

Final

Environmental Assessment



Demolition of Building 633

at

Langley Air Force Base, Virginia

U.S. Air Force
Air Combat Command
1st Fighter Wing

January 2005

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14. ABSTRACT This EA describes the potential environmental consequences resulting from a proposal to demolish Building 633. Historically used as a Seaplane Hangar, this obsolete, vacant facility will be replaced by parking. Seven resource categories received a thorough evaluation to identify potential impacts. An increase to safety risks during demolition would be mitigated by employing standard safety practices. Any noise associated with this action would be temporary and limited to daytime hours. Air Quality would not be significantly affected and any asbestos material would be removed prior to demolition. The action would have the potential to disturb ERP sites; a waiver from ACC would be necessary, which would identify appropriate control measures. Parking placed at the demo site would be consistent with the Base General Plan, and any transportation impacts would be minor. Cultural Resources would be adversely impacted; consultation with the SHPO has been completed and specifies the mitigation necessary for this action, to include documentation of the resource and other efforts. This action would have no significant effects on Physical Resources.					
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ACRONYMS AND ABBREVIATIONS

1 FW	1 st Fighter Wing	NAAQS	National Ambient Air Quality Standards
ACC	Air Combat Command	NASA	National Aeronautics and Space Administration
ACHP	Advisory Council on Historic Preservation	NEPA	National Environmental Policy Act
ADP	Area Development Plan	NHPA	National Historic Preservation Act
AFB	Air Force Base	NO ₂	nitrogen dioxide
AFH	Air Force Handbook	NO _x	nitrogen oxide
AFI	Air Force Instruction	NRHP	National Register of Historic Places
AFOSH	Air Force Occupational Safety and Health	O ₃	ozone
AICUZ	Air Installation Compatible Use Zone	OSHA	Occupational Safety and Health Administration
Air Force	United States Air Force	P.L.	Public Law
AQCR	Air Quality Control Region	PA/SI	Preliminary Assessment/Site Inspection
CAA	Clean Air Act	Pb	lead
CAP	Corrective Action Plan	PCB	polychlorinated biphenyl
CEQ	Council on Environmental Quality	PCT	polychlorinated triphenyl
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act	PM ₁₀	particulate matter equal to or less than 10 micrometers in diameter
CFR	Code of Federal Regulations	PM _{2.5}	particulate matter equal to or less than 2.5 micrometers in diameter
CO	carbon monoxide	PP	Proposed Plan
CRMP	Cultural Resource Management Plan	RCRA	Resource Conservation and Recovery Act
CWA	Clean Water Act	RI	Remedial Investigation
CZMA	Coastal Zone Management Act	ROD	Record of Decision
dB	decibel	ROI	region of influence
dba	A-weighted decibel	SAFO	Secretary of the Air Force Order
DCR	Department of Conservation and Recreation	SHPO	State Historic Preservation Office
DD	Decision Document	SIP	State Implementation Plan
DNL	Day-Night Average Sound Level	SO ₂	sulfur dioxide
DoD	Department of Defense	SR	State Route
EA	environmental assessment	U.S.	United States
EIAP	environmental impact analysis process	USACE	United States Army Corps of Engineers
EO	Executive Order	USC	United States Code
EPCRA	Emergency Planning and Community Right-to-Know Act	USDCESA	United States Department of Commerce, Economics, and Statistics Administration
ERP	Environmental Restoration Program	USEPA	United States Environmental Protection Agency
ESA	Endangered Species Act	USFWS	United States Fish and Wildlife Service
FONSI	Finding of No Significant Impact	UST	underground storage tank
FS	Feasibility Study	VDEQ	Virginia Department of Environmental Quality
FY	Fiscal Year	VDHR	Virginia Department of Historic Resources
HRSD	Hampton Roads Sanitation District	VOC	volatile organic compound
HTA	Heavier-Than-Air	VPDES	Virginia Pollutant Discharge Elimination System
I-64	Interstate 64		
IRA	Interim Remedial Action		
LRC	Langley Research Center		
LTA	Lighter-Than-Air		
MSL	mean sea level		

FINDING OF NO SIGNIFICANT IMPACT/ FINDING OF NO PRACTICABLE ALTERNATIVE

NAME OF THE PROPOSED ACTION

Demolition of Building 633 at Langley Air Force Base (AFB), Virginia.

DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

Langley AFB proposes to demolish Building 633 at Langley AFB and construct a 135 vehicle parking lot. The EA also evaluates two alternatives which use the indoor space for vehicle storage or boat storage and the no-action alternative.

SUMMARY OF ENVIRONMENTAL CONSEQUENCES

Proposed Action: This Environmental Assessment (EA) provides an analysis of the potential environmental consequences associated with the proposed action, two action alternatives and the no-action alternative. Seven resource categories received thorough evaluation to identify potential environmental consequences. As indicated in Chapter 4.0, implementation of the Proposed Action, the two action alternatives and the no-action alternative would not result in significant impacts to any resource area.

Land Use Resources: Demolition of the facility would be consistent with The Base General Plan and the ACC Campus Area Development Plan and with the goals of the Coastal Zone Management Act (CZMA). Standard demolition practices would be included in the project to reduce the potential for soil erosion into the Chesapeake Bay watershed. Under the proposed action, on-base roads may experience lane closures temporarily during demolition activities. In all cases, the contractor would provide signage and detours to maintain access to this area for base personnel. It is possible that truck traffic may lead to some degradation of base road surfaces. Demolition of the building and construction of a parking area with landscaped islands would provide an improved view to base personnel to the Back River. Implementation of the Indoor Parking alternative would alleviate the need for parking spaces. It is probable that an extensive line of vehicles would form in mornings and after lunch interfering with base traffic patterns while users wait for attendants to park each vehicle. If either alternative was chosen exterior renovations would be completed to the building improving the appearance of the industrial building. Views of the Back River would continue to be blocked. No significant environmental consequences to land use resources would be expected with the implementation of the Proposed Action or either of the two action alternatives.

Cultural Resources. Adverse impacts to historic properties proposed for demolition are likely to occur under the Proposed Action. Building 633 is a contributing member of the Langley Field Historic District (USACE 1998). Consultation with the Virginia Department of Historic Resources (DHR), in compliance with Section 106 of the National Historic Preservation Act (NHPA), has been completed for the proposed action. A Programmatic Agreement (PA) with the SHPO specifies that mitigation measures would

include Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) documentation and other efforts identified in consultation between the Air Force and the State Historic Preservation Office (SHPO).

Implementation of either of the two alternatives would include exterior rehabilitation that would be conducted in consultation with Virginia DHR, in compliance with a PA for the project. The rehabilitation would be in keeping with the architectural standards of the Langley Field Historic District, and the *Secretary of the Interior's Standards for Treatment of Historic Properties*. Impacts are not expected to be adverse. Demolition activities are not expected to impact archaeological or traditional resources under the Proposed Action or either of the two alternatives. The project area has been inventoried for archaeological resources.

Physical Resources. Demolition activities would have no adverse effects to individual species or native plants or animals since the only plant or animal species likely to be displaced from this marginal habitat are individuals of common and locally abundant species. No significant impacts are expected to wetlands. No threatened, endangered, or special species/communities would be adversely affected by the proposed action. Incidentally occurring listed, proposed, or candidate species are not likely to be adversely affected because no critical habitat exists on Langley AFB. Demolition of the facility would not be expected to significantly affect the water quality of the Back River and Chesapeake Bay with the adoption of standard sediment control and erosion practices. The majority of Langley AFB is located within the 100-year floodplain. There is no practicable alternative of not disturbing the floodplain with the implementation of the proposed action. No adverse environmental consequences are anticipated to physical resources in the immediate area or elsewhere on Langley AFB from the implementation of the Proposed Action or either of the alternatives to these resources.

Hazardous Materials and Waste Management. Demolition of Building 633 would have the potential to disturb portions of various Environmental Restoration Program (ERP) sites OT-55 and OT-64.. The Langley AFB ERP Manager would request a waiver from ACC policy concerning disturbances on ERP sites. The waiver would identify the appropriate control measures that would be necessary for the activities at the ERP sites and no long-term adverse environmental consequences are anticipated. Asbestos-containing materials and the existing wash rack and oil water separator would be removed prior to demolition or reuse proposed under the two action alternatives in accordance with state regulations. No significant environmental consequences are expected.

Safety. Demolition of Building 633 would increase safety risks during the demolition phase; however, these risks would be reduced with implementation of standard demolition safety practices. Operations associated with the implementation of either of the two alternatives would be under the control of facility personnel and would not present any increased risk to base personnel. No significant environmental

consequences are anticipated with the implementation of the Proposed Action or either of the two alternatives.

Noise. Demolition of the facility would have temporary, localized noise effects during the demolition phase. These localized noise increases may disrupt base personnel in nearby structures. Because the noise disruptions would be temporary and would be limited to daytime hours, impacts are considered insignificant. Operations associated with the implementation of either of the two alternatives would not generate noise that would exceed noise generally experienced in this portion of an active Air Force installation. No significant environmental consequences are anticipated with the implementation of the Proposed Action or either of the two alternatives.

Air Quality. With the implementation of the Proposed Action project-related air emissions would be generated both on base and within the region due to the hauling of materials and other earth-moving activities. These emissions would be less than one percent of emissions in the Hampton Air Quality Control Region (AQCR). Langley AFB is located in a marginal area for ozone; however, the proposed action would not contribute ozone-related emissions above United States Environmental Protection Agency (USEPA) established *de minimis* levels for ozone. Therefore, a formal air quality conformity determination is not required. Project-related emissions from the implementation of either of the two alternatives would be substantially less than those expected from the Proposed Action and no significant environmental consequences are expected.

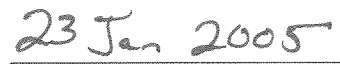
No-Action Alternative: Under the no-action alternative, demolition of Building 633 would not take place and no additional parking spaces would be added at the site.

CONCLUSION

Based on the findings of the EA, no significant impact is anticipated from implementation of the proposed action or the no-action alternative. Therefore, issuance of a Finding of No Significant Impact (FONSI) is warranted, and an environmental impact statement is not required. Pursuant to Executive Order (EO) 11988, the authority delegated in Secretary of the Air Force Order (SAFO) 791.1, and taking the above information into account, I find that there is no practicable alternative to this action and that the proposed action includes all practicable measures to minimize harm to floodplain environments.



BRUCE A. WRIGHT
Lieutenant General, USAF
Commander



DATE

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**ENVIRONMENTAL ASSESSMENT FOR
DEMOLITION OF BUILDING 633
AT
LANGLEY AIR FORCE BASE, VIRGINIA**

**U.S. Air Force
Air Combat Command
1st Fighter Wing**

January 2005

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EXECUTIVE SUMMARY

This Environmental Assessment (EA) describes the potential environmental consequences resulting from a proposal to demolish Building 633 at Langley Air Force Base (AFB), Virginia and construct a 135 vehicle parking lot.

ENVIRONMENTAL IMPACT ANALYSIS PROCESS

This EA has been prepared by the United States Air Force (Air Force), Air Combat Command (ACC) and the 1st Fighter Wing (1 FW) in accordance with the requirements of the National Environmental Policy Act (NEPA) of 1969, (42 United States Code [USC] 4321-4347), Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] §§ 1500-1508), and 32 CFR Part 989, et seq., Environmental Impact Analysis Process (formerly known as Air Force Instruction [AFI] 32-7061).

PURPOSE AND NEED FOR ACTION

The purpose of this action is to demolish Building 633 at Langley AFB and construct a parking lot. Building 633 is located within the ACC Campus area of Langley AFB at the intersection on Douglas Street and Hunting Avenue. This facility was historically used as the Seaplane Hangar, then as warehouse space and most recently by the 1 FW Civil Engineering Pavement and Equipment shop. Due to the facility's age and condition, it is considered obsolete, vacant, and/or no longer needed.

PROPOSED ACTION AND ALTERNATIVES

Langley AFB proposes to demolish Building 633 and construct a 135 space parking lot. This EA analyzes the impacts associated the proposed action to demolish and building and construct a parking lot, two alternatives which use the indoor space for vehicle storage or boat storage and the no-action alternative.

SUMMARY OF ENVIRONMENTAL CONSEQUENCES

This EA provides an analysis of the potential environmental consequences associated with the proposed action, the two action alternatives and the no-action alternative. Seven resource categories received thorough evaluation to identify potential environmental consequences. As indicated in Chapter 4.0, demolition of this facility would not result in significant impacts to any resource area.

Land Use Resources. Demolition of the facility would be consistent with The Base General Plan and the ACC Campus Area Development Plan and with the goals of the Coastal Zone Management Act (CZMA). Standard demolition practices would be included in the project to

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reduce the potential for soil erosion into the Chesapeake Bay watershed. Under the proposed action, on-base roads may experience lane closures temporarily during demolition activities. In all cases, the contractor would provide signage and detours to maintain access to this area for base personnel. It is possible that truck traffic may lead to some degradation of base road surfaces and occasional congestion at the West Gate. Demolition of the building and construction of a parking area with landscaped islands would provide an improved view to base personnel to the Back River. Implementation of the Indoor Parking alternative would alleviate the need for parking spaces. It is probable that an extensive line of vehicles would form in mornings and after lunch interfering with base traffic patterns while users wait for attendants to park each vehicle. If either alternative was chosen exterior renovations would be completed to the building improving the appearance of the industrial building. Views of the Back River would continue to be blocked. No significant environmental consequences to land use resources would be expected with the implementation of the proposed action or either of the two action alternatives.

Cultural Resources. Adverse impacts to historic properties proposed for demolition are likely to occur under the Proposed Action. Building 633 is a contributing member of the Langley Field Historic District (USACE 1998). Consultation with the Virginia Department of Historic Resources (DHR), in compliance with Section 106 of the National Historic Preservation Act (NHPA), has been completed for the proposed action. A Programmatic Agreement (PA) with the SHPO specifies that mitigation measures would include Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) documentation and other efforts identified in consultation between the Air Force and the State Historic Preservation Office (SHPO).

Implementation of either of the two alternatives would include exterior rehabilitation that would be conducted in consultation with Virginia DHR, in compliance with a PA for the project. The rehabilitation would be in keeping with the architectural standards of the Langley Field Historic District, and the *Secretary of the Interior's Standards for Treatment of Historic Properties*. Impacts are not expected to be adverse. Demolition activities are not expected to impact archaeological or traditional resources under the Proposed Action or either of the two alternatives. The project area has been inventoried for archaeological resources.

Physical Resources. Demolition activities would have no adverse effects to individual species or native plants or animals since the only plant or animal species likely to be displaced from this marginal habitat are individuals of common and locally abundant species. No significant impacts are expected to wetlands. No threatened, endangered, or special species/communities would be adversely affected by the proposed action. Incidentally occurring listed, proposed, or candidate species are not likely to be adversely affected because no critical habitat exists on Langley AFB. Demolition of the facility would not be expected to significantly affect the water quality of the Back River and Chesapeake Bay with the adoption of standard sediment control and erosion practices. The majority of Langley AFB is located within the 100-year floodplain. There is no practicable alternative of not disturbing the floodplain with the implementation of

the proposed action. No adverse environmental consequences are anticipated to physical resources in the immediate area or elsewhere on Langley AFB from the implementation of the Proposed Action or either of the alternatives to these resources.

Hazardous Materials and Waste Management. Demolition of Building 633 would have the potential to disturb portions of various Environmental Restoration Program (ERP) sites OT-55 and OT-64.. The Langley AFB ERP Manager would request a waiver from ACC policy concerning disturbances on ERP sites. The waiver would identify the appropriate control measures that would be necessary for the activities at the ERP sites and no long-term adverse environmental consequences are anticipated. Asbestos containing materials and the existing wash rack and oil water separator would be removed prior to demolition or reuse proposed under the two action alternatives in accordance with state regulations. No significant environmental consequences are expected.

Safety. Demolition of Building 633 would increase safety risks during the demolition phase; however, these risks would be reduced with implementation of standard demolition safety practices. Operations associated with the implementation of either of the two alternatives would be under the control of facility personnel and would not present any increased risk to base personnel. No significant environmental consequences are anticipated with the implementation of the Proposed Action or either of the two alternatives.

Noise. Demolition of the facility would have temporary, localized noise effects during the demolition phase. These localized noise increases may disrupt base personnel in nearby structures. Because the noise disruptions would be temporary and would be limited to daytime hours, impacts are considered insignificant. Operations associated with the implementation of either of the two alternatives would not generate noise that would exceed noise generally experienced in this portion of an active Air Force installation. No significant environmental consequences are anticipated with the implementation of the Proposed Action or either of the two alternatives.

Air Quality. With the implementation of the Proposed Action project-related air emissions would be generated both on base and within the region due to the hauling of materials and other earth-moving activities. These emissions would be less than one percent of emissions in the Hampton Air Quality Control Region (AQCR). Langley AFB is located in a marginal area for ozone; however, the proposed action would not contribute ozone-related emissions above United States Environmental Protection Agency (USEPA) established *de minimis* levels for ozone. Therefore, a formal air quality conformity determination is not required. Project-related emissions from the implementation of either of the two alternatives would be substantially less than those expected from the Proposed Action and no significant environmental consequences are expected.

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1.0 PURPOSE AND NEED FOR ACTION

1.1 INTRODUCTION

The United States Air Force (Air Force), 1st Fighter Wing (1 FW) proposes to demolish Building 633 at Langley Air Force Base (AFB). This environmental assessment (EA) has been prepared to analyze the potential environmental consequences associated with the proposed action, two action alternatives and the no-action alternative in accordance with the requirements of the National Environmental Policy Act (NEPA) (42 United States Code [USC] 4321 *et seq.*). This document was prepared in accordance with the following:

- Regulations established by the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] 1500-1508).
- Requirements of the NEPA of 1969, (42 United States Code [USC] 4321-4347), Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] §§ 1500-1508), and 32 CFR Part 989, *et seq.*, Environmental Impact Analysis Process (formerly known as Air Force Instruction [AFI] 32-7061).

Section 1.2 provides background information that briefly describes Langley AFB. The purpose and need for the proposed action are described in Section 1.3. A detailed description of the proposed action and the no-action alternative is provided in Chapter 2.0. Chapter 3.0 describes the existing conditions of various environmental resources that could be affected if the proposal were implemented. Chapter 4.0 describes how those resources would be affected by implementation of the proposed action or the no-action alternative. Chapter 5.0 addresses the cumulative effects of the proposed action, as well as other recent past, current, and future actions that may be implemented in the region of influence (ROI) for the proposed action.

1.2 BACKGROUND

Langley AFB is located approximately 175 miles south of Washington, D.C., near the south end of the lower Virginia Peninsula on the Back River, a tributary of the Chesapeake Bay. Langley AFB is situated in the Hampton Roads Standard Metropolitan Statistical Area, in the City of Hampton, Virginia. Other cities in the area include Newport News, Poquoson, Norfolk, and Portsmouth. As shown in Figure 1-1, the main base occupies 2,883 acres between the Northwest and Southwest Branches of the Back River.

Langley AFB is home to the Headquarters (HQ) Air Combat Command (ACC) and to the 1 FW. ACC is one of eight major commands in the Air Force and is responsible for organizing, equipping, training, and maintaining combat-ready forces at the highest level of readiness. HQ ACC is responsible for the administrative and operational support to over 100,000 active-duty members and civilian personnel located throughout the continental United States and other

EA for Demolition of Building 633 at Langley AFB

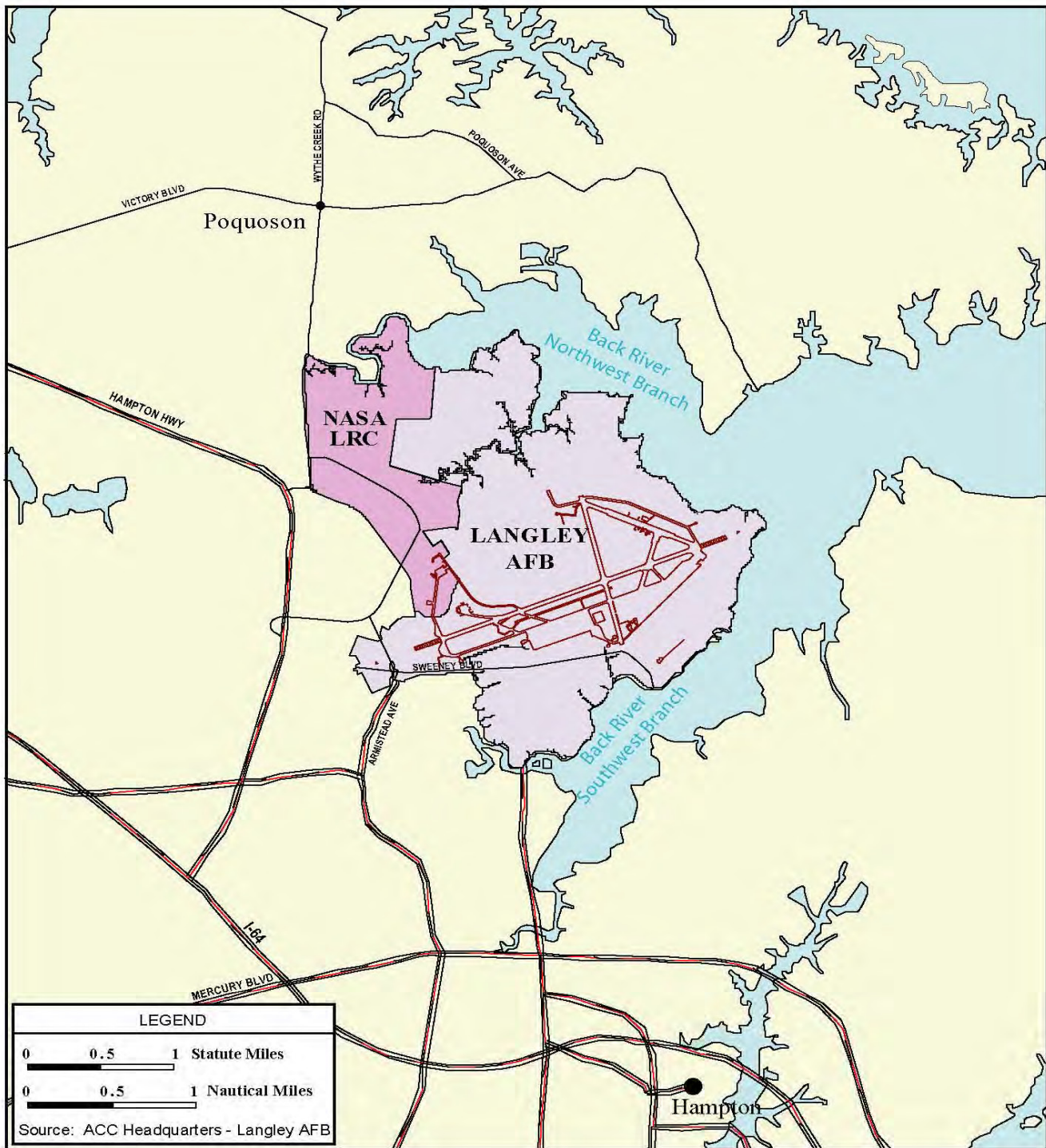
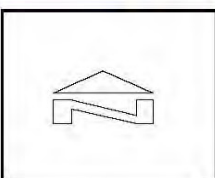


Figure 1-1
Langley AFB, Virginia



overseas locations. HQ ACC provides this support through its 32 squadrons and directorates. Units of the command are housed primarily in ACC facilities located in the southwestern portion of the base, designated as the ACC Campus in the base's General Plan. Some units/personnel are also located in 1 FW Communication Squadron and National Aeronautics and Space Administration (NASA) facilities located throughout the base. Additionally, several units are located off-base in nearby commercially leased facilities in the cities of Hampton and Newport News. These units include the Directorate of Logistics Program Management Squadron and Contracting Squadron, the Directorate of Safety, Safety Board, Office of the Inspector General, Inspection Squadron, Training Support Squadron and the Aerospace Command and Control and Intelligence Surveillance Reconnaissance Center (AFC2ISRC) Experimentation Office.

HQ ACC conducted the *Facility Utilization Survey* (Air Force 2002) to provide more efficient use of existing resources and improve long-range facility planning. A component of this effort, the Space Utilization Plan focused on meeting administrative and operational space requirements, maximizing facility utilization, maintaining unit integrity where feasible to effectively enhance command and control and to relocate off-base units in leased facilities to on-base facilities (Air Force 2002).

1.3 PURPOSE AND NEED

The purpose of this action is to demolish Building 633 at Langley AFB and make the area available to support parking for HQ ACC, 1 FW and contractor personnel. Building 633 is located within the ACC Campus area of Langley AFB at the intersection on Douglas Street and Hunting Avenue. The building is surrounded by ACC administrative offices on the south, west, and northwest and by NASA facilities on the north. The need for this action is prompted by the requirements for new administrative space and parking areas to support HQ ACC as identified in the *Facility Utilization Study* (Air Force 2002).

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2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

Langley AFB proposes to demolish Building 633 at Langley AFB. The building is located at the north east corner of Douglas Street and Hunting Avenue as identified in Figures 2-1 and 2-2. The building, which was constructed in 1921, was recently occupied by the 1 FW Civil Engineering Squadron (1 CES) Pavement and Equipment Shop. This shop supported 47 personnel and 70 vehicles, including snow brooms, snow plows, 5- and 10-ton trucks and other miscellaneous industrial vehicles. Also occupying portions of the building were the 1 CES Structures Shop and storage for 1 CES heating, ventilation, air conditioning and cooling section. The 1 CES Pavement and Equipment Shop has relocated to a new facility in the north base industrial area. In addition to the proposed action, this EA evaluated two action alternatives and the no-action alternative.

2.1 PROPOSED ACTION

The proposed action consists of the demolition of Building 633 located within the ACC Campus area of Langley AFB and the construction of a 135-vehicle parking area. Figure 2-1 depicts the location of the building and the surrounding structures, parking areas and streets. This 39,155 square foot metal facility measures 191 feet wide and 205 feet long, has a concrete foundation and floor, and a built-up roof. The building height varies with the top of the clerestory extending up 46 feet and with the gutter line at 25 feet. Building photographs, floor plans, and building elevation are included in Appendix A. The building interior is separated into two large bays by a 20-foot floor-to-ceiling concrete block wall. Associated with the building is a parking lot with 38 parking spaces along the south side of the building. Inside the building there are offices, storage rooms, and a small engine workshop. The building also has a wash rack and oil-water separator installed in the concrete floor.

Immediately east of the building is a 250-foot wide by 350-foot deep area used for vehicle parking and equipment and supply storage. This area consists of paved and graveled surfaces and also includes Building 632 – Electrical Shop, its associated vehicle parking area, and the foundations from Buildings 630 and 631 which were previously demolished. There are also four monitoring wells associated with the Environmental Restoration Program (ERP) within this area (Air Force 2003). This area has approximately 250 feet of shoreline on the Southwest Branch of the Back River.

Prior to demolition of the building, Langley AFB would use contracting services to remove asbestos-containing materials (ACMs) and lead-based paint from the structure. The ACMs include, but may not be limited to; floor tile and adhesive in various locations within the building, pipe insulation, interior drain pipe, metal panel sealer and roof cement (Langley AFB

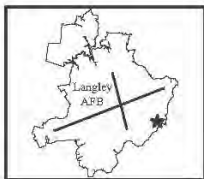
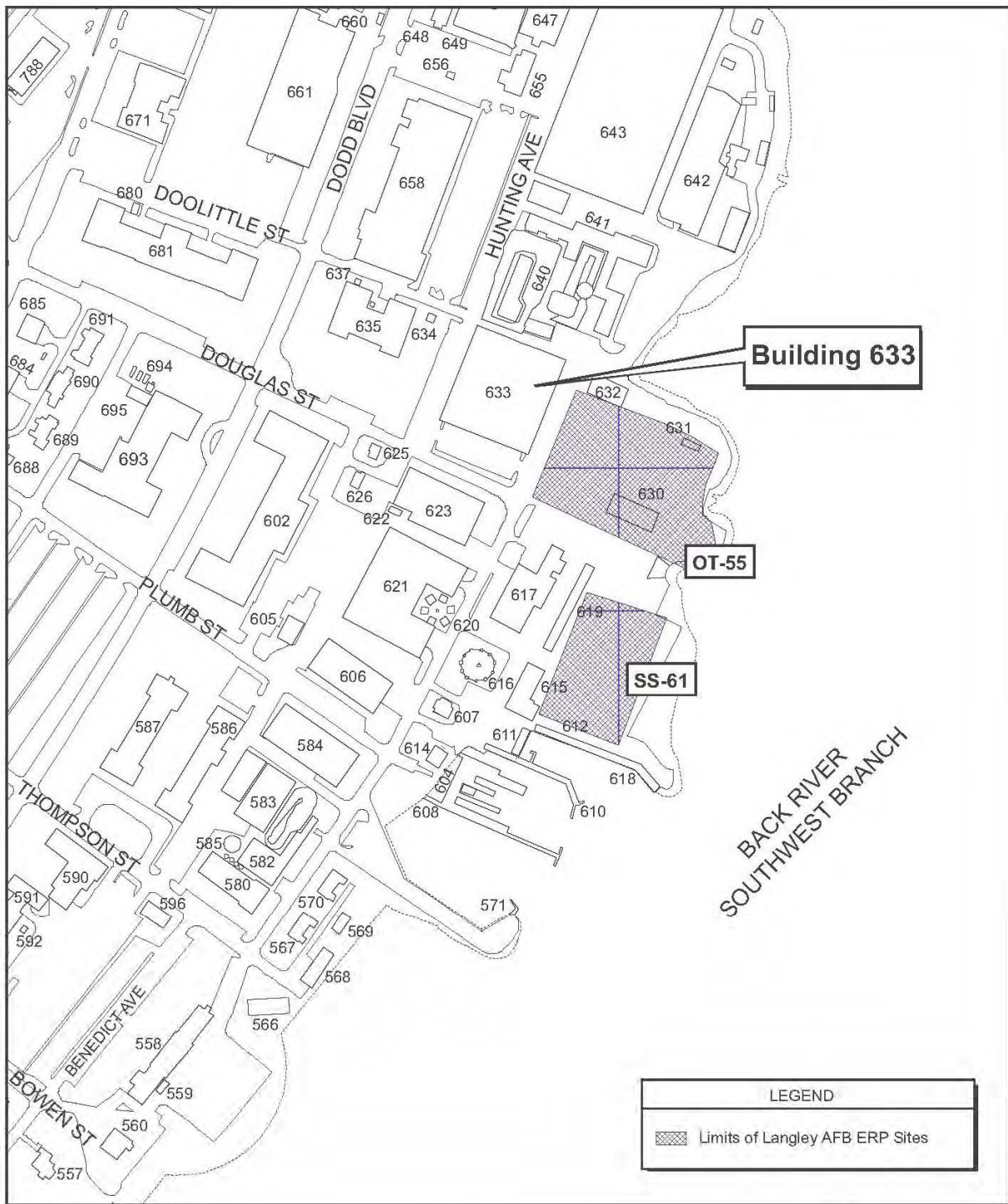
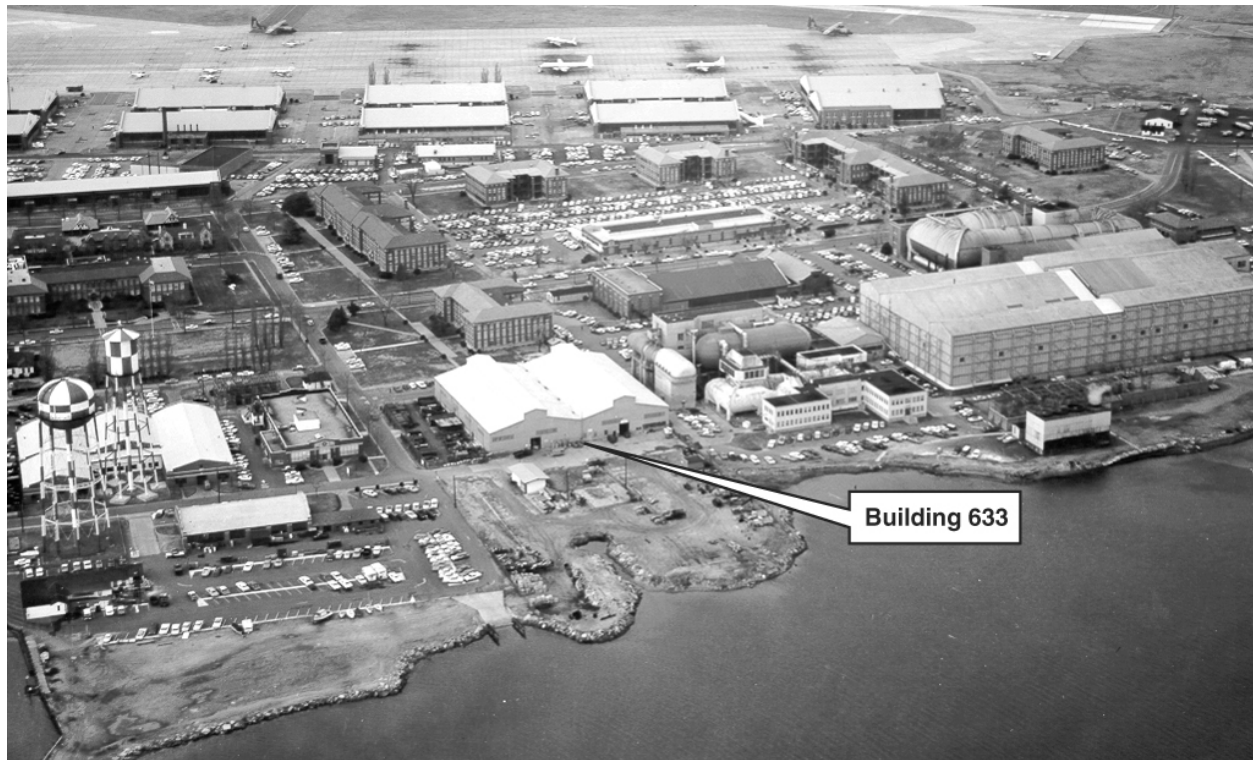


Figure 2-1
Location of Building 633
Langley AFB



2004). The contractor would be responsible for demolition and disposal of all waste materials in accordance with Commonwealth requirements.



Source: Air Force, 1967

Figure 2-2. Location of Building 633 on Langley AFB

Prior to demolition, the contractor would establish a haul route for the removal of materials from the site, establish a safe buffer zone around the building, and create a material handling area in the rear yard that maintains access to Building 632-Electrical Shop. The proposed demolition would involve complete dismantling and removal of all facility structures, equipment and machinery. To ensure proper handling and disposition of the waste, all actions would be completed in accordance with applicable regulatory requirements. All utilities would be capped or disconnected. The existing wash rack and oil-water separator would be removed and a closure report provided to the base for submittal to VDEQ.

To the greatest extent practicable demolition materials would be recycled. The demolition contractor would dispose of the remaining materials in an approved landfill in accordance with state and local regulations and utilizing the established haul route for equipment delivery and debris removal. Any landscaped areas that may be disturbed by the demolition would be restored to prevent any long-term soil erosion.

Once the demolition was completed, construction of the 135 space parking area would commence. The parking area would be constructed with landscaped islands at the ends of the rows of parking spaces and with a landscaped buffer between the parking area and Douglas

EA for Demolition of Building 633

Street. Trenches would be excavated for the placement of an electrical system in order to provide lighting to the new parking area. Storm water runoff would be directed to these landscaped areas to reduce the sediment load entering the storm water system. Any trees located in construction or demolition areas would be visibly marked and fenced at least to the dripline or the end of the root system to avoid any damage to trees.

2.2 INDOOR PARKING ALTERNATIVE

Implementation of this alternative would provide an open parking garage that would accommodate 396 vehicles with the use of a three-tiered mechanical parking system (Langley AFB 2004). The building would be gutted of the existing interior partitions, the existing roof replaced, and additional wall and monitor openings consisting of 20 percent of the perimeter wall area would be added to the existing structure. The parking garage would be monitored by an attendant and security site lighting would be installed.

This building configuration is proposed because without significant retrofitting the existing building structure cannot meet the requirement for a 3-hour fire rating on the exterior walls. An attendant is required to meet sections of building code that prevents open public access to mechanical access parking structures.

Removal of ACMs, lead-based paint, the existing oil-water separator and wash rack would occur as identified under the Proposed Action.

2.3 INDOOR BOAT STORAGE ALTERNATIVE

Implementation of this alternative would provide an indoor boat storage facility using fixed racks to accommodate vessels. Use of the storage area would be limited to boat storage, no maintenance, rebuilding or painting of boats would occur within the building. The building would be gutted of the existing interior partitions, the existing roof replaced, and additional wall and monitor openings consisting of 20 percent of the perimeter wall area would be added to the existing structure.

Removal of ACMs, lead-based paint, the existing oil-water separator and wash rack would occur as identified under the Proposed Action.

2.4 NO-ACTION ALTERNATIVE

Under the no-action alternative, demolition of Building 633 would not occur. The 1 CES Pavement and Equipment Shop would relocate to the new facility constructed in the north base industrial area. No future use or maintenance of Building 633 has been identified.

2.5 ALTERNATIVE CONSIDERED BUT NOT CARRIED FORWARD

In addition to the proposed action, alternative actions, and no-action alternative discussed above, other alternatives were evaluated and found to be infeasible or unreasonable, and therefore eliminated from detailed consideration. These alternatives include the following:

- Warehouse Space – As a result of the manner in which the original building was constructed, warehouse use is limited to “no-combustible” storage. Given the volume of space in the building and the condition of the structure and the warehouse space would not be heated or cooled. The building affords 38,500 square feet of storage space once the building interior was gutted of the existing interior partitions and configured for warehouse space. The roof would need to be replaced due to the numerous leaks that currently render the facility unfit for warehousing. No requirement for warehousing space has been identified in this portion of the base.
- Administrative Space – In order to provide additional administrative space, the interior of the building would be gutted of existing interior partitions and the leaking roof replaced. As a result of the leaking roof, mold and mildew has developed in existing office areas that would need to be eliminated prior to continuous occupation by office workers. Approximately 61,000 square feet of office and conference space could be generated within the building, however additional parking space to support this office/conference space is not available within this portion of the base making this proposal infeasible.

2.6 ENVIRONMENTAL IMPACT ANALYSIS PROCESS

The EIAP includes the review of all information pertinent to the proposed action and reasonable alternative and provides a full and fair discussion of potential consequences to the natural and human environment. The process includes involvement with the public and agencies to identify possible consequences of an action, as well as the focusing of analysis on environmental resources potentially affected by the proposed action or the alternatives.

2.6.1 Public and Agency Involvement

Through the scoping process, the Air Force obtained information regarding pertinent environmental issues the agencies felt should be addressed in the environmental impact analysis. Agency consultations were undertaken with regard to cultural resources and biological resources, primarily for compliance with the Endangered Species Act (ESA).

The Air Force prepared and published a newspaper advertisement in the *Daily Press* on August 12, 2004 announcing the availability of the Draft EA for public and agency review. No comments were received from the public. Copies of the Draft EA were provided to the Virginia

Department of Environmental Protection (VDEP) Single Point of Contact to allow for review by appropriate state and local agencies. Comments from the VDEP were received and a copy is included in Appendix B.

2.6.2 Regulatory Compliance

This EA has been prepared to satisfy the requirements of NEPA (Public Law [P.L.] 91-190, 42 USC 4321 et seq.) as amended in 1975 by P.L. 94-52 and P.L. 94-83. The intent of NEPA is to protect, restore, and enhance the environment through well-informed federal decisions. In addition, this document was prepared in accordance with the requirements of the NEPA of 1969, (42 United States Code [USC] 4321-4347), Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] §§ 1500-1508), and 32 CFR Part 989, et seq., *Environmental Impact Analysis Process (formerly known as Air Force Instruction [AFI] 32-7061)*.

Implementation of the proposed action or an alternative requires coordination with several regulatory agencies. Compliance with the ESA involves communication with the Department of the Interior (delegated to the U.S. Fish and Wildlife Service [USFWS]) in cases where a federal action could affect the listed threatened or endangered species, species proposed for listing, or species that could be candidates for listing. A letter was sent to the appropriate USFWS agencies, as well as their state counterparts, informing them of the proposed action and alternative and requesting data regarding applicable protected species. Since no adverse effects are anticipated, further consultation is not required.

The preservation of cultural resources falls under the purview of the State Historic Preservation Office (SHPO), as mandated by the National Historic Preservation Act (NHPA) and its implementing regulations. A letter was sent to the SHPO informing them of the proposed action. A Programmatic Agreement between Langley AFB and the Virginia Department of Historic Resources and the Virginia Council on Indians has been executed and is included in Appendix B.

Appendix B includes copies of relevant coordination letters and letters regarding protected species provided by the United States Department of Fish and Wildlife Service and the Virginia Department of Historic Resources.

2.6.3 Permit Requirements

This EA has been prepared in compliance with NEPA; other federal statutes, such as the Clean Air Act (CAA) and the Clean Water Act; Executive Orders (EOs), and applicable state statutes and regulations. Table 2-1 summarizes applicable federal, state, and local permits necessary for implementation of the proposed action or alternative. In addition to this EA being prepared for the decision maker and the interested public, it is also a tool for Air Force personnel to ensure compliance with all regulatory requirements from proposal through project implementation.

2.7 COMPARISON OF ALTERNATIVES

Table 2-2 summarizes the potential environmental impacts of the proposed action, the two action alternatives and the no-action alternative, based on the detailed impact analyses presented in Chapter 4.0. In no instance would the potential environmental consequences be significant with the implementation of the proposed action or alternative. Under the no-action alternative, no changes would be made to the existing structures.

Table 2-1. Environmental Related Permitting

<i>Type of Permit or Regulatory Requirement</i>	<i>Requirement</i>	<i>Agency</i>
Endangered Species Act	Required to consult on impacts of project implementation on federally listed or proposed threatened and endangered species	U.S. Fish and Wildlife Service, Commonwealth of Virginia
Clean Water Act	Virginia Pollutant Discharge Elimination System Stormwater General Permit for Construction Activities	Commonwealth of Virginia, Department of Environmental Quality
National Historic Preservation Act Section 106	Consultation with State Historic Preservation Office	Commonwealth of Virginia, Department of Historic Resources
Coastal Consistency Determination	Determine consistency with enforceable policies of Commonwealth's Coastal Zone Management Program	Commonwealth of Virginia, Department of Environmental Quality

Table 2-2. Summary of Potential Environmental Impacts of Proposed Action and No-Action Alternative

<i>Resource</i>	<i>Proposed Action</i>	<i>Indoor Parking Alternative</i>	<i>Indoor Boat Storage Alternative</i>	<i>No-Action Alternative</i>
Land Use Resources	+	+	+	-
Cultural Resources	-	+	+	0
Physical Resources ¹	-	0	0	0
Hazardous Materials and Waste Management	-	-	-	0
Noise	-	-	-	0
Air Quality	-	-	-	0
- = Adverse, but not significant, impact + = Positive/beneficial impact 0 = No change				

Note: 1. Physical Resources include Biological and Water Resources

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3.0 AFFECTED ENVIRONMENT

This chapter describes relevant existing environmental conditions at Langley AFB for resources potentially affected by the proposed action and no-action alternative described in Chapter 2.0. In compliance with guidelines contained in the NEPA, CEQ regulations, and the requirements of the (NEPA of 1969, (42 United States Code [USC] 4321-4347), Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] §§ 1500-1508), and 32 CFR Part 989, et seq., Environmental Impact Analysis Process (formerly known as Air Force Instruction [AFI] 32-7061), the description of the existing environment focuses on those environmental resources potentially subject to impacts. These resources and conditions are land use, including visual and transportation; cultural resources; physical resources, including water and biological resources; hazardous materials and waste; noise; and air quality. The expected geographic scope of potential impacts, known as the region of influence (ROI), is defined for each resource analyzed.

RESOURCES ELIMINATED FROM DETAILED CONSIDERATION

Several resources were not evaluated in this EA because it was determined that implementation of the proposed action is unlikely to affect them. These resources include airspace, safety, earth resources, socioeconomics and environmental justice. A brief explanation of the reasons why each resource has been eliminated from further consideration in this EA is provided below.

Airspace. The proposed action and the alternatives do not involve aircraft or airspace modifications.

Earth Resources. Since the demolition involves existing structures and previously developed areas, no impacts to earth resources (e.g., soils, paleontological resources) would occur as a result of the proposed action. Use of the existing structure as considered by the alternative does not affect earth resources. The physical resources section addresses erosion concerns.

Socioeconomics and Environmental Justice. Implementation of the proposed action or the alternatives does not include modifications to current manpower authorizations. Therefore, both of these resources were eliminated from further analysis.

3.1 LAND USE RESOURCES

The attributes of land use addressed in this analysis include land use, transportation, and visual resources. Land use focuses on general land use patterns, as well as management plans, policies, ordinances, and regulations. These provisions determine the types of uses that are allowable and identify appropriate design and development standards to address specially designated or environmentally sensitive areas. Transportation addresses roads and circulation. Visual resources present the natural and manufactured features that constitute the aesthetic qualities of an area. The ROI for land use resources consists of Langley AFB.

3.1.1 Land Use

Land uses on Langley AFB are grouped by function in distinct geographic areas. For example, aircraft operations and maintenance facilities are located in the southern portion of the base. The residential areas on base are located along the Back River in the southeastern and northeastern portions of the base.

Adopted plans and programs guide land use planning on Langley AFB. Base plans and studies present factors affecting both on- and off-base land use and include recommendations to assist on-base officials and local community leaders in ensuring compatible development. The *2003 Langley AFB General Plan* provides an overall perspective concerning development opportunities and constraints. Area Development Plans (ADPs), part of the Langley General Plan, provide focused information on the future organization and circulation of personnel, facilities, and equipment within portions of the base. The HQ ACC Campus ADP specifically addresses the area where demolition is to take place. ACC Campus ADP provides guidance relative to the development and use of the area surrounding Building 633. This area is predominately laid out in a standard urban grid manner with a mix of building types and parking areas. The HQ ACC Campus ADP outlines development opportunities and constraints in the vicinity of Building 633.

The base's *Integrated Natural Resource Management Plan* (Air Force 1998a) is used to coordinate natural resource management. Langley's *Urban Forest Inventory Review and Management Plan* (Davey Resource Group 1997) is an important component of this plan. Trees are an integral component of the base's urban environment. Their shade and beauty contribute to the quality of life and soften the hard appearance of concrete structures and streets, moderating harsh urban conditions. Trees help stabilize the soil by controlling wind and water erosion. They also help reduce noise levels, cleanse pollutants from the air, produce oxygen and absorb carbon dioxide, which is believed to contribute to the greenhouse effect. Trees also provide significant economic benefits. Several studies have shown that properly placed trees provide shade and act as windbreaks, helping to decrease residential energy consumption. Trees return overall benefits and value far in excess of the time and money invested in them for planting, pruning, care, and removal. There are four trees located between the parking spaces on the south side of the building and Douglas Street.

Langley AFB officials have recognized these benefits and realize the need to protect their investment with a comprehensive, urban forest management program. Such a program begins with an inventory of the trees and an evaluation of their condition. The inventory draws attention to immediate problems and provides the basis for designing a long-term management plan. The management plan, in turn, allows for a more effective use of existing tree care funds and for accurate budget projections.

The Coastal Zone Management Act (CZMA) was enacted to develop a national coastal management program that comprehensively manages and balances competing uses of land impacts to any coastal use or resource. The CZMA federal consistency requirement, CZMA

section 307, mandates that federal agency activities be consistent to the maximum extent practicable with the enforceable policies of a state management program. The federal consistency requirement applies when any federal activity, regardless of location, affects any land or water use or natural resource of the coastal zone. The question of whether a specific federal agency activity may affect any natural resource, land use, or water use in the coastal zone is determined by the federal agency.

The Virginia Department of Environmental Quality (VDEQ) oversees activities in the coastal zone of the Commonwealth through a number of enforceable programs. In reviewing the proposed action, VDEQ may require agencies to coordinate with its specific divisions or other agencies for consultation or to obtain permits; they also may comment on environmental impacts and mitigation. VDEQ enforceable programs and policies pertain to fisheries management, subaqueous lands management, wetlands management, dunes management, non-point source pollution control, point source pollution control, shoreline sanitation, air pollution control, and coastal lands management. The Chesapeake Bay Local Assistance Department regulates activities in the Chesapeake Bay Resource Management Areas and Resource Protection Areas.

3.1.2 Transportation

Access to Langley AFB is provided from Interstate 64 (I-64) via Armistead Avenue to the west of the base, and from Mercury Boulevard (United States [U.S.] Route 258/Virginia State Route [SR] 32), via LaSalle Avenue (SR 167) or King Street (SR 278). Langley AFB has a network of streets that provide access to all base facilities. Nealy Avenue begins at the Main Gate and continues northeast through the installation. Sweeney Boulevard is the primary east west corridor linking directly to the West Gate at Armistead Avenue. It has three lanes, (center lane reversible) from the gate to the intersection with Nealy Avenue/Hammond Avenue. Parking in some on-base areas is limited. The combination of Ward Road, Clarke Avenue, Weyland Road and Lee Road comprise the “base perimeter road.”

Building 633 is located within the ACC Campus with Dodd Boulevard acting as the main spine of the area. Building 633 is located one block east of Dodd Boulevard at the corner of Douglas Street and Hunting Avenue.

3.1.3 Visual Resources

Langley AFB is located in the city of Hampton near the southern end of the lower Virginia Peninsula, between the Northwest and Southwest Branches of the Back River, a branch of the Chesapeake Bay. The base is in the Coastal Plain physiographic province on Hampton Flat, a nearly flat plain that gently slopes toward the east, with elevations between 5 and 11 feet above mean sea level (MSL).

The main base occupies 2,883 acres of the total site. The largest structures on base are the aircraft operations and maintenance facilities located in the southern portion of the base. NASA

EA for Demolition of Building 633 at Langley AFB

operates a facility complex in the northwestern, southern, and southeastern portion of the base. The large wind tunnels and aeronautical test equipment that comprise the NASA facility resemble a large industrial area. A number of older facilities on base, such as the Albert Kahn-designed hangars, give the base a character reflecting its history as an important airbase from the beginning of the aviation era. Building 633 is located within the Langley Field Historic District.

Much of the vegetation on base was planted at the time of the base's original construction (circa 1916). Towering oak trees are the dominant species of trees in the Langley Field Historic District. They have been used mainly as street plantings and as decorative plantings around many facilities. Building 633 is located between a NASA wind tunnel on the north and office buildings on the west and south. To the east is the vehicle storage yard and views of the Southwest Branch of the Back River.

3.2 CULTURAL RESOURCES

Cultural resources are defined as any prehistoric or historic district, site, building, structure, or object considered important to a culture, subculture, or community for scientific, traditional, or religious reasons. They can be divided into three categories: archaeological; architectural/engineering; and traditional.

Archaeological resources are locations where prehistoric or historic activity measurably altered the earth, or produced deposits of physical remains. Architectural/engineering resources include standing buildings, dams, canals, bridges, and other structures of historic significance. Architectural/engineering resources generally must be more than 50 years old to be considered for inclusion in the National Register of Historic Places (NRHP). However, more recent structures, such as Cold War era resources, may warrant protection if they manifest "exceptional significance" or the potential to gain significance in the future. Traditional resources are resources associated with cultural practices and beliefs of a living community that are rooted in its history and are important in maintaining the continuing cultural identity of the community.

The ROI for cultural resources is the area within which the proposed action has the potential to affect existing or potentially occurring archaeological, architectural, or traditional resources. For the proposed action and no-action alternative, the ROI is defined as Langley AFB.

3.2.1 Identified Cultural Resources

Thirteen archaeological sites and many historic architectural resources have been identified within Langley AFB. The project area has no recorded archaeological sites and has a low potential for unidentified archaeological resources because of heavy development and use over the years (Wheaton et al 1991). No Native American issues have been identified at Langley AFB (Air Force 1996). No federally recognized Indian tribes or lands are located in Virginia.

The present project area lies within the Langley Field Historic District (USACE 1998). Building 633, the former Seaplane Hangar, is a contributing member of the Langley Field Historic District, located in an area of historic buildings associated with the development of the National Advisory Committee for Aeronautics' (NACA) flight programs, and the development of the installation during the 1930s.

Building 633 was constructed in 1921 to support seaplane testing (Hayes et al. 2004). It was built during a period when Langley AFB began to assume its place as the center of Army aviation after the establishment of the Army Air Service. The building was used as a Quartermaster Corps warehouse by 1934, and later as a Corps of Engineers maintenance facility (Hayes et al. 2004). It was remodeled in 1952 when it is believed that the roofing material was removed, the hangar openings in-filled, and the glazed opening covered over (HSMM 2004).

The seaplane hangar is a metal-frame, two-story structure with a rectangular footprint. It is an example of early experimental construction using steel-supported frames with a "Monitor" roof which was not seen in great use until the 1940s (HSMM 2004). The walls are clad in pressed metal. The building is sheltered by twin gable roofs, defining the original two bays in the building's southeast (riverfront) elevation. Each gable ridge incorporates a clerestory. When originally constructed, the primary elevation of the seaplane hangar was contiguous with the shore of the Back River; infill of Back River shore has extended the shoreline approximately 400 feet to the southeast.

Immediately north of Building 633 is a cluster of NACA buildings, two of which are National Historic Landmarks dating to the 1930s: the Full Scale Tunnel (Building 643) and the Eight-Foot High Speed Tunnel (Building 641). To the west and south of the seaplane hangar are Building 617, Quartermaster Maintenance (1934); Building 621, Quartermaster Garage (1932), Building 623, Technical Warehouse (1920), Building 625, Blueprint Room (1933), Building 626, Electrical Substation, 1932; Building 635, Barracks (1932); and Building 658, Gymnasium (1933) (USACE 1998). Further to the south is another cluster of buildings associated with the early development of NACA's flight programs, ranging in age from 1918 to 1940.

Sixteen buildings constructed in the 1920s remain within the Langley Field Historic District as a whole. Table 3-1 lists buildings from that era.

Table 3-1. Langley Field Historic District 1920s-era Facilities

<i>Building #</i>	<i>Name</i>	<i>Construction Date</i>	<i>National Register Status</i>
455, 456, 460, 461, 461	Officer's Quarters	1920	Contributing in a District
546	Austin Hall	1924	Contributing in a District
580	NACA Wind Tunnel	1924	Contributing in a District
582	NACA Wind Tunnel	1921	Contributing in a District
583a	Maintenance - NACA	1929	Contributing in a District
586	Service Building - NACA	1926	Contributing in a District
596	Gas Station Reclamation	1920	Non-contributing
633	Seaplane Hangar	1921	Contributing in a District
868, 869	Officers' Quarters	1923	Contributing in a District
948, 949	Enlisted Bachelors' Quarters	1921	Contributing in a District

A 2004 study of Building 633 (HSMM 2004) finds that although Building 633 is associated with the development of seaplane technology by the Army Air Corps, this development was abandoned early at Langley AFB and by 1934, the facility served as a Quartermaster Corps warehouse. The study notes that the building was not designed by a noted architect, and that its original style was obscured by remodeling in 1953 (HSMM 2004). It further identifies several unique aspects of the building, including that it is the only "Monitor" form hangar constructed at Langley Field, and that it may be one of the earliest uses of this form of construction, although it does not appear to be "'prototypical' development for a structure that was not fully used until the late 1930's [stet], and then by the U.S. Navy" (HSMM 2004).

3.3 PHYSICAL RESOURCES

3.3.1 Biological Resources

For purposes of the impact analysis, biological resources are divided into three major categories: (1) terrestrial communities, (2) wetland and freshwater aquatic communities, and (3) threatened, endangered, and special status species/communities. The ROI for biological resources includes Langley AFB and the specific areas associated with the proposed action.

TERRESTRIAL COMMUNITIES

Only a relatively small portion of Langley AFB is forested or remains in its natural state. Plant communities include approximately 250 acres of mixed oak-hickory hardwood forests, 60 acres

of 60-year-old planted loblolly pine forests, 450 acres of tidal salt marshes, and an undetermined amount of old-field successional areas. The remaining portions of the base consist of managed lawns and developed areas of buildings, structures, and pavement.

Wildlife on the base are widespread species that are habitat generalists or tolerant of disturbance. This includes a wide variety of game and furbearing species, small mammals, waterfowl, songbirds, raptors, amphibians, reptiles, and fish. The proximity of the base to estuarine and marine habitats of Chesapeake Bay provides habitat for a variety of neotropical migrants and waterfowl.

WETLAND AND FRESHWATER AQUATIC COMMUNITIES

Wetlands at Langley AFB encompass approximately 652 acres, 462 acres of which are non-freshwater estuarine wetlands. A wetlands delineation of the entire base, conducted in late 2000 (Air Force 2001a), is under jurisdictional determination review by the Norfolk USACE (personal communication, Wittkamp 2003). However, no wetlands are located adjacent to Building 633.

THREATENED, ENDANGERED, AND SPECIAL STATUS SPECIES/COMMUNITIES

Sixteen special status species occur, or have the potential to occur, on Langley AFB and are presented in Table 3-2. Eleven have special state status and five have additional federal status. No critical habitat occurs on base.

Langley AFB provides habitat for one federally listed threatened species: the bald eagle. Surveys conducted in 1993 and 1994 indicated that foraging by bald eagles occurs to a limited extent within creeks and marshes of the base. Habitat suitable for nesting or roosting occurs among the loblolly pines on the northern side of the base, but no nesting or long-term roosting has ever been observed. Uniform age/size structure of loblolly pine stands may limit use of the base as nesting or roosting habitat (Barrera 1995). The second federally listed threatened species, the northeastern beach tiger beetle, has no record of occurrence on base; it typically inhabits broad sandy beaches and has become a species of concern within the Chesapeake Bay ecosystem. The third federally listed threatened species, the piping plover, is associated with sandy beaches, which are not found on Langley AFB. The Virginia least trillium, found in forested wetlands, is a federal species of concern.

Virginia special status species include the barking treefrog, canebrake rattlesnake, Foster's tern, glossy ibis, great egret, Harper's finch, least tern, Mabey's salamander, night-heron yellow-crowned, and the peregrine falcon. The Canebrake rattlesnake has been found along the shore of the southwest branch of the Back River.

The USFWS, Virginia Field Office, was notified of the proposed action (see Appendix B) and the Virginia Department of Conservation and Recreation's National Heritage website for rare,

**Table 3-2. Threatened, Endangered, and Special-Status Species/
Communities that Occur or Potentially Occur on Langley AFB**

<i>Species</i>	<i>Status</i>	<i>Areas of Occurrence</i>
Plants		
Harper's fimbriatilis <i>Fimbristylis perpusill</i>	SE	Coastal seasonal ponds.
Virginia least trillium <i>Trillium pusillum var. virginianum</i>	FSC	Forested wetlands and mesic woods including the "green sea" wetlands. Recorded from the City of Hampton.
Invertebrates		
Northeastern beach tiger beetle <i>Cicindela dorsalis dorsalis</i>	FT	Broad beaches with well-developed sand dunes.
Amphibians		
Barking treefrog <i>Hyla gratiosa</i>	ST	Breeds in coastal seasonal freshwater ponds. Needs fish-free breeding habitat. Base at northern edge of range. Spends warm months in treetops, seeks moisture during dry periods by burrowing among tree roots and clumps of vegetation.
Mabee's salamander <i>Ambystoma mabeei</i>	ST	Breeds in coastal seasonal freshwater ponds. Needs fish-free breeding habitat. Tupelo and cypress bottoms in pine woods, open fields, and lowland deciduous forest.
Northern Diamond-backed terrapin <i>Malaclemys terrapin terrapin</i>	FSC	Breeds on sandy beaches or dunes. Prefers the brackish water of estuaries, tidal marshes, the tidal portions of rivers, and sometimes seen in the Atlantic Ocean. They are found overwintering in mud.
Reptiles		
Canebrake rattlesnake <i>Crotalus horridus atricaudatus</i>	SE	Meadows, canebrake or "green sea" wetlands. At risk because of wetland loss. Swampy areas, canebrake thickets, and floodplains.
Birds		
Bald eagle <i>Haliaeetus leucocephalus</i>	FT/SE	Forages occasionally on base. Nests within three miles of the base.
Foster's tern <i>Sterna forsteri</i>	SSC	Coastal and marshland bird that fishes the waters of the region.
Glossy ibis <i>Plegadis falcinellus</i>	SSC	Wades in marshes and fishes the waters of the region.
Great egret <i>Asmerodius albus</i>	SC	Palustrine and estuarine wetlands; marshes.
Night-heron yellow-crowned <i>Nyctanassa violacea violacea</i>	SSC	Wades in marshes and fishes the waters of the region.
Northern harrier <i>Circus cyaneus</i>	SSC	Hunts over marshes and fields and is known to nest in the area.
Least tern <i>Sterna antillarum</i>	SSC	Found feeding or nesting on beaches in the area.
Peregrine falcon <i>Falco peregrinus</i>	SE	Observed foraging over salt marshes on base. Open wetlands near cliffs.
Piping plover <i>Charadrius melodus</i>	FT/ST	Prefers areas with expansive sand or mudflats (for foraging) in close proximity to a sand beach (for roosting). Fifty-two designated critical habitat units from North Carolina south to northern Florida along mainland beaches and barrier islands.
Notes: FSC = Federal Species of Concern FT = Federal Threatened SC = State Candidate		
SE = State Endangered SSC = State Special Concern ST = State Threatened		

threatened and endangered plants and animals (Virginia Department of Conservation and Recreation [DCR] 2004) was reviewed to complete Table 3-2.

3.3.2 Water Resources

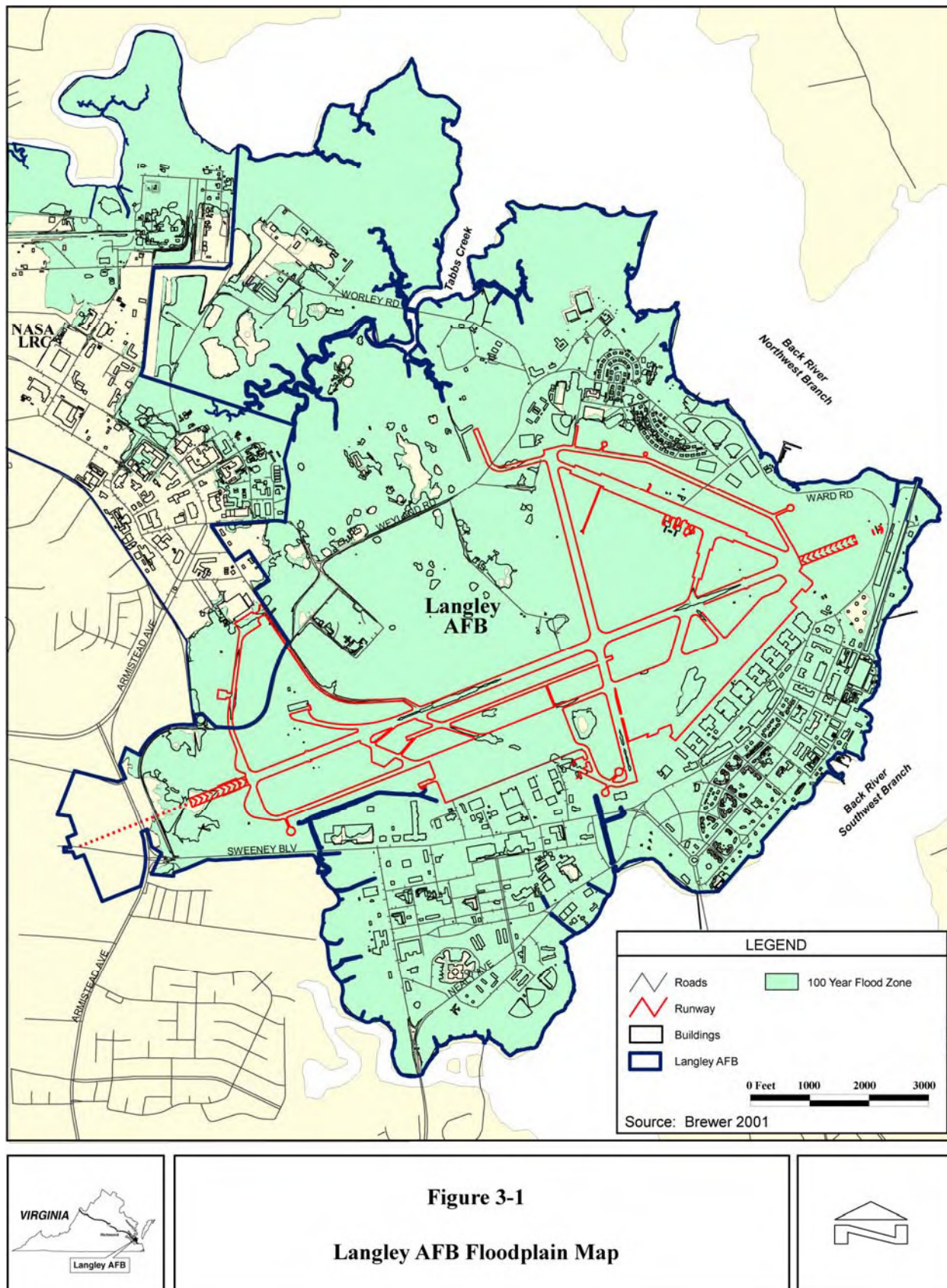
Water resources include surface and groundwater features located within the base as well as watershed areas affected by existing and potential runoff from the base, including floodplains. The ROI is defined as the base and the immediate vicinity.

Langley AFB occupies a flat lowland peninsula with a gentle eastward slope of 1 foot per mile and elevations of 5 to 11 feet MSL within the Atlantic Coastal Plain physiographic province. The base is bounded on the northeast side by the Northwest Branch of the Back River, and on the southeast side by the Southwest Branch of the Back River, which flow into the Chesapeake Bay.

In the Langley AFB area, groundwater occurs in a shallow water table aquifer, an upper artesian aquifer system, and the principal artesian aquifer system. All three aquifers in this area contain water of moderate to poor quality due to high salinity and total dissolved solids; they have little or no potential for a conventional water supply. Standard construction practices would be applied to control sedimentation and erosion during demolition pursuant to Executive Order 12088-Federal Compliance with Pollution Control Standards and the Sikes Act. Additionally, federal agencies and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations (VSWML&R) and other applicable federal non-point source pollution mandates. Clearing and grading activities, installation of staging areas, parking lots, or related land conversion activities that disturb 2,500 square feet or more would be regulated by VESCL&R and those that disturb one acre or greater would be covered by VSWML&R. Accordingly, Langley AFB would have erosion and sediment control and storm water management plans prepared and implemented by the contractor to ensure compliance with state law.

Due to its proximity to the Back River and the Chesapeake Bay, much of Langley AFB lies within the 100-year floodplain. Langley AFB is susceptible to high tide surges during storms and spring tides, and flooding is sometimes severe on the base. Figure 3-1 illustrates the extent of the floodplains on Langley AFB. A 100-year flood would cover the entire area designated 50-year flood zone and the areas designated in the 100-year flood zone (see Figure 3-1). A 500-year flood would cover the 50- and 100-year floodplain areas, and the areas designated in the 500-year flood zone.

The proposed action is located within the 100-year floodplain. An examination of Figure 3-1 indicates that areas above the 100-year floodplain are located within the clear zone on the western end of the runway, and at a few small locations on the north side of the base within the



golf course, away from existing infrastructure. Currently storm water generated from Building 633 enters the storm water system directly through a series of roof drains.

3.4 HAZARDOUS MATERIALS AND WASTE MANAGEMENT

Hazardous materials are identified and regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); the Occupational Safety and Health Administration (OSHA); and the Emergency Planning and Community Right-to-Know Act (EPCRA). Hazardous materials have been defined in AFI 32-7086, *Hazardous Materials Management*, to include any substance with special characteristics that could harm people, plants, or animals. Hazardous waste is defined in the Resource Conservation and Recovery Act (RCRA) as any solid, liquid, contained gaseous or semisolid waste, or any combination of wastes that could or do pose a substantial hazard to human health or the environment. Waste may be classified as hazardous because of its toxicity, reactivity, ignitibility, or corrosivity. In addition, certain types of waste are “listed” or identified as hazardous in 40 CFR 263. The ROI for this resource consists of Langley AFB.

Hazardous Materials

The majority of hazardous materials used by Air Force and contractor personnel at Langley AFB are controlled through an Air Force pollution prevention process called HAZMART. This process provides centralized management of the procurement, handling, storage, and issuing of hazardous materials and turn-in, recovery, reuse, or recycling of hazardous materials. The HAZMART process includes review and approval by Air Force personnel to ensure users are aware of exposure and safety risks. Pollution prevention measures are likely to minimize chemical exposure to employees, reduce potential environmental impacts, and reduce costs for material purchasing and waste disposal.

Hazardous Waste

Langley AFB is a large-quantity hazardous waste generator. Hazardous wastes generated during operations and maintenance activities include solvents, metal-contaminated spent acids, and sludge from wash racks. Langley AFB recycles all lubricating fluids, batteries, oil filters, and shop rags. Hazardous wastes are managed in accordance with the *Langley AFB Hazardous Waste Management Plan*, dated 15 December 2003.

Langley AFB has a *Spill Prevention and Facility Response Plan* (certified in September 2000). The plan meets the Federal Spill Prevention Control and Countermeasures requirements, the Virginia Oil Discharge Contingency Plan requirements and the Coast Guard requirements.

Environmental Restoration Program

The Department of Defense (DoD) developed the Environmental Restoration Program (ERP) to identify, investigate, and remediate potentially hazardous material disposal sites that existed on *EA for Demolition of Building 633 at Langley AFB*

DoD property prior to 1984. Forty-eight ERP sites, including one at Bethel Manor Housing, have been identified since the ERP began at Langley AFB. Thirty-three sites have been closed or require no further action. The remaining 15 sites are regulated under CERCLA. The *Langley AFB Management Action Plan* (Air Force 2003) summarizes the current status of the base environmental programs and presents a comprehensive strategy for implementing actions necessary to protect human health and the environment. This strategy integrates activities under the ERP and the associated environmental compliance programs that support full restoration of the base.

ACC policy requires that any proposed project on or near a Langley AFB ERP site be coordinated through the Langley ERP Manager. Demolition of Building 633 would take place near ERP site OT-55 and OT-64.

ERP Site OT-55 (Civil Engineering Yard) includes underground petroleum contamination beneath a paved storage yard covering approximately 2.5 acres directly east of Building 633. An area in front of the building was expanded by dumping fill material into the Back River in front of the building during the early 1950s and 1960. This area may have included storage pits containing unknown liquids. Several of these liquid pits were identified in aerial photographs taken in 1959 and 1960. An Interim Remedial Action was conducted in 1992 and 740 cubic yards of petroleum and PCB-contaminated soil was removed. The Final ROD was signed on December 2, 2002. No further work is required on this site, and it is considered closed.

ERP Site OT-64 (OT-55) is an operable unit that addresses base-wide ground water contamination from 23 ERP sites and an additional 5 areas of concern. In general, the contaminants of concern in the ground water are volatile organic carbons, semi-volatile organic carbons, pesticides, herbicides, and some metals (personal communication, Patterson 2004) depending on the individual site of contamination. A groundwater monitoring program is underway for all associated sites. A data gap summary was finalized in July, 2001. The Engineering Evaluation and FS are in progress.

Solid Waste Management

Solid waste generated on Langley AFB is removed by contract services to either the City of Hampton's Bethel Sanitary Landfill or to the Hampton Waste-to-Energy facility for incineration. In Fiscal Year (FY) 02, the base generated 8,021 tons of solid waste and diverted 1,830 tons through recycling and composting activities. The base also generated 4,707 tons of construction and demolition debris and was able to recycle 566 tons of the debris. Big Bethel is a sanitary landfill, but also accepts construction and demolition waste. In 2001, this facility received 447,623 tons of waste of all types. With a total capacity of about 24,654,982 tons, it has a remaining useful life of about 55 years (Commonwealth of Virginia 2003). In addition, there are five dedicated construction/demolition waste disposal landfills in the Hampton Roads area (Table 3-3). Their combined capacity is 24,558,463 tons. These facilities together received

2,968,610 tons of construction and demolition waste in 2001, and have a collective remaining useful life of about 8.3 years.

Table 3-3. Capacity, Disposal Rates, and Remaining Useful Life (RUL) for Construction-Demolition Waste Disposal Facilities in Hampton Roads

<i>Name</i>	<i>Permit</i>	<i>County</i>	<i>Capacity (tons)</i>	<i>2001 Disposal (tons)</i>	<i>RUL</i>
Debris Landfill Indian Trail Disposal Facility	451	Suffolk	178,888	87,396	2.0
Higgerson-Buchanan Inc.	493	Chesapeake	518,256	103,651	5.0
Thrasher CDD Landfill	305	Chesapeake	150,000	132,776	1.1
Waltrip Landfill	322	James City	12,000	3,514	3.4
Wolftrap Operations Inc. Debris Landfill	436	York	116,713	58,220	2.0
Total for Hampton Roads			975,857	385,666	2.5 ¹
Total for Virginia			24,558,463	2,968,610	8.3

Note: 1. This is the combined (average) RUL for the five facilities, not the sum of their individual RUL's.

Source: Commonwealth of Virginia Department of Environmental Quality, June 2003

Asbestos Waste/Lead Based Paint Management

An asbestos management plan provides guidance for the identification of asbestos-containing materials (ACMs) and the management of asbestos. The 1st FW *Asbestos Management and Operations Plan* provides guidance on the management of asbestos. An asbestos facility register is maintained by Civil Engineering. Persons inspecting, designing, or conducting asbestos response actions in public or commercial buildings must be properly trained and accredited through an applicable asbestos training program. The design of building alteration projects and requests for self-help projects are reviewed to determine if asbestos contaminated materials are present in the proposed work area and, if so, are disposed of in an off base permitted landfill.

The 1st FW *Lead-Based Paint Management and Operations Plan* contains policies and procedures associated with the management of lead-based paint.

3.5 SAFETY

This section typically addresses ground, explosive, and flight safety associated with activities conducted by the 1 FW at Langley AFB, VA. Given the nature of the proposed action and No-Action alternative only ground safety issues are addressed in this EA. There are no components of the action that would affect explosive and flight safety programs at the base. Ground safety considers issues associated with operations and maintenance activities that support base

operations, including fire and crash response. The ROI for safety in this EA is Langley AFB, and, specifically, the area surrounding Building 633.

Ground Safety

Day-to-day operations and maintenance activities conducted by the 1 FW are performed in accordance with applicable USAF safety regulations, published Air Force Technical Orders, and standards prescribed by Air Force Occupational Health and Safety requirements. Safety issues related to the proposed action focus on factors affecting demolition. All contractors performing demolition on Langley AFB are responsible for following safety regulations and worker compensation programs, and are required to conduct construction or demolition activities in a manner that does not pose a risk to their workers or Langley AFB personnel. In addition, Langley AFB has established an industrial hygiene program that addresses exposure to hazardous materials, use of personal protective equipment, and the availability of Material Safety Data Sheets. Contractor personnel are required to follow this program.

Fire and crash response at Langley AFB is provided by the Langley AFB Fire Department. The department possesses all required equipment, and is fully capable of responding to aircraft accidents. All 1 FW facilities have all required infrastructure in place, and hangars are equipped with required automatic fire suppression capability.

Unified Facilities Criteria (UFC) 3-260-01, *Airfield and Heliport Planning and Design Criteria* (2001), limits locations and heights of objects and facilities around, and in the immediate vicinity of an airfield to minimize hazards to airfield and flight operations. Any condition not meeting these requirements is classified as an approved waiver, a permissible deviation, and exemption, or a violation (UFC 3-260-01). Langley AFB is in compliance with all critical requirements (personal communication, Baie 2004).

3.6 NOISE

Noise is defined as any sound that is undesirable because it interferes with communication, is intense enough to damage hearing, or is otherwise annoying. Human response to noise varies according to the type and characteristics of the noise source, distance between source and receptor, receptor sensitivity, and time of day. The ROI for noise includes the area surrounding the project location.

Sound is measured with instruments that record instantaneous sound levels in decibels (dB). A-weighted sound level measurements (often denoted dBA) are used to characterize sound levels that are heard especially well by the human ear. All sound levels analyzed in this EA are A-weighted; thus, the term dB implies dBA unless otherwise noted.

Currently noise exposure around Langley AFB results primarily from aviation activities. The noise contributions from aircraft operations and ground engine run-ups at the airfield have been calculated using the NOISEMAP model, the standard noise estimation methodology used

for military airfields. NOISEMAP uses the following data to develop noise contours: aircraft types, runway utilization patterns, engine power settings, airspeeds, altitude profiles, flight track locations, number of operations per flight track, engine run-ups, and time of day. Although some noise results from routine human presence and activities, as well as vehicular traffic, noise from aircraft operations and their associated activities dominates the acoustic environment at Langley AFB. The Air Installation Compatible Use Zone (ACIUZ) Program indicates that the proposed action site would be in the 75-80 Day-Night Average Sound Level (DNL) noise contour (Air Force 1997).

3.7 AIR QUALITY

Air quality is described by the atmospheric concentration of six pollutants: ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter equal to or less than 10 micrometers in diameter (PM₁₀), and lead (Pb). Langley AFB is located within the Hampton Roads Intrastate Air Quality Control Region (AQCR) #223. The Hampton Roads AQCR includes four counties (York, James City, Isle of Wright, and Southampton), as well as nine independent cities (Chesapeake, Hampton, Newport News, Norfolk, Poquoson, Portsmouth, Suffolk, Virginia Beach, and Williamsburg). This area includes substantial industry, several military and commercial airfields, and a large population that generates air quality emissions. Table 3-4 summarizes the baseline emissions (stationary and mobile) of criteria pollutants and precursor emissions for this AQCR. Baseline Langley AFB emissions are incorporated into the totals for the AQCR. For each criteria pollutant, Langley AFB contributes less than 1 percent of the regional emissions. The base has been issued a Synthetic Minor operating permit from the VDEQ.

Table 3-4. Baseline Emissions for Langley AFB Affected Environment

<i>Emissions</i>	<i>Pollutants (tons per year)</i>				
	CO	VOCs	NO _x	SO ₂	PM ₁₀
Hampton Roads AQCR ¹	257,325	79,750	83,560	110,220	49,860
Langley AFB	768.09	115.18	283.38	6.47	10.29
---Stationary Sources ²	7.19	10.68	42.18	0.87	2.09
---Mobile Sources ³	760.9	104.5	241.2	5.6	8.2

Sources: 1. Federal Register (629123) June 26, 1997; 2. Air Force 2003; 3. Air Force 2000

Air quality in Hampton Roads AQCR is currently designated as attainment for all criteria pollutants. For ozone and its precursor pollutants (volatile organic compounds [VOCs] and nitrogen oxides [NO_x]), the affected area is considered in "transitional attainment" or "maintenance." On April 15, 2004, the USEPA designated the City of Hampton as marginal nonattainment for the newly established 8-hour O₃ standard effective as of June 15, 2004. The USEPA will revoke the 1-hour O₃ standard in July 2005 (USEPA 2004a). Also, monitoring data are being collected for determining compliance with the newly developed standard for

particulates less than 2.5 micrometer in diameter (PM_{2.5}). The Commonwealth of Virginia has recommended that, based on the most recent three years of monitoring that, the entire state be designated as attainment for the PM_{2.5} standard. The USEPA intends to promulgate its official designations in December 2004 (USEPA 2004c).

The CAA Section 176(c), General Conformity, establishes certain statutory requirements for federal agencies with proposed federal activities to demonstrate conformity of the proposed activities with each state's State Implementation Plan (SIP) for attainment of national ambient air quality standards (NAAQS). In 1993, USEPA issued the final rules for determining air quality conformity. Federal activities must not (1) cause or contribute to any new violation; (2) increase the frequency or severity of any existing violation; or (3) delay timely attainment of any standard, interim emission reductions, or milestones in conformity to a SIP's purpose of eliminating or reducing the severity and number of NAAQS violations or achieving attainment of NAAQS. General conformity applies only to non-attainment and maintenance areas. If the emissions from a federal action proposed in a non-attainment area exceed annual emission thresholds identified in the rule (*de minimis* levels) or are regionally significant (identified as equal to, or more than, 10 percent of the emissions inventory for the region), a conformity determination is required of that action. The thresholds become more restrictive as the severity of the non-attainment status of the region increases. For the newly adopted 8-hour O₃ and the PM_{2.5} standards, according to USEPA Guidance (March 2000), conformity and other planning requirements would be triggered on the effective date of the final USEPA designations.

4.0 ENVIRONMENTAL CONSEQUENCES

Chapter 4.0 presents the environmental consequences of the proposed action and alternative at Langley AFB for each of the resource areas discussed in Chapter 3.0. To define the consequences, this chapter evaluates the project elements described in Chapter 2.0 against the affected environment provided in Chapter 3.0. Cumulative effects of the proposed action with other foreseeable future actions are presented in Chapter 5.0.

4.1 LAND USE

4.1.1 Proposed Action

LAND USE

Implementation of the proposed action would be consistent with the Base General Plan and Area Development Plan (ADP) that has been developed for the HQ ACC Campus. Demolition of this building would eliminate a facility that no longer provides a useful function to Langley AFB. The area cleared would be developed to meet parking requirements identified in the ACC Campus ADP and by the HQ ACC Facility Utilization Study. The proposed action is consistent with surrounding land uses and would be in accordance with the Enforceable Regulatory Programs of the Virginia Coastal Resources Management Program. This project would not have any component that would affect any of the following sections of the Enforceable Regulatory Program: Fisheries Management, Subaqueous Lands Management, Dunes Management, Point Source Pollution Control, Shoreline Sanitation, and Coastal Lands Management.

Fisheries Management. The demolition of this structure would have no adverse effect on the conservation and enhancement of finfish and shellfish resources, or on the promotion of commercial and recreational fisheries.

Subaqueous Lands Management. The demolition of this structure would not involve encroachment into, on, or over, state-owned subaqueous lands.

Dunes Management. There are no sand-covered beaches or sand dunes in the vicinity of this structure.

Point Source Pollution Control. There would be no requirement to obtain a Virginia Pollutant Discharge Elimination System (VPDES) or Virginia Water Protection Permit for the Proposed Action.

Shoreline Sanitation. This project would not include interconnections to the base sanitary sewer system. All existing connections to the sanitary sewer system would be capped. No septic systems, regulated by this program, would be proposed.

Coastal Lands Management. Building 633 is located within a highly developed portion of Langley AFB outside of the areas managed by the Chesapeake Bay Preservation Act.

TRANSPORTATION

With the implementation of the proposed action, on-base vehicular circulation would not be altered. Truck traffic associated with the demolition would be directed through the West Gate to avoid base housing areas to the greatest extent possible. It is possible that truck traffic would lead to some degradation of base road surfaces and occasional congestion at the West Gate. On-base roads in the immediate vicinity of Building 633 may experience lane closures temporarily during demolition activities. In all cases, the contractor would provide signage and detours to maintain access to this area for base personnel. These adverse effects would be short-term and not significant.

VISUAL RESOURCES

Demolition of Building 633 would remove a large industrial building that is bordered on two sides by brick office buildings (Buildings 623 and 635). Construction of the parking lot with landscaped islands would provide a landscaped transition between the adjacent office building and the nearby industrial and marina facilities. Implementation of the proposed action would benefit the visual resources of the base with no negative effect to the existing visual and natural character of the base.

4.1.2 Indoor Parking Alternative

LAND USE

Implementation of this alternative would provide additional parking needed within the ACC Campus Area as identified in the Base General Plan and ACC Campus ADP. The proposed action is consistent with surrounding land uses and would be in accordance with the Enforceable Regulatory Programs of the Virginia Coastal Resources Management Program. There would be no impacts to this resource with the implementation of this alternative.

TRANSPORTATION

Installation of the indoor parking structures would provide 396 parking spaces within the Building 633. Since parking attendants would be used to place each vehicle in the stalls, there is the potential for an extensive line to form each morning and after lunches, while users wait in their vehicles for attendants to park vehicles. This line could adversely interfere with normal and emergency vehicle traffic flow in the ACC Campus on Douglas Street and Hunting Avenue.

VISUAL RESOURCES

As part of the construction of the parking facilities, exterior portions of the facility, including the roof would be replaced and restored to improve the visual quality of the 80 year old building. The renovation of the exterior of the building would be a beneficial effect of this alternative.

4.1.3 Indoor Boat Storage Alternative

LAND USE

Implementation of this alternative would provide additional boat storage at a location adjacent to the marina. No maintenance activities would take place as part of boat storage. The action would not meet the needs for additional vehicle parking within the ACC Campus Area as identified in the Base General Plan and ACC Campus ADP. The alternative would support development at the marina, although an adequate maneuver area behind Building 633 may interfere with marina parking plans. This alternative would be in accordance with the Enforceable Regulatory Programs of the Virginia Coastal Resources Management Program. There would be no impacts to this resource with the implementation of this alternative.

TRANSPORTATION

Installation of the storage racks within Building 633 would provide boat storage spaces within close proximity to the existing marina at Langley AFB. Adequate turning radius at the intersection of Douglas Street and Thornell Avenue would be needed to accommodate vehicles towing boats. There would be no significant impacts to this resource with the implementation of this alternative.

VISUAL RESOURCES

As part of the construction of the boat storage facilities, exterior portions of the facility, including the roof would be replaced and restored to improve the visual quality of the 80 year old building. The renovation of the exterior of the building would be a beneficial effect of this alternative.

4.1.4 No-Action Alternative

Without removal of this obsolete structure, redevelopment and in-fill opportunities would not be constructed on Langley AFB as recommended by the Base General Plan. The 1 CES Pavement and Equipment Shop would relocate to new facilities. No impacts to transportation resources are anticipated under the no-action alternative since the demolition would not occur, and the existing structure would remain. In addition, the dilapidated condition of the seaplane hangar would continue to detract from the visual character of the base and Langley Field Historic District.

4.2 CULTURAL RESOURCES

A number of federal regulations and guidelines have been established for the management of cultural resources. Section 106 of the National Historic Preservation Act (NHPA), as amended, requires federal agencies to take into account the effects of their undertakings on historic properties. Historic properties are cultural resources that are listed in, or eligible for listing in, the National Register of Historic Places (NRHP). Eligibility evaluation is the process by which resources are assessed relative to NRHP significance criteria for scientific or historic research, for the general public, and for traditional cultural groups. Under federal law, impacts to cultural resources may be considered adverse if the resources have been determined eligible for listing in the NRHP or have significance for Native American groups.

Analysis of potential impacts to cultural resources considers both direct and indirect impacts. Direct impacts may occur by physically altering, damaging, or destroying all or part of a resource; altering characteristics of the surrounding environment that contribute to the resource's significance; introducing visual or audible elements that are out of character with the property or alter its setting; or neglecting the resource to the extent that it deteriorates or is destroyed. Direct impacts are assessed by identifying the types and locations of proposed activity and determining the exact location of cultural resources that could be affected. Indirect impacts result primarily from the effects of project-induced population increases.

4.2.1 Proposed Action

Adverse impacts to a historic property proposed for demolition are likely under the Proposed Action. The seaplane hangar (Building 633) is a contributing member of the Langley Field Historic District (USACE 1998).

Consultation with the Virginia Department of Historic Resources (DHR), in compliance with Section 106 of the *National Historic Preservation Act* (NHPA), has been completed for the Proposed Action. A Programmatic Agreement (PA) between Langley AFB and the State Historic Preservation Office (SHPO) (Appendix B) specifies that if Langley AFB determines that rehabilitation of Building 633 cannot be completed in an economically feasible manner that meets Air Force mission requirements, the building may be demolished provided that specific mitigation measures are implemented. As mitigation for adverse impacts, Langley AFB would:

- Prepare intensive-level recording of the facility according to current SHPO and Historic American Building Survey/Historic American Engineering Record (HABS/HAER) standards;
- Submit facility recording materials for review by the SHPO prior to demolition;
- Rehabilitation of historic Buildings 607 and 617 for adaptive reuse by an office function to the condition depicted in the historic photographs in consultation with the SHPO;

-
- Include Building 633 in the new Langley AFB Cultural Resources Management Training video that is under development;
 - Highlight historic buildings and structures in its annual Historic Preservation Week.

Impacts to archaeological or traditional resources are not expected under the Proposed Action. The facilities are located in heavily developed areas or in locations that have been surveyed for archaeological resources (Wheaton et al 1991). There are two recently discovered archeological sites containing Native American resources at Langley AFB. Contact with the Virginia Council on Indians has been initiated and the VCI is not planning on participating in the consultation for this action due to the low probability of discovery of additional resources in this highly disturbed area of the base. There are no federally recognized Indian lands at Langley AFB, and no issues have been identified by federally recognized or other Indian groups in Virginia.

4.2.2 Indoor Parking Alternative

Impacts to a historic property proposed for renovation (Building 633) could occur under the Indoor Parking Alternative. Implementation of this alternative would provide an open parking garage that would accommodate 396 vehicles with the use of a three-tiered mechanical parking system. Existing interior partitions would be removed from the building; the existing roof would be replaced; and portions of the exterior wall would be removed to comply with building codes. However, exterior renovation would be conducted in consultation with the Virginia Department of Historic Resources (DHR), and in keeping with the Secretary of the Interior's *Standards for Rehabilitation* (36 CFR Part 67), and the architectural standards of the Langley Field Historic District, so the impacts are not expected to be adverse.

Consultation with the Virginia Department of Historic Resources (DHR), in compliance with Section 106 of the *National Historic Preservation Act* (NHPA), has been completed for this alternative. If this alternative is selected, Langley AFB would comply with the terms of a PA with the SHPO (Appendix B) and undertake all rehabilitation in a manner sensitive to the fabric of the building, using historic photographs as a guide. Further, rehabilitation would be undertaken in consultation with the SHPO, in compliance with the *Secretary of the Interior's Standards for Treatment of Historic Properties*, and in consideration of the historic fabric of the Langley Field Historic District. Impacts are not expected to be adverse.

Potential impacts to archaeological or traditional resources would be similar to those described for the Proposed Action.

4.2.3 Indoor Boat Storage Alternative

Impacts to a historic property proposed for renovation (Building 633) could occur under the Indoor Boat Storage Alternative. Implementation of this alternative would provide an indoor boat storage facility utilizing fixed racks to accommodate vessels. Existing interior partitions would be removed from the building; the existing roof would be replaced; and portions of the

exterior wall would be removed to comply with building codes. Consultation with the Virginia Department of Historic Resources (DHR), in compliance with Section 106 of the NHPA, has been completed for this alternative. If this alternative is selected, Langley AFB would comply with the terms of a PA with the SHPO (Appendix B) and undertake all rehabilitation in a manner sensitive to the fabric of the building, using historic photographs as a guide. Further, rehabilitation would be undertaken in consultation with the SHPO, in compliance with the *Secretary of the Interior's Standards for Treatment of Historic Properties*, and in consideration of the historic fabric of the Langley Field Historic District. Impacts are not expected to be adverse.

Potential impacts to archaeological or traditional resources would be similar to those described for the Proposed Action.

4.2.4 No-Action Alternative

Under the no-action alternative, Building 633 would not be demolished. The 1 CES Pavement and Equipment Shop has relocated to new facilities and the building has not been occupied. Minimal maintenance would be performed on the structure to secure it from unauthorized access and to protect the facility from degradation due to exposure to the elements. Building 633 would continue to be managed in compliance with federal law and Air Force regulation. Under Section 106 of the NHPA, "neglect of a property resulting in its deterioration or destruction" is considered an adverse effect (Section 800.9 [b]).

4.3 PHYSICAL RESOURCES

4.3.1 Proposed Action

BIOLOGICAL RESOURCES

Under the proposed action, demolition would disturb an area that is previously developed, has currently experienced high levels of continual human activity, lacks native terrestrial habitat, and exhibits a low level of biodiversity. The only plant or animal species likely to be displaced from this marginal habitat are individuals of common and locally abundant species. The overall ecological effect would therefore be insignificant.

There would be no impacts to wetlands from the implementation of the proposed action and the proposed action would not conflict with the wetlands management program associated with the Virginia Coastal Zone Management Program.

Soil erosion and sediment control measures consistent with the DCR Virginia Erosion and Sediment Control Handbook would be applied during demolition, thereby avoiding secondary effects to any wetlands or freshwater aquatic species. With the implementation of these practices during demolition, no adverse environmental consequences are anticipated.

Species listed, proposed for listing, or candidates for listing as threatened and endangered in accordance with the ESA of 1973 (87 Stat. 884, as amended; 16 USC 1531 *et seq.*) are not anticipated to be adversely affected by the proposed action (see Appendix B).

State-protected species would also not be adversely affected by the proposed action because their habitat would not be altered and because changes in base activities are not expected to be biologically significant. No special species or sensitive habitats are expected to be impacted.

WATER RESOURCES

Demolition of Building 633 would occur within the 100-year floodplain. Prior to the start of demolition, silt fences, storm drain inlet and outlet protection, and other appropriate standard demolition practices would be instituted in accordance with DCR's Virginia Erosion and Sediment Control Handbook. Because soil disturbance at each project site would exceed 2,500 square feet, erosion and sediment control and storm water management plans would be developed and implemented by the demolition contractor for the project.

There would be no significant impacts to water resources from point source or non-point sources with implementation of the proposed action, and the proposed action would not conflict with point source or non-point source pollution control objectives associated with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R) and the Virginia Coastal Zone Management Program.

4.3.2 Indoor Parking Alternative

BIOLOGICAL RESOURCES

Interior and exterior renovations to Building 633 would not have any affect to the nearby area which is highly developed, lacks native terrestrial habitat, and exhibits a low level of biodiversity. There would be no impacts to wetlands and this alternative would not conflict with the wetlands management program associated with the Virginia Coastal Zone Management Program. Species listed, proposed for listing, or candidates for listing as threatened and endangered in accordance with the ESA of 1973 (87 Stat. 884, as amended; 16 USC 1531 *et seq.*) and state-protected species are not anticipated to be adversely affected because changes in base activities are not expected to be biologically significant.

WATER RESOURCES

With the implementation of this alternative, all demolition, construction and renovation would occur within the footprint of the existing building. There would be no change to amount of impervious surface and there is no additional soil disturbance anticipated. There would be no significant impacts to water resources from point source or non-point sources under this alternative. Also this alternative would not conflict with point source or non-point source

pollution control objectives associated with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R) and the Virginia Coastal Zone Management Program.

4.3.3 Indoor Boat Storage Alternative

BIOLOGICAL RESOURCES

Interior and exterior renovations to Building 633 would not have any affect to the nearby area which is highly developed, lacks native terrestrial habitat, and exhibits a low level of biodiversity. There would be no impacts to wetlands and this alternative would not conflict with the wetlands management program associated with the Virginia Coastal Zone Management Program. Species listed, proposed for listing, or candidates for listing as threatened and endangered in accordance with the ESA of 1973 (87 Stat. 884, as amended; 16 USC 1531 *et seq.*) and state-protected species are not anticipated to be adversely affected because changes in base activities are not expected to be biologically significant.

WATER RESOURCES

With the implementation of this alternative, all demolition, construction and renovation would occur within the footprint of the existing building. There would be no change to amount of impervious surface and there is no additional soil disturbance anticipated. There would be no significant impacts to water resources from point source or non-point sources under this alternative. Also this alternative would not conflict with point source or non-point source pollution control objectives associated with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R) and the Virginia Coastal Zone Management Program.

4.3.4 No-Action Alternative

Under the no-action alternative, demolition of Building 633 would not occur, however the 1 CES Pavement and Equipment Shop would relocate to new facilities and the building would not be occupied. There would be no environmental consequences to this resource.

4.4 HAZARDOUS MATERIALS AND WASTE MANAGEMENT

4.4.1 Proposed Action

HAZARDOUS MATERIALS

Demolition of Building 633 may require the use of hazardous materials by contractor personnel. In accordance with the base's HAZMART procedure, copies of Material Safety Data Sheets must be provided to the base and maintained on the demolition site. Demolition contractors would comply with federal, state, and local environmental laws and would employ affirmative procurement practices when economically and technically feasible.

All hazardous materials and demolition debris would be handled, stored and disposed of in accordance with federal state and local regulations and laws. Permits for handling and disposal of hazardous material are the responsibility of the contractor. Hazardous materials would not be stored on base. All hazardous materials used at the demolition site including, but not limited to, paint, paint thinners, gasoline, diesel, oil and lubricants would be removed daily. Only quantities of hazardous materials required to carry out the work for the day would be permitted on site.

HAZARDOUS WASTE

Contractor personnel may generate hazardous waste during demolition. Storage and disposal of these wastes would be the responsibility of the site contractor. Generations of appreciable amounts of hazardous wastes are not anticipated and no adverse environmental consequences are expected. Removal of the existing wash rack and oil-water separator would be accomplished and a closure report would be prepared and submitted to VDEQ. Any soil suspected of contamination, as discovered during the demolition process, would be tested and either replaced back into the excavation or disposed of in accordance with proper regulations.

If asbestos-containing materials (ACM) or lead-based paint (LBP) are found in or near the demolition areas, then the following Federal and State regulations must be followed.

- *Asbestos Removal and Disposal.* Upon classification as friable or non-friable, all waste ACM should be disposed of in accordance with the Virginia Solid Waste Management Regulations (9 VAC 20-80-640), and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 *et seq.*).
- *Lead-Based Paint Removal and Disposal.* The proposed project should comply with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) regulations, and with the Virginia Lead-Based Paint Activities Rules and Regulations (9 VAC 20-60-261).

In the event of fuel spillage during demolition, the contractor would be responsible for its containment, clean up and related disposal costs. The contractor would have sufficient spill supplies readily available on the pumping vehicle and/or at the site to contain any spillage. In the event of a contractor related release, the contractor would immediately notify the 1 FW Civil Engineering/Environmental Management Office and take appropriate actions to correct its cause and prevent future occurrences.

ENVIRONMENTAL RESTORATION PROGRAM

Demolition of Building 633 would occur near ERP Site OT-55 and OT-64. The base ERP office, 1 CES/CEVR, would request an ACC waiver for this demolition project. Any soil suspected of contamination, as discovered during demolition, would be tested and disposed of in accordance with proper VDEQ regulations. Disposal of contaminated soil would be funded by the

EA for Demolition of Building 633 at Langley AFB

demolition project. Project contractors would ensure that access to existing monitoring wells would remain during and after demolition and construction activities. No significant environmental effects would result from the implementation of the proposed action.

SOLID WASTE

Demolition of the Building 633 would generate approximately 44,960 cubic yards of construction debris consisting concrete, structural steel, glass, and miscellaneous metal building components. These materials would be generated during FY 04. Demolition contractors would be directed to recycle materials to the maximum extent possible, thereby reducing the amount of demolition debris disposed in landfills. Materials not suitable for recycling would be taken to a landfill permitted to handle construction debris wastes, such as the Bethel Landfill in Hampton. That landfill has capacity to operate for 60 years (personal communication Deibler, 2003) and the waste generated by the proposed action would not have a significant impact to the operating life of the landfill.

4.4.2 Indoor Parking Alternative

HAZARDOUS MATERIALS

Exterior and interior renovations to Building 633 may require the use of hazardous materials. These materials would be managed under the Base's HAZMART program as identified under the Proposed Action.

HAZARDOUS WASTE

Renovations to the exterior and interior of Building 633 may generate ACMs, lead-based paint waste and other hazardous wastes. Interior renovations would include the removal of the existing wash rack and oil-water separator in accordance with VDEQ regulations. These waste streams would be managed in accordance with the appropriate federal and state regulation identified under the Proposed Action.

ENVIRONMENTAL RESTORATION PROGRAM

Exterior and interior renovations to Building 633 would occur near ERP Site OT-55 and OT-64. The base ERP office, 1 CES/CEVR, would request an ACC waiver for this project. Any soil suspected of contamination, as discovered during renovation, would be tested and disposed of in accordance with proper VDEQ regulations. Disposal of contaminated soil would be funded by the project.

SOLID WASTE

Construction debris would be generated from the replacement of the roof, other exterior renovations and interior renovations. This amount is estimated to be less than 100 cubic yards and would not have a significant impact to the operating life of the landfill receiving the wastes.

No significant environmental effects would result to hazardous materials and waste management activities from the implementation of this alternative.

4.4.3 Indoor Boat Storage Alternative

HAZARDOUS MATERIALS

Exterior and interior renovations to Building 633 may require the use of hazardous materials. These materials would be managed under the Base's HAZMART program as identified under the Proposed Action.

HAZARDOUS WASTE

Renovations to the exterior and interior of Building 633 may generate AM'S, lead-based paint waste and other hazardous wastes. Interior renovations would include the removal of the existing wash rack and oil-water separator in accordance with VDEQ regulations. These waste streams would be managed in accordance with the appropriate federal and state regulation identified under the Proposed Action.

ENVIRONMENTAL RESTORATION PROGRAM

Renovations to the interior and exterior of Building 633 would occur near ERP Site OT-55 and OT-64. The base ERP office, 1 CES/CEVR, would request an ACC waiver for these alterations. Any soil suspected of contamination, discovered during construction, would be tested and disposed of in accordance with proper VDEQ regulations. Disposal of contaminated soil would be funded by the project. No significant environmental effects would result from the implementation of this alternative.

SOLID WASTE

Construction debris would be generated from the replacement of the roof, other exterior renovations and interior renovations. This amount is estimated to be less than 100 cubic yards and would not have a significant impact to the operating life of the landfill receiving the wastes.

No significant environmental effects would result to hazardous materials and waste management activities from the implementation of this alternative.

4.4.4 No-Action Alternative

Under the no-action alternative, demolition of Building 633 would not occur. No adverse environmental consequences are expected.

4.5 NOISE

Noise impact analyses typically evaluate potential changes to existing noise environments that would result from implementation of a proposal. Potential changes in the noise environment can be (1) beneficial (i.e., if they reduce the number of sensitive receptors exposed to unacceptable noise levels); (2) negligible (i.e., if the total area exposed to unacceptable noise levels is essentially unchanged); or (3) adverse (i.e., if they result in increased exposure to unacceptable levels).

4.5.1 Proposed Action

Under the Proposed Action, aircraft operations on Langley AFB would not change; however, demolition would have minor, temporary increases in localized noise levels in the vicinity of the project area. Use of heavy vehicles and earth moving equipment for site preparation and demolition would generate noise. Table 4-1 shows sound levels associated with typical heavy construction equipment under varying modes of operation.

The base is an active military facility that typically experiences high noise levels from daily flight operations. As previously stated, the ACC Campus area on Langley AFB is generally within the 75 – 80 DNL noise contour. Construction noise emanating from demolition activities would probably be noticeable in the immediate site vicinity, but would not be expected to create adverse impacts. The acoustic environment on this portion of Langley AFB would be expected to remain relatively unchanged. Overall, noise impacts associated with the Proposed Action are expected to be minimal.

Table 4-1. Typical Equipment Sound Levels

<i>Equipment</i>	SOUND LEVEL (IN DBA) UNDER INDICATED OPERATIONAL MODE ¹		
	<i>Idle Power</i>	<i>Full Power</i>	<i>Moving Under Load</i>
Forklift	63	69	91
Backhoe	62	71	77
Dozer	63	74	81
Front-End Loader	60	62	68
Dump Truck	70	71	74

Note: 1. Measured at 125 feet.
Source: Air Force 1998c.

4.5.2 Indoor Parking Alternative

With the implementation of this alternative, much of the construction that would generate noise would take place within the structure. Operation of a parking facility would not lead to the noise levels in excess of those currently experienced in the vicinity of Building 633, and there would be no impact from operations on noise levels.

4.5.3 Indoor Boat Storage Alternative

With the implementation of this alternative, much of the construction that would generate noise would take place within the structure. Operation of a boat storage facility may lead to a slight increase in the noise levels in excess of those currently experienced in the vicinity of Building 633 as a result of vehicles and equipment (i.e. forklifts) moving boats in and out of storage. No significant impact is anticipated to personnel working in nearby offices and industrial facilities.

4.5.4 No-Action Alternative

Under the no-action alternative, demolition of Building 633 would not occur. Noise levels in the immediate vicinity of Building 633 would decrease slightly with the relocation of the CE Pavement and Equipment Shop to a new location.

4.6 AIR QUALITY

4.6.1 Proposed Action

The air quality analysis included an assessment of direct and indirect emissions from the known activities associated with the proposed action at Langley AFB that would affect the regional air quality. Emissions from the proposed action are either “presumed to conform” (based on emissions levels that are considered insignificant in the context of overall regional emissions) or they must demonstrate conformity with approved State Implementation Plan (SIP) provisions.

Emissions for the project period were quantified to determine the potential impacts on regional air quality. These emissions were compared to federal conformity *de minimis* thresholds for O₃ precursors (VOCs and NO_x). Emissions of VOC, NO_x, CO, SO_x, and PM₁₀ from demolition and paving activities were calculated using USEPA emission factors compiled in the *Air Emissions Inventory Guidance Document for Mobile Sources at Air Force Installations* (USAF/IERA, 2002c) and the California *Environmental Quality Act Air Quality Handbook* (South Coast Air Quality Management District 1993). The emission factors included contributions from engine exhaust emissions (i.e., on-site demolition equipment, material handling, and workers’ travel) and fugitive dust emissions (e.g., from grading and trenching activities). The demolition project was estimated to span a 5-day period, including demolition and material hauling, with grading to follow. Emissions from trucks hauling demolition debris from and paving material to the facility were calculated using emission factors for heavy-duty diesel vehicles from *Calculation*

Methods for Criteria Pollutant Air Pollutant Emission Inventories (Jagelski and O'Brien 1994). The emissions, in tons from the proposed action are presented in Table 4-2.

General conformity regulations set forth in 40 Code of Federal Regulations (CFR) 51 Subpart W, and adopted in the Virginia Administrative Code (9 VAC 5 Chapter 160), outline *de minimis* levels of emissions, below which it is presumed that the action conforms to the SIP. The *de minimis* levels for O₃ precursors in a maintenance area outside of an O₃ transport region (i.e., Hampton Roads AQCR) are 100 tons per year of VOCs emissions and 100 tons per year of NO_x. In addition, the proposed action's emissions (both direct and indirect) must be compared to the regional inventory to determine if the emissions are "regionally significant." Emission increases of O₃ precursors (NO_x and VOCs) are well below the threshold thus demonstrating compliance with Clean Air Act conformity requirements. In addition, the proposed action emissions are well below the regional significance threshold defined by 10 percent of the regional emissions (i.e., 836 tons per year of NO_x and 797 tons per year of VOCs).

Table 4-2. Project Emissions – Proposed Action

<i>Criteria Pollutants</i>	<i>Langley AFB Baseline Emissions (tons per year)</i>	<i>Hampton Roads AQCR (tons per year)</i>	<i>Temporary Emissions (tons)</i>
CO	768.09	257,325	2.6
VOCs	115.18	79,750	0.5
NO _x	283.38	83,560	2.9
SO ₂	6.17	110,220	0.1
PM ₁₀	10.29	49,860	0.6

Total project emissions generated on base and within the Hampton Roads AQCR are less than one percent when compared to regional emissions and are below the 100 tons per year *de minimis* federal conformity thresholds for NO_x and VOCs. Emissions generated by construction and demolition projects are temporary in nature and would end when project is complete. The emissions from fugitive dust (PM₁₀) would be significantly less due to the implementation of control measures in accordance with standard demolition practices. For instance, frequent spraying of water on exposed soil during ground disturbance and demolition activities, proper soil stockpiling methods, and prompt replacement of ground cover or pavement are standard landscaping procedures that could be used to minimize the amount of dust generated during demolition. Using efficient grading practices and avoiding long periods where engines are running at idle may reduce combustion emissions from demolition equipment.

No direct operational emissions are expected to occur after the proposed project is completed, as the facility would no longer exist. No new stationary sources or additional personnel would

be added to the Base as a result of the proposed project. No changes to the Synthetic Minor Operating permit issued by VDEQ Title V program are anticipated.

4.6.2 Indoor Parking Alternative

With the implementation of this alternative minor exterior and interior demolition and construction activities would generate short term air emissions. These emissions would be a slight portion of those generated under the Proposed Action which is not significant in relation to existing base emissions and emissions in the Hampton Roads AQCR.

4.6.3 Indoor Boat Storage Alternative

With the implementation of this alternative minor exterior and interior demolition and construction activities would generate short term air emissions. These emissions would be a slight portion of those generated under the Proposed Action which is not significant in relation to existing base emissions and emissions in the Hampton Roads AQCR.

4.6.4 No-Action Alternative

Under the no-action alternative, Building 633 would not be demolished, however the 1 CES Pavement and Equipment Shop would relocate to new facilities and the building would not be occupied. There would be no environmental consequences to this resource.

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5.0 CUMULATIVE EFFECTS AND IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

5.1 CUMULATIVE EFFECTS

This section provides (1) a definition of cumulative effects, (2) a description of past, present, and reasonably foreseeable actions relevant to cumulative effects, and (3) an evaluation of cumulative effects potentially resulting from these interactions.

5.1.1 Definition of Cumulative Effects

CEQ regulations stipulate that the cumulative effects analysis within an EA should consider the potential environmental impacts resulting from “the incremental impacts of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions” (40 CFR 1508.7). Recent CEQ guidance in *Considering Cumulative Effects* affirms this requirement, stating that the first steps in assessing cumulative effects involve defining the scope of the other actions and their interrelationship with the proposed action and the no-action alternative. The scope must consider geographic and temporal overlaps among the proposed action and the no-action alternative and other actions. It must also evaluate the nature of interactions among these actions.

Cumulative effects are most likely to arise when a relationship or synergism exists between a proposed action and the no-action alternative and other actions expected to occur in a similar location or during a similar time period. Actions overlapping with, or in close proximity to, the proposed action and the no-action alternative would be expected to have more potential for a relationship than actions that may be geographically separated. Similarly, actions that coincide, even partially, in time would tend to offer a higher potential for cumulative effects.

To identify cumulative effects, this EA addresses three questions:

1. Does a relationship exist such that elements of the proposed action and the no-action alternative might interact with elements of past, present, or reasonably foreseeable actions?
2. If one or more of the elements of the proposed action and the no-action alternative and another action could be expected to interact, would the proposed action and the no-action alternative affect or be affected by impacts of the other action?
3. If such a relationship exists, does an assessment reveal any potentially significant impacts not identified when the proposed action and the no-action alternative is considered alone?

In this EA, an effort has been made to identify all actions that are being considered and that are in the planning phase at this time. To the extent that details regarding such actions exist and the actions have a potential to interact with the proposed action and the no-action alternative in this EA, these actions are included in this cumulative analysis. This approach enables decisionmakers to have the most current information available so that they can evaluate the environmental consequences of the proposed action and the no-action alternative.

5.1.2 Past, Present, and Reasonably Foreseeable Actions

This EA applies a stepped approach to provide decisionmakers with not only the cumulative effects of the proposed action and the no-action alternative, but also the incremental contribution of past, present, and reasonably foreseeable actions.

PAST AND PRESENT ACTIONS RELEVANT TO THE PROPOSED ACTION AND NO-ACTION ALTERNATIVE

Langley AFB is an active military installation that undergoes continuous change in mission and in training requirements. This process of change is consistent with the U.S. defense policy that the Air Force must be ready to respond to threats to American interests throughout the world. In 1998, the Air Force implemented a force structure change that added 12 F-15C aircraft and 134 personnel to Langley AFB, increasing the total number of F-15C aircraft to 66. In 2001 Langley AFB was chosen as the beddown location of the Initial Operational Wing for 72 of the new F/A-22 aircraft. To support this beddown various projects including demolition and construction of three hangers, a new simulator building and other support buildings have been constructed or are under construction. Approximately 16 acres of the base along the flightline are under development to support the beddown.

The base, like any other major installation, also requires occasional new construction, facility improvements, and infrastructure upgrades. The base has been in operation since 1917 and many facilities have outlived their useful life and require extensive renovation or demolition. Demolition within the historic district in 2003 included of the Langley Tow Tank (720) and water tower (620). Another water tower (616) in the historic district was demolished in 2004. Langley AFB is currently upgrading portions of its water, storm water drainage system and electrical system and renovating the old Shopette (442). Also under construction in 2004 is a new operations support center, housing management office, dormitory complex, reconstruction of the King Street Gate, and a new outdoor running track.

REASONABLY FORESEEABLE FUTURE ACTIONS

During the FY 05 to FY 08 timeframe, Langley AFB has proposed a number of actions that are independent of the proposed action and would be implemented irrespective of a decision on the demolition of building 633 and the construction of a new parking area. In order to redevelop portions of the base and to eliminate facilities that are obsolete, the base is considering demolition of various buildings within the historic district. These buildings include

EA for Demolition of Building 633 at Langley AFB

Greenhouse (1001), Dock (610), LTA single-family housing units (868, 869, 948, 949), and miscellaneous buildings 615, 731, 732, 735. Outside the historic district the AAFES gas station (258), Class VI store (272) and buildings 80 and 1033 are being considered for demolition.

Planned community support construction includes a new youth center, visitors' quarters, expansion of the hospital and construction of a new AAFES mini-mall, redevelopment of the marina, reconstruction of the LaSalle and West gates, including widening of a portion of Sweeney Boulevard. The base is also planning a series of infrastructure improvements that include an expansion to the alert area, construction of a new visitors quarters, replacement of the existing 2 MGD potable water storage tank, relocation of the government gas station and construction of a Combined Arms Training Range.

5.1.3 Analysis of Cumulative Impacts

The following analysis examines how the impacts of these other actions might be affected by the proposed action and the alternatives at Langley AFB and whether such a relationship would result in potentially significant impacts not identified when the proposed action and the alternatives are considered alone.

A previous EA for the implementation of a force structure change at Langley AFB and the construction of the new water tower did not identify any significant environmental consequences (Air Force 1998b, 2001d). The result of the force structure change left Langley AFB operating at levels below those occurring in the early 1990s. The establishment of a Combined Air Operations Center-Experimental and the beddown of the Aerospace Expeditionary Force Center, while adding a total of 122 new personnel, qualified for categorical exclusions because no new construction was required to support the actions.

The beddown of the Initial Operational Wing of F/A-22 aircraft has been analyzed in an Environmental Impact Statement (Air Force 2001b). Construction at Langley AFB would impact the architectural and visual aspects of the Langley Historic District. Given that the proposed F/A-22 construction would have a minimal effect on noise, air quality, and traffic, the combined environmental consequences of these actions would remain well below the threshold of significance for these resources.

None of the future infrastructure actions (analyzed in separate environmental documents) would be expected to result in more than negligible impacts either individually or cumulatively. All actions affect very specific, circumscribed areas, and the magnitude of the actions is minimal. Given that the proposed action and the no-action alternative would likewise have a minimal effect within the base, the combined impacts of these actions would remain well below the threshold of significance for any resource category.

5.2 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

NEPA requires that environmental analysis include identification of “. . . any irreversible and irretrievable commitments of resources which would be involved in the proposed action and no-action alternative should it be implemented.” Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the effects that the uses of these resources have on future generations. Irreversible effects primarily result from the use or destruction of a specific resource (e.g., energy and minerals) that cannot be replaced within a reasonable time frame. Irretrievable resource commitments involve the loss in value of an affected resource that cannot be restored as a result of the action (e.g., extinction of a threatened or endangered species or the demolition of a historic building).

Building 633 has been identified as a “contributing” to the historic district at Langley AFB and its demolition would be considered an adverse effect to the Langley Field Historic District. Implementation of the proposed action would result in an irretrievable commitment of fossil fuels through the use of vehicles necessary to remove the debris and construct the parking lot. Given the small scale of the site this is considered a negligible commitment of resources.

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Persons and Agencies Contacted

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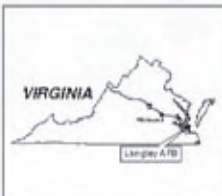
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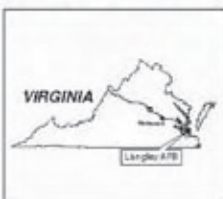
Appendix A

Building Photographs, Floor Plans, and Building Elevation

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Elevation Views of Building 633 - Langley AFB



Aerial View of Building 633 - Langley AFB

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DEMOLITION STUDY
FOR
BUILDING 633

LANGLEY
AIR FORCE BASE
HAMPTON, VIRGINIA

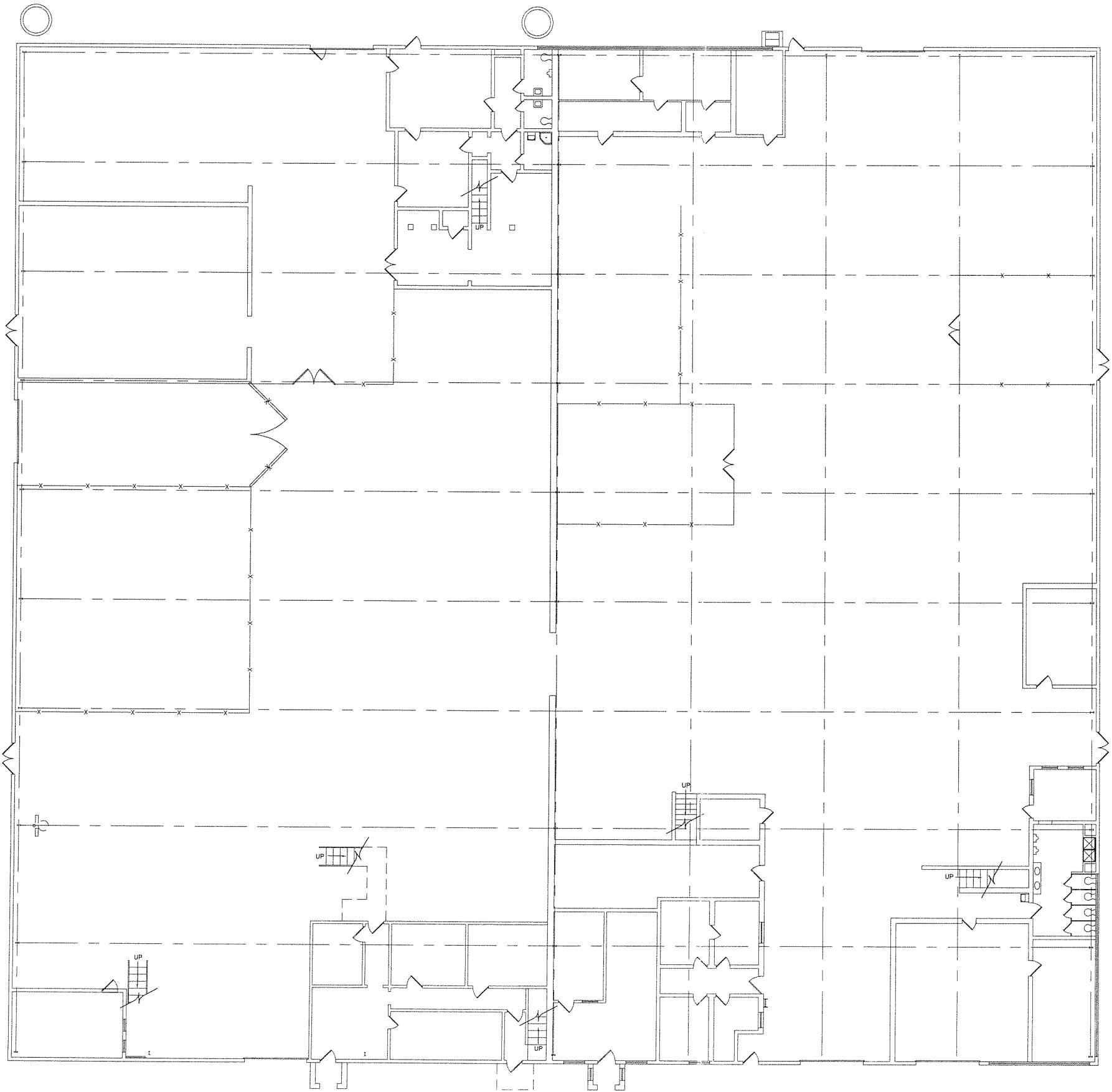
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FIRST FLOOR
PLAN

A101



FIRST FLOOR PLAN
SCALE: 1/8"=1'-0"

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DEMOLITION STUDY
FOR
BUILDING 633

LANGLEY
AIR FORCE BASE
HAMPTON, VIRGINIA

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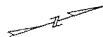
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PLAN

A102



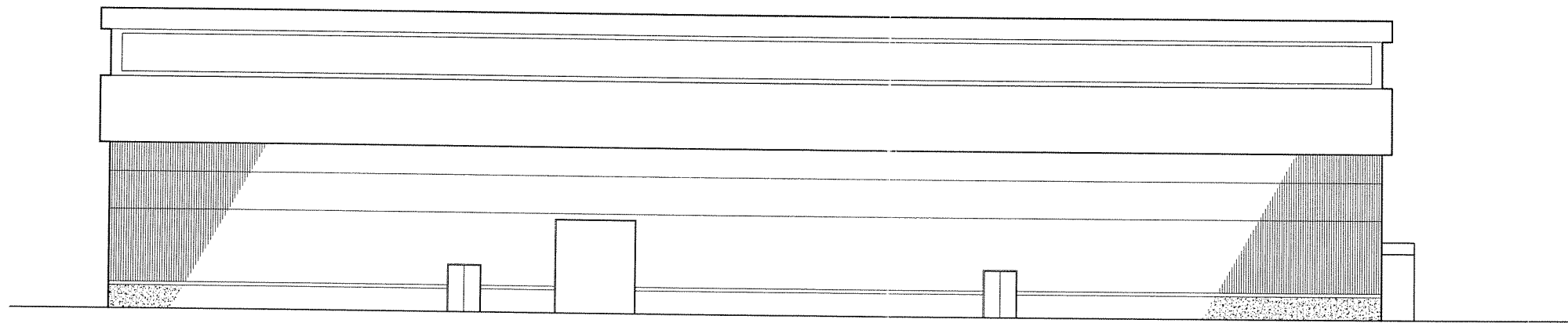
SECOND FLOOR PLAN

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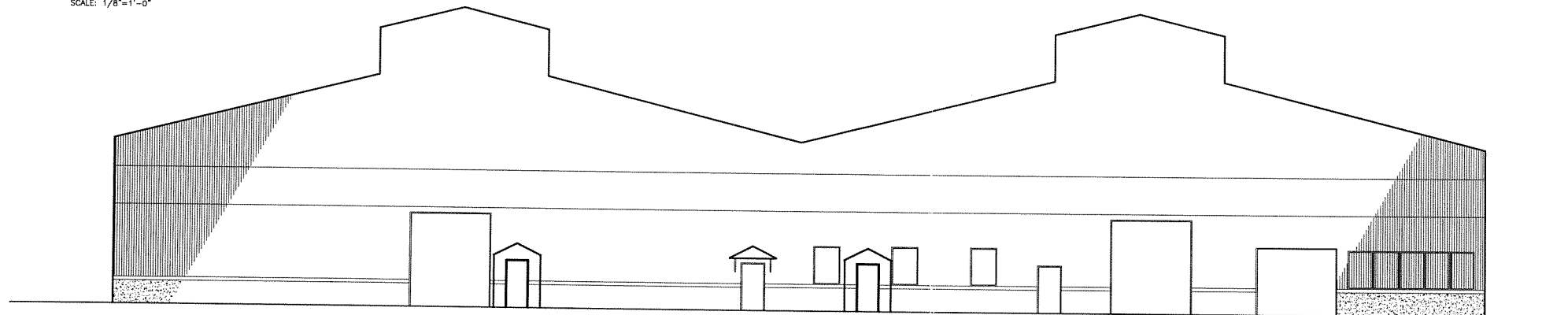


CONSULTANT

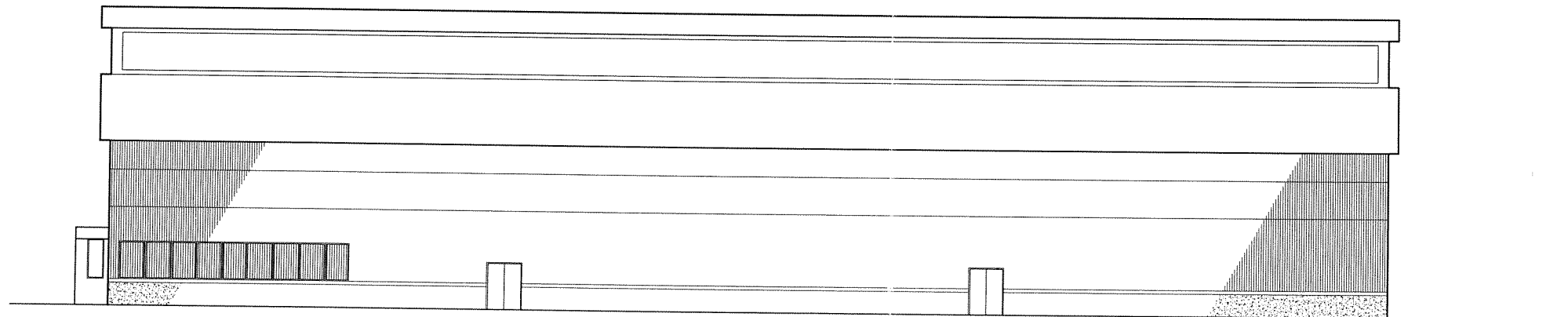
CONSULTANT



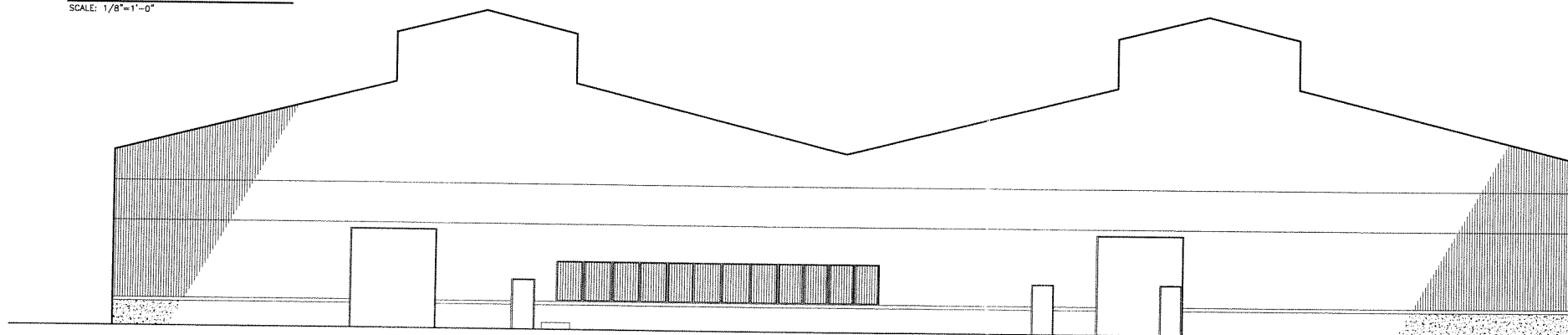
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EAST ELEVATION
SCALE: 1/8"=1'-0"



NORTH ELEVATION
SCALE: 1/8"=1'-0"



WEST ELEVATION
SCALE: 1/8"=1'-0"

**DEMOLITION STUDY
FOR
BUILDING 633**

LANGLEY
AIR FORCE BASE
HAMPTON, VIRGINIA

REV	DATE	DESCRIPTION	APP

COMM NO: 50140H
ISSUE DATE: MMM DD, YYYY
DESIGNED BY: DRAWN BY: CADD
CHECKED BY: SUBMITTED BY: GFA
© HAYES, SEAY, MATTERN & MATTERN, INC.,
2003. ALL RIGHTS RESERVED.

ARCHITECTURAL

ELEVATIONS

A201

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Appendix B

Consultation Letters

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Science Applications International Corporation
An Employee-Owned Company

29 July 2004

U.S. Fish and Wildlife Service
Virginia Field Office
6669 Short Lane
P.O. Box 99
Gloucester, VA 23061

Dear Sirs:

The U.S. Air Force is preparing an Environmental Assessment (EA) to evaluate potential environmental impacts associated with demolition of Building 633 (Seaplane Hanger) and the construction of a 135 vehicle parking lot at Langley Air Force Base. In addition to evaluating the demolition of the building, various alternatives including the no-action alternative will be evaluated.

Pursuant to the Endangered Species Act and the National Environmental Policy Act we must consider potential impacts of the proposed action to federal and state listed threatened, endangered, candidate and proposed to be listed species that occur or may occur in the potentially affected area. We have received species information from various federal and state offices recently and would like to confirm these lists (see Attachment 2) with your office. Please provide your response to: SAIC, Building 633 EA-Dischner, 22 Enterprise Parkway, Suite 200, Hampton VA 23666. Until the extent of the potential impact to listed species is determined, we will make no decision regarding the need for a section 7 consultation.

Sincerely,

Science Applications International Corporation

A handwritten signature in black ink, appearing to read "D. Dischner", is written over a horizontal line.

David Dischner
Project Manager

Attachments:

1. Project Location
2. Threatened and Endangered Species List

22 Enterprise Parkway, Suite 200, Hampton, Virginia 23666 • (757) 825-6334 • Fax: (757) 825-9104

Other SAIC Offices: Albuquerque, Colorado Springs, Dayton, Falls Church, Huntsville, Las Vegas, Los Altos, Los Angeles, McLean, Oak Ridge, Orlando, San Diego, Seattle, Tucson

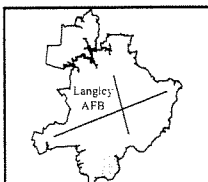
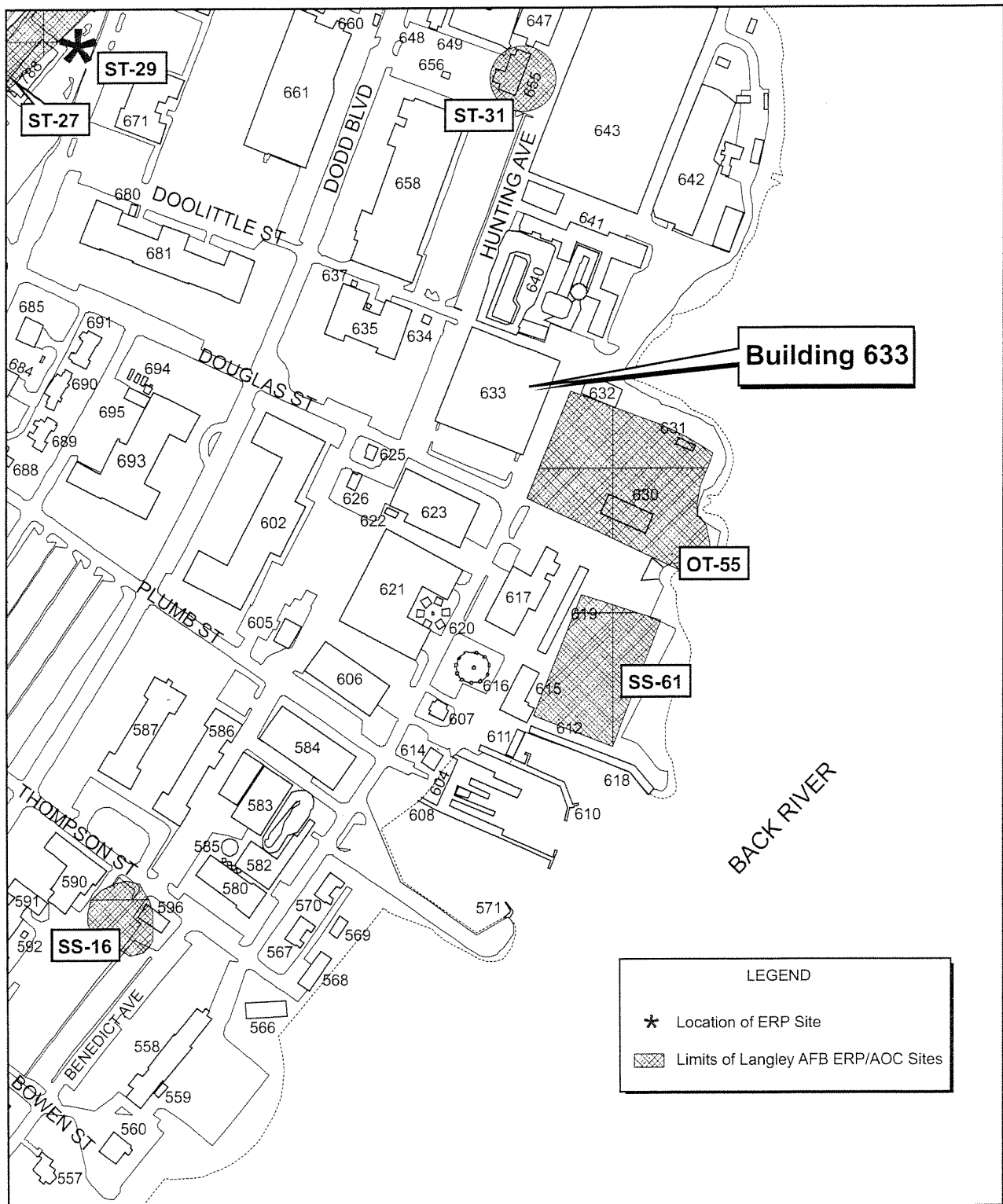


Figure 2-1
Location of Building 633
Langley AFB



**Threatened, Endangered, and Special-Status Species/
Communities that Occur or Potentially Occur on Langley AFB**

<i>Species</i>	<i>Status</i>	<i>Areas of Occurrence</i>
Plants		
Harper's fimbriatilis <i>Fimbristylis perpusill</i>	SE	Coastal seasonal ponds.
Virginia least trillium <i>Trillium pusillum</i> var. <i>virginianum</i>	FSC	Forested wetlands and mesic woods including the "green sea" wetlands. Recorded from the City of Hampton.
Invertebrates		
Northeastern beach tiger beetle <i>Cicindela dorsalis dorsalis</i>	FT	Broad beaches with well-developed sand dunes.
Amphibians		
Barking treefrog <i>Hyla gratiosa</i>	ST	Breeds in coastal seasonal fish-free freshwater ponds. Base at northern edge of range. Spends warm months in treetops, seeks moisture during dry periods by burrowing among tree roots and clumps of vegetation.
Mabee's salamander <i>Ambystoma mabeei</i>	ST	Breeds in coastal seasonal freshwater ponds. Needs fish-free breeding habitat. Tupelo and cypress bottoms in pine woods, open fields, and lowland deciduous forest.
Northern diamond-backed terrapin <i>Malaclemys terrapin terrapin</i>	FSC	Prefers the brackish water of estuaries, tidal marshes, and the tidal portions of rivers. It is sometimes seen in the Atlantic Ocean. Nesting occurs on sandy beaches or dunes
Reptiles		
Canebrake rattlesnake <i>Crotalus horridus atricaudatus</i>	SE	Meadows, canebrake or "green sea" wetlands. At risk because of wetland loss. Swampy areas, canebrake thickets, and floodplains.
Birds		
Bald eagle <i>Haliaeetus leucocephalus</i>	FT/SE	Forages occasionally on base. Nests within three miles of the base.
Foster's tern <i>Sterna forsteri</i>	SSC	Coastal and marshland bird that fishes the waters of the region.
Glossy ibis <i>Plegadis falcinellus</i>	SSC	Wades in marshes and fishes the waters of the region.
Great egret <i>Asmerodius albus</i>	SC	Palustrine and estuarine wetlands; marshes.
Night-heron yellow-crowned <i>Nyctanassa violacea violacea</i>	SSC	Wades in marshes and fishes the waters of the region.
Northern harrier <i>Circus cyaneus</i>	SSC	Hunts over marshes and fields and is known to nest in the area.
Least tern <i>Sterna antillarum</i>	SSC	Found feeding or nesting on beaches in the area.
Peregrine falcon <i>Falco peregrinus</i>	SE	Observed foraging over salt marshes on base. Open wetlands near cliffs.
Piping plover <i>Charadrius melodus</i>	FT/ST	Prefers areas with expansive sand or mudflats (for foraging) in close proximity to a sand beach (for roosting). Fifty-two designated critical habitat units from North Carolina south to northern Florida along mainland beaches and barrier islands.

Notes: FSC = Federal Species of Concern
FT = Federal Threatened
SC = State Candidate

SE = State Endangered
SSC = State Special Concern
ST = State Threatened



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
6669 Short Lane
Gloucester, VA 23061



Project name: Demolition of Bldg 633 + Construction of Parking Lot; Langley AFB

Project number: 9010 City/County, VA: Hampton

Greetings:

The U.S. Fish and Wildlife Service has reviewed your request for information on federally listed or proposed endangered or threatened species and designated critical habitat for the above referenced project. The following comments are provided under provisions of the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

☐ You requested scoping comments. Enclosed are county lists (with species fact sheets).

☐ The information you requested is available at our website at <http://vafo.fws.gov>.

☐ In order to ensure coordination with the State agencies, we recommend that you contact **both** of the State agencies listed below since each agency maintains a different database and has differing expertise and/or regulatory responsibility. If either of these agencies determines that your project may impact a federally listed, proposed, or candidate species OR federally designated critical habitat, please contact this office and provide a copy of the response letter from each agency and the above referenced project number; otherwise, further contact with this office is not necessary.

Virginia Dept of Game and Inland Fisheries
Environmental Services Section
P.O. Box 11104
Richmond, VA 23230
(804) 367-1000

Virginia Dept of Conservation and Recreation
Division of Natural Heritage
217 Governor Street, 2nd Floor
Richmond, VA 23219
(804) 786-7951

☐ Enclosed is information about communication towers and how certain categories of work may not require further coordination.

☒ We concur that the proposed action is not likely to adversely affect federally listed species.

If you have any questions, please contact Eric Davis at (804) 693-6694, ext. 104.

Sincerely,

Karen L. Mayne
Supervisor
Virginia Field Office

Mr. Marc Holma
Architectural Historian
Virginia Department of Historic Resources (VDHR)
2801 Kensington Avenue
Richmond VA 23221

Dear Mr. Holma

As you may be aware, the Department of Defense, US Air Force, proposes the demolition of Facility 633 located at Langley Air Force Base in Hampton, Virginia. Commonly referred to as the "Seaplane Hangar," we wish to formally initiate consultation, as well as seek input on project documentation that might be requested by your office as part of the consultation process. Furthermore, since we have found that the adverse effects are unavoidable, the Air Force is concurrently notifying the Advisory Council on Historic Preservation and providing them with an opportunity to comment.

Historic Properties

The resource scheduled for demolition consists of a single structure known as Facility 633. The building, which was originally constructed as a seaplane hangar, has been identified as a contributing element to the Langley Field Historic District.

The historic district itself was identified as eligible for listing in the National Register of Historic Places in 1997 under Criterion A for its association with significant events and trends in military history, and under Criterion C, as an entity illustrating the evolution of construction within the Army Air Corps between 1916 and 1945. Concurrence on the National Register eligibility of the resource was received from your office in 1997. Formal listing of the Langley Field Historic District in the National Register of Historic Places has not yet been sought. Draft nomination materials, prepared by the National Park Service in June 1995, are currently on file with VDHR.

The structure affected by this undertaking was constructed in 1921. It served as a seaplane hangar and could accommodate up to 20 aircraft according to Quartermaster Corps real property records. Also according to those records, the facility transitioned from its use as a seaplane hangar to a warehouse in 1934. Today, the building is occupied by the 1st Civil Engineer Squadron's Pavement and Equipment Shop. The majority of the floor space is used for vehicle and equipment storage.

Project Justification

The building is located on a site identified for redevelopment by Headquarters Air Combat Command. Due to continuing unmet parking requirements that have been further exacerbated by new construction and Force Protection setbacks between occupied buildings and parking areas, plans entail the construction of approximately 150 new spaces on the site. The existing Pavement and Equipment Shop will be relocated to a new facility on the north side of the base pending construction approval and funding, now slated for FY 03.

Project Effects

The removal of this structure located within the National Register-eligible Langley Field Historic District has been assessed as an adverse effect for the purposes of Section 106 of the National Historic Preservation Act of 1966, as amended. Langley Air Force Base proposes recordation of the structure to mitigate the effects of the demolition upon the District.

A draft Memorandum of Agreement specifying these conditions will be developed and forwarded for your consideration and signature subsequent to further discussion and negotiation with your office and the Advisory Council, should they choose to engage in the consultation.

Thank you in advance for your input, particularly in regard to project documentation requirements. Should you have any questions, please feel free to contact Ms. Suzanne Allan, Base Cultural Resources Manager, either by telephone at (757) 764-2696, or e-mail suzanne.allan@langley.af.mil.

NEAL B. MCELHANNON
Commander, 1st Civil Engineer Squadron

Attachments:

1. Building Report Excerpt from LAFB Cultural Resource Management Plan
2. Historic Real Property Records
3. Historic and Contemporary Photos



COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.state.va.us

30 October 2002

Neal B. McElhannon, Commander
1st Civil Engineer Squadron
37 Sweeney Blvd.
Langley AFB VA 23665-2101

Re: Facility 633, Seaplane Hangar (VDHR project no. 2002-1442)
Langley Air Force Base
Hampton, VA

Dear Commander McElhannon,

Thank you for requesting comments from the Virginia Department of Historic Resources (DHR) concerning the proposed demolition of Facility 633, the Seaplane Hangar. We understand that you wish to initiate consultation with DHR for this project, according to Section 106 of the National Historic Preservation Act of 1966, as amended. Additional information will be needed before we can continue our review.

Before DHR's review of this project can proceed, it is necessary to address additional steps in the Section 106 process. First, as you know the Section 106 regulations define an undertaking as a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; those requiring a Federal permit, license or approval; and those subject to state or local regulation administered pursuant to a delegation or approval by a Federal agency (36 CFR 800.3 and 800.16(y)). Based upon the description of the proposed action concerning Facility 633, we agree that the project constitutes an undertaking.

Please note that the Section 106 process requires step-by-step consultation between the Federal agency and the appropriate State Historic Preservation Office (SHPO; in Virginia, DHR), from establishing the undertaking, to identification and evaluation of historic properties, and assessment of and resolution of adverse effects (36 CFR Part 800.3 through 800.6). If the Federal agency is interested in expediting consultation by addressing multiple steps in sections

Administrative Svcs.
10 Courthouse Avenue
Petersburg, VA 23803
Tel: (804) 863-1685
Fax: (804) 863-6196

Petersburg Office
19-B Bollingbrook Street
Petersburg, VA 23803
Tel: (804) 863-1620
Fax: (804) 863-1627

Portsmouth Office
615 Court Street, 3rd Floor
Portsmouth, VA 23704
Tel: (757) 396-6709
Fax: (757) 396-6712

Roanoke Office
1030 Pennmar Avenue, SE
Roanoke, VA 24013
Tel: (540) 857-7585
Fax: (540) 857-7588

Winchester Office
107 N. Kent Street, Suite 205
Winchester, VA 23301
Tel: (540) 733-3427
Fax: (540) 722-7535

Facility 633, Seaplane Hangar (VDHR project no. 2002-1442)
Langley Air Force Base
Hampton, VA

800.3 through 800.6, it is necessary for the Federal agency to obtain agreement from the SHPO that this approach is appropriate. Due to the large number of projects regularly under review and because of understaffing, DHR is rarely able to agree to compress the steps of the Section 106 process. For the subject undertaking, DHR does not have on record a request from the Air Force to follow this approach, and we do not feel that it is appropriate in the circumstances. Therefore, we ask that the Air Force follow the process outlined in 36 CFR Part 800.3 through 800.6 of the Section 106 regulations, and in particular address the requirements set forth at Part 800.6.

As you noted in your correspondence, Facility 633 is considered by the Air Force to contribute to the Langley Field Historic District's eligibility for listing in the National Register of Historic Places. DHR concurs with this finding. DHR also agrees that the proposed demolition of Facility 633 will result in an adverse effect on the historic district.

According to the Section 106 regulations, once the determination has been made that an undertaking has the potential to effect resources listed in or eligible for the National Register, it is the Federal agency's responsibility to apply the criteria of adverse effect. As stated in the Council's summary of the revised Section 106 regulations, "A finding of adverse effect requires further consultation on ways to resolve it." Please see 36 CFR Part 800.5(d)(2) and 800.6 for direction on this process. Note that Section 800.5(d)(2) states that "If an adverse effect is found, the [Federal] Agency Official shall consult further to resolve the adverse effect pursuant to Sec. 800.6", and 800.6(a) states that "The [Federal] Agency Official shall consult with the SHPO/THPO and other consulting parties . . . to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties."

Please consider alternatives to the proposed undertaking that will avoid or minimize the adverse effect. Since your letter states that demolition of Facility 633 is proposed to create space for more parking, and the building is now used for vehicle and equipment storage, DHR suggests that the Air Force explore the possibility of using the building as an enclosed parking area. Another branch of the military has addressed this option as a compatible use for historic warehouse buildings, and while the project was not carried out due to programmatic changes, this was found to be a feasible and practical solution.

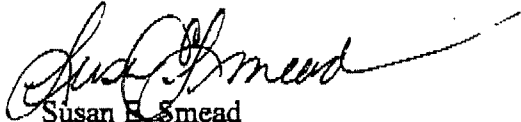
Once the Air Force has fully considered alternatives and modifications to the undertaking that would avoid or minimize the adverse effect, information resulting from the investigations should be provided to DHR. If after full consideration of alternatives it is found that the adverse effect is unavoidable, the Air Force should notify the Council on Historic Preservation of the adverse effect and determine Council participation in the consultation process. Notice to the Council shall invite the Council's participation when the Federal agency official wants Council participation, when the undertaking has an adverse effect on a National Historic Landmark, and when a Programmatic Agreement will be prepared. DHR or any other consulting party may, at any time, independently request the participation of the Council in the consultation process.

Facility 633, Seaplane Hangar (VDHR project no. 2002-1442)
Langley Air Force Base
Hampton, VA

It is also the responsibility of the Air Force to identify others who may be entitled to become consulting parties for this undertaking, and to provide notification about the undertaking to the public. Please refer to Part 800.6 of the regulations governing the Section 106 review process for an outline of the steps involved in the resolution of adverse effects (the Section 106 regulations and information about their application can be found on the Council's web site at www.achp.gov).

Once DHR has received information from your office concerning the proposed undertaking that addresses all of the required steps outlined in 36 CFR Part 800, the review process will continue. If you have questions about applying the Section 106 regulations to consideration of this undertaking or about DHR's comments, please contact me at SSmead@dhr.state.va.us, or by phone at 804-367-2323, extension 110.

Sincerely,



Susan E. Smead

Architectural Historian/Historian at Large Preservationist III

c: Suzanne Allan, Base Cultural Resources Manager, Langley AFB

Ellis, Charles

From: Andy Zadnik [ZadnikA@dgif.state.va.us]
Sent: Tuesday, August 24, 2004 2:59 PM
To: Ellis, Charles
Subject: 04-159F_Demolition of Building 633 at Langley

We have reviewed the subject project and offer the following comments.

We do not anticipate a significant adverse impact upon resources under our jurisdiction to occur as a result of this project.

Thank you for the opportunity to comment on this project.

Andrew K. Zadnik
Environmental Services Section Biologist
Department of Game and Inland Fisheries
4010 West Broad Street
Richmond, VA 23230

(804) 367-2733
(804) 367-2427 (fax)



COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street
Richmond, Virginia 23219-2010
(804) 786-6124

RECEIVED

SEP 14 2004

DEQ-Office of Environmental
Impact Review

MEMORANDUM

Date: 10 September 2004

To: Charles H. Ellis, III, Virginia Department of Environmental Quality



From: John R. Davy, Director, Planning & Recreation Resources

Subject: DEQ#04-159F: Demolition of Building 633 at Langley Air Force Base, Hampton

The Department of Conservation and Recreation (DCR) functions to preserve and protect the environment of the Commonwealth of Virginia and advocate the wise use of its scenic, cultural, recreation and natural heritage resources. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, state unique or exemplary natural communities, significant geologic formations and similar features of scientific interest.

DCR has searched its Biotics data system for occurrences of natural heritage resources in the project area. Biotics documents the presence of natural heritage resources in the project vicinity. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Under the Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Department of Conservation and Recreation (DCR), DCR has the authority to report for VDACS on state-listed plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to BCD. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

Please note that the Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 10009, Richmond, Virginia 23240

Fax (804) 698-4500 TDD (804) 698-4021

www.deq.state.va.us

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

Robert G. Burnley
Director

(804) 698-4000
1-800-592-5482

MEMORANDUM

TO: Charles H. Ellis, III, Environmental Program Planner
FROM: *ARB* Allen Brockman, Waste Division Environmental Review Coordinator
DATE: September 7, 2004
COPIES: Sanjay Thirunagari, Waste Division Environmental Review Manager; Paul Herman, file
SUBJECT: Environmental Assessment
DOD/Air Force—Langley Air Force Base, Demolition of Building 633, DEQ Project #04-159F

RECEIVED

SEP 07 2004

DEQ-Office of Environmental
Impact Review

The Waste Division has completed its review of the Environmental Impact report for the demolition of Building 633, Langley Air Force Base, Hampton, Virginia. We have the following comments concerning the waste issues associated with this project:

Both solid and hazardous waste issues were addressed adequately in the report. However, the report did not include a search of waste-related data bases. The Waste Division staff performed a cursory review of its data files and determined that the facility is under DEQ's Federal Facilities Installation Restoration Program (VA2800005033), a Formerly Used Defense Site (VA9799F1590), and a RCRA small quantity generator of hazardous waste (VAD988222527). The following websites may prove helpful in locating additional information for these identification numbers: http://www.epa.gov/echo/search_by_permit.html or http://www.epa.gov/enviro/html/rcris/rcris_query_java.html. Paul Herman of DEQ's Federal Facilities Program has been contacted for his review of this assessment and will reply in a separate memo, (if he identifies any additional issues).

Any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained

MEMORANDUM

DEPARTMENT OF ENVIRONMENTAL QUALITY - WASTE DIVISION
Federal Facilities Restoration Program
629 E. Main Street P.O. Box 10009 Richmond, Virginia 23240

SUBJECT: Environmental Assessment – Langley Air Force Base Building 633 Demolition

TO: Allen Brockman

FROM: Paul E. Herman, P.E., FFR 

DATE: September 10, 2004

COPIES: File

The *Draft Environmental Assessment Demolition of Building 633 at Langley Air Force Base* dated August 2004 has been reviewed as requested by Allen Brockman, Waste Division Environmental Review Manager. The document presents the proposed demolition action and the no-action alternatives.

Langley Air Force Base (LAFB) is on the National Priorities List. The Building 633 property lies adjacent to the closed Environmental Restoration Program (ERP) Site OT-55 and atop the Base-wide Groundwater Site, OT-64. Site OT-55 is located directly east of Building 633 at the edge of the Back River. The Site includes underground petroleum contamination beneath a paved storage yard that covers approximately 2.5 acres. In 1992, an Interim Remedial Action was taken to remove 740 cubic yards of petroleum and PCB-contaminated soil. A “No Further Action” Record of Decision (ROD) was signed for this Site on December 2, 2002. Site OT-64 is currently being addressed on a site-by-site basis. No characterization or Interim Remedial Action has taken place with respect to groundwater beneath Building 633.

The Risk Assessment conducted for Site OT-55 did not consider surface soil to be a viable pathway to receptors because the ground surface at the site is covered with a mixture of gravel, concrete and asphalt. Removal or penetration of the paved storage area by demolition equipment or stockpiled debris may be viewed as providing a viable pathway that was otherwise not considered in the Risk Assessment for this site prior to ROD development. The Federal Facilities Restoration Program recommends the facility contact Mr. John Tice, LAFB Environmental Restoration at (757) 764-1086, for information concerning the CERCLA obligations at or near the site prior to initiating any land, sediment, or ground water disturbing activities.

RECEIVED

SEP 09 2004

MEMORANDUM

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WATER QUALITY
Ellen Gilinsky, Ph.D., Director

DEQ-Office of Environmental
Impact Review

TO: Charles H. Ellis, III
Office of Environmental Impact Review

FROM: Michelle Henicheck *MH*
Office of Wetlands and Water Protection and Compliance

DATE: September 7, 2004

SUBJECT: Environmental Assessment (EA)
Demolition of Building 633 at Langley Air Force Base (AFB)
04-159F

We have reviewed the information provided concerning the above-referenced project. The purpose of the project is to demolish Building 633 and construct a 135 space parking lot at Langley AFB.

According to the report, (Section 3, page 7) approximately 462 acres of wetlands are located on the property. However, the report states that no wetlands are located adjacent to Building 633. The report concludes, and we concur, that this project will not adversely affect surface water, wetland, or groundwater resources.

According to the report (Section 3, Page 12), the Air Combat Command (ACC) policy requires that any proposed project on or near Langley AFB Environmental Restoration Program (ERP) sites be coordinated through the Langley ERP manager. Based on potential ground water contamination ERP sites near Building 633, DEQ concurs with the above referenced policy.

Should the size or scope of the project change, additional review may be necessary. We recommend strict adherence to erosion and stormwater management practices, and further encourage the project proponent to monitor construction activities to make certain that erosion and stormwater management practices are adequately preventing sediment and pollutant migration into surface waters, including wetlands. A VPDES stormwater general permit for construction activities will be required should the project disturb one or more acres of land.



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION
1401 EAST BROAD STREET
RICHMOND, 23219-2000

PHILIP A. SHUCET
COMMISSIONER

September 14, 2004

EARL T. ROBB
STATE ENVIRONMENTAL ADMINISTRATOR

Ms. Anne B. Newsom
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main St., Sixth Floor
Richmond VA 23219

Re: **#04-159F, Demolition of Building 633, Langley Air Force Base, Hampton, VA**

Dear Ms. Newsom:

Mr. Eric Stringfield, of Virginia Department of Transportation's Transportation Planning Division has reviewed the information provided for the referenced project. Our review covers impacts to existing and proposed transportation facilities.

This access change should note coordination with VDOT. The improvement should not adversely impact the existing or future transportation system, however, careful consideration and coordination with the Williamsburg Residency (757-925-2500) is required to insure that all current VDOT standards are met.

Thank you for the opportunity to comment on this project.

Sincerely,

A. C. Ray
Environmental Specialist II
VDOT

1401 East Broad St.
Richmond, VA 23219
804-371-6823 - O
804-786-7401 - FAX

W. Tayloe Murphy, Jr.
Secretary of Natural
Resources



Joseph H. Maroon
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

101 N. 14th Street, 17th Floor
Richmond, Virginia 23219-3684
PHONE: (804) 225-3440 FAX: (804) 225-3447

September 8, 2004

RECEIVED

SEP 10 2004

DEQ-Office of Environmental
Impact Review

Mr. Charles H. Ellis III
Department of Environmental Quality
Office of Environmental Impact Review
629 east Main Street, Sixth Floor
Richmond, VA 23219

RE: Demolition of Building 633 at Langley Air Force Base
DEQ Project # 04-159F
DCBLA Project # FSPR-USAF-04-04, Building 633 Demolition at Langley AFB

Dear Mr. Ellis,

We have reviewed the Environmental Assessment for the proposed Demolition of Building 633 at Langley Air Force Base and have the following comments:

The Environmental Assessment states that the redevelopment of the proposed site is "outside of the areas managed by the Chesapeake Bay Preservation Act." While this may be technically true in that Chesapeake Bay Preservation Areas are not locally designated on federal lands, this does not relieve the Air Force of its responsibilities to be consistent with the provisions of the Chesapeake Bay Preservation Area Designation and Management Regulations (Regulations), as one of the enforceable programs on Virginia's Coastal Resources Management Program (VCRMP). Federal actions on installations located within Tidewater Virginia are required to be consistent with the performance criteria of the Regulations on lands analogous to locally designated Chesapeake Bay Preservation Areas.

The Chesapeake Bay Preservation Act, as locally implemented through Section 17.3-60 (Chesapeake Bay Preservation District) of the City of Hampton's zoning ordinance and Section 33.1-9 of the City of Hampton's stormwater management ordinance, strictly controls land disturbance in tidal wetlands, non-tidal wetlands connected by surface flow and contiguous to tidal wetlands or perennial water bodies, tidal shores and within a 100-foot vegetated buffer area located adjacent to and landward of the aforementioned features and along both sides of any waterbody with perennial flow. Less stringent performance criteria apply to land that is contiguous to the 100-foot buffer for a distance



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ARTHUR L. COLLINS, EXECUTIVE DIRECTOR/SECRETARY
~~DEQ-Office of Environmental Impact Review~~

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Thomas G. Shepperd Jr., *Vice Chairman*

August 30, 2004

Mr. Charles H. Ellis, III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, Virginia 23219

Re: Demolition of Building 633 at Langley
Air Force Base DEQ #04-130F
(ENV:GEN)

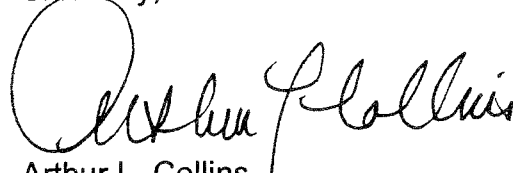
Dear Mr. Ellis:

Pursuant to your request of August 18, 2004, the staff of the Hampton Roads Planning District Commission has reviewed the Environmental Assessment for the demolition of building 633 at Langley Air Force Base. We have contacted the City of Hampton concerning the project.

Based on this review, the proposal is consistent with local and regional plans and policies.

We appreciate the opportunity to review this project. If you have any questions, please do not hesitate to call.

Sincerely,


Arthur L. Collins
Executive Director/Secretary

HRV:fh

Copy: Mr. Brian Ballard, HA



Science Applications International Corporation
An Employee-Owned Company

29 July 2004

U.S. Fish and Wildlife Service
Virginia Field Office
6669 Short Lane
P.O. Box 99
Gloucester, VA 23061

Dear Sirs:

The U.S. Air Force is preparing an Environmental Assessment (EA) to evaluate potential environmental impacts associated with demolition of Building 633 (Seaplane Hanger) and the construction of a 135 vehicle parking lot at Langley Air Force Base. In addition to evaluating the demolition of the building, various alternatives including the no-action alternative will be evaluated.

Pursuant to the Endangered Species Act and the National Environmental Policy Act we must consider potential impacts of the proposed action to federal and state listed threatened, endangered, candidate and proposed to be listed species that occur or may occur in the potentially affected area. We have received species information from various federal and state offices recently and would like to confirm these lists (see Attachment 2) with your office. Please provide your response to: SAIC, Building 633 EA-Dischner, 22 Enterprise Parkway, Suite 200, Hampton VA 23666. Until the extent of the potential impact to listed species is determined, we will make no decision regarding the need for a section 7 consultation.

Sincerely,

Science Applications International Corporation

A handwritten signature in black ink, appearing to read "David Dischner". The signature is fluid and cursive, with the first and last names being the most prominent parts.

David Dischner
Project Manager

Attachments:

1. Project Location
2. Threatened and Endangered Species List

22 Enterprise Parkway, Suite 200, Hampton, Virginia 23666 • (757) 825-6334 • Fax: (757) 825-9104

Other SAIC Offices: Albuquerque, Colorado Springs, Dayton, Falls Church, Huntsville, Las Vegas, Los Altos, Los Angeles, McLean, Oak Ridge, Orlando, San Diego, Seattle, Tucson

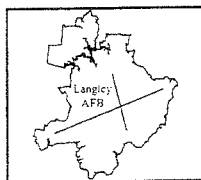
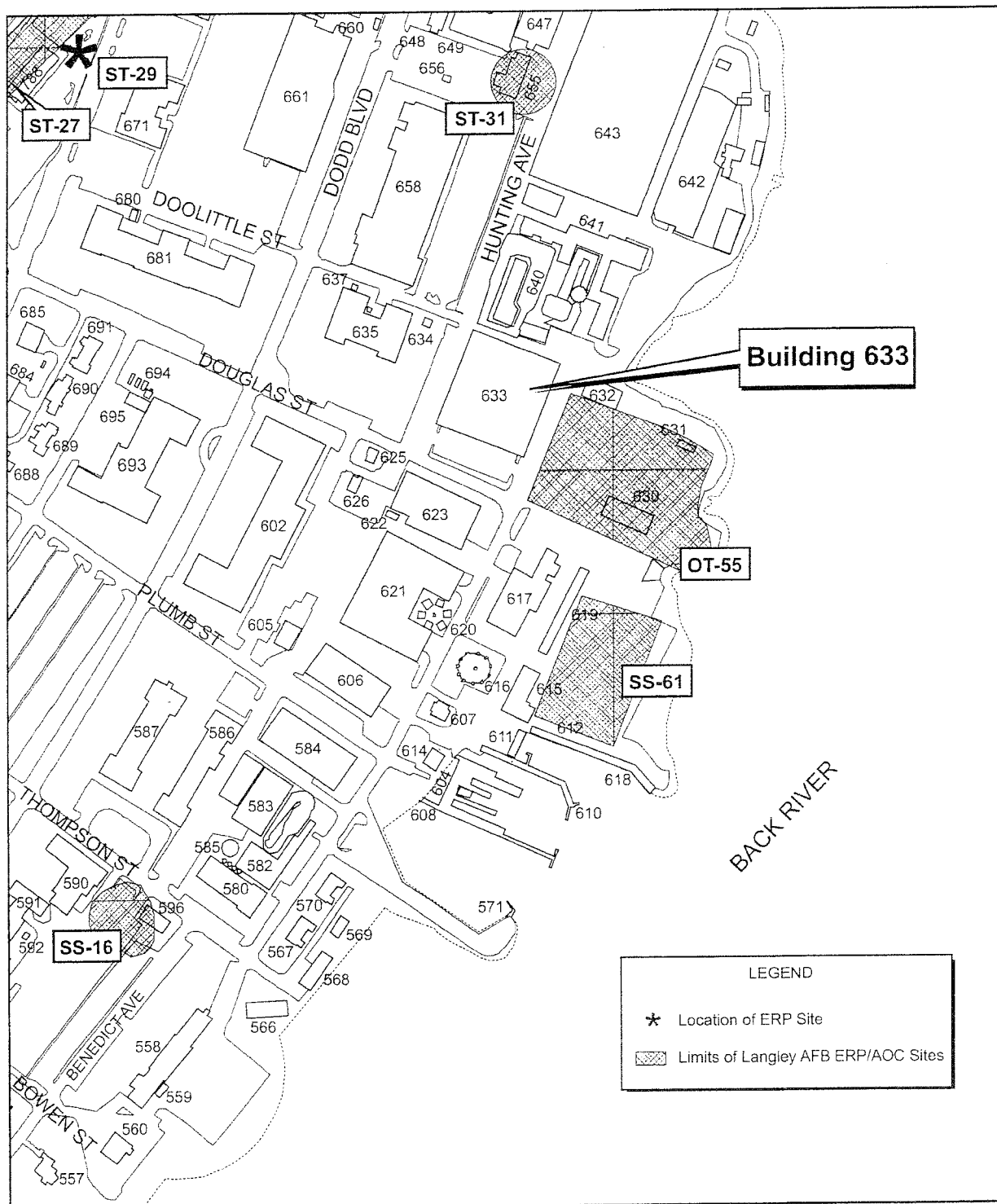
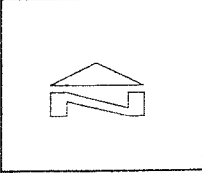


Figure 2-1
Location of Building 633
Langley AFB



**Threatened, Endangered, and Special-Status Species/
Communities that Occur or Potentially Occur on Langley AFB**

<i>Species</i>	<i>Status</i>	<i>Areas of Occurrence</i>
Plants		
Harper's fimbriatylis <i>Fimbristylis perpusill</i>	SE	Coastal seasonal ponds.
Virginia least trillium <i>Trillium pusillum</i> var. <i>virginianum</i>	FSC	Forested wetlands and mesic woods including the "green sea" wetlands. Recorded from the City of Hampton.
Invertebrates		
Northeastern beach tiger beetle <i>Cicindela dorsalis dorsalis</i>	FT	Broad beaches with well-developed sand dunes.
Amphibians		
Barking treefrog <i>Hyla gratiosa</i>	ST	Breeds in coastal seasonal fish-free freshwater ponds. Base at northern edge of range. Spends warm months in treetops, seeks moisture during dry periods by burrowing among tree roots and clumps of vegetation.
Mabee's salamander <i>Ambystoma mabeei</i>	ST	Breeds in coastal seasonal freshwater ponds. Needs fish-free breeding habitat. Tupelo and cypress bottoms in pine woods, open fields, and lowland deciduous forest.
Northern daimond-backed terrapin <i>Malaclemys terrapin terrapin</i>	FSC	Prefers the brackish water of estuaries, tidal marshes, and the tidal portions of rivers. It is sometimes seen in the Atlantic Ocean. Nesting occurs on sandy beaches or dunes
Reptiles		
Canebrake rattlesnake <i>Crotalus horriäus atricaudatus</i>	SE	Meadows, canebrake or "green sea" wetlands. At risk because of wetland loss. Swampy areas, canebrake thickets, and floodplains.
Birds		
Bald eagle <i>Haliaeetus leucocephalus</i>	FT/SE	Forages occasionally on base. Nests within three miles of the base.
Foster's tern <i>Sterna forsteri</i>	SSC	Coastal and marshland bird that fishes the waters of the region.
Glossy ibis <i>Plegadis falcinellus</i>	SSC	Wades in marshes and fishes the waters of the region.
Great egret <i>Asmerodius albus</i>	SC	Palustrine and estuarine wetlands; marshes.
Night-heron yellow-crowned <i>Nyctanassa violacea violacea</i>	SSC	Wades in marshes and fishes the waters of the region.
Northern harrier <i>Circus cyaneus</i>	SSC	Hunts over marshes and fields and is known to nest in the area.
Least tern <i>Sterna antillarum</i>	SSC	Found feeding or nesting on beaches in the area.
Peregrine falcon <i>Falco peregrinus</i>	SE	Observed foraging over salt marshes on base. Open wetlands near cliffs.
Piping plover <i>Charadrius melodius</i>	FT/ST	Prefers areas with expansive sand or mudflats (for foraging) in close proximity to a sand beach (for roosting). Fifty-two designated critical habitat units from North Carolina south to northern Florida along mainland beaches and barrier islands.

Notes: FSC = Federal Species of Concern
FT = Federal Threatened
SC = State Candidate

SE = State Endangered
SSC = State Special Concern
ST = State Threatened



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
6669 Short Lane
Gloucester, VA 23061



Project name: Demolition of Bldg 633 + Construction of Parking Lot; Langley AFB

Project number: 9010 City/County, VA: Hampton

Greetings:

The U.S. Fish and Wildlife Service has reviewed your request for information on federally listed or proposed endangered or threatened species and designated critical habitat for the above referenced project. The following comments are provided under provisions of the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

☐ You requested scoping comments. Enclosed are county lists (with species fact sheets).

☐ The information you requested is available at our website at <http://vafo.fws.gov>.

☐ In order to ensure coordination with the State agencies, we recommend that you contact **both** of the State agencies listed below since each agency maintains a different database and has differing expertise and/or regulatory responsibility. If either of these agencies determines that your project may impact a federally listed, proposed, or candidate species OR federally designated critical habitat, please contact this office and provide a copy of the response letter from each agency and the above referenced project number; otherwise, further contact with this office is not necessary.

Virginia Dept of Game and Inland Fisheries
Environmental Services Section
P.O. Box 11104
Richmond, VA 23230
(804) 367-1000

Virginia Dept of Conservation and Recreation
Division of Natural Heritage
217 Governor Street, 2nd Floor
Richmond, VA 23219
(804) 786-7951

☐ Enclosed is information about communication towers and how certain categories of work may not require further coordination.

☒ We concur that the proposed action is not likely to adversely affect federally listed species.

If you have any questions, please contact Eric Davis at (804) 693-6694, ext. 104.

Sincerely,

Karen L. Mayne
Supervisor
Virginia Field Office

Mr. Marc Holma
Architectural Historian
Virginia Department of Historic Resources (VDHR)
2801 Kensington Avenue
Richmond VA 23221

Dear Mr. Holma

As you may be aware, the Department of Defense, US Air Force, proposes the demolition of Facility 633 located at Langley Air Force Base in Hampton, Virginia. Commonly referred to as the "Seaplane Hangar," we wish to formally initiate consultation, as well as seek input on project documentation that might be requested by your office as part of the consultation process. Furthermore, since we have found that the adverse effects are unavoidable, the Air Force is concurrently notifying the Advisory Council on Historic Preservation and providing them with an opportunity to comment.

Historic Properties

The resource scheduled for demolition consists of a single structure known as Facility 633. The building, which was originally constructed as a seaplane hangar, has been identified as a contributing element to the Langley Field Historic District.

The historic district itself was identified as eligible for listing in the National Register of Historic Places in 1997 under Criterion A for its association with significant events and trends in military history, and under Criterion C, as an entity illustrating the evolution of construction within the Army Air Corps between 1916 and 1945. Concurrence on the National Register eligibility of the resource was received from your office in 1997. Formal listing of the Langley Field Historic District in the National Register of Historic Places has not yet been sought. Draft nomination materials, prepared by the National Park Service in June 1995, are currently on file with VDHR.

The structure affected by this undertaking was constructed in 1921. It served as a seaplane hangar and could accommodate up to 20 aircraft according to Quartermaster Corps real property records. Also according to those records, the facility transitioned from its use as a seaplane hangar to a warehouse in 1934. Today, the building is occupied by the 1st Civil Engineer Squadron's Pavement and Equipment Shop. The majority of the floor space is used for vehicle and equipment storage.

Project Justification

The building is located on a site identified for redevelopment by Headquarters Air Combat Command. Due to continuing unmet parking requirements that have been further exacerbated by new construction and Force Protection setbacks between occupied buildings and parking areas, plans entail the construction of approximately 150 new spaces on the site. The existing Pavement and Equipment Shop will be relocated to a new facility on the north side of the base pending construction approval and funding, now slated for FY 03.

Project Effects

The removal of this structure located within the National Register-eligible Langley Field Historic District has been assessed as an adverse effect for the purposes of Section 106 of the National Historic Preservation Act of 1966, as amended. Langley Air Force Base proposes recordation of the structure to mitigate the effects of the demolition upon the District.

A draft Memorandum of Agreement specifying these conditions will be developed and forwarded for your consideration and signature subsequent to further discussion and negotiation with your office and the Advisory Council, should they choose to engage in the consultation.

Thank you in advance for your input, particularly in regard to project documentation requirements. Should you have any questions, please feel free to contact Ms. Suzanne Allan, Base Cultural Resources Manager, either by telephone at (757) 764-2696, or e-mail suzanne.allan@langley.af.mil.

NEAL B. MCELHANNON
Commander, 1st Civil Engineer Squadron

Attachments:

1. Building Report Excerpt from LAFB Cultural Resource Management Plan
2. Historic Real Property Records
3. Historic and Contemporary Photos



COMMONWEALTH of VIRGINIA

Department of Historic Resources

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.state.va.us

30 October 2002

Neal B. McElhannon, Commander
1st Civil Engineer Squadron
37 Sweeney Blvd.
Langley AFB VA 23665-2101

Re: Facility 633, Seaplane Hangar (VDHR project no. 2002-1442)
Langley Air Force Base
Hampton, VA

Dear Commander McElhannon,

Thank you for requesting comments from the Virginia Department of Historic Resources (DHR) concerning the proposed demolition of Facility 633, the Seaplane Hangar. We understand that you wish to initiate consultation with DHR for this project, according to Section 106 of the National Historic Preservation Act of 1966, as amended. Additional information will be needed before we can continue our review.

Before DHR's review of this project can proceed, it is necessary to address additional steps in the Section 106 process. First, as you know the Section 106 regulations define an undertaking as a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; those requiring a Federal permit, license or approval; and those subject to state or local regulation administered pursuant to a delegation or approval by a Federal agency (36 CFR 800.3 and 800.16(y)). Based upon the description of the proposed action concerning Facility 633, we agree that the project constitutes an undertaking.

Please note that the Section 106 process requires step-by-step consultation between the Federal agency and the appropriate State Historic Preservation Office (SHPO; in Virginia, DHR), from establishing the undertaking, to identification and evaluation of historic properties, and assessment of and resolution of adverse effects (36 CFR Part 800.3 through 800.6). If the Federal agency is interested in expediting consultation by addressing multiple steps in sections

Administrative Svcs.
10 Courthouse Avenue
Petersburg, VA 23803
Tel: (804) 863-1685
Fax: (804) 863-6196

Petersburg Office
13-B Bollingbrook Street
Petersburg, VA 23803
Tel: (804) 863-1820
Fax: (804) 863-1827

Portsmouth Office
612 Court Street, 3rd Floor
Portsmouth, VA 23704
Tel: (757) 396-6709
Fax: (757) 396-6712

Roanoke Office
1030 Penmar Avenue, SE
Roanoke, VA 24013
Tel: (540) 857-7585
Fax: (540) 857-7586

Winchester Office
107 N. Kent Street, Suite 203
Winchester, VA 23361
Tel: (540) 722-3427
Fax: (540) 722-7635

Facility 633, Seaplane Hangar (VDHR project no. 2002-1442)
Langley Air Force Base
Hampton, VA

800.3 through 800.6, it is necessary for the Federal agency to obtain agreement from the SHPO that this approach is appropriate. Due to the large number of projects regularly under review and because of understaffing, DHR is rarely able to agree to compress the steps of the Section 106 process. For the subject undertaking, DHR does not have on record a request from the Air Force to follow this approach, and we do not feel that it is appropriate in the circumstances. Therefore, we ask that the Air Force follow the process outlined in 36 CFR Part 800.3 through 800.6 of the Section 106 regulations, and in particular address the requirements set forth at Part 800.6.

As you noted in your correspondence, Facility 633 is considered by the Air Force to contribute to the Langley Field Historic District's eligibility for listing in the National Register of Historic Places. DHR concurs with this finding. DHR also agrees that the proposed demolition of Facility 633 will result in an adverse effect on the historic district.

According to the Section 106 regulations, once the determination has been made that an undertaking has the potential to effect resources listed in or eligible for the National Register, it is the Federal agency's responsibility to apply the criteria of adverse effect. As stated in the Council's summary of the revised Section 106 regulations, "A finding of adverse effect requires further consultation on ways to resolve it." Please see 36 CFR Part 800.5(d)(2) and 800.6 for direction on this process. Note that Section 800.5(d)(2) states that "If an adverse effect is found, the [Federal] Agency Official shall consult further to resolve the adverse effect pursuant to Sec. 800.6", and 800.6(a) states that "The [Federal] Agency Official shall consult with the SHPO/THPO and other consulting parties . . . to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties."

Please consider alternatives to the proposed undertaking that will avoid or minimize the adverse effect. Since your letter states that demolition of Facility 633 is proposed to create space for more parking, and the building is now used for vehicle and equipment storage, DHR suggests that the Air Force explore the possibility of using the building as an enclosed parking area. Another branch of the military has addressed this option as a compatible use for historic warehouse buildings, and while the project was not carried out due to programmatic changes, this was found to be a feasible and practical solution.

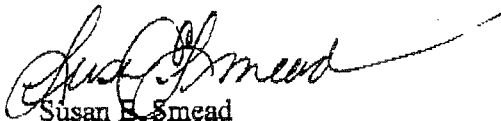
Once the Air Force has fully considered alternatives and modifications to the undertaking that would avoid or minimize the adverse effect, information resulting from the investigations should be provided to DHR. If after full consideration of alternatives it is found that the adverse effect is unavoidable, the Air Force should notify the Council on Historic Preservation of the adverse effect and determine Council participation in the consultation process. Notice to the Council shall invite the Council's participation when the Federal agency official wants Council participation, when the undertaking has an adverse effect on a National Historic Landmark, and when a Programmatic Agreement will be prepared. DHR or any other consulting party may, at any time, independently request the participation of the Council in the consultation process.

Facility 633, Seaplane Hangar (VDHR project no. 2002-1442)
Langley Air Force Base
Hampton, VA

It is also the responsibility of the Air Force to identify others who may be entitled to become consulting parties for this undertaking, and to provide notification about the undertaking to the public. Please refer to Part 800.6 of the regulations governing the Section 106 review process for an outline of the steps involved in the resolution of adverse effects (the Section 106 regulations and information about their application can be found on the Council's web site at www.achp.gov).

Once DHR has received information from your office concerning the proposed undertaking that addresses all of the required steps outlined in 36 CFR Part 800, the review process will continue. If you have questions about applying the Section 106 regulations to consideration of this undertaking or about DHR's comments, please contact me at SSmead@dhr.state.va.us, or by phone at 804-367-2323, extension 110.

Sincerely,



Susan B. Smead
Architectural Historian/Historian at Large Preservationist III

c: Suzanne Allan, Base Cultural Resources Manager, Langley AFB



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 10009, Richmond, Virginia 23240

Fax (804) 698-4500 TDD (804) 698-4021

www.deq.state.va.us

Robert G. Burnley
Director

(804) 698-4000
1-800-592-5482

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

September 15, 2004

Cpt. Tiffany S. Warnke
Deputy Chief, Environmental Flight
Headquarters, 1st Fighter Wing
Department of the Air Force
Langley Air Force Base, Virginia 23665

RE: Draft Environmental Assessment, Demolition of Building 633 at Langley
Air Force Base, Virginia
DEQ-04-159F

Dear Captain Warnke:

The Commonwealth of Virginia has completed its review of the above-referenced Draft Environmental Assessment (hereinafter "Draft EA"). The Department of Environmental Quality ("DEQ") is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act ("NEPA") and responding to appropriate federal officials on behalf of the Commonwealth. DEQ is also the lead agency for Virginia's review of federal consistency determinations and certifications submitted pursuant to the Coastal Zone Management Act. The following agencies and regional planning district commission joined in this review:

Department of Environmental Quality
Department of Game and Inland Fisheries
Department of Agriculture and Consumer Services
Department of Conservation and Recreation
Department of Historic Resources
Department of Transportation
Hampton Roads Planning District Commission
City of Hampton.

In addition, the City of Poquoson was invited to comment.

Project Description

The Air Force proposes to demolish Building 633 at Langley Air Force Base and construct a parking lot for 135 vehicles in its place. The building is located in the ACC campus area of Langley, at the intersection of Douglas Street and Hunting Avenue, not far inland of the Southwest Branch of the Back River. The building covers 39,155 square feet, and is 191 feet wide and 205 feet long. The project would include the removal of asbestos-containing materials and lead-based paints from the existing structure before demolition (Draft EA, pages 2-1 through 2-3, section 2.1). The EA also discusses an indoor parking alternative, an indoor boat storage alternative, and a no-action alternative (Draft EA, page 2-4, sections 2.2 through 2.4).

Environmental Impacts and Mitigation

The Department of Historic Resources has indicated that the proposed demolition of Building 633 would have an adverse effect upon a structure that may be of historic importance (see item 7, below). Accordingly, on behalf of the Commonwealth of Virginia, we reserve judgment on the Draft Finding of No Significant Impact for this undertaking that appears before the title page of the Draft EA.

1. Natural Heritage Resources. The Department of Conservation and Recreation has examined its Biotics Data System for occurrences of natural heritage resources within the project area. "Natural heritage resources" are defined as the habitat of rare, threatened, or endangered animal and plant species, unique or exemplary natural communities, significant geologic formations, and other features of scientific interest. According to the Department of Conservation and Recreation, natural heritage resources are documented as present in the project vicinity. However, due to the scope of the activity and the distance to the resources, the Department does not anticipate that this project will adversely impact these natural heritage resources.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Department of Conservation and Recreation (DCR), DCR has the authority to report for VDACS on state-listed plant and insect species. The proposed demolition and associated activities will not affect any documented state-listed plant and insect species. VDACS confirms this conclusion.

Because the Biotics Data Base is continually changing, the Department of Conservation and Recreation recommends that its Division of Natural Heritage be contacted (Christopher Ludwig, telephone (804) 371-6206) for updated information if a significant amount of time passes before the above information is used.

2. *Water Quality and Wetlands.* The Draft EA indicates that there are approximately 462 acres of estuarine wetlands at the Air Force Base, but that none of these are adjacent to Building 633 (page 3-7, section 3.3.1, “Wetland and Freshwater Aquatic Communities” heading). DEQ’s Division of Water Quality concurs with the conclusion of the Draft EA that the project will not adversely affect surface water, wetland, or groundwater resources.

If the land disturbance involved in this project equals or exceeds one acre, a Virginia Pollutant Discharge Elimination System (VPDES) Stormwater General Permit for Construction Activities will be necessary. See “Regulatory and Coordination Needs,” item 3, below.

DEQ’s Division of Water Quality recommends that the Air Force monitor demolition and construction activities to ensure that erosion controls and stormwater management practices for this project are effectively preventing sediment and pollutants from entering surface waters or wetlands near the project area.

3. *Air Quality.* DEQ’s Division of Air Program Coordination indicates that the project area is a non-attainment area for ozone. Accordingly, all precautions are to be taken to restrict the emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NO_x).

During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the Regulations for the Control and Abatement of Air Pollution. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

In addition, if project activities include the burning of construction or demolition material, this activity must meet the requirements of the Regulations for open burning (9 VAC 5-40-5600 et seq.), and it may require a permit (see “Regulatory and Coordination Needs,” item 2, below). The Regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. The Air Force should contact Hampton and/or Poquoson officials to determine what local requirements, if any, exist. The model ordinance includes, but is not limited to, the following provisions:

- All reasonable effort shall be made to minimize the amount of material burned, with the number and size of the debris piles;
- The material to be burned shall consist of brush, stumps and similar debris waste and clean burning demolition material;
- The burning shall be at least 500 feet from any occupied building unless the occupants have given prior permission, other than a building located on the property on which the burning is conducted;
- The burning shall be conducted at the greatest distance practicable from highways and air fields;
- The burning shall be attended at all times and conducted to ensure the best possible combustion with a minimum of smoke being produced;
- The burning shall not be allowed to smolder beyond the minimum period of time necessary for the destruction of the materials; and
- The burning shall be conducted only when the prevailing winds are away from any city, town or built-up area.

4. *Solid and Hazardous Waste Management.* The Draft EA adequately discussed both solid waste and hazardous waste issues. However, it did not include a search of waste-related data bases. DEQ's Waste Division performed a cursory review of its data files and determined that the Air Force Base is listed three ways:

- The Base is subject to DEQ's Federal Facilities Installation Restoration Program under identification number VA2800005033. In this regard, the Base is listed on the National Priorities List pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"); see item 4(a), below;
- The Base is a Formerly Used Defense Site under identification number VA9799F1500; and
- The Base is a small-quantity generator of hazardous waste under the Resource Conservation and Recovery Act (RCRA), identification number VAD988222527.

The following web sites may be helpful in locating additional information for these identification numbers:

- http://www.epa.gov.echo/search_by_permit.html and
- http://www.epa.gov/enviro/html/rcris/rcris_query_java.html.

(a) *National Priorities List Status and Background.* The Building 633 property is adjacent to the closed Environmental Restoration Program (ERP) Site OT-55 and atop the Base-wide Groundwater Site, OT-64. Site OT-55 lies directly east of Building 633 at the edge of the Back River. This Site includes underground petroleum contamination beneath a paved storage yard that covers approximately 2.5 acres. In 1992, an Interim Remedial Action was taken to remove 740 cubic yards of petroleum- and PCB-contaminated soil. A “No Further Action” Record of Decision (ROD) was signed for this Site on December 2, 2002. Site OT-64 is currently being addressed on a site-by-site basis. No characterization or Interim Remedial Action has taken place with respect to groundwater beneath Building 633.

(b) *Precautions for Groundwater Protection.* The Risk Assessment conducted for Site 55 did not consider surface soil to be a viable pathway for contamination of soil or groundwater because the surface at the site is covered with a mixture of gravel, concrete, and asphalt. Removal or penetration of the paved storage area may provide a viable pathway that was otherwise not considered in the Risk Assessment for this Site prior to ROD development. Accordingly, DEQ’s Waste Division, Federal Facilities Restoration Program recommends that the Air Force pursue additional information concerning CERCLA obligations at or near the Site. See “Regulatory and Coordination Needs,” item 3(a), below.

According to DEQ’s Tidewater Regional Office, all wastes generated during the project must be properly characterized to determine whether any of them are hazardous wastes. All waste materials generated must be disposed of at appropriate, permitted facilities. See also “Regulatory and Coordination Needs,” item 3, below.

The Draft EA describes aspects of the management of asbestos-containing materials and lead-based paints, citing the 1st Fighter Wing’s *Asbestos Management and Operations Plan* and its *Lead-Based Paint Management and Operations Plan* (page 3-13, section 3.4, “Asbestos Waste/Lead Based Paint Management” heading). For additional guidance on these matters, see “Regulatory and Coordination Needs,” items 3(b) and 3(c), below.

DEQ encourages all project proponents to implement pollution prevention principles, including the reduction of wastes at the source, re-use of materials, and recycling of waste materials (see also item 9, below). Hazardous waste generation should be minimized, and hazardous wastes handled appropriately under federal and state laws.

5. *Erosion and Sediment Control; Stormwater Management.* Federal agencies and their authorized agents conducting regulated land-disturbing activities on public and private lands in the Commonwealth of Virginia must comply with the Virginia Erosion and Sediment Control Law, the Virginia Stormwater Management Law, and other

applicable federal non-point source pollution control mandates such as section 313 of the Clean Water Act and the federal consistency requirements of the Coastal Zone Management Act. Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, or other structures, soil/dredge spoil areas, or related land conversion activities that disturb 10,000 square feet or more (2,500 square feet or more in Chesapeake Bay Preservation Areas; see item 8, below) are regulated by the Erosion and Sediment Control Law and its implementing regulations. Similar activities that disturb one acre or more are regulated by the Stormwater Management Law and its implementing regulations. Accordingly, the Air Force should prepare and implement Erosion and Sediment Control Plans and Stormwater Management Plans that comply with state law (see also items 8(c) through 8(e), below). The Air Force is ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliance, and/or other mechanisms consistent with Air Force policy. See "Regulatory and Coordination Needs," item 5, below.

6. Wildlife Resources. The Department of Game and Inland Fisheries, as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species, but excluding listed insects. The Department (hereinafter "DGIF") is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 *et seq.*), and provides environmental analysis of projects or permit applications coordinated through the Department of Environmental Quality and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce, or compensate for those impacts.

DGIF states that the proposed project is not anticipated to give rise to a significant adverse impact upon wildlife resources under DGIF jurisdiction.

DGIF maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters other than the resources contemplated in the Department of Conservation and Recreation's Biotics Data Base. One may gain access to the DGIF database through the web site http://www.dgif.virginia.gov/wildlife/info_map/index.html or by calling DGIF (Shirl Dresser, telephone (804) 367-6913).

7. Historic Structures and Archaeological Resources. According to the Department of Historic Resources (State Historic Preservation Office), the proposed demolition of Building 633 would result in an adverse effect upon a contributing structure to the Langley Air Force Base Historic District, which is eligible for listing on the National Register of Historic Places and the Virginia Landmarks Register. The Air

Force has submitted a draft Memorandum of Agreement to the Department of Historic Resources as part of its consultation pursuant to section 106 of the National Historic Preservation Act. The Department expects continued consultation with the Air Force to complete the section 106 process. See “Regulatory and Coordination Needs,” item 1, below.

8. Chesapeake Bay Preservation Areas.

(a) Applicable Requirements. The Draft EA states that the redevelopment of the proposed site is “outside of the areas managed by the Chesapeake Bay Preservation Act” (page 4-2, section 4.1.1, “Land Use” heading). While Chesapeake Bay Preservation Areas are not locally designated on federal lands, this does not relieve the Air Force of its responsibilities to conduct its activities consistently with the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 *et seq.*), which are among the Enforceable Policies of the Virginia Coastal Resources Management Program. Federal activities on installations in Tidewater Virginia must be consistent, to the maximum extent practicable, with the performance criteria of the Regulations on lands analogous to locally designated Chesapeake Bay Preservation Areas.

(b) Types of Land Area to be Protected. In Hampton, the areas protected by the Chesapeake Bay Preservation Act (*Virginia Code* sections 10.1-2100 *et seq.*) and the Regulations cited above, and that require stringent performance criteria, include the following:

- tidal wetlands
- non-tidal wetlands connected by surface flow and contiguous to tidal wetlands and tributary streams;
- tidal shores; and
- a 100-foot wide vegetated buffer area adjacent to and landward of any of the aforementioned features.

Less stringent performance criteria apply to land that is contiguous to the 100-foot buffer for a distance of 100 feet in the landward direction. The area of the proposed project appears to be at least partially within areas analogous to those areas requiring the less-stringent performance criteria.

(c) Erosion and Sediment Control Plan. Because the project would disturb more than 2,500 square feet of land area, it is subject to the requirement for an erosion and sediment control plan in accordance with the *Virginia Erosion and Sediment Control Handbook*. See “Regulatory and Coordination Needs,” item 5, below.

(d) Stormwater Requirements: State and Local Controls. The requirements of the Chesapeake Bay Preservation Act are locally administered. Accordingly, in order to comply with the City of Hampton's stormwater management performance standards (section 33.1.9 of Hampton's Stormwater Management Ordinance), the Air Force, in undertaking this project, should minimize impervious cover, minimize land disturbance, and control stormwater quality in a manner consistent with the water quality provisions of the Virginia Stormwater Management Regulations (4 VAC 3-20 *et seq.*; see 4 VAC 3-20-71 *et seq.*). Because this would be a re-development project, the non-point source water pollution load must be reduced by at least 10%. The Air Force should use the performance-based water quality calculation procedures in Appendix 5D of the *Virginia Stormwater Management Handbook* to determine the adequacy of the existing Best Management Practices for this project (see "Regulatory and Coordination Needs," item 5, below).

(e) Stormwater Requirements: Federal Agency Commitments. The 1998 Federal Agencies' Chesapeake Ecosystem Unified Plan (hereinafter "Unified Plan") requires the signatories, including the Air Force, to fully cooperate with local and state governments in carrying out voluntary and mandatory actions to comply with stormwater management requirements (page 3, "Supporters of Smart Growth" heading, item 4). In the Unified Plan, the agencies also committed themselves to encourage construction design that (a) minimizes natural area loss on new and rehabilitated federal facilities, (b) adopts low-impact development and best management technologies for stormwater, sediment and erosion control, and that reduces impervious surfaces; and (c) considers the Conservation Landscaping and Bay-Scapes Guide for federal land managers (page 3, same heading, item 5).

The Chesapeake 2000 Agreement committed its signatories, including the U.S. Air Force, to a number of sound land use and stormwater quality controls. The federal and state agencies agreed to lead by example with respect to controlling nutrient, sediment, and chemical contaminant runoff from government properties. In December 2001, the Executive Council of the Chesapeake Bay Program issued Directive No. 01-1, "Managing Storm Water on State, Federal, and District-owned Lands and Facilities," which includes specific commitments for agencies to lead by example with respect to stormwater control.

9. Pollution Prevention. DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site Best Management Practices (BMPs) will help to ensure that environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source. We have several pollution prevention recommendations that may be helpful in constructing or operating this project:

- Consider development of an Environmental Management System (EMS). An effective EMS will ensure that the proposed facility is committed to minimizing its environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitments to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure and building construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into facility maintenance and operation, to include the following: inventory control (record-keeping and centralized storage for hazardous materials), product substitution (use of non-toxic cleaners), and source reduction (fixing leaks, energy-efficient HVAC and equipment). Maintenance facilities should be designed with sufficient and suitable space to allow for effective inventory control and preventive maintenance.

DEQ's Office of Pollution Prevention provides free information and technical assistance relating to pollution prevention techniques and EMS. If interested, the Air Force may contact that Office (Tom Griffin, telephone (804) 698-4545).

10. Transportation Impacts. According to the Department of Transportation (VDOT), the project is not likely to give rise to adverse impacts upon the surrounding road system.

11. Local and Regional Comments. The Hampton Roads Planning District Commission indicates, following its consultation with the City of Hampton, that the proposed demolition of Building 633 at Langley Air Force Base is consistent with local and regional plans and policies.

Federal Consistency under the Coastal Zone Management Act

Pursuant to the Coastal Zone Management Act of 1972, as amended, federal activities located inside or outside of Virginia's designated coastal management area that can have reasonably foreseeable effects on coastal resources or coastal uses must, to the maximum extent practicable, be implemented in a manner consistent with the Virginia Coastal Resources Management Program (VCP). The VCP consists of a network of programs administered by several agencies. The DEQ coordinates the review of federal consistency determinations with agencies administering the Enforceable and Advisory Policies of the VCP.

The Draft EA addressed consistency of the project with the Enforceable Policies of the VCP in its discussion of the consequences of the project on land use (page 4-1, section 4.1.1) and in other discussions relating to wetlands (page 3-7, section 3.3.1), air quality (pages 4-13 through 4-15, section 4.6), and non-point source water pollution control (page 4-7, section 4.3.1). Based on the information submitted and the comments of reviewing agencies, we concur that the proposed activity is consistent with the Virginia Coastal Resources Management Program, provided that the Air Force and its contractors comply with all applicable Program requirements.

Regulatory and Coordination Needs

1. Historic Structure Consultation under Section 106. As mentioned above ("Environmental Impacts and Mitigation," item 7), the Air Force has submitted a draft Memorandum of Agreement (MOA) to the Department of Historic Resources. Contact between the Air Force and the Department of Historic Resources (Marc Holma, telephone (804) 367-2323, extension 114) should be maintained in order to complete agreement on the MOA and to act in accordance with it and with section 106 of the National Historic Preservation Act.

2. Air Quality Regulation. As mentioned above ("Environmental Impacts and Mitigation," item 2), any open burning of debris in conjunction with this project may require an open burning permit. Similarly, fuel-burning equipment used in construction activities may require a new source review permit. Questions about the applicability and implementation of these permitting requirements may be directed to DEQ's Tidewater Regional Office (Jane Workman, telephone (757) 518-2112).

3. Solid and Hazardous Waste Management. Any soil suspected of contamination, or wastes that are generated, must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. These include, but are not limited to, the Virginia Waste Management Act (*Virginia Code* sections 10.1-1400 *et seq.*), the Virginia Hazardous Waste Management Regulations (9 VAC 20-60), the

Virginia Solid Waste Management Regulations (9 VAC 20-80), and others (see enclosed memo, Brockman to Ellis, dated September 7, 2004).

(a) *CERCLA Obligations Pre-requisite to Land Disturbance.* Before initiating any activities which would disturb sediments, the land, or groundwater at or near the Building 633 site, the Air Force should contact the Base's Environmental Restoration Office (John Tice, telephone (757) 764-1086).

(b) *Asbestos Abatement.* It is the responsibility of the owner or operator of a demolition or renovation project, prior to the commencement of project activity, to thoroughly inspect the affected part of the facility for the presence of asbestos, including Category I and Category II non-friable asbestos-containing material (ACM). Upon classification as friable or non-friable, all waste ACM must be disposed of in accordance with the Virginia Solid Waste Management Regulations (9 VAC 20-80-640), and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 et seq.) The Air Force may contact the DEQ Waste Management Program (telephone (804) 698-4021) and the Department of Labor and Industry (Dr. Clarence Wheeling, telephone (804) 786-0574) for additional information.

(c) *Lead-Based Paint.* In carrying out the proposed project, the Air Force must comply with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) regulations, and with the Virginia Lead-Based Paint Activities Rules and Regulations (9 VAC 20-60-261). For additional information regarding these requirements, the Air Force may contact the Department of Professional and Occupational Regulation (Thomas Perry, telephone (804) 367-8595).

4. *Water Quality Regulation.* To determine applicability of either the Virginia Water Protection Permit or the VPDES Stormwater General Permit for Construction Activities, the Air Force should contact DEQ's Tidewater Regional Office (Harold Winer, telephone (757) 518-2153).

5. *Erosion and Sediment Control; Stormwater Management.* The Department of Conservation and Recreation's Chowan, Albemarle, and Coastal Watersheds Office (Jeff Hancock, telephone (757) 925-2468) should be contacted for guidance on Erosion and Sediment Control Plans and Stormwater Management Plans for this project (see "Environmental Impacts and Mitigation," items 5 and 8, above). As indicated above, land disturbance of 10,000 or more square feet requires an Erosion and Sediment Control Plan pursuant to the Virginia Erosion and Sediment Control Law (*Virginia Code* section 10.1-567); disturbance of 1 acre or more requires a Stormwater Management Plan pursuant to the Virginia Stormwater Management Law (*Virginia Code* section

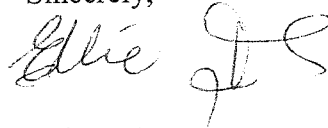
Cpt. Tiffany S. Warnke
Page 12

10.1-603.15). The Watersheds Office can also explain how to obtain copies of the *Handbooks* mentioned above ("Environmental Impacts and Mitigation," items 8(c) and 8(d)).

6. *Road System Impacts.* Any work affecting area roadways should be coordinated with the Department of Transportation's Williamsburg Residency (telephone (757) 925-2500).

Thank you for the opportunity to review this Draft EA. We look forward to reviewing the Final EA for this project.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ellie L. Irons".

Ellie L. Irons
Program Manager
Office of Environmental Impact Review

Enclosures

cc: Andrew K. Zadnik, DGIF
Keith R. Tignor, VDACS
John R. Davy, DCR
Allen R. Brockman, DEQ-Waste
Kotur S. Narasimhan, DEQ-Air
Ellen Gilinsky, DEQ-Water
Harold J. Winer, DEQ-TRO
A. C. Ray, VDOT
Marc E. Holma, DHR
Alice R. T. Baird, DCR-CBLA
John M. Carlock, Hampton Roads PDC
Brian Ballard, City of Hampton
Charles W. Burgess, Jr., City of Poquoson

Ellis, Charles

From: Andy Zadnik [ZadnikA@dgif.state.va.us]
Sent: Tuesday, August 24, 2004 2:59 PM
To: Ellis, Charles
Subject: 04-159F_Demolition of Building 633 at Langley

We have reviewed the subject project and offer the following comments.

We do not anticipate a significant adverse impact upon resources under our jurisdiction to occur as a result of this project.

Thank you for the opportunity to comment on this project.

Andrew K. Zadnik
Environmental Services Section Biologist
Department of Game and Inland Fisheries
4010 West Broad Street
Richmond, VA 23230

(804) 367-2733
(804) 367-2427 (fax)

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

- A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.
- B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.
- C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

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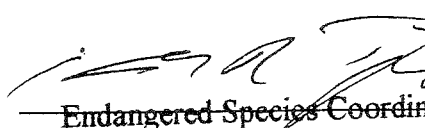
SEP 10 2004

DEQ-Office of Environmental
Impact Review


Charles H. Ellis III
Environmental Review Coordinator

COMMENTS

Statements in the project document concerning endangered species were reviewed and compared to available information. No additional comments are necessary in reference to endangered plant and insect species regarding this project.

(signed)  (Keith R. Tignor) September 7, 2004
Endangered Species Coordinator (date)
(title) VDACS, Office of Plant and Pest Service
(agency)

W. Tayloe Murphy, Jr.
Secretary of Natural
Resources



Joseph H. Maroon
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street
Richmond, Virginia 23219-2010
(804) 786-6124

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DEQ-Office of Environmental
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MEMORANDUM

Date: 10 September 2004

To: Charles H. Ellis, III, Virginia Department of Environmental Quality



From: John R. Davy, Director, Planning & Recreation Resources

Subject: DEQ#04-159F: Demolition of Building 633 at Langley Air Force Base, Hampton

The Department of Conservation and Recreation (DCR) functions to preserve and protect the environment of the Commonwealth of Virginia and advocate the wise use of its scenic, cultural, recreation and natural heritage resources. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, state unique or exemplary natural communities, significant geologic formations and similar features of scientific interest.

DCR has searched its Biotics data system for occurrences of natural heritage resources in the project area. Biotics documents the presence of natural heritage resources in the project vicinity. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Under the Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Department of Conservation and Recreation (DCR), DCR has the authority to report for VDACS on state-listed plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to BCD. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

Please note that the Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous

*State Parks • Soil and Water Conservation • Natural Heritage • Outdoor Recreation Planning
Chesapeake Bay Local Assistance • Dam Safety and Floodplain Management • Land Conservation*

fish waters that may contain information not documented in this letter. Their database may be accessed from http://www.dgif.virginia.gov/wildlife/info_map/index.html , or contact Shirli Dressler at (804) 367-6913.

In addition, be aware that federal agencies and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations (VSWML&R), and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313, Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, or other structures, soil/dredge spoil areas, or related land conversion activities that disturb 2,500 square feet or more would be regulated by VESCL&R and those that disturb one acre or greater would be covered by VSWML&R. Accordingly, the sponsoring federal agency should prepare and implement erosion and sediment control (ESC) and stormwater management (SWM) plans to ensure compliance with state law. The Department of Defense/U. S. Air Force is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and/or other mechanisms consistent with agency policy. The U. S. Air Force is highly encouraged to contact DCR's Chowan, Albemarle & Coastal Watershed Office (and/or the local ESC and SWM authorities to obtain plan development, implementation assistance and to ensure project conformance during and after active construction. *[Reference: VESCL §10.1-567; VSWML §10.1-603.15]*

Thank you for the opportunity to offer comments on this project.



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 10009, Richmond, Virginia 23240

Fax (804) 698-4500 TDD (804) 698-4021

www.deq.state.va.us

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

Robert G. Burnley
Director

(804) 698-4000
1-800-592-5482

MEMORANDUM

TO: Charles H. Ellis, III, Environmental Program Planner
FROM: *ARB* Allen Brockman, Waste Division Environmental Review Coordinator
DATE: September 7, 2004
COPIES: Sanjay Thirunagari, Waste Division Environmental Review Manager; Paul Herman, file
SUBJECT: Environmental Assessment
DOD/Air Force—Langley Air Force Base, Demolition of Building 633, DEQ
Project #04-159F

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SEP 07 2004

DEQ-Office of Environmental
Impact Review

The Waste Division has completed its review of the Environmental Impact report for the demolition of Building 633, Langley Air Force Base, Hampton, Virginia. We have the following comments concerning the waste issues associated with this project:

Both solid and hazardous waste issues were addressed adequately in the report. However, the report did not include a search of waste-related data bases. The Waste Division staff performed a cursory review of its data files and determined that the facility is under DEQ's Federal Facilities Installation Restoration Program (VA2800005033), a Formerly Used Defense Site (VA9799F1590), and a RCRA small quantity generator of hazardous waste (VAD988222527). The following websites may prove helpful in locating additional information for these identification numbers: http://www.epa.gov/echo/search_by_permit.html or http://www.epa.gov/enviro/html/rcris/rcris_query_java.html. Paul Herman of DEQ's Federal Facilities Program has been contacted for his review of this assessment and will reply in a separate memo, (if he identifies any additional issues).

Any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained

in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous materials, 49 CFR Parts 107.

Also, any structures that may be demolished/renovated/ removed should be checked for asbestos-containing materials (ACM) and lead-based paint prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed.

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Allen Brockman at (804) 698-4468.

MEMORANDUM

DEPARTMENT OF ENVIRONMENTAL QUALITY - WASTE DIVISION
Federal Facilities Restoration Program
629 E. Main Street P.O. Box 10009 Richmond, Virginia 23240

SUBJECT: Environmental Assessment – Langley Air Force Base Building 633 Demolition

TO: Allen Brockman

FROM: Paul E. Herman, P.E., FFR 

DATE: September 10, 2004

COPIES: File

The *Draft Environmental Assessment Demolition of Building 633 at Langley Air Force Base* dated August 2004 has been reviewed as requested by Allen Brockman, Waste Division Environmental Review Manager. The document presents the proposed demolition action and the no-action alternatives.

Langley Air Force Base (LAFB) is on the National Priorities List. The Building 633 property lies adjacent to the closed Environmental Restoration Program (ERP) Site OT-55 and atop the Base-wide Groundwater Site, OT-64. Site OT-55 is located directly east of Building 633 at the edge of the Back River. The Site includes underground petroleum contamination beneath a paved storage yard that covers approximately 2.5 acres. In 1992, an Interim Remedial Action was taken to remove 740 cubic yards of petroleum and PCB-contaminated soil. A “No Further Action” Record of Decision (ROD) was signed for this Site on December 2, 2002. Site OT-64 is currently being addressed on a site-by-site basis. No characterization or Interim Remedial Action has taken place with respect to groundwater beneath Building 633.

The Risk Assessment conducted for Site OT-55 did not consider surface soil to be a viable pathway to receptors because the ground surface at the site is covered with a mixture of gravel, concrete and asphalt. Removal or penetration of the paved storage area by demolition equipment or stockpiled debris may be viewed as providing a viable pathway that was otherwise not considered in the Risk Assessment for this site prior to ROD development. The Federal Facilities Restoration Program recommends the facility contact Mr. John Tice, LAFB Environmental Restoration at (757) 764-1086, for information concerning the CERCLA obligations at or near the site prior to initiating any land, sediment, or ground water disturbing activities.

**DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION**

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: Charles H. Ellis III

DEQ - OEIA PROJECT NUMBER: 04 - 159F

PROJECT TYPE: ☐ STATE EA / EIR / FONSI ☒ FEDERAL EA / EIS ☐ SCC

☐ CONSISTENCY DETERMINATION/CERTIFICATION

PROJECT TITLE: DEMOLITION OF BUILDING AT LANGLEY AIR FORCE BASE

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PROJECT SPONSOR: DOD / U. S. AIR FORCE

AUG 20 2004

PROJECT LOCATION: ☒ OZONE NON ATTAINMENT AREA

DEQ-Office of Environmental
Impact Review

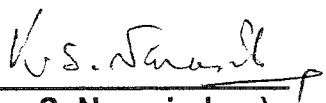
REGULATORY REQUIREMENTS MAY BE APPLICABLE TO: ☒ DEMOLITION
☐ OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E - STAGE I
2. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F - STAGE II Vapor Recovery
3. ☐ 9 VAC 5-40-5490 et seq. - Asphalt Paving operations
4. ☒ 9 VAC 5-40-5600 et seq. - Open Burning
5. ☒ 9 VAC 5-50-60 et seq. Fugitive Dust Emissions
6. ☐ 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to _____
7. ☐ 9 VAC 5-50-160 et seq. - Standards of Performance for Toxic Pollutants
8. ☐ 9 VAC 5-50-400 Subpart _____, Standards of Performance for New Stationary Sources, designates standards of performance for the _____
9. ☐ 9 VAC 5-80-10 et seq. of the regulations - Permits for Stationary Sources
10. ☐ 9 VAC 5-80-1700 et seq. Of the regulations - Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
11. ☐ 9 VAC 5-80-2000 et seq. of the regulations - New and modified sources located in non-attainment areas
12. ☐ 9 VAC 5-80-800 et seq. Of the regulations - Operating Permits and exemptions. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:

Being in an ozone non-attainment area, all precautions are to be taken to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NOx).


(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: August 20, 2004

RECEIVED

SEP 09 2004

MEMORANDUM

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WATER QUALITY
Ellen Gilinsky, Ph.D., Director

DEQ-Office of Environmental
Impact Review

TO: Charles H. Ellis, III
Office of Environmental Impact Review

FROM: Michelle Henicheck *MH*
Office of Wetlands and Water Protection and Compliance

DATE: September 7, 2004

SUBJECT: Environmental Assessment (EA)
Demolition of Building 633 at Langley Air Force Base (AFB)
04-159F

We have reviewed the information provided concerning the above-referenced project. The purpose of the project is to demolish Building 633 and construct a 135 space parking lot at Langley AFB.

According to the report, (Section 3, page 7) approximately 462 acres of wetlands are located on the property. However, the report states that no wetlands are located adjacent to Building 633. The report concludes, and we concur, that this project will not adversely affect surface water, wetland, or groundwater resources.

According to the report (Section 3, Page 12), the Air Combat Command (ACC) policy requires that any proposed project on or near Langley AFB Environmental Restoration Program (ERP) sites be coordinated through the Langley ERP manager. Based on potential ground water contamination ERP sites near Building 633, DEQ concurs with the above referenced policy.

Should the size or scope of the project change, additional review may be necessary. We recommend strict adherence to erosion and stormwater management practices, and further encourage the project proponent to monitor construction activities to make certain that erosion and stormwater management practices are adequately preventing sediment and pollutant migration into surface waters, including wetlands. A VPDES stormwater general permit for construction activities will be required should the project disturb one or more acres of land.

Ellis, Charles

From: Winer, Harold
Sent: Tuesday, September 07, 2004 2:17 PM
To: Ellis, Charles

Regarding Waste issues, all wastes generated during demolition must be properly characterized to determine if it is a hazardous waste. All solid and hazardous wastes generated must be disposed at appropriate, permitted facilities.

Hazardous wastes generated during demolition must be managed under hazardous waste ID# and tracked as part of the hazardous waste program. "So and so" is the generator of the hazardous waste, not the contractor, and is fully responsible for the proper management of the material. Liability for the proper management of the hazardous wastes generated by this project cannot be passed on to the contractor.

Harold J. Winer
Deputy Regional Director
DEQ, Tidewater Regional Office
Phone - 757-518-2153 Fax - 757-518-2003
email - hjwiner@deq.virginia.gov



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION
1401 EAST BROAD STREET
RICHMOND, 23219-2000

PHILIP A. SHUCET
COMMISSIONER

September 14, 2004

EARL T. ROBB
STATE ENVIRONMENTAL ADMINISTRATOR

Ms. Anne B. Newsom
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main St., Sixth Floor
Richmond VA 23219

Re: **#04-159F, Demolition of Building 633, Langley Air Force Base, Hampton, VA**

Dear Ms. Newsom:

Mr. Eric Stringfield, of Virginia Department of Transportation's Transportation Planning Division has reviewed the information provided for the referenced project. Our review covers impacts to existing and proposed transportation facilities.

This access change should note coordination with VDOT. The improvement should not adversely impact the existing or future transportation system, however, careful consideration and coordination with the Williamsburg Residency (757-925-2500) is required to insure that all current VDOT standards are met.

Thank you for the opportunity to comment on this project.

Sincerely,

A. C. Ray
Environmental Specialist II
VDOT
1401 East Broad St.
Richmond, VA 23219
804-371-6823 - O
804-786-7401 - FAX



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DEQ-Office of Environmental
Impact Review

COMMONWEALTH of VIRGINIA

Department of Historic Resources

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.state.va.us

September 2, 2004

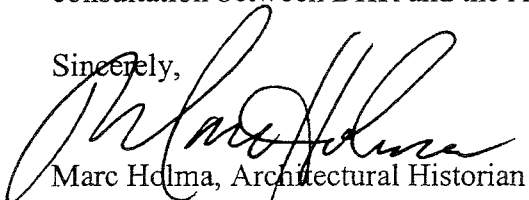
Mr. Charles H. Ellis III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

Re: Demolition of Building 633 at Langley Air Force Base
Project no. 04-159F
DHR file no. 2002-1442

Dear Mr. Ellis,

Thank you for providing the Department of Historic Resources with an opportunity to comment on the above referenced project. The Air Force is currently consulting with DHR about the demolition of Building 633 at Langley Air Force Base pursuant to Section 106 of the National Historic Preservation Act. This project will result in an adverse effect and a draft MOA has been submitted to our office. We anticipate continued consultation between DHR and the Air Force until the Section 106 process is complete.

Sincerely,


Marc Holma, Architectural Historian
Office of Review and Compliance

Administrative Services
10 Courthouse Avenue
Petersburg, VA 23803
Tel: (804) 863-1624
Fax: (804) 862-6196

Capital Region Office
2801 Kensington Ave.
Richmond, VA 23221
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Portsmouth, VA 23704
Tel: (757) 396-6707
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Roanoke Region Office
1030 Penmar Ave., SE
Roanoke, VA 24013
Tel: (540) 857-7585
Fax: (540) 857-7588

Winchester Region Office
107 N. Kent Street, Suite 203
Winchester, VA 22601
Tel: (540) 722-3427
Fax: (540) 722-7535

W. Tayloe Murphy, Jr.
Secretary of Natural
Resources



Joseph H. Maroon
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

101 N. 14th Street, 17th Floor
Richmond, Virginia 23219-3684
PHONE: (804) 225-3440 FAX: (804) 225-3447

September 8, 2004

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DEQ-Office of Environmental
Impact Review

Mr. Charles H. Ellis III
Department of Environmental Quality
Office of Environmental Impact Review
629 east Main Street, Sixth Floor
Richmond, VA 23219

RE: Demolition of Building 633 at Langley Air Force Base
DEQ Project # 04-159F
DCBLA Project # FSPR-USAF-04-04, Building 633 Demolition at Langley AFB

Dear Mr. Ellis,

We have reviewed the Environmental Assessment for the proposed Demolition of Building 633 at Langley Air Force Base and have the following comments:

The Environmental Assessment states that the redevelopment of the proposed site is "outside of the areas managed by the Chesapeake Bay Preservation Act." While this may be technically true in that Chesapeake Bay Preservation Areas are not locally designated on federal lands, this does not relieve the Air Force of its responsibilities to be consistent with the provisions of the Chesapeake Bay Preservation Area Designation and Management Regulations (Regulations), as one of the enforceable programs on Virginia's Coastal Resources Management Program (VCRMP). Federal actions on installations located within Tidewater Virginia are required to be consistent with the performance criteria of the Regulations on lands analogous to locally designated Chesapeake Bay Preservation Areas.

The Chesapeake Bay Preservation Act, as locally implemented through Section 17.3-60 (Chesapeake Bay Preservation District) of the City of Hampton's zoning ordinance and Section 33.1-9 of the City of Hampton's stormwater management ordinance, strictly controls land disturbance in tidal wetlands, non-tidal wetlands connected by surface flow and contiguous to tidal wetlands or perennial water bodies, tidal shores and within a 100-foot vegetated buffer area located adjacent to and landward of the aforementioned features and along both sides of any waterbody with perennial flow. Less stringent performance criteria apply to land that is contiguous to the 100-foot buffer for a distance

of 100 feet in the landward direction. The area of the proposed activity appears to be at least partially within areas analogous to those areas requiring the less stringent performance criteria.

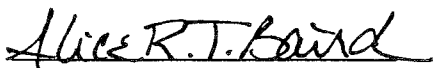
In order to comply with Hampton's Stormwater management performance standards (Sec. 33.1.9 of its Stormwater Management Ordinance), the project should minimize impervious cover, minimize land disturbance, and control stormwater quality consistent with the water quality provisions (4 VAC 3-20-71 et seq.) of the Virginia Stormwater Management Regulations (4 VAC 3-20). Since the project is redevelopment, the nonpoint source pollution load shall be reduced by at least 10%. The performance-based water quality calculation procedures in Appendix 5D of the *Virginia Stormwater Management Handbook* should be followed to determine the adequacy of the existing BMP for this project.

In addition, since the project exceeds 2,500 square feet of land disturbance, an erosion and sediment control plan is required prior to land disturbance in accordance with the *Virginia Erosion and Sediment Control Handbook*, Third Edition, 1992.

The 1998 Federal Agencies' Chesapeake Ecosystem Unified Plan requires the signatories, including the US Air Force, to fully cooperate with local and state governments in carrying out voluntary and mandatory actions to comply with the management of stormwater. The agencies also committed to encouraging construction design that a) minimizes natural area loss on new and rehabilitated federal facilities; b) adopts low impact development and best management technologies for storm water, sediment and erosion control, and reduces impervious surfaces; and c) considers the Conservation Landscaping and Bay-Scapes Guide for Federal Land Managers. In addition, the Chesapeake 2000 Agreement committed the government agencies to a number of sound land use and stormwater quality controls. The signatories additionally committed the agencies to lead by example with respect to controlling nutrient, sediment and chemical contaminant runoff from government properties. In December 2001, the Executive Council of the Chesapeake Bay Program issued Directive No. 01-1, Managing Storm Water on State, Federal and District-owned Lands and Facilities, which includes specific commitments for agencies to lead by example with respect to stormwater control.

We appreciate the opportunity to provide our comments on this project. Please do not hesitate to contact us at 1-800-CHESBAY should you have any questions.

Sincerely,



Alice R. T. Baird, LA
Senior Environmental Planner



Brad Belo
Senior Environmental Planner

C: John Davy



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SEP 01 2004

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Mr. Charles H. Ellis, III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, Virginia 23219

Re: Demolition of Building 633 at Langley
Air Force Base DEQ #04-130F
(ENV:GEN)

Dear Mr. Ellis:

Pursuant to your request of August 18, 2004, the staff of the Hampton Roads Planning District Commission has reviewed the Environmental Assessment for the demolition of building 633 at Langley Air Force Base. We have contacted the City of Hampton concerning the project.

Based on this review, the proposal is consistent with local and regional plans and policies.

We appreciate the opportunity to review this project. If you have any questions, please do not hesitate to call.

Sincerely,


Arthur L. Collins
Executive Director/Secretary

HRV:fh

Copy: Mr. Brian Ballard, HA

Ellis,Charles

From: Ballard, Brian [bballard@hampton.gov]
Sent: Monday, September 13, 2004 3:11 PM
To: Ellis,Charles
Subject: RE: Comments on Air Force EA, Demolition of Bldg. 633 at Langley AFB (DEQ-04-159F)

Hi Charlie-

The City of Hampton has no comments - I believe that the HRPDC noted this in the letter that they sent to your office.

Thanks for the follow up-

Brian

Brian Ballard

City Planner

Hampton Planning Department

Land Development Services Office

22 Lincoln Street

Hampton, VA 23669

P: 757.727.6077

F: 757.727.6364

From: Ellis,Charles [mailto:chellis@deq.virginia.gov]
Sent: Tuesday, September 07, 2004 2:40 PM
To: ktignor@vdacs.state.va.us; swaymack@dcv.virginia.gov; jdavy@dcv.virginia.gov; Brockman,Allen; Henicheck,Michelle; eeaton@dhv.virginia.gov; bballard@hampton.gov; cburgess@ci.poquoson.va.us
Subject: Comments on Air Force EA, Demolition of Bldg. 633 at Langley AFB (DEQ-04-159F)

**PROGRAMMATIC AGREEMENT
BETWEEN
LANGLEY AIR FORCE BASE,
THE VIRGINIA DEPARTMENT OF HISTORIC RESOURCES
AND THE VIRGINIA COUNCIL ON INDIANS
REGARDING TREATMENT OF FACILITY 633,
DEMOLITION OF FACILITY 615, AND THE MARINA REHABILITATION**

WHEREAS, Langley Air Force Base (Langley AFB) proposes to carry out a program that will involve determination of the appropriate treatment for Facility 633, the demolition of Facility 615, and upgrading of Marina facilities (Project) at Langley Air Force Base in the City of Hampton, Virginia, and

WHEREAS, the Project at Langley AFB includes the potential demolition of Facility 633 and replacement with a parking lot or reuse of the building as described below, the demolition of Facility 615, the old marina restaurant, and improvements in the marina area, to include the renovations and adaptive reuse of contributing structures Facility 607 and 617, the construction of new dry slips, wet slips, a floating pier, a boat launching ramp, a refueling area, a sewage pumping facility, a fish cleaning area, a new marina restaurant facility, fenced parking for boats and personal vehicles, and shoreline restoration, and

WHEREAS, Langley AFB in consultation with the Virginia Department of Historic Resources (SHPO) has established the Program's Area of Potential Effect (APE) as defined at 36 CFR Part 800.16(d), to be the Langley Field Historic District (Historic District), which is eligible for listing in the National Register of Historic Places (National Register), and is depicted on the map included at Appendix A of this Programmatic Agreement (Agreement), and

WHEREAS, Langley AFB has determined the Program may have an adverse effect on the Historic District, and specifically on Facility 633, a former seaplane hangar that is currently vacant, and on Facility 615, the old marina restaurant, both facilities are contributing properties in the Historic District, and

WHEREAS, as part of the Program, Langley AFB is considering alternative treatments for Facility 633, and a recently completed study is being provided for SHPO review that provides recommendations for alternative treatments ("alternatives analysis") currently under consideration, and

WHEREAS, Facility 615 was extensively damaged by Hurricane Isabel and demolition is proposed for health, safety and welfare reasons, and

WHEREAS, Langley AFB has recently conducted an Identification (Phase I) archaeological survey of Langley Air Force Base, and

WHEREAS, Langley AFB has consulted with the SHPO and with the Virginia Council on Indians, in accordance with Section 106 of the National Historic Preservation Act, 16 U.S.C. § (NHPA) and its implementing regulations (36 CFR Part 800.6(b)(2)) to address the adverse effect resulting from actions carried out as part of the Program, and

WHEREAS, Langley AFB has provided notification to the Advisory Council on Historic Preservation (Council), pursuant to 36 C.F.R. 800.6(a)(1), and they have declined to participate, and has invited two local organizations to participate in the consultation, to include the Hampton History Museum, and the Hampton Historical Society, and these parties have not responded within 30 days, and it is therefore assumed that they do not wish to participate, and

WHEREAS, Langley AFB intends to use the provisions of this Agreement, and the completion of an Environmental Assessment of the Project, to address applicable requirements of Sections 110(a)(1) and 110(b) of the NHPA, Section 106 of the NHPA, and 32 CFR 989 of the National Environmental Policy Act (NEPA);

NOW, THEREFORE, Langley AFB and the SHPO agree that upon Langley AFB's decision to proceed with the Program, Langley AFB shall ensure the following stipulations are implemented in order to take into account the effect of the Program on historic properties, and these stipulations shall govern the Program and all of its parts until this Agreement expires or is terminated.

Stipulations

Langley AFB shall ensure that the following stipulations are implemented.

I. Treatment of Alternatives for Facility 633:

A. Langley AFB shall provide the SHPO a copy of the alternatives analysis for Facility 633 for review and comment with submittal of this PA. Langley AFB shall consult with the SHPO concerning the recommendations proposed in the alternatives analysis for Facility 633, and shall consider the SHPO's comments on the alternatives analysis in making a decision concerning the selected treatment for Facility 633.

B. Langley AFB will choose one of the following options when considering its course of action regarding the treatment of Facility 633:

1. Langley AFB may rehabilitate Facility 633 for use as an indoor parking or storage area. Parking would be used for both Privately Owned Vehicles (POV) or boats. If rehabilitation is chosen, Langley AFB shall implement the following actions:
 - a. All rehabilitation will be undertaken in a manner sensitive to the building's historic fabric, using historic photographs of the facility as a guide, and shall

follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

- b. The chosen rehabilitation proposal will be provided to the SHPO for review and approval.
2. Should Langley AFB determine the rehabilitation of Facility 633 cannot be completed in an economically feasible manner that meets Air Force mission requirements, Facility 633 shall be demolished and replaced with a parking lot as part of the proposed marina expansion and rehabilitation. Langley AFB shall afford the SHPO an opportunity to review and comment on plans for site development and installation of the parking lot, and shall take the SHPO's comments into account as discussed in item IIIB below.

C. Should Langley AFB, on the basis of the alternative analysis report, make the decision to demolish Facility 633, Langley AFB shall implement the mitigation described in item III, below, as agreed to by both Langley AFB and the SHPO.

II. Demolition of Facility 615

- A. Langley AFB shall follow the requirements as listed below in item III prior to the demolition of Facility 615.
- B. Langley AFB shall provide a copy of the project design for the Marina Rehabilitation Project to the SHPO for review and approval. The project will include the construction of new dry slips, wet slips, a floating pier, a boat launching ramp, a refueling area, a sewage pumping facility, a fish cleaning area, a new marina restaurant facility, fenced parking for boats and Privately Owned Vehicles, and shoreline restoration.

III. Recordation and Other Mitigation

A. Recordation

1. Prior to any demolition, Langley AFB shall document Facility 615 and Facility 633, if demolition is proposed, through preparation of the following materials:
 - Site Plan drawings of the facilities.
 - 5" x 7" medium format black and white photos of the buildings' exteriors and interiors printed on black and white photographic paper, and showing overall views to include exterior elevations and detail views of significant exterior and interior features of the structures.
 - Concise description and statements of significance for the buildings, placing the buildings within the context of the draft National Register nomination for the Historic District
 - Completion of the SHPO's Intensive Level Survey Field Form and accompanying documentation materials, according to current SHPO

standards, and data entry of the survey information into the SHPO's Data Sharing System (DSS) program.

All documentation materials shall comply with the Historic American Building Survey/Historic American Engineering Records (HABS/HAER) standards.

2. Langley AFB shall provide these draft documentation materials to the SHPO for review and approval prior to demolition.
3. Langley AFB shall provide two sets of recordation materials for this facility to the SHPO for permanent storage and one set to the Office of the Command Historian, HQ Air Combat Command. Langley AFB shall further offer a copy of said documentation to the City of Hampton Public Library in an effort to make these recordation materials more readily accessible to the public. The documentation materials shall further be provided to the Library of Congress or any other appropriate agency determined by the Secretary of the Interior.

B. Other Mitigation

1. Langley AFB, in consultation with the SHPO, agrees to rehabilitate Facility 607, an old Radio Building, and Facility 617, an old Quartermaster Maintenance Building, both contributing buildings in the historic district that are located adjacent to Facility 615 in the Marina Rehabilitation Project area. Langley AFB shall return these two facilities to the condition depicted in historic photographs, following *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, contingent on funding.
2. Langley AFB has provided plans for the rehabilitation of Facility 617 and shall provide plans for the rehabilitation of Facility 607 to the SHPO for review and approval of the project designs prior to beginning construction.
3. Langley AFB shall further mitigate the demolitions by highlighting historic buildings and structures in its annual Historic Preservation Week. Langley AFB shall provide a copy of the plans for Preservation Week to the SHPO to document this has been done.

IV. Rehabilitation of the Marina

Prior to any demolition or ground disturbance in the area of the marina, Langley AFB shall provide two copies of the draft report the Identification (Phase I) Archaeological Survey (Survey) of Langley Air Force Base to the SHPO for review and comment. All comments made within the thirty-day review period shall be addressed in the final report.

The proposed marina rehabilitation shall include the construction of new dry slips, wet slips, a floating pier, a boat launching ramp, a refueling area, a sewage pumping facility, a fish cleaning area, a new marina restaurant facility, fenced parking for boats and POVs, and shoreline

restoration Once plans are available, Langley AFB shall provide a copy to the SHPO for review and comment.

If Langley AFB determines in consultation with the SHPO that further archaeological investigations are needed in connection with the marina, Langley AFB shall prepare and implement a program to identify and evaluate archeological sites within the project area. The area to be investigated shall be determined by Langley AFB in consultation with the SHPO. The program shall be of sufficient intensity to provide an evaluation of eligibility for the National Register of Historic Places by Langley AFB in consultation with the SHPO following the regulations outlined in 36 CFR 800.4 (c).

If as a result of the testing program, Langley AFB determines an eligible archeological site will be affected, the base shall submit a plan for avoidance, protection, or recovery of data to the SHPO for review and comment prior to implementation.

All data recovery plans prepared under the terms of this agreement, if any, shall include the following elements:

- Information on the archaeological property or properties where data recovery is to be carried out, and the context in which such properties are eligible for the National Register;
- Information on any property, properties, or portions of properties that will be destroyed without data recovery;
- Discussion of the research questions to be addressed through the data recovery, with an explanation/justification of their relevance and importance;
- Description of the recovery methods to be used, with an explanation of their pertinence to the research questions;
- Information on arrangements for any regular progress reports or meetings to keep Langley AFB and the SHPO up to date on the course of the work. The plan should contain the expected timetable for excavation, analysis and preparation of the final report. Langley AFB shall notify the SHPO in writing once the fieldwork portion of the data recovery program is complete so a site visit may be scheduled, if the SHPO finds it appropriate. The proposed construction may proceed following this notification while the technical report is in preparation.
- Description of the proposed disposition of recovered materials and records.
- Proposed methods for disseminating results of the work to the interested public (e.g. slide packet for use in the local schools, an exhibit in the local libraries during Virginia Archaeology Month, etc.); and

- Proposed methods by which the Virginia Council on Indians (VCI) and (any relevant Indian tribe/s), and other specific groups/interested parties will be kept informed of the work, and if human remains or grave goods are expected to be encountered, a plan developed in consultation with the VCI (and any relevant tribe/s) regarding final disposition of the human remains and any funerary objects.

All archeological work, including data recovery plan(s), shall be consistent with the Secretary of the Interior's *Standards and Guidelines for Archeological Documentation* (48 FR 44734-37), The Advisory Council Handbook, *Recommended Approach for Consultation on Recovery of Significant Information from Archeological Sites*, June 17, 1999, the DoD Legacy Management Program Office Project No. 98-1714, *Guidelines for the Field Collection of Archeological Materials and Standard Operating Procedures for Curating Department of Defense Archeological Collections*, 1999, and the Virginia SHPO's *Guidelines for Conducting Cultural Resource Survey in Virginia: Additional Guidance for the Implementation of the Federal Standards Entitled Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines* (48 FR 44742, September 29, 1983) (1999, rev. 2000) and take into account the Council's publication, *Consulting About Archeology Under Section 106* (1990).

All archeological work will be conducted under the direct supervision of a qualified archeologist who meets, at a minimum, the qualifications set forth in the Secretary of Interior's *Professional Qualifications Standards* (48 FR 44738-9).

All archeological materials and appropriate field and research notes, maps, drawing and photographic records collected as part of this project (with the exception of human skeletal remains) will be cared for in a repository in accordance with the requirements in 36 CFR Part 79, *Curation of Federally Owned and Administered Archeological Collections*.

All technical reports prepared pursuant to this agreement will be consistent with the federal standards entitled *Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines* (48 FR 44716-44742, September 29, 1983) and SHPO guidelines.

A. Professional Qualifications

1. All archeological work will be conducted by or under the direct supervision of a qualified archeologist who meets, at a minimum, the qualifications set forth in the Secretary of the Interior's *Professional Qualifications Standards* (48 FR 44738-9).
2. Work concerning historic structures and districts will be carried out by or under the supervision of a qualified architectural historian(s) who meets, at a minimum the qualifications set forth in the Secretary of the Interior's *Professional Qualifications Standards* (48 FR 44738-9).

B. Review of Documentation.

1. The SHPO agrees to review all documentation submitted within thirty (30) days. If the SHPO does not provide comments within the thirty (30) days of confirmed receipt, Langley AFB may assume SHPO approval of the documentation.

V. Unexpected Discoveries

Langley AFB shall ensure all relevant construction documents contain the following provisions:

A. In the event a previously unidentified archaeological resource is discovered during ground disturbing activities, all construction work involving subsurface disturbance will be halted in the area of the resource and in the surrounding area where further subsurface remains can reasonably be expected to occur. The Contractor shall immediately notify Langley AFB, who shall notify the SHPO within 48 hours of discovery. Langley AFB and the SHPO, or an archeologist meeting *The Secretary of Interior's Qualifications Standards*, will inspect the work site and determine the nature and area of the affected archeological resource and assess whether further investigations are warranted. Work may then continue in the project area outside the site area.

B. Langley AFB will consult with the SHPO to determine the National Register eligibility of the previously unidentified resource. The SHPO will respond within two business days of receipt of the documentation. The documentation may be submitted electronically. Potentially eligible historic properties will be evaluated using the National Register criteria in accordance with 36 CFR 800.4(c). If it is determined the resource meets the National Register Criteria (36 CFR Part 60.4), Langley AFB shall ensure compliance with Section 800.13 of the Council's Regulations. The SHPO shall provide comments on any treatment plan submitted within two business days of receipt. Langley AFB shall take into account the SHPO's recommendations regarding National Register eligibility and proposed actions, and then carry out appropriate actions. Langley AFB shall provide the SHPO a report of these actions once they are completed. If the SHPO fails to comment, Langley AFB may assume concurrence and implement the plan. Work in the affected area shall not proceed until both the development and implementation of an appropriate treatment plan; or the determination is made that the located resource is not eligible for inclusion on the National Register.

C. Human Remains

1. Human remains and associated funerary objects encountered during the course of actions taken as a result of this Agreement shall be treated in the manner consistent with the provisions of the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001) and the *Virginia Antiquities Act*, Section 10.1-2305 of the *Code of Virginia*, and with the final regulations adopted by the Virginia Board of Historic Resources and published in the Virginia Register of July 15, 1991. Copies of the above-listed law and regulations are included as Appendix 3.

2. In the event human remains encountered are likely to be of Native American origin, whether prehistoric or historic, Langley AFB will immediately notify the Virginia Council on Indians (VCI) and (appropriate Tribe/s). The treatment of Native American human remains and associated funerary objects will be determined in consultation with the VCI and the (appropriate Tribe/s). All reasonable efforts will be made to avoid disturbing Native American gravesites and associated artifacts. To the extent possible, the City will ensure the general public is excluded from viewing any Native American gravesites and associated artifacts. No photographs of any Native American gravesites and/or associated funerary objects will be released to the press or the general public.

3. Langley AFB may obtain a permit from the SHPO for the removal of human remains in accordance with the regulations stated above. In reviewing a permit involving removal of Native American human remains, the SHPO will notify and consult with the VCI and the (appropriate Tribe/s) as required by the regulations stated above.

VI. Dispute Resolution

A. Should any party to this Agreement object in writing to Langley AFB regarding any action carried out or proposed with respect to the undertaking or implementation of this Agreement, Langley AFB shall consult with the objecting party to resolve the objection. If after initiating such consultation Langley AFB determines the objection cannot be resolved through consultation, Langley AFB shall forward all documentation relevant to the objection to the Council, including Langley AFB 's proposed response to the objection. Within thirty days after receipt of all pertinent documentation, the Council shall exercise one of the following options:

1. Advise Langley AFB the Council concurs in Langley AFB's proposed response to the objection, whereupon the agency will respond to the objection accordingly;
2. Provide Langley AFB with recommendations, which Langley AFB shall take into account in reaching a final decision regarding its response to the objection; or
3. Notify Langley AFB the objection will be referred for comment pursuant to 36 CFR 800.7(a)(4), and proceed to refer the objection and comment. Langley AFB shall take the resulting comment into account in accordance with 36 CFR 800.7(c)(4) and Section 110(l) of the NHPA.

B. Should the Council not exercise one of the above options within thirty days after receipt of all pertinent documentation, Langley AFB may assume the Council's concurrence in its proposed response to the objection.

C. Langley AFB shall take into account any Council recommendation or comment provided in accordance with this stipulation with reference only to the subject of the

objection; Langley AFB's responsibility to carry out all actions under this Agreement that are not the subjects of the objection shall remain unchanged.

D. At any time during implementation of the measures stipulated in this Agreement, should an objection pertaining to this Agreement or the effect of any individual undertaking on historic properties be raised by a member of the public, Langley AFB shall notify the parties to this Agreement and take the objection into account, consulting with the objector and, should the objector so request, with any of the parties to this Agreement to resolve the objection.

VII. Amendments and Termination

A. Any party to this Agreement may request that it be amended, whereupon the parties shall consult in accordance with 36 CFR 800.6 to consider such an amendment.

B. If Langley AFB determines it cannot implement the terms of this Agreement, or if the SHPO or the Council determines the Agreement is not being properly implemented, Langley AFB, the SHPO or the Council may propose to the other parties that it be terminated.

C. Termination shall include the submission of any outstanding documentation on any work done up to and including the date of termination.

D. A party proposing to terminate this Agreement shall so notify all parties to the Agreement, explaining the reasons for termination and affording them at least thirty days to consult and seek alternatives to termination. The parties shall then consult.

E. Should such consultation fail and the Agreement be terminated, Langley AFB shall comply with 36 CFR 800.3 through 800.6 with regard to individual actions covered by this Agreement

VIII. Duration of the Agreement

This Agreement will continue in full force and effect until five years after the date of the last signature. At any time in the sixth-month period prior to such date, Langley AFB may request the SHPO to consider an extension or modification of this Agreement. No extension or modification will be effective unless all parties to the Agreement have agreed with it in writing.

IX. Execution

Execution of this Agreement by Langley AFB and the SHPO, and its submission to the Advisory Council on Historic Preservation (Council) in accordance with 36 CFR 800.6(b)(1)(iv), shall, pursuant to 36 CFR 800.6(c), be considered to be an agreement with the Council for the purposes of Section 110(l) of NHPA. Execution and submission of this Agreement, and implementation of its terms, shall serve as evidence that Langley AFB has afforded the Council

an opportunity to comment on the Program and its effects on historic properties, and Langley AFB has taken into account the effects of the Program on historic properties.

LANGLEY AIR FORCE BASE

By: Frank GorencDate: 19 Oct 2004

FRANK GORENC, Colonel, USAF
Commander, 1st Fighter Wing

VIRGINIA DEPARTMENT OF HISTORIC RESOURCES

By: Kathleen S. KilpatrickDate: 1 Aug 04

KATHLEEN S. KILPATRICK
Director and State Historic Preservation Officer

VIRGINIA COUNCIL ON INDIANS

By: Deanna BeachamDate: 13 Dec 04

DEANNA BEACHAM
Program Specialist