2003. "Designation of 8-Hour Ozone Non-attainment Areas." Available <http://www.epa.state.il.us/air/monitoring/8hr_naa.html>. Site accessed on July 2003.

SAFB 1996 Scott Air Force Base (AFB). 1996. *Lead Based Paint Management Plan*. 1996.

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SAFB 2000b Scott Air Force Base (AFB). 2000. *Asbestos Operations Plan*. 2000.

SAFB 2000c Scott Air Force Base (AFB). 2000. *Scott AFB Pollution Prevention Plan*. 2000.

SAFB 2002a Scott Air Force Base (SAFB). 2002. *Scott Air Force Base General Plan*. Prepared by Woolpert LLP. May 2002.

SAFB 2002b Scott Air Force Base (AFB). 2002. "Gate Security, Safety, and Capacity Traffic Engineering Study Scott Air Force Base Illinois." Prepared by Gonnett Fleming. July 2002.

USAF 1993 U.S. Air Force (USAF). 1993. *Air Force Policy and Guidance on Lead Based Paint in Facilities*. June 1993.

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APPENDIX A

INTERAGENCY AND INTERGOVERNMENTAL COORDINATION FOR ENVIRONMENTAL PLANNING CORRESPONDENCE

APPENDIX A
INTERAGENCY AND INTERGOVERNMENTAL COORDINATION FOR ENVIRONMENTAL PLANNING CORRESPONDENCE LIST

Mr. Ken Westlake
Environmental Review Coordinator
USEPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3507

Ms. Joyce Collins
Assistant Field Supervisor
USFWS, Marion Ecological Services Sub-Office
8588 Route 148
Marion, IL 62959-4565

Mr. William L. Wheeler
SHPO, Associate Director
Illinois Historic Preservation Agency
1 Old State Capitol Plaza
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Mr. Todd Shekell
Planning and Zoning Director
O'Fallon Planning and Zoning Department
255 South Lincoln
O'Fallon, IL 62269

Mr. Ken Zacharski
Chairman
Mascoutah Planning Commission
Mascoutah City Hall
3 West Main Street
Mascoutah, IL 62258

Mr. Tom Flattery ORP
Environmental Planning
Illinois Department of Natural Resources
1 Natural Resources Way
Springfield, IL 62702-1271

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Ken Westlake
Environmental Review Coordinator
USEPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3507

Dear Mr. Westlake

The 375th Airlift Wing is preparing an Environmental Assessment (EA) of Entry Control Point Upgrades for Scott Air Force Base, Illinois. The Draft Finding of No Significant Impact (FONSI) is included with this correspondence as an Attachment.

The environmental impact analysis process for this proposal is being conducted by the Air Mobility Command in accordance with the Council on Environmental Quality guidelines pursuant to the requirements of the National Environmental Policy Act of 1969. In accordance with Executive Order 12372, *Intergovernmental Review of Federal Programs*, we request your participation by reviewing the attached EA and solicit your comments concerning the proposal and any potential environmental consequences. Please provide written comments or information regarding the action at your earliest convenience but no later than August 30, 2003. If there are any additional agencies that you feel should review and comment on the proposal, please include them in your distribution of this letter and the attached materials.

Please address questions concerning or comments on the proposal to our consultant, engineering-environmental Management, Inc. (e^2M). The point-of-contact at e^2M is Ms. Suanne Collinsworth. She can be reached at (703) 263-3350. Please forward your written comments to Ms. Collinsworth, in care of e^2M, Inc., 4215 Walney Road, Suite 4, Chantilly, VA 20151. Thank you for your assistance.

Sincerely,
engineering-environmental Management, Inc.

Brian Hoppy, Vice President
Project Manager

Attachment:
Draft FONSI

DRAFT FINDING OF NO SIGNIFICANT IMPACT (FONSI)

ENTRY CONTROL POINTS UPGRADES AT SCOTT AIR FORCE BASE, ILLINOIS

INTRODUCTION

The 375th Airlift Wing (375 AW) of the United States Air Force (USAF) has proposed to accomplish Entry Control Point (ECP) upgrades at Scott Air Force Base (AFB), Illinois. Scott AFB proposes to modify the three primary ECPs on the base to improve security and safety, as well as to reduce traffic congestion at the Shiloh, Belleville, and Mascoutah Gates. These Proposed Action and the No Action Alternative that were assessed in the attached Environmental Assessment (EA). Scott AFB is a USAF base under the Air Mobility Command (AMC) and is home of the 375 AW. The 375 AW supports two major headquarters: the U.S. Transportation Command and Headquarters AMC. The 375 AW supports Scott AFB by providing a responsive aeromedical airlift system to move eligible patients and operational support airlift for priority passengers and cargo; conducting all USAF C-9A qualification and instructor training; and providing all base support services to multiple tenant units on base.

PURPOSE OF AND NEED FOR THE PROPOSED ACTION

All U.S. Department of Defense (DOD) installations are required to seek effective ways to minimize the likelihood of mass casualties from terrorist attacks against DOD personnel in the buildings in which they work and live. While terrorists have many tactics available to them, they frequently use explosive devices when they target large numbers of DOD personnel. Most existing DOD buildings offer little protection from terrorist attacks. By applying the standards provided in Unified Facilities Criteria (UFC) 4-010-01, *DOD Minimum Antiterrorism Standards for Buildings*, Scott AFB would become a lesser target of opportunity for terrorists.

Current ECPs do not meet the standards specified in UFC 4-010-01. The need for the Proposed Action is to modify existing structures and construct new access lanes and facilities at the main ECPs of Scott AFB that would improve gate security, personnel safety, and reduce traffic congestion while maintaining access control requirements to meet the standards specified in UFC 4-010-01.

DESCRIPTION OF THE PROPOSED ACTION

Scott AFB proposes to modify three gate entrances to the base (Shiloh, Belleville, and Mascoutah Gates) and construction projects to improve security and safety and reduce traffic congestion.

NO ACTION ALTERNATIVES

Under the No Action Alternative, existing conditions would remain as is and none of the proposed projects would occur. If the No Action Alternative were carried forward there would be no change in or effects on air quality, geological resources, water resources, biological resources, hazardous materials and waste management, and infrastructure and utilities at

Scott AFB. However, safety of base personnel and visitors could be compromised and the ECPs at Scott AFB would be susceptible to potential terrorist attacks if the No Action Alternative were implemented.

ENVIRONMENTAL IMPACTS OF THE PROPOSED ACTION

Analysis of the Proposed Action indicates that the affected environment would not be significantly impacted by proceeding with the proposed ECP construction activities.

PUBLIC REVIEW AND INTERAGENCY COORDINATION

Federal, state, and local agencies listed in Appendix A of the EA were contacted for comment on the Proposed Action. Agency comments are included in this appendix and are addressed in the EA.

Based on the provisions set forth in the Proposed Action, all activities were found to comply with the criteria or standards of environmental quality and coordinated with the appropriate Federal, state, and local agencies. The EA and Draft FONSI will be made available to the public for a 30-day review period. Additionally, copies of the EA and Draft FONSI will be forwarded to Federal, state, and local agencies for review and comment. Public and agency comments will be addressed at the end of the review period prior to implementing the Proposed Action.

FINDING OF NO SIGNIFICANT IMPACT

After review of the EA prepared in accordance with the requirements of the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations, and Environmental Impact Analysis Process (EIAP), 32 Code of Federal Regulations 989, as amended, I have determined that the Proposed Action would not have a significant impact on the quality of the human or natural environment and, therefore, an Environmental Impact Statement (EIS) does not need to be prepared. This decision has been made after taking into account all submitted information, and considering a full range of practical alternatives that would meet project requirements and are within the legal authority of the USAF.

_____ _____

STEPHEN E. SHEA, Lt Col, USAF Date
Commander

NO OBJECTION
U.S. Fish & Wildlife Service
Marion, Illinois
Joyce A Collins 08/22/03
Asst. Supervisor **Date**

Joyce Collins
Assistant Field Supervisor
USFWS, Marion Ecological Services Sub-Office
8588 Route 148
Marion, IL 62959-4565

Dear Ms. Collins

The 375th Airlift Wing is preparing an Environmental Assessment (EA) of Entry Control Point Upgrades for Scott Air Force Base, Illinois. The Draft Finding of No Significant Impact (FONSI) is included with this correspondence as an Attachment.

The environmental impact analysis process for this proposal is being conducted by the Air Mobility Command in accordance with the Council on Environmental Quality guidelines pursuant to the requirements of the National Environmental Policy Act of 1969. In accordance with Executive Order 12372, *Intergovernmental Review of Federal Programs*, we request your participation by reviewing the attached EA and solicit your comments concerning the proposal and any potential environmental consequences. Please provide written comments or information regarding the action at your earliest convenience but no later than August 30, 2003. If there are any additional agencies that you feel should review and comment on the proposal, please include them in your distribution of this letter and the attached materials.

Please address questions concerning or comments on the proposal to our consultant, engineering-environmental Management, Inc. (e^2M). The point-of-contact at e^2M is Ms. Suanne Collinsworth. She can be reached at (703) 263-3350. Please forward your written comments to Ms. Collinsworth, in care of e^2M, Inc., 4215 Walney Road, Suite 4, Chantilly, VA 20151. Thank you for your assistance.

Sincerely,
engineering-environmental Management, Inc.

Brian K. Hoppy

Brian Hoppy, Vice President
Project Manager

Attachment:
Draft FONSI

355 West Lancaster Avenue, Bldg. E, 2nd Floor East, Haverford, PA 19041 • (610) 649-8064 • Fax (610) 649-8675
DENVER • JACKSONVILLE • PHILADELPHIA • SACRAMENTO • SAN ANTONIO • SAN DIEGO • TULSA • WASHINGTON, DC

Illinois Historic
Preservation Agency

1 Old State Capitol Plaza • Springfield, Illinois 62701-1507 • Voice (217) 782-4836 • Teletypewriter Only (217) 524-7128

St. Clair County
Scott Air Force Base
Environmental Impact Analysis, Entry Control Point Upgrades
Shiloh, Belleville and Mascoutah Gates
IHPA Log #001081903

September 2, 2003

Brian Hoppy
Engineering-Environmental Management, Inc.
355 West lancaster Avenue
Building E, Second Floor East
Haverford, PA 19041

Dear Mr. Hoppy:

Thank you for requesting comments from our office concerning the possible effects of your project on cultural resources. Our comments are required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".

Our staff has reviewed the specifications of the referenced project as submitted by your office. We cannot adequately review this proposed project until the following additional documentation has been submitted to our Agency:

Current photos (not xerox) of all standing structures within the project area.

In your reply, please refer to IHPA Log #001081903. If you have any further questions, please contact Cody Wright, Cultural Resource Manager, Illinois Historic Preservation Agency, 1 Old State Capitol Plaza, Springfield, IL 62701, 217/785-3977.

Sincerely,

Anne E. Haaker

Anne E. Haaker
Deputy State Historic
Preservation Officer
AEH

Cc: Andy Rodriguez, Department of the Air Force

Illinois Historic Preservation Agency

Voice (217) 782-4836
1 Old State Capitol Plaza • Springfield, Illinois 62701-1507 • Teletypewriter Only (217) 524-7128

St. Clair County
Scott Air Force Base
Environmental Impact Analysis, Entry Control Point Upgrades
Shiloh, Belleville and Mascoutah Gates,

USAF,
IHPA Log #001081903

September 29, 2003

Andy Rodriguez
Department of the Air Force
375 CES/CEVR
701 Hangar Road
Scott AFB, IL 62225-5035

Dear Mr. Rodriguez:

We have reviewed the documentation submitted for the referenced project(s) in accordance with 36 CFR Part 800.4. Based upon the information provided, no historic properties are affected. We, therefore, have no objection to the undertaking proceeding as planned.

Please retain this letter in your files as evidence of compliance with section 106 of the National Historic Preservation Act of 1966, as amended. This clearance remains in effect for two years from date of issuance. It does not pertain to any discovery during construction, nor is it a clearance for purposes of the Illinois Human Skeletal Remains Protection Act (20 ILCS 3440).

If you have any further questions, please contact Cody Wright, Cultural Resources Manager, Illinois Historic Preservation Agency, 1 Old State Capitol Plaza, Springfield, IL 62701, 217/785-3977.

Sincerely,

Anne E. Haaker

Anne E. Haaker
Deputy State Historic
Preservation Officer
AEH

Cc: Brian Hoppy, Engineering-Environmental Management, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

September 18, 2003

Ms. Suanne Collinsworth
engineering-environmental Management, Inc
4215 Walney Road, Suite 4
Chantilly, VA 20151

Re: Environmental Assessment for Entry Control Points Upgrade at Scott Air Force Base, Illinois

Dear Ms. Collinsworth

The Environmental Planning and Evaluation Branch has received the document listed above. Under the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations, and Section 309 of the Clean Air Act; U.S. EPA reviews and comments on major federal actions. Typically, these reviews focus on Environmental Impact Statements, but we also have the discretion to review and comment on other environmental documents prepared under NEPA if interest and resources permit.

We did not undertake a detailed review of the document you sent to this office, and will not be generating comments because of the reason selected below.

_____ The document was not prepared under NEPA.
_____ The document was given a cursory review, but other workload priorities precluded us from undertaking a detailed review and generating comments.
XX____ The document was given a cursory review, and we determined that there were no significant concerns meriting comment.
_____ We opted to wait for the next level of documentation on this project before deciding whether or not to comment.

We reserve the right to reconsider undertaking a review at future planning stages, or if significant new data on the project is made available by the sponsoring agency or other interested parties. Thank you for providing information on the project.

Sincerely,

Kenneth A. Westlake, Chief
Environmental Planning and Evaluation Branch

The Draft Finding of No Significant Impact (FONSI) and Environmental Assessment (EA) were made available for public review from August 9, 2003 through August 24, 2003. The below Notice of Availability was published in the Belleview News Democrat on August 9, 2003. No public comments were received during the public comment period

Belleville News Democrat
09 Aug 03
B-3

MASCOUTAH

Scott Air Force Base seeks public input

Scott Air Force Base is seeking public comment on an environmental impact finding of community interest before beginning construction on an upgrade to entrances to the base.

The base's Environmental Protection Committee reviewed the environmental impact of the proposed construction and determined there would be no adverse impacts to air quality, noise, wetlands, floodplains, threatened or endangered species, cultural resources or community safety.

For more information or to comment, call Paul Schmidt at 256-2092.

In addition, the following Privacy Advisory was published as part of the Cover Sheet to the Draft EA:

Privacy Advisory

Your comments on this Draft EA are requested. Letters or other written comments provided, may be published in the EA. Comments will normally be addressed in the EA and made available to the public. Any personal information provided will be used only to identify your desire to make a statement during the public comment period or to fulfill requests for copies of the EA or associated documents. Private addresses will be compiled to develop a mailing list for those requesting copies of the EA. However, only the names of the individuals making comments and their specific comments will be disclosed; personal home addresses and phone numbers will not be published in the EA.
