



Draft

Supplemental Environmental Assessment

Addressing Infrastructure
Improvements at Marine Corps
Reserve Center
Brooklyn, New York

August

2020



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UNITED STATES MARINE CORPS

MARINE FORCES RESERVE
2000 OPELOUSAS AVENUE
NEW ORLEANS, LOUISIANA 70114

XX Month 2020

MEMORANDUM FOR THE RECORD

Subj: DRAFT FINDING OF NO SIGNIFICANT IMPACT (FONSI) FOR
INFRASTRUCTURE IMPROVEMENTS AT MARINE CORPS RESERVE CENTER
(MCRC) BROOKLYN, NEW YORK

Ref: (a) MCO P5090.2 "Environmental Compliance and Protection"

1. Introduction. Pursuant to Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations [CFR] §§ 1500-1508) implementing the National Environmental Policy Act (NEPA), and U.S. Marine Corps (USMC) Environmental Compliance and Protection Manual (Marine Corps Order 5090.2 dated June 11, 2018), the Department of the Navy (Navy) gives notice that a Supplemental Environmental Assessment (SEA) has been prepared and an Environmental Impact Statement (EIS) is not required for infrastructure improvements at MCRC Brooklyn, New York.

2. Proposed Action. The SEA evaluates the potential environmental impacts associated with additional infrastructure improvements at MCRC Brooklyn supplemental to modernization and infrastructure improvements analyzed in a previous 2016 EA for the installation. The Proposed Action in the SEA would supplement ongoing infrastructure improvements at MCRC Brooklyn with the construction of an additional privately owned vehicle parking lot, construction of a new west gate, replacement of the east and north gates, installation of a new fire suppression facility, installation of fiber optic communication service to the MCRC, upgrade of property boundary fencing, and stormwater drainage improvements. The SEA analyzes the potential for significant environmental impacts associated with the Proposed Action and alternatives, including the No Action Alternative.

3. Purpose and Need. The purpose of the Proposed Action is to further optimize installation management and reservist training through the improvement of MARFORRES infrastructure at MCRC Brooklyn. The Proposed Action is needed to improve long-term sustainable unit readiness through coordinated training and to prepare for future mission requirements. To complete training requirements, the facilities, utilities, and assets on MCRC Brooklyn require ongoing maintenance and utilities upgrades. Infrastructure on the installation is aging and requires capital

investment to address deficiencies in the buildings and meet current and future mission requirements.

Upon relocation of staff and equipment from MCRC Garden City and AFRC Farmingdale to MCRC Brooklyn starting in 2017, the need for additional infrastructure improvements was required to further support this realignment identified the 2016 MCRC Brooklyn EA and improve the ability of the installation to meet mission requirements.

4. No Action Alternative. Under the No Action Alternative, operations at MCRC Brooklyn would continue without the additional infrastructure projects to support MARFORRES mission activities. Reservists would continue to use existing parking available to them on and off the installation during drill weekends. Training activities at MCRC Brooklyn would continue to be inefficient because of delays getting onto the installation. Inadequate fiber optic capacity, excessive traffic queuing during drill weekends and inadequate parking availability, and insufficient stormwater drainage capacity and repairs would result in long-term, minor to moderate, adverse impacts on communications, transportation, and stormwater, respectively.

5. Environmental Effects of the Proposed Action. The following environmental resources, which could be impacted by the Proposed Action, were analyzed in the SEA: land use, coastal zone management, infrastructure, noise, air quality, geological resources, water resources, biological resources, cultural resources, and cumulative impacts.

For each resource area analyzed, the environmental impacts of the Proposed Action are summarized as follows:

6. Land Use and Recreation. Short-term, negligible to minor, direct, adverse impacts on land use and recreation would be expected from construction activities. Safety measures put in place to limit access to certain locations at MCRC Brooklyn or cause different traffic routes to be taken on the installation to avoid construction sites could temporarily impact land use and recreation. Long-term, minor, beneficial impacts on recreation would be expected as a result of improved access to Floyd Bennett Field during drill weekends and improved traffic flow along Aviation Road during daily operations at MCRC Brooklyn.

7. Coastal Zone Management. Construction activities and an increase in impervious surfaces could result in short- and long-term, negligible, adverse impacts on coastal resources. The net

change in impervious surfaces is relatively small. Infiltration basins would be included as part of the POV lot and east gate projects and an approved Stormwater Pollution Prevention Plan and Erosion and Sediment Control Plan would be developed before starting any construction and infrastructure improvements to minimize impacts on state coastal resources.

8. Infrastructure. Short- and long-term, negligible to minor, adverse and long-term, moderate, beneficial impacts on infrastructure would be expected. Temporary service disruptions would occur during construction and repair activities. The new fire suppression facility could place a higher demand on the water supply. Increased stormwater runoff would be expected from construction activities and the addition of impervious surfaces. Stormwater improvements would reduce stormwater runoff in the long-term. Installation of the fiber optic line would result in improved communications connectivity and capacity. Solid waste generation would occur as a result of construction and repair activities.

Short-term, negligible, direct, adverse impacts on transportation and NPS property would occur as a result of accessibility limitations during construction activities and gate upgrades. Long-term, moderate, beneficial impacts on transportation would occur as a result of the addition of the west gate and improvements of the east and north gates and additional parking with the construction of the new POV lot.

9. Noise. Short-term, negligible to minor, adverse impacts on the ambient noise environment and National Park Service ranger housing would be expected as a result of construction and traffic-related noise.

10. Air Quality. Short-term, minor, adverse impacts on air quality would be expected as a result of emissions from construction and repair activities.

11. Geological Resources. Short- and long-term, negligible, adverse impacts could occur as a result of ground disturbance, soil erosion and compaction, and topographic changes from construction and repair activities and the addition of impervious surfaces.

12. Water Resources. Long-term, negligible, adverse impacts on groundwater and surface water would be expected as a result of decreased infiltration and increased stormwater runoff from the addition of impervious surfaces. Long-term, moderate, adverse

impacts on floodplains would occur as a result of construction of the POV lot within the 100-year floodplain.

13. Biological Resources. Short- and long-term, negligible to moderate, direct and indirect, adverse impacts would be expected as a result of temporary and permanent loss of natural vegetation communities and associated wildlife habitat from construction activities and the permanent conversion to impervious surfaces and the addition of POV lot lighting. Although unlikely, if any special status species were discovered within the project area, it would be protected from disturbance to the greatest extent practicable and the appropriate agency would be notified upon discovery to determine the further appropriate course of action.

14. Cultural Resources. Impacts on cultural resources would range from no impacts to long-term, minor, direct, adverse impacts from the Proposed Action. MCRC Brooklyn does not contain archaeological sites and the potential for buried archaeological deposits is very low. Ground disturbance associated with the Fiber Optic Communication Services would be monitored by an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for Archeology. Should archeological deposits be discovered during ground-disturbing activities, construction would be immediately halted and the location secured and protected from further disturbance. No adverse effect on archaeological and historic resources under the National Historic Preservation Act would be expected. Long-term, negligible to minor, direct, adverse impacts on visual resources under NEPA would be expected from the construction of the fire suppression facility and the addition of fencing, lighting in the POV lot, and construction and use of the west gate within the viewshed of the Floyd Bennett Field Historic District and Jacob Riis Park.

15. Cumulative Impacts. Short- and long-term, negligible to minor, cumulative impacts would be expected from the Proposed Action when combined with other past, present, and reasonably foreseeable future actions.

16. Finding. Although implementation of the Proposed Action would result in long-term impacts on some environmental resources, they would not be significant. Therefore, it is determined that the analyses in the SEA support a FONSI. Accordingly, the requirements of NEPA (42 United States Code 4321 et seq.); CEQ NEPA regulations; Department of Navy Regulations

for Implementing NEPA (32 CFR § 775); and MCO 5090.2 have been fulfilled. Preparation of an EIS is not necessary.

17. Coordination. The SEA addressing this action is on file and interested parties may obtain a copy from: Mr. Christopher Hurst, NEPA Program Manager, U.S. Marine Corps Forces Reserve, 2000 Opelousas Avenue, New Orleans, LA 70114, or by email at Christopher.A.Hurst@usmc.mil.

MARFORRES has made the SEA and FONSI available for a limited time on the following web site:

<http://www.marforres.marines.mil/GeneralSpecialStaff/Facilities.aspx>

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Copy to:

Ronald Lamb, NEPA Program Manager, USMC Headquarters
Richard Godchaux, MARFORRES Environmental Program Manager

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Acronyms and Abbreviations

AADT	annual average daily traffic
ACAM	Air Conformity Applicability Model
AFRC	Armed Forces Reserve Center
AT/FP	Antiterrorism/Force Protection
BMP	best management practice
CCD	Coastal Consistency Determination
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
CZMA	Coastal Zone Management Act
dB	Decibels
dBA	A-weighted decibels
DoD	Department of Defense
DoN	Department of the Navy
EA	Environmental Assessment
EO	Executive Order
ft ²	square foot/feet
GHG	greenhouse gas
kW	Kilowatt
L _{eq}	equivalent sound level
MARFORRES	U.S. Marine Corps Forces Reserve
MCRC	Marine Corps Reserve Center
NA	not applicable
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO _x	nitrogen oxides
NPS	National Park Service
NRA	National Recreation Area
NRHP	National Register of Historic Places

NY SHPO	New York State Historic Preservation Office
NYCDEP	New York State Department of Environmental Protection
NYCDOT	New York City Department of Transportation
NYSDEC	New York State Department of Environmental Conservation
O ₃	Ozone
PM ₁₀	particulate matter less than or equal to 10 microns in diameter
PM _{2.5}	particulate matter less than or equal to 2.5 microns in diameter
POV	privately owned vehicle
PV	photovoltaic
ROW	right-of-way
SATCOM	satellite communication
SEA	Supplemental Environmental Assessment
SO ₂	sulfur dioxide
SO _x	sulfur oxides
SPCC	Spill Prevention, Control, and Countermeasures
SWPPP	Stormwater Prevention Pollution Plan
tpy	tons per year
USC	U.S. Code
USEPA	U.S. Environmental Protection Agency
USMC	U.S. Marine Corps
VMF	vehicle maintenance facility
VOC	volatile organic compounds

Cover Sheet

Draft Supplemental Environmental Assessment Addressing Infrastructure Improvements at Marine Corps Reserve Center Brooklyn, New York

Responsible Agency: U.S. Marine Corps Forces Reserve

Cooperating Agency: National Park Service

Affected Location: Marine Corps Reserve Center (MCRC) on Floyd Bennett Field in Brooklyn, New York

Report Designation: Draft Supplemental Environmental Assessment (SEA)

Abstract: The Proposed Action would supplement ongoing infrastructure improvements at MCRC Brooklyn with the construction of an additional privately owned vehicle parking lot, construction of a new west gate, replacement of the east and north gates, installation of a new fire suppression facility, installation of fiber optic communication service to the MCRC, upgrade of property boundary fencing, and stormwater drainage improvements.

The analysis in this SEA considers the Proposed Action and alternatives, including the No Action Alternative, and aids in determining whether a Finding of No Significant Impact can be prepared or an Environmental Impact Statement is required. Written comments regarding this document should be directed to Mr. Christopher Hurst, NEPA Project Manager, U.S. Marine Corps Forces Reserve, 2000 Opelousas Avenue, New Orleans, LA 70114, or by email to *Christopher.A.Hurst@usmc.mil*.

Privacy Notice

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

Draft

**SUPPLEMENTAL ENVIRONMENTAL
ASSESSMENT**

**Addressing Infrastructure Improvements
at
Marine Corps Reserve Center Brooklyn,
New York**

U.S. MARINE CORPS FORCES RESERVE

New Orleans, Louisiana



AUGUST 2020

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1. Purpose of and Need for the Proposed Action

1.1 Introduction

This Supplemental Environmental Assessment (SEA) addresses infrastructure improvements at Marine Corps Reserve Center (MCRC) Brooklyn in New York City. The U.S. Marine Corps Forces Reserve (MARFORRES) proposes the following infrastructure improvements to supplement ongoing modernization and infrastructure improvements analyzed in a previous Environmental Assessment (EA) (MARFORRES 2016) at MCRC Brooklyn: construction of an additional privately owned vehicle (POV) parking lot, construction of a new west gate, replacement of the east and north gates, installation of a new fire suppression facility, installation of fiber optic communication service to the MCRC, upgrade to MCRC property boundary fencing, and stormwater drainage improvements.

This SEA analyzes the potential for significant environmental impacts associated with the Proposed Action and alternatives, including the No Action Alternative. This SEA has been developed in compliance with the National Environmental Policy Act (NEPA); Council of Environmental Quality (CEQ) regulations implementing NEPA (Title 40 Code of Federal Regulations [CFR] §§ 1500–1508), *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act*; Department of the Navy (DoN) Regulations for Implementing NEPA (32 CFR § 775); U.S. Marine Corps (USMC) Environmental Compliance and Protection Program (Marine Corps Order 5090.2, dated 18 June 2018); and the USMC NEPA Manual Version 3.4.

This SEA is organized into five sections, plus appendices. **Section 1** provides location and background information, the purpose of and need for the Proposed Action, and a summary of the NEPA compliance requirements. **Section 2** contains a description of the Proposed Action and alternatives. **Section 3** provides the discussion on the existing conditions of the affected environment and the potential environmental consequences, including cumulative effects. **Section 4** lists the references used in the preparation of this document. **Section 5** provides the names of those individuals who prepared the document.

1.2 Background

MCRC Brooklyn encompasses approximately 70 acres of the 19,000-acre Jamaica Bay Unit of the National Park Service (NPS) Gateway National Recreation Area (NRA). It is on the southernmost end of Floyd Bennett Field (NPS 2014) (see **Figure 1-1**).

Floyd Bennett Field was formerly U.S. Naval Air Station Brooklyn, and was used from World War II until 1967 prior to its decommissioning in 1971. Subsequently, the majority of the 1,450-acre property was transferred from the Department of Defense (DoD) to the U.S. Coast Guard and NPS, an agency within the Department of the Interior. The Navy retained the southern portion of Floyd Bennett Field, and a series of parcel transfers deeded the property to



19_75_Figure 1-1_Location Map of MCRC Brooklyn 8x11 v3.mxd
Data Source: ESRI Streetmap 2010

Figure 1-1. Location Map of MCRC Brooklyn, New York

MARFORRES in 1998 for continued use as MCRC Brooklyn. The remainder of Floyd Bennett Field is owned and managed by NPS as part of the Gateway NRA. Floyd Bennett Field is a historic district and was determined eligible for the National Register of Historic Places (NRHP) by the New York State Historic Preservation Office (NY SHPO). Utilities, roads, and other infrastructure necessary for the MCRC require crossing NPS lands on Floyd Bennett Field; therefore, the Department of Navy executes, on behalf of MARFORRES, any necessary permits with NPS for rights-of-way (ROWs) on NPS lands.

Gateway NRA was the nation's first urban national park, and provides a national park experience in the country's largest metropolitan area. The park preserves a mosaic of coastal ecosystems and natural areas interwoven with historic coastal defense and maritime sites around New York's Outer Harbor. Beaches, marshes, waters, scenic views, and open space offer resource-based recreational opportunities to a diverse public, recognizing the importance to preserve these special places for future generations. The legislative boundary for Gateway NRA incorporates 27,025 acres and extends into adjacent waters, including Jamaica Bay, Raritan Bay, Upper and Lower New York Bay, and the Atlantic Ocean. The park is divided into three administrative units: Jamaica Bay, Sandy Hook, and Staten Island. The Jamaica Bay Unit is the largest of the three units and is one of the largest expanses of open space in the region, consisting of over 19,000 acres of land, bays, and ocean waters across the Brooklyn and Queens boroughs of New York City (NPS 2014).

1.2.1 Previous Projects at MCRC Brooklyn

MARFORRES considers MCRC Brooklyn a highly valuable site due to its potential for hosting additional units, centralized location in the New York City metropolitan area, excess capacity, and size of its facilities. As such, MARFORRES continues to invest in modernization and renovation activities at MCRC Brooklyn. The environmental impacts from ongoing activities were analyzed in previous NEPA documents and are, therefore, not part of the Proposed Action being addressed in this SEA, but are included in the cumulative effects analysis. Previously evaluated and implemented projects at MCRC Brooklyn include the following:

- Renovation of the MCRC Brooklyn Administration Building (also known as the Drill Hall), the original vehicle maintenance facility (VMF), and the existing Technical Storage Warehouse. Interior renovations included upgraded utilities and reconfiguration of offices (MARFORRES 2015).
- Construction of a new VMF and satellite communications (SATCOM) vehicle storage building (MARFORRES 2010).
- Installation of two temporary armories (440 square feet [ft²] each) in the tactical vehicle area and a covered weapons cleaning area (MARFORRES 2013a).
- Installation of a 100-kilowatt (kW) demand response metering system (MARFORRES 2013b). This system helps MARFORRES capture energy usage and savings for the installation.
- Upgrade of 1,200 feet of sanitary sewer line on from MCRC Brooklyn to the north side of Aviation Road on Gateway NRA property.

An EA for consolidating MARFORRES units to MCRC Brooklyn and renovating the installation was completed in 2016 (MARFORRES 2016). This MCRC Brooklyn Consolidation and Renovation EA described and evaluated the potential environmental impacts that would result from the relocation of full-time active duty and reserve MARFORRES personnel to MCRC Brooklyn and facility and infrastructure improvements at MCRC Brooklyn. Units being relocated are the Farmingdale – 6th Communications Company and Garden City – 25th Marine Regiment, 4th Marine Division and their equipment from Armed Forces Reserve Center (AFRC) Farmingdale and MCRC Garden City. This SEA is intended to supplement the 2016 MCRC Brooklyn EA by addressing additional infrastructure improvements proposed for MCRC Brooklyn. This SEA incorporates the 2016 MCRC Brooklyn EA by reference. Projects analyzed in the 2016 MCRC Brooklyn EA that have been completed include the following:

- Additional renovation of the Administration Building, including excavating the existing earthen berms, replacing damaged exterior materials, adding a new roof, and removing the photovoltaic (PV) array system to be recycled and installed at another MARFORRES location
- Renovation of the original VMF and technical storage warehouse, including repairing and replacing metal siding
- Construction of a new SATCOM maintenance warehouse
- Installation of dedicated underground power line to MCRC Brooklyn, which crossed Gateway NRA property, to upgrade the electrical infrastructure.

1.2.2 NPS Background and Policies

NPS is a cooperating agency on this EA to facilitate their involvement and communication throughout the NEPA process. MCRC Brooklyn is on 70 acres of land owned by the U.S. Marine Corps, and is bordered on each side by land and water managed by NPS. Given that some installation development at MCRC Brooklyn requires some access to and use of NPS-managed property, NPS involvement in U.S. Marine Corps development planning is necessary. The NPS has the authority to issue permits necessary to authorize implementation of proposed actions on NPS lands and a statutory responsibility to manage to fulfill the park's purpose and NPS mission.

NPS is the federal agency responsible for managing all national parks in the United States, many American national monuments, and other conservation and historical properties. The NPS role is to preserve the ecological and historical integrity of the places entrusted to its management while making them available to the public. NPS has broad authority to manage all natural and cultural resources within the boundaries of national park units in accordance with the laws, policies, and regulations that pertain to the National Park System. The most important statutory directives for the National Park Service are provided by the interrelated provisions of the NPS Organic Act of 1916 and the NPS General Authorities Act of 1970, as amended. NPS's 2006 Management Policies and regulations found within 36 CFR interpret the Organic Act and provide a regulatory framework for the management of park resources.

Public Law 92-592, enacted on October 27, 1972, established Gateway NRA as a unit of NPS “to preserve and protect for the use and enjoyment of present and future generations an area

possessing outstanding natural and recreational features.” This legislation identifies that the park shall be administered to “protect the islands and waters within the Jamaica Bay Unit with the primary aim of conserving the natural resources, fish, and wildlife located therein and shall permit no development or use of this area which is incompatible with this purpose” and that the William Fitts Ryan Visitor Center will be established at Floyd Bennett Field.

1.3 Purpose and Need

The purpose of the Proposed Action is to further optimize installation management and reservist training through the improvement of MARFORRES infrastructure at MCRC Brooklyn. The Proposed Action is needed to improve long-term sustainable unit readiness through coordinated training and to prepare for future mission requirements. To complete training requirements, the facilities, utilities, and assets on MCRC Brooklyn require ongoing maintenance and utilities upgrades. Infrastructure on the installation is aging and requires capital investment to address deficiencies in the buildings and meet current and future mission requirements.

Upon relocation of staff and equipment from MCRC Garden City and AFRC Farmingdale to MCRC Brooklyn starting in 2017, the need for additional infrastructure improvements was required to further support this realignment identified the 2016 MCRC Brooklyn EA and improve the ability of the installation to meet mission requirements.

1.4 Decision to Be Made

Upon completion of the SEA process, MARFORRES will determine whether or not the Proposed Action would result in significant impacts. If such impacts are predicted, then MARFORRES would decide whether to provide mitigation to reduce impacts below the level of significance, undertake preparation of an Environmental Impact Statement, or abandon the Proposed Action. If no significant impacts are predicted, the determination to implement the Proposed Action would be documented in a Finding of No Significant Impact. As a cooperating agency, NPS could adopt the SEA as the basis for a FONSI and decision on any NPS action, if the SEA sufficiently covers the NPS action and meets all NEPA requirements applicable to the NPS.

1.5 Scope of the Analysis

This SEA describes and evaluates the potential environmental impacts that may result from the infrastructure improvements at MCRC Brooklyn in support of MARFORRES mission operations at the installation.

In accordance with CEQ, DoN, and USMC NEPA regulations and guidelines for implementing NEPA, evaluation of environmental impacts in this SEA focuses primarily on those resources and conditions potentially subject to impacts, identifies potentially relevant environmental resource areas deserving of study, and de-emphasizes irrelevant resource areas. The environmental resource areas analyzed in the SEA includes: land use and recreation, coastal zone management, infrastructure and transportation, noise, air quality, geological resources, water resources, biological resources, cultural resources, socioeconomics and environmental justice, hazardous materials and wastes, and health and safety.

1.6 Environmental Review Process

1.6.1 National Environmental Policy Act

NEPA of 1969 (42 United States Code [USC] §§ 4321–4307) is a federal statute requiring the identification and analysis of potential environmental impacts associated with proposed federal actions before those actions are taken. The intent of NEPA is to help decision makers make well-informed decisions based on an understanding of the potential environmental consequences, and take actions to protect, restore, or enhance the environment. DoN Regulations for Implementing NEPA, the USMC Environmental Compliance and Protection Program, and the USMC NEPA Manual provide a framework for how to implement CEQ NEPA regulations and achieve the goals of NEPA.

To comply with NEPA, the planning and decision-making process for actions proposed by federal agencies involves a study of other relevant environmental statutes and regulations. The NEPA process does not, however, replace procedural or substantive requirements of other environmental statutes and regulations. It addresses them collectively in an EA or Environmental Impact Statement, which enables the decision maker to have a comprehensive view of major environmental issues and requirements associated with a proposed action. According to CEQ regulations, the requirements of NEPA can be integrated “with other planning and environmental review procedures required by law or by agency practice so that all such procedures run concurrently rather than consecutively.”

1.6.2 Other Relevant Laws and Regulations

This SEA examines several resource areas that have the potential to be affected by the Proposed Action and alternatives and includes applicable elements of the human and natural environments required by specific laws, regulations, Executive Orders (EOs), and policies. Notable laws and regulations are listed below:

- Endangered Species Act (16 USC §§ 1531–1544)
- Migratory Bird Treaty Act (16 USC §§ 703–712)
- Bald and Golden Eagle Protection Act (16 USC §§ 668–668c)
- Sikes Act and Sikes Act Improvement Act (16 USC §§ 670a–670o), Conservation Programs on Government Lands
- Coastal Zone Management Act (16 USC §§ 1451–1466)
- Clean Air Act (42 USC §§ 7401–7671q)
- Clean Water Act, Sections 401, 402, and 404 (33 USC §§ 1251–1387)
- National Historic Preservation Act (NHPA) of 1966 (16 USC §§ 470–470x-6)
- Archaeological Resources Protection Act of 1979 (16 USC §§ 470aa–470mm)
- Gateway NRA Enabling Legislation (Public Law 92-592)
- Organic Act of 1916 (16 USC §§ 1–4)

- General Authorities Act of 1970 (16 USC § 1a-1 et seq.)
- Redwood Act of 1978
- EO 11990, Protection of Wetlands
- EO 11988, Floodplain Management
- EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations
- EO 13045, Protection of Children from Environmental Health Risks and Safety Risks
- EO 13148, Greening the Government through Leadership in Environmental Management
- EO 13186, Responsibilities of Federal Agencies to Protect Migratory Birds
- EO 13834, Efficient Federal Operations.

1.6.3 Permits and Consultations/Agency Coordination

In order to facilitate key agency stakeholder involvement, NPS has been identified as a cooperating agency for this SEA per CEQ regulations (40 CFR §§ 1501.6 and 1508.5). MARFORRES is also notifying relevant federal, state, and local agencies and tribes of the Proposed Action and alternatives and providing them with sufficient time to make known their environmental concerns specific to the action. This process also provides MARFORRES the opportunity to coordinate with agencies that manage resources with the potential for impacts and consider state and local views in implementing the federal proposal. Interagency/intergovernmental coordination materials related to this action is included in **Appendix A**.

1.6.4 Public Involvement

NEPA requirements help ensure that environmental information is made available to the public during the decision-making process and prior to actions being taken. The premise of NEPA is that the quality of the federal decisions will be enhanced if proponents inform and involve the public in the planning process. Opportunities for public input will be provided through the scoping process and again with the publication of a Notice of Availability for the Draft SEA and Finding of No Significant Impact.

The Notice of Availability will be published in the *Federal Register* and the *Brooklyn Daily Eagle* newspaper, and provided to Brooklyn Community Board 18, which is a representative organization for the borough adjacent to Floyd Bennett Field. The Draft SEA will be posted on the MARFORRES website.

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2. Description of the Proposed Action and Alternatives

This section provides detailed information on the Proposed Action and alternatives considered for the infrastructure improvements slated for MCRC Brooklyn. **Section 2.1** discusses the Proposed Action in detail, while **Section 2.2** provides a description of the No Action Alternative. Alternatives to the Proposed Action considered and eliminated from further study are described in **Section 2.3**. **Section 2.4** includes a summary and comparison of impacts from the alternatives.

2.1 Proposed Action

Under the Proposed Action, MARFORRES would supplement ongoing infrastructure improvements at MCRC Brooklyn with the construction of an additional POV parking lot, construction of a new west gate, replacement of the east and north gates, installation of a new fire suppression facility, installation of fiber optic communication service to MCRC Brooklyn, upgrade of property boundary fencing, and stormwater drainage improvements. **Figure 2-1** illustrates the locations of the Proposed Action components.

2.1.1 New POV Parking Lot

Current POV parking on the installation is not sufficient to accommodate all POVs on drill weekends. Therefore, MARFORRES proposes to construct a new POV parking lot for up to 325 new spaces, which would allow for parking accommodation of 80 percent of the maximum number of marine reservists expected to attend a drill weekend on the installation. The proposed POV parking lot would be on the western side of MCRC Brooklyn, entirely within the installation boundary (see **Figure 2-1**). Access to the POV parking lot would occur via the proposed west gate described in **Section 2.1.2**. The proposed parking lot would improve long-term sustainable unit readiness by increasing efficiency for accessing the installation and allowing for more time for coordinated training requirements during drill weekends. Drill weekends for MCRC Brooklyn and AFRC Farmingdale, which would include 1,030 marine reservists, and MCRC Garden City, which would include 386 reservists, would be staggered between two weekends a month to further reduce demands on parking and traffic (MARFORRES 2018). The POV parking lot would be illuminated using 14 light poles spaced across the lot and at the west gate. The light poles (with fixtures of 263 watts maximum) would be up to 30 feet tall and the lumens oriented downward (i.e., to the ground), not outward, and would be connected through buried electrical utilities installed during construction. The lighting would be Dark Sky Friendly in accordance with International Dark Sky Association seal of approval requirements, and glare, light trespass, and skyglow would be minimized. The lighting would include sensors and controls to ensure lights are only on between dusk and dawn. The controls would automatically dim the lighting by 30 percent in the hours the facility is not in use or when no activity is detected for 15 minutes.



Figure 2-1. Proposed Project Locations under the Proposed Action at MCRC Brooklyn

2.1.2 New West Gate Construction

A new west gate would be constructed near the proposed POV parking lot to provide more efficient access to the installation during drill weekends (see **Figure 2-1**). The west gate would be located along the installation boundary on a former airfield taxiway (Seaplane Taxiway 7) that can provide access to the installation from Aviation Road. The taxiway, which is located on NPS property, has been determined not eligible for NRHP listing as a contributing resource by the NY SHPO. Although not planned at this time, the west gate could include a portable guard house in the future to avoid construction of permanent facilities on the historic taxiway. The inbound lanes to the gate would be lined with removable cement jersey barriers.

West gate access would only be used from 5:30 a.m. to 7:30 a.m. during drill weekends to provide access to the proposed POV parking lot. The new gate would allow for greater queuing off Aviation Road. The gate would be one-way inbound only with a rejection lane. Following training activities, reservists would exit the installation through the existing north gate. New standard roadway signage on NPS property would direct the flow of traffic through the new west gate during drill weekends. The design of the gate would include access control point antiterrorism/force protection (AT/FP) features and comply with AT/FP regulations and physical security mitigation in accordance with Unified Facilities Criteria 4-010-01, *DoD Minimum Antiterrorism Standards for Buildings*. Best management practices (BMPs) would be used to minimize lighting impacts from the gate.

Construction of the west gate would occur largely on NPS property (approximately 2 acres) and would require removal of an existing earthen berm on the north side of the taxiway and a model car racetrack on the taxiway. Soil from the berm would be characterized and disposed or reused in accordance with NPS policies, Resource Conservation and Recovery Act requirements, and New York State hazardous waste management regulations.

2.1.3 Replacement of East and North Gates

MARFORRES also proposes the replacement of the existing east and north gates on the installation. The east gate along the eastern fenceline of the installation would be upgraded, which would include replacement of an existing gate on Enterprise Avenue to the East Training Area in the eastern portion of MCRC Brooklyn and an existing gate along the existing fenceline east of the tactical vehicle lot. The roadway south of the Enterprise Avenue gate to the tactical equipment lot gate would be repaved (see **Figure 2-1**). This upgraded gate would allow for more efficient movement of vehicles and trailers on and off the installation via Enterprise Avenue from the tactical equipment lot by avoiding use of the north gate during or in preparation for drill weekends. Currently, travel lanes set aside for tactical equipment on the installation take up space that could otherwise be used for POV parking. The installation of the separate gate and access road for tactical equipment would effectively increase available parking in the POV lot and allow for the safer movement of tactical equipment. The resurfaced road would meet Enterprise Avenue at the MCRC Brooklyn property boundary and gate, which would be upgraded to a new 8-foot tall, manual-sliding gate topped with barbed wire. The east gate project would occur entirely within MCRC Brooklyn. An infiltration basin would also be

constructed at the southern end of the new paved road where it would enter the tactical vehicle lot.

The existing north gate would be upgraded by creating a separate adjacent gate to exit from the installation; replacing the sliding gate, access controls, lighting, communication services, USMC signage, and guardhouse; relocation of the entry point farther back into the installation to allow for more queuing room; expanding the driveway and adding a vehicle search area on MCRC property; and repairing perimeter fence (see **Figure 2-1**). The purpose of adding a new exit gate and driveway east of the existing driveway would be to separate the inbound and outbound traffic to ease MCRC Brooklyn traffic congestion. The new exit gate driveway would extend through the concrete walkway along Aviation Road and meet that roadway, and the project would include improvements to buried drainage that extends the length of the roadway. Following construction, the new exit driveway and gate would operate as the temporary ingress/egress for MCRC traffic until improvements to the existing north gate and driveway are complete. The existing gate, driveway, and guardhouse would then be replaced. Both gates would be, 8-foot tall electronic sliding gates topped with barbed wire, controlled at the new guardhouse and powered by buried utilities. The guardhouse would be located between the entrance and exit driveways and would sit on a 10-foot by 10-foot cement slab and measure approximately 8 feet long, 6 feet wide, and 8 feet tall. The guardhouse would have electricity supplied by a buried electrical line extending from Building 1 (Administration Building on MCRC Brooklyn); a camera pole would be installed next to the guardhouse to monitor incoming traffic into the installation. Additional improvements would include adding crosswalks along the exit and entrance driveways, installing a new USMC sign, and replacing the existing small visitor parking lot that is located adjacent to Building 1. The north gate project would occur within MCRC Brooklyn except for a less than 0.1-acre area adjacent to Aviation Road, where the expanded entry and exit driveways would connect to Aviation Road on NPS property.

2.1.4 New Fire Suppression Facility

MARFORRES would construct a new fire suppression facility for the installation that would consist of a new water storage tank, pump house, and fire water pump north of the Drill Hall in Building 1 entirely on MCRC Brooklyn (see **Figure 2-1**). The new 35-foot diameter 195,000-gallon water storage tank would accommodate fire suppression and sprinkler systems in Building 1 and the 6th Communications VMF (Building 2). The fire pump house would be designed to blend in with the existing facilities (i.e., same architectural style and color scheme) and would not be more than two stories high; therefore, the tank would not rise above any existing facilities and would not change the viewshed.

2.1.5 New Fiber Optic Communication Service

A new fiber optic communication line to MCRC Brooklyn would be installed on approximately 0.9 acre of NPS property to ensure adequate network bandwidth for the 6th Communications Company and the 2/25th Marines that transferred to MCRC Brooklyn as addressed in the 2016 MCRC Brooklyn EA. The current copper line capacity does not meet increased bandwidth requirements, and the existing conduit for the copper line is at capacity. The proposed fiber optic communication line would tie into an existing Verizon fiber optic line near the intersection

of Flatbush Avenue and Aviation Road, and extend approximately 3,330 feet east to the entrance of the MCRC (see **Figure 2-2**). The new fiber optic line would use the same ROW as the utility corridor analyzed in the 2016 MCRC Brooklyn EA for an electrical line. An additional approximately 150 feet of fiber optic line within public ROW along Flatbush Avenue would be required to connect to the existing Verizon line along Flatbush Avenue, for which Verizon would obtain any necessary permits. The fiber optic line would be installed primarily by directional drilling, with open trenching used as required. MARFORRES is required to obtain an Archaeological Resources Protection Act permit and conduct archaeological monitoring during installation of the fiber optic communication line. Depending on the surface features, the fiber optic line would be installed between 2 and 10 feet below the ground surface. Handhole boxes would be installed approximately every 200 feet along the utility corridor to provide access to the line for maintenance and repair. Handholes would be flush with the roadway surface, measure 1 by 2 feet and extend approximately 2 feet below the ground surface.

2.1.6 Property Boundary Fencing Upgrades

MARFORRES would repair or install new chain-link fencing around the perimeter of the installation to meet AT/FP minimum security measures as outlined in the DoD Minimum Antiterrorism Standards for Buildings. New fencing would be the same height and color as the existing fence: aluminum/chrome plated, 8 feet in height, with 3 feet buried in the ground and topped with barbed wire, and at least 82 feet from any building on the installation to meet AT/FP requirements. The fencing is composed of 7-foot high chain-link panels with posts located approximately 10 feet apart with a crown of 1-foot high 3-stand barbed wire oriented outward with support arm extensions oriented at the posts. While the existing fencing sits at the property line, the new fenceline would be stepped-back on to MCRC Brooklyn property up to 10 feet from the property line and vegetation on MCRC Brooklyn property would be mowed/maintained on either side of the fence. Approximately 0.3 acre of temporary impacts on NPS property could occur during fence construction; following construction, these areas would be returned to pre-existing conditions. To improve visual aesthetics and reduce any noise and dust impacts from MARFORRES operations, MARFORRES would also install privacy fencing adjacent to the ranger housing.

2.1.7 Stormwater Drainage Improvements

MARFORRES manages stormwater runoff at MCRC Brooklyn primarily through natural infiltration into the highly permeable fill that predominates the area. There is no traditional subsurface stormwater system at MCRC Brooklyn that collects runoff and discharges into local surface waters.

Visual observations as well as subsurface investigations using soil borings and ground penetrating radar have identified two areas of erosion at the site. One location is between Buildings 2 and 5, and the other is a location on the existing POV parking lot (see **Figure 2-1** and photographs in **Figure 2-3**). The investigations indicated that poorly consolidated fill in these areas are likely the cause of the erosion and creating sinkholes. Fill material under concrete is also shifting, resulting in depressed spots in paved areas and ponding. In winter



Figure 2-2. Fiber Optic Communication Line Conduit Path

months these areas collect water that freezes, resulting in hazardous driving and walking conditions.

MARFORRES proposes to excavate any unconsolidated fill, re-fill, compact, and regrade these areas to eliminate the ongoing erosion and ponding and to stabilize these two areas. It is anticipated that future stormwater management would continue to rely primarily on infiltration.

MARFORRES has also planned a stormwater management study that would assess any need for a more robust approach to managing stormwater runoff that may include detention storage and engineered infiltration features. Development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) would provide guidance for managing stormwater runoff and potential impacts on water quality on the installation. Apart from limited stormwater at the north gate already directed to stormwater management facilities along Aviation Road, management of stormwater falling on MCRC Brooklyn would not occur on or be directed to NPS property.



Figure 2-3. Photographs of Stormwater Drainage Issues

2.2 No Action Alternative

The No Action Alternative serves as a baseline for comparison with the Proposed Action. Under the No Action Alternative, operations at MCRC Brooklyn would continue without the additional infrastructure projects to support MARFORRES mission activities. Reservists would continue to use existing parking available to them on and off the installation during drill weekends. Training activities at MCRC Brooklyn would continue to be inefficient because of delays getting onto the installation. The No Action Alternative would not meet the purpose and need of the Proposed Action; however, as recommended by CEQ NEPA regulations, it is carried forward for analysis in the SEA to compare with the consequences of not implementing the Proposed Action.

2.3 Alternatives Considered but Eliminated from Detailed Analysis

Considering alternatives helps to avoid unnecessary impacts and allows for an analysis of reasonable ways to achieve the stated purpose. To warrant detailed evaluation, an alternative must be reasonable. To be considered reasonable, an alternative must be suitable for decision

making, capable of implementation, and sufficiently satisfactory with respect to meeting the purpose of and need for the action. CEQ defines reasonable alternatives as those that are economically and technically feasible, and that show evidence of common sense.

Certain facility, operational, and mission requirements must be present or reasonably attainable to meet the purpose of and need for the Proposed Action. MARFORRES developed the following selection standards for infrastructure improvements based on mission operation and training requirements:

- Ability to become an enduring facility
- Facility optimization
- Equipment readiness
- AT/FP standards
- Training optimization.

AT/FP standards were considered in siting all the infrastructure projects to enhance and ensure security on the installation, including secure fencing, sufficient lighting, entry control access, and surveillance capability.

Under NEPA, action proponents must consider and analyze reasonable alternatives to the Proposed Action. The following alternatives were considered, but eliminated from detailed analysis. These alternatives either do not meet the purpose of and need for the Proposed Action described in **Section 1.3**, or do not meet the selection standards.

Alternative locations for a new POV parking lot were evaluated. Due to the limited space on MCRC Brooklyn available for a parking lot and AT/FP requirements, the proposed location represents the only suitable location for a lot. The lot could be configured in different ways, but a footprint encompassing a reasonable configuration is sufficient for the purposes of the analysis in this SEA.

The east gate on Enterprise Avenue was evaluated as an alternative location to the proposed west gate entrance for use during drill weekends. POV traffic would have to cross the tactical equipment lot or the entire lot would have to be reoriented to separate POV traffic from tactical traffic through this gate. The presence of POV traffic on Enterprise Avenue during drill weekends would also adversely affect the ranger housing along this roadway. For these reasons, this alternative was eliminated from analysis.

The fire suppression facility represents the optimal location for siting. All the other infrastructure improvement projects being analyzed in this SEA are improvements to existing infrastructure in situ or maximize use of existing corridors. Therefore, no other alternatives to the infrastructure improvements proposed in this SEA have been identified.

2.4 Comparison of Alternatives

Table 2-1 summarizes the potential environmental consequences of the Proposed Action and the No Action Alternative, based on the impact analyses presented in the SEA.

Table 2-1. Summary of Potential Environmental Consequences

Resource	Proposed Action	No Action Alternative
Land Use and Recreation	Short-term, negligible to minor, direct, adverse impacts on land use and recreation could occur due to limited access or temporary partial lane closures on the MCRC Brooklyn or along Aviation Road to avoid conflicts with construction activities. Long-term, minor, beneficial impacts on recreation would occur from west gate installation due to reduced traffic congestion during drill weekends and subsequent improved accessibility to Floyd Bennett Field.	Long-term, minor, adverse impacts on land use and recreation would be expected due to the continued traffic congestion along Aviation Road during drill weekends.
Coastal Zone Management	Short- and long-term, minor, adverse impacts would occur due to construction activities and an increase in impervious surfaces, but would be minimized through implementation of BMPs. Therefore, a Negative Determination would be submitted to the New York Department of State.	No impacts would be expected.
Infrastructure and Transportation	<p>Short-term, negligible, adverse impacts on utilities would be expected due to temporary service disruptions during construction and repair activities. Long-term, minor, adverse impacts on the water supply could occur as a result of the new fire suppression facility.</p> <p>Short-term, minor, adverse impacts on stormwater would occur as a result of increased runoff during construction activities. Long-term, negligible to minor, adverse impacts on stormwater would occur as a result of increased runoff from the addition of impervious surfaces. Long-term, minor, beneficial impacts on stormwater would occur as a result of stormwater drainage improvements.</p> <p>Long-term, moderate, beneficial impacts on communications would occur as a result of improved connectivity and capacity associated with installation of the new fiber optic line.</p> <p>Short-term, minor, adverse impacts on solid waste would occur as a result of construction and repair activities.</p> <p>Short-term, negligible, adverse impacts on transportation would occur as a result of accessibility limitations during construction</p>	Long-term, minor to moderate, adverse impacts would occur on communications, transportation, and stormwater as a result of inadequate fiber optic capacity, excessive traffic queuing during drill weekends and inadequate parking availability, and insufficient stormwater drainage capacity and repairs.

	activities and gate upgrades. Long-term, moderate, beneficial impacts on transportation would occur as a result of the addition of the west gate and improvements of the east and north gates and additional parking with the construction of the proposed POV parking lot.	
Noise	Short-term, negligible to minor, adverse impacts on the ambient noise environment and NPS housing would be expected as a result of construction and traffic-related noise.	No impacts would be expected.
Air Quality	Short-term, minor, adverse impacts on air quality would be expected as a result of emissions from construction and repair activities.	No impacts would be expected.
Geological Resources	Short- and long-term, negligible, adverse impacts could occur as a result of ground disturbance, soil erosion and compaction, and topographic changes from construction and repair activities and the addition of impervious surfaces. Long-term, beneficial impacts would occur from stormwater drainage improvements and development and implementation of a SWPPP, which would improve water quality and reduce runoff and soil erosion.	No impacts would be expected.
Water Resources	Long-term, negligible, adverse and beneficial impacts on groundwater and surface water would be expected as a result of decreased infiltration and increased stormwater runoff from the addition of impervious surfaces, but would be enhanced through proposed stormwater drainage improvements. Long-term, moderate, adverse impacts on floodplains would occur as a result of construction of the proposed POV parking lot within the 100-year floodplain.	No impacts would be expected.
Biological Resources	Long-term, negligible to moderate, direct and indirect, adverse impacts would be expected as a result of temporary and permanent loss of natural vegetation communities and associated wildlife habitat from construction activities and the permanent conversion to impervious surfaces and the addition of lighting for the proposed POV lot.	No impacts would be expected.
Cultural Resources	No adverse effect on archaeological or historic resources under the NHPA would be expected. Long-term, negligible to minor, direct, adverse impacts on visual resources under NEPA would be expected from the construction of the fire suppression facility within the viewshed of the Floyd Bennett Field Historic District and the addition of fencing, lighting in the POV lot, and construction and use of the west gate.	No impacts would be expected.

3. Affected Environment and Environmental Consequences

This section describes the existing environmental baseline conditions and the analysis of potential consequences of implementing the Proposed Action or the No Action Alternative, as described in **Section 2**.

The information and data presented in this section are commensurate with the importance of the potential impacts to provide the proper context for evaluating impacts. Both short- and long-term impacts are addressed where applicable.

All potentially relevant resources were initially considered for analysis in this SEA. **Sections 3.1 through 3.9** present the existing environmental conditions and potential environmental impacts for the following resource areas: land use and recreation, coastal zone management, infrastructure and transportation, noise, air quality, geological resources, water resources, biological resources, and cultural resources. **Section 3.10** presents an analysis of cumulative impacts.

In compliance with NEPA, CEQ NEPA regulations, and 32 CFR § 775, this section focuses only on the resources considered potentially subject to impacts from the Proposed Action and the No Action Alternative. Resource areas that have been eliminated from further detailed analysis in this SEA and the rationale for eliminating them are presented as follows.

Socioeconomics and Environmental Justice. The majority of the Proposed Action would occur on MARFORRES property, where no commercial activity occurs. Portions of the Proposed Action that would occur on NPS property would not prevent patrons from accessing Floyd Bennett Field or commercial centers therein. Accessibility to Floyd Bennett Field would be improved as a result of the reduced traffic queuing on drill weekends. Because drill weekends only occur every other weekend, only negligible impacts would be expected. Additionally, no environmental justice populations exist in the area. Therefore, impacts on socioeconomics and environmental justice would be negligible or less.

Hazardous Materials and Wastes. The Proposed Action does not involve the use, removal, or disposal of hazardous materials. Risks of spills from petroleum, oils, and lubricants associated with construction equipment would be minimized through implementation of the MCRC Brooklyn's Spill Prevention, Control, and Countermeasures (SPCC) Plan. All construction-related hazardous materials and wastes would be disposed of in accordance with regulations. Therefore, no impacts on hazardous materials and wastes would be expected.

Health and Safety. No changes to daily operations or safety conditions would occur as a result of the Proposed Action. Additionally, appropriate Occupational Safety and Health Administration regulations would be implemented during construction activities, minimizing any potential safety hazards to personnel and the public. Therefore, no impacts on health and safety would be expected.

3.1 Land Use and Recreation

3.1.1 Definition of the Resource

The definition of land use was described in the 2016 MCRC Brooklyn EA; therefore, this information is incorporated herein by reference.

Recreational resources include areas and infrastructure designated by federal, state, and local planning entities to offer visitors and residents diverse opportunities to enjoy leisure activities. Recreational resources can range from natural and relatively undisturbed areas to highly developed sites with permanent infrastructure. Recreational resources include open space, parklands, hiking and biking trails, conservation areas, playgrounds, and ballparks.

3.1.2 Affected Environment

The affected environment for land use was discussed previously in the 2016 MCRC Brooklyn EA and remains largely the same in this SEA; however, the Proposed Action in this SEA would affect land use and recreation resources not previously described. Resources changed are discussed in this section; other resources are incorporated by reference.

Floyd Bennett Field includes over 1,300 acres of grassland, saltmarshes, tidal mudflats, a marina, and the former airfield, including a former control tower and terminal that now houses the Ryan Visitor Center (NPS 2014). Recreational uses, such as birding, camping, fishing, biking, archery, golfing, gardening, ice skating, and various indoor and outdoor sports, are permitted at Floyd Bennett Field (NPS 2014, NYHP 2020). Land uses within Floyd Bennett Field include administrative (e.g., Ryan Visitor Center, U.S. Park Police facility north of MCRC Brooklyn), recreation (e.g., biking, ranger-led interpretation and environmental education programs, curriculum-based overnight camping programs, Aviator Sports Center), and residential (three NPS park ranger residences directly adjacent to the north and east of MCRC Brooklyn). Specific recreational activities within Floyd Bennett Field near the Proposed Action include the following:

- Baseball field northeast of MCRC Brooklyn
- Publicly accessible shoreline to the west and east of MCRC Brooklyn where fishing is permitted.
- Biking on nearby roadways.

During drill weekends, two weekends a month, visitor access to Floyd Bennett Field and recreational activities can be hindered by increased Marine reservist traffic. According to traffic data, approximately 1,600 vehicles on weekdays and 1,000 vehicles on weekend days access Floyd Bennett Field via Aviation Road during non-summer months and up to 3,000 vehicles per day during the summer months, which is a rate of approximately 300 vehicles per hour during typical daytime recreation hours. Peak hour traffic using Aviation Drive is 150 vehicles (morning) to 200 vehicles per hour (evening). Saturday midday peak hour traffic is slightly more than 200 vehicles per day (NPS 2014). Reservists commuting during drill weekends can currently add up to 350 cars along Aviation Road routing into and out of MCRC Brooklyn during early morning

and evening hours on weekends (MARFORRES 2018). The current north gate allows for the queuing of two cars from Aviation Road for installation access.

3.1.3 Environmental Consequences

For analyzing potential impacts on land use and recreation within the project area, the evaluation criteria are based on existing and future land use, development, and management and current recreational uses and resources in the project area. An action could have a significant impact on land use and recreation if it were to preclude the viability of a land use, including recreation, or the continued use or occupation of the area; be incompatible with adjacent land use to the extent that public health or safety is threatened; conflict with planning criteria established to ensure the safety and protection of human life and property; or result in noncompliance with laws, regulations, or orders applicable to land use.

3.1.3.1 PROPOSED ACTION

The Proposed Action would not introduce incompatible land uses at MCRC Brooklyn; therefore, short-term, negligible, direct, adverse impacts on land use resulting from construction activities would be expected. The infrastructure improvements would be a continuation of maintaining the existing training and operations mission of the installation. The construction of an additional POV parking lot, new and replacement gates, fire suppression facility, fiber optic communication services, and stormwater drainage improvements would make the installation safer and more efficient, thereby improving the ability of the installation to support existing land uses. During construction, negligible impacts would occur from safety measures that could be put in place to limit access to certain locations at MCRC Brooklyn or cause different traffic routes to be taken on the installation to avoid construction sites.

The Proposed Action would be compatible with the surrounding land uses on Floyd Bennett Field due to the continuation of existing land uses. Construction of the west gate would occur on a former airfield taxiway and would allow for more efficient access to the installation during drill weekends. The Proposed Action does not involve manufacturing and would meet M1-1 zoning performance standards. Because use of the east gate would be infrequent and limited to occasional use during drill weekends twice a month, and would not preclude access, negligible, direct impacts on the NPS ranger housing along Enterprise Avenue outside the installation would be expected. Short-term, minor, direct, adverse impacts would be expected on recreation during construction activities. Portions of the Proposed Action that would occur on NPS property would not prevent patrons from accessing Floyd Bennett Field. Due to the proximity to MCRC Brooklyn's boundary, limited recreational activities currently occur on the three acres of NPS property that would be impacted by the Proposed Action (see **Table 3-1**). Partial lane closures may temporarily be required to direct recreational users of Floyd Bennett Field around equipment or activities during construction. Single lane closures could reduce the rate of traffic flow along Aviation Road to a single eastbound lane. Up to 3,000 vehicles, including visitors, enter Floyd Bennett Field each day during the summer, which is a rate of approximately 300 vehicles per hour during typical daytime recreation hours, or 5 vehicles per minute. A single eastbound lane on Aviation Road during temporary construction activities would be able to accommodate this maximum traffic rate.

Temporary increases in traffic entering and exiting the installation due to delivery of construction materials would also occur along Aviation Road. Measures for reducing construction impacts include avoiding active construction during the morning and evening commuting periods, drill weekends, and peak NPS visitor periods when traffic congestion is high. Because a recent electrical line installation did not impact traffic or access to recreational activities at Floyd Bennett Field, it is unlikely that the proposed fiber optic line installation would have impacts on recreation. While the existing north gate is being reconfigured, the west gate and new north gate exit lane would temporarily be used for two-way installation access. Because access to Floyd Bennett Field would not be completely obstructed during construction, any adverse impacts on recreation access would be short-term and minor. Aside from minor traffic-related impacts, construction actions on NPS property for the proposed west gate, replacement of the north gate, and proposed fenceline would not inhibit or impact recreation because recreational activities on Floyd Bennett Field do not typically occur in such close proximity to MCRC Brooklyn.

Table 3-1. Property Impacts from Proposed Action

	Acres Impacted
MARFORRES Property	19.6
NPS Property	3.0
Total	22.6

Long-term, minor, direct, beneficial impacts on recreation would occur as a result of improved access to Floyd Bennett Field during drill weekends. Increased traffic on Aviation Road is present during the morning and evening hours of drill weekends. With the addition of the west gate and renovated east gate, traffic flow and congestion would be improved by moving queued reservist traffic off Aviation Road onto the west gate access lanes and allowing military vehicles to use the east gate, and impacts on recreational traffic would be avoided or minimized. The typical traffic rate entering Floyd Bennett Field is between 150 and 300 vehicles per hour depending on the season. The rate of traffic flow on Aviation Road would not change, but the volume of traffic would be reduced by the removal of approximately 30 reservist personal vehicles from Aviation Road onto the reservist traffic queuing lanes on the former airfield taxiway at the proposed west gate, in addition to the two-car queuing availability at the north gate and tactical vehicle access at the east gate. Renovation of the north gate would also improve traffic flow for daily operations at MCRC Brooklyn, resulting in beneficial impacts on recreation at Floyd Bennett Field.

3.1.3.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, operations at MCRC Brooklyn would continue without the additional infrastructure projects to support MARFORRES mission activities. Increased traffic congestion would continue to occur in the early morning and late evening on drill weekends, two weekends a month, adversely impacting visitor experience and access to Floyd Bennett Field. Therefore, long-term, minor, direct, adverse impacts on land use and recreation under the No Action Alternative would be expected.

3.2 Coastal Zone Management

3.2.1 Definition of the Resource

The definition of coastal zone management was described in the 2016 MCRC Brooklyn EA; therefore, this information is incorporated herein by reference.

3.2.2 Affected Environment

The affected environment for coastal zone management was discussed previously in the 2016 MCRC Brooklyn EA and remains largely the same in this SEA; however, the Proposed Action in this SEA would affect resources not previously described. Resources changed are discussed in this section; other resources are incorporated by reference.

The New York City Waterfront Revitalization Program refines and supplements New York State's Coastal Management Program and provides a framework that critical waterfront issues can be addressed and waterfront improvement projects implemented. The Waterfront Revitalization Program contains 10 policies and defines the boundaries of New York City's coastal zone and two types of coastal areas with special characteristics. MCRC Brooklyn is within the city's coastal zone and a Special Natural Waterfront Area (NYC Planning 2020). There are six New York City policies that are relevant to the Proposed Action, including:

- Policy 2 – Maritime and Industrial Development
- Policy 4 – Ecological Resources
- Policy 5 – Water Quality
- Policy 6 – Flooding and Erosion
- Policy 7 – Hazardous Materials
- Policy 8 – Public Access
- Policy 10 – Historical and Cultural Resources.

3.2.3 Environmental Consequences

For analyzing potential effects on coastal zone management, the evaluation criteria are based on coastal resources in the area and applicable state and federal CZM policies. Development that could substantially increase impervious surface area, sedimentation, and stormwater runoff under a proposed action could significantly affect local coastal uses or resources if no countermeasures were to be enforced to protect such resources.

3.2.3.1 PROPOSED ACTION

The Proposed Action would have short- and long-term, negligible, adverse impacts on the coastal resources of New York State because it would involve construction activities and result in an increase in impervious surfaces. Impacts would not be considered significant. The net change in impervious surfaces would be relatively small (approximately 3.7 acres), infiltration basins would be included as part of the POV lot and east gate projects, and an approved SWPPP and an Erosion and Sediment Control Plan would each be obtained before starting any construction and infrastructure improvements to minimize impacts on state coastal resources. MARFORRES would implement the Proposed Action to be consistent to the maximum extent

practicable with the applicable New York State Coastal Management Program and New York City LWEPP enforceable policies. Water quality and geology and soils impacts and BMPs relevant to coastal zone management can be found in **Section 3.6.3** and **Section 3.7.3**.

MARFORRES has developed a Coastal Consistency Determination (CCD) in accordance with 15 CFR § 930.39 under the Coastal Zone Management Act (CZMA) and will submit a Negative Determination to the New York State Department of State for concurrence. **Appendix A** contains the CCD for the Proposed Action and associated materials to be provided to the New York State Department of State.

3.2.3.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the proposed infrastructure improvements would not occur. Therefore, no impacts on water use or natural resources of New York State's coastal zone under the No Action Alternative would be expected.

3.3 Infrastructure and Transportation

3.3.1 Definition of the Resource

The definition of infrastructure and transportation was described in the 2016 MCRC Brooklyn EA; therefore, this information is incorporated herein by reference. Street and highway operation are primarily regulated by the Federal Highway Administration and implemented by the New York State Department of Transportation and New York City Department of Transportation (NYCDOT). Local street operations and maintenance activities are managed by NYCDOT and MCRC Brooklyn.

3.3.2 Affected Environment

The affected environment for infrastructure and transportation was discussed previously in the 2016 MCRC Brooklyn EA and remains largely the same in this SEA; however, the Proposed Action in this SEA would affect resources not previously described. Resources changed are discussed in this section; other resources are incorporated by reference.

Water Supply. The New York City water supply system has a total available storage capacity of 570 billion gallons and provides approximately one billion gallons of potable water daily to New York City and the surrounding area (NYCDEP 2019, NYW 2019).

Stormwater. The area east of the administration building and parts of the existing POV parking area at MCRC Brooklyn have inadequate stormwater drainage. Fill material under the pavement is unconsolidated and has resulted in low spots in the existing POV lot and a large sinkhole in the parking area between the SATCOM and VMF buildings (see **Figure 2-3** and **Figure 3-1**). The sinkhole has destroyed the majority of the parking area and created hazardous conditions for personnel, who must avoid the area to avoid falling in. The sinkhole continues to expand, threatening the integrity of the foundation of the nearby VMFs. The low spot in the existing POV lot has been cordoned off to prevent personnel from parking or walking through the area due to the safety hazard. Without mitigation efforts, continuous pooling of stormwater in these areas has the potential to expand the existing sinkholes or create new ones. The poor condition of the

pavement and insufficient stormwater drainage has not only resulted in an ongoing health and safety concern but has also led to the underutilization of the parking area.



Figure 3-1. Photograph of Sinkhole in Parking Area near VMF

Communications. The existing communications system at MCRC Brooklyn include telephone and internet lines that are owned and managed by Verizon Communications (MARFORRES 2013c). The current copper communications line capacity does not meet the bandwidth requirements of the installation and requires upgrades.

Other Utilities. Sewer, natural gas, and liquid fuel systems would be less than negligibly affected by the Proposed Action and are therefore not discussed further in this SEA.

Transportation. MCRC Brooklyn is accessible through one operational security gate. The north gate is used by all installation personnel, reservists on training weekends, and tactical vehicles. The north gate is located off of Aviation Road and provides access to the main buildings on the installation and the POV parking lot, as well as access to the tactical equipment storage lot. The east gate, which can be reached via Enterprise Avenue from Aviation Road, provides access to the tactical equipment lot via the East Training Area in the eastern portion of the installation, but the gate is currently not operational. Because only the north gate is in operation at MCRC Brooklyn, queuing along Aviation Road during drill weekends occurs, which reduces the level of service of the roadway and slows down civilian access to other areas on Floyd Bennett Field.

Primary access to MCRC Brooklyn is provided via the Shore Parkway, also referred to as Belt Parkway, which is a six-lane highway that runs west to northeast through the southern portion of Brooklyn. From the parkway, Flatbush Avenue travels in a northwest to southeast direction adjacent to Floyd Bennett Field. The 2016 two-way annual average daily traffic (AADT) for Shore Parkway, starting at Rockaway Parkway travelling southwest toward Flatbush Avenue, was 165,379 vehicles. The Shore Parkway AADT count, starting at Knapp Street travelling northeast toward Flatbush Avenue, was 158,160 vehicles. The AADT count for Flatbush

Avenue, from Shore Parkway to the Marine Parkway Bridge, was 24,420 vehicles. Although less common, access to MCRC Brooklyn is also available from the south via Beach Channel Drive, Rockaway Point Boulevard, and the Marine Parkway Bridge, which had 2016 AADT counts of 22,616, 6,753, and 21,100, respectively. The average travel time for people commuting in New York City is 36.2 minutes while the average commuter in Kings County drives approximately 42.6 minutes (NYSDOT 2016, USCB 2019).

Parking on MCRC Brooklyn consists of a POV parking lot with 513 parking spaces and a tactical equipment lot with 300 spaces. The existing parking lot is insufficient to meet installation needs and results in reservists parking in undesignated areas or within parking lots on Floyd Bennett Field.

Flatbush Avenue is part of the Jamaica Bay Greenway, a 19-mile pedestrian and bicycle loop around Jamaica Bay in Brooklyn and Queens. A protected bicycle lane with access points is located along the eastern side of Flatbush Avenue. NPS allows pedestrians and cyclists to hike and bike the historic runways at Floyd Bennett Field (NYCDOT 2019).

3.3.3 Environmental Consequences

For analyzing potential effects on infrastructure, the evaluation criteria are based on their potential to disrupt or improve existing infrastructure service levels and create additional needs. An impact could be considered significant if a proposed action resulted in the exceedance of a utility or created a long-term interruption in the operation of the utility.

For analyzing potential effects on transportation, the evaluation criteria are based on their potential to change roadway and intersection service levels, travel patterns, and accessibility (i.e, ease of drivers to reach a desired destination). An impact on transportation could be considered significant if a proposed action resulted in a substantial decline in service level; reduced traffic safety leading to increased risk of vehicular accidents; or substantial and permanent changes to roadway accessibility.

3.3.3.1 PROPOSED ACTION

Electrical Supply. Short-term, negligible, adverse impacts would occur on the electrical supply at MCRC Brooklyn from temporary disruptions during construction and repair activities. The existing utility corridor from the Consolidated Edison South Substation along Flatbush Avenue to the MCRC Brooklyn transformer would be used for installation of the proposed fiber optic communication line. Installation has the potential to interfere with existing electrical lines. Electrical interruptions are not likely and contractors would locate and avoid all electric lines before beginning construction activities. Lighting for the proposed west gate, POV parking lot, and renovated north and east gates would not be expected to notably increase electricity consumption, resulting in no long-term impacts.

Water Supply. Short-term, negligible, adverse impacts on water supply would be expected from a temporary change in demand during construction and repair activities. The increase in water demand would be minimal and would not noticeably change the demand on or capacity of the New York City water supply system. Long-term, minor, adverse impacts on water supply could occur as a result of operation of the fire suppression facility and installation of a new 200,000-

gallon water storage tank. Although MCRC Brooklyn would store more water on the installation, the increase in water demand would be minimal.

Stormwater. Short- and long-term, minor, adverse and beneficial impacts on stormwater drainage would occur. Construction would temporarily disrupt natural stormwater drainage flows and increase soil erosion until areas are constructed or revegetated. Construction of the proposed POV parking lot and west gate, and renovation of the north gate and east gate would increase impervious surfaces on the installation by approximately 3.7 acres, and less than 0.1 acre on NPS property from addition of a right turn lane on Aviation Road to the west gate and expansion of the driveways at the north gate to connect to Aviation Road. The addition of impervious surfaces on the installation would increase stormwater runoff, leading to a greater risk of flooding and ponding and soil erosion. Adverse effects would be minimized through the implementation of an Erosion and Sedimentation Control Plan and BMPs, which could include the installation of temporary stormwater controls to minimize the volume and velocity of stormwater flow. Infiltration basins would be constructed adjacent to the POV lot and east gate projects to further reduce the volume and velocity of stormwater flow associated with the increase in impervious surfaces. Because construction would involve soil disturbance of more than one acre, a New York State Pollutant Discharge Elimination System General Permit for Stormwater Discharges from Construction Activity would be required (NYSDEC 2020a).

Long-term, negligible to minor, adverse impacts would occur because of the addition of impervious surfaces at MCRC Brooklyn, increasing the amount of stormwater runoff. Stormwater falling on the northern portion of the access lanes to the west gate would occur on NPS property and runoff would flow into existing facilities along Aviation Road; otherwise, drainage would flow southeast into MCRC Brooklyn. At the north gate, rainwater is already directed to existing stormwater management facilities along Aviation Road. Due to proposed grading requirements for the north gate, the drainage area for these facilities, which overlaps both MCRC Brooklyn and NPS property, would increase by 0.12 acre from 1.44 to 1.56 acres. This increase would negligibly contribute to stormwater drainage onto NPS property along Aviation Road. Impacts would be offset by constructing three additional stormwater drains on MCRC Brooklyn and two additional stormwater drains to the stormwater main along Aviation Road. These drains would be able to accommodate an anticipated 0.3 cubic foot per second increase in runoff during a 1-hour, 100-year storm event due to the increased impervious surfaces. No changes to the Municipal Separate Storm Sewer Systems permit would be required because the existing permit would cover the stormwater runoff increases.

Long-term, minor beneficial impacts would occur from the stormwater drainage improvements, which would reduce the occurrence of erosion and sinkholes, prevent flooding in the existing POV lot, and improve the overall stormwater drainage efficiency at MCRC Brooklyn. Temporary and permanent stormwater controls would be designed to drain through MARFORRES property and prevent drainage, flooding, erosion, and sedimentation on NPS property.

Communications. Short- and long-term, minor to moderate, adverse and beneficial impacts on communications at MCRC Brooklyn would be expected as a result of connection and disconnection of communications infrastructure during construction and repair activities and

subsequent operation. The proposed fiber optic communications line would extend from the eastern perimeter of the installation to the existing Verizon fiber optic line near the intersection of Flatbush Avenue and Aviation Road. The communications line would extend in a southward direction within the installation and terminate north of the VMF. Directional drilling, with some open trenching as necessary, would be used to install the proposed communications line within the same ROW as the utility corridor for the proposed electrical lines as described in the 2016 MCRC Brooklyn EA. An additional 150 feet of fiber optic line within public ROW along Flatbush Avenue would be required. Temporary disruptions in communications due to construction activities could occur at the MCRC while the proposed fiber line is installed and the copper line is disconnected at the VMF.

Long-term, moderate, beneficial impacts on communications at MCRC Brooklyn would occur from the installation of a new fiber optic communications line. Because the current copper communication line does not meet the installation's bandwidth requirements and the conduit is at capacity, the new fiber line would result in increased communications capabilities and capacity for the installation.

Solid Waste Management. Short-term, minor, adverse impacts on solid waste management at MCRC Brooklyn would be expected from the construction and repair activities under the Proposed Action. Solid waste generated from construction would be disposed of in accordance with relevant federal, state, and local regulations. Materials would be recycled or reused to the maximum extent possible. Soils from berm removal at the access point for the west gate along Aviation Road would be managed as discussed in **Section 2.1.2**. It is not anticipated that material would be hauled offsite. Concrete, among other materials, from construction and repair would be sent to appropriate recycling facilities to be repurposed and reused. No long-term impacts on solid waste management would be expected.

Transportation. Short-term, negligible, adverse impacts on traffic associated with queuing at the security gates at MCRC Brooklyn would occur under the Proposed Action. Construction periods for the west, east, and north gates would be staggered to not coincide with each other and traffic would still be able to access the installation using the newly open west gate or temporarily use the new north gate exit lane for two-way traffic during the realignment of the existing north gate. Therefore, it is not likely that traffic accessing the installation would encounter construction crews or equipment, which would not impact traffic flow or roadway service levels at each gate.

Short-term, negligible, adverse impacts on traffic and roadways within the area of MCRC Brooklyn would occur during construction. Delivery of construction and repair materials, including removal of materials, would cause a temporary increase in traffic entering and exiting the installation. The construction periods for the various components of the Proposed Action would generally not overlap and heavy construction vehicles would remain on the installation for the duration of the construction period, resulting in a negligible increase in traffic. Because the AADT counts for accessing MCRC Brooklyn are already high (24,420 on Flatbush Avenue from Shore Parkway to the Marine Parkway Bridge), the additional construction traffic in the area would not considerably decrease the level of service of the roadway. Following the completion

of the construction and repair activities, movement from construction and delivery vehicles would cease and no further long-term impacts on traffic roadways within the area would occur.

Short-term, negligible, direct, adverse impacts on NPS property would occur as a result of renovations of the north gate. Construction of the west gate and the new exit lane adjacent to the existing north gate would occur prior to renovation of the existing north gate as an entry-only lane. During temporary closure of the existing north gate for reconfiguration, the west gate and north gate exit lane would temporarily be utilized for two-way daily operational traffic to and from MCRC Brooklyn. Daily MCRC Brooklyn traffic flow and capacity on and to Aviation Road would not differ from existing levels during and following construction.

Long-term, moderate, beneficial impacts on traffic associated with queuing at security gates would occur as a result of construction/repair of the west, east, and north gates under the Proposed Action. The proposed west gate would allow for more efficient access to the installation from 5:30 a.m. to 7:30 a.m. during drill weekends. The new one-way west gate access road/queuing lane would be located on a former airfield taxiway and would include AT/FP features and a portable guard house. **Section 3.1.2** noted that peak hour traffic using Aviation Drive is up to 200 vehicles per hour. Reservists commuting during drill weekends can currently add up to 350 cars along Aviation Road routing into and out of MCRC Brooklyn during early morning and evening hours. As stated in **Section 3.1.3.2**, The rate of traffic flow on Aviation Road would not change, but the volume of traffic would be reduced by the removal of approximately 30 reservist vehicles from Aviation Road through queuing availability on the former airfield taxiway at the proposed west gate in addition to the two-car queuing availability at the north gate and tactical vehicle access at the east gate. Because reservist traffic would generally avoid peak hour travel and occur in the early morning, evening, and weekend time periods; reservist traffic accessing the installation would be spread out over a half-hour or more period; and the availability of queuing lanes would remove reservist traffic from Aviation Road, it is expected the Proposed Action would result in beneficial impacts on traffic levels when compared with existing conditions.

The renovated east gate would provide a dedicated access point for the USMC tactical vehicle fleet, which would remove traffic from the north gate and allow more efficient tactical vehicle access to the installation. Having a dedicated tactical vehicle gate would also increase the available parking in the POV lot and allow for the safer movement of equipment. The renovated north gate would include a new sliding gate, access controls, lighting, communications service, and guard house. The entrance gate would be located farther back from Aviation Road and the addition of an exit gate and vehicle search area on MCRC Brooklyn would allow for more queuing on the installation.

Short- and long-term, minor, adverse and moderate, beneficial impacts on parking at MCRC Brooklyn would occur under the Proposed Action. Weekend-long training exercises for reserve duty personnel would continue to take place throughout the construction period; however, parking capacity would be reduced during construction of the new POV parking lot, construction of the west gate, and from upgrading the fenceline. MCRC Brooklyn would coordinate with NPS to accommodate anticipated parking needs until sufficient parking capacity for reservists is

available following completion of the new POV parking lot. Long-term, moderate, beneficial impacts on parking at MCRC Brooklyn would occur following the construction of the lot and its additional 325 parking spaces. POVs would no longer overburden the existing lot during drill weekends, which would allow for easier access to MCRC Brooklyn and provide sufficient space for certain types of training activities to occur unencumbered. Additionally, following the completion of the stormwater drainage improvements, localized ponding and sinkholes would no longer occur, which would result in increased efficient and use of the existing POV parking lot.

No impacts on public transportation or pedestrian networks in the vicinity of MCRC Brooklyn would occur under the Proposed Action.

3.3.3.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the proposed construction and repair activities outlined in **Section 2.1** would not be implemented, which could result in long-term, minor to moderate, adverse impacts. Reservists would continue to overburden the existing POV parking lot or park in unauthorized areas on drill weekends, which would result in inefficient access to the installation, affect civilian traffic at the NRA, and occupy available space that could be used for some training activities. The proposed west gate would not be constructed and the north gate would remain the only operation access point to the installation and, therefore, long queuing lines on Aviation Road during drill weekends would continue to occur. The proposed fiber optic communication line would not be installed and the existing line would continue to operate at full capacity, inadequately supporting the MCRC Brooklyn mission. Stormwater drainage improvements, such as the removal, regrading, and replacement of concrete in the POV parking area and the installation of stormwater controls as analyzed in the 2016 MCRC Brooklyn EA would be implemented. However, these stormwater drainage improvements would be inadequate to sufficiently address all the stormwater issues. Because additional stormwater drainage improvements as part of the Proposed Action in this SEA would not be implemented, the severity of flooding and erosion and sinkhole events could be increased in the long-term.

3.4 Noise

3.4.1 Definition of the Resource

The definition of noise was described in the 2016 MCRC Brooklyn EA; therefore, this information is incorporated herein by reference.

3.4.2 Affected Environment

The noise environment in the project area was previously discussed in the 2016 MCRC Brooklyn EA and has not noticeably changed since then; therefore, this description of the affected environment is incorporated herein by reference.

3.4.3 Environmental Consequences

For analyzing potential impacts on noise, the evaluation criteria area based on the changes to the ambient noise environment or potential changes to land compatibility from noise caused by the implementation of a proposed action. Impacts on noise would be considered significant if a

proposed action were to result in the violation of applicable federal, state, or local noise regulations; create appreciable areas of incompatible land use outside the MCRC Brooklyn boundary; or result in noise that would negatively affect the health of the community.

3.4.3.1 PROPOSED ACTION

Given the temporary nature of proposed construction and repair activities and the existing noise environment, short-term, negligible to minor, adverse impacts on the ambient noise environment would occur under the Proposed Action. Several pieces of heavy construction equipment would likely be used simultaneously during construction and repair activities, and this equipment would produce noise. **Table 3-2** presents typical additive noise levels for the main phases of construction. In general, the addition of a piece of equipment with identical noise levels to another piece of equipment would add approximately 3 A-weighted decibels (dBA) to the overall noise environment (USEPA 1971). Additive noise associated with multiple pieces of construction equipment operating simultaneously would increase the overall noise environment by a few decibels (dB) over the noisiest equipment, depending on the noise levels (USEPA 1971).

Table 3-2. Additive Noise Levels Associated with Construction in an Urban Area

Construction Phase	L _{eq} (dBA at 50 feet)	L _{eq} (dBA at 250 feet)	L _{eq} (dBA at 500 feet)	L _{eq} (dBA at 1,000 feet)
Ground clearing	84	70	64	58
Excavation and trenching	89	75	69	63
Finishing	84	70	64	58

Sources: USEPA 1971, TRS Audio 2019

Note: Values were estimated assuming an ambient noise environment of 70 dBA. L_{eq} = equivalent sound level

Noise levels at Floyd Bennett Field are generally around 45 to 50 dbA, which is more typical of residential area with little to light automobile traffic (NPS 2015). Due to the proximity to the NYPD helicopter unit and presence of John F. Kennedy International Airport across Jamaica Bay from Floyd Bennett Field, aircraft noise is also present in the area. The project components under the Proposed Action that have the greatest potential to produce noise levels that may impact the surrounding area are the fiber optic communication service in which excavation and trenching would occur approximately 300 feet from the closest noise-sensitive receptor, which is an NPS ranger housing unit, and the east gate replacement, which would occur adjacent to NPS ranger housing. According to **Table 3-2**, noise levels from installation of the fiber optic communication service would be below 75 dBA. Because the east gate replacement would occur adjacent to a noise-sensitive receptor, noise levels could reach 89 dBA, which is still compliant with the New York City Noise Code (NYCDEP 2014). Activities less than 50 feet from sensitive noise receptors (i.e., fenceline upgrades) at this noise level would occur quickly and intermittently, would only require one or two pieces of heavy construction equipment, and should last only a few days. Additionally, construction noise would decrease with distance from the noise source. To prevent noise impacts on construction crews, contractors would require personnel, and particularly equipment operators, to wear hearing protection to limit exposure to noise and ensure compliance with relevant regulations. To prevent noise impacts on noise-

sensitive receptors, such as the Floyd Bennett Field Historic District or the NPS ranger housing units, the following BMPs could be implemented:

- Develop and maintain a noise mitigation plan during the duration of construction and repair activities.
- Limit construction to normal weekday daytime hours (7 a.m. to 6 p.m.) to maintain compliance with the New York City Noise Code.
- Ensure that all heavy construction equipment include noise abatement components such as mufflers, engine enclosures, engine vibration isolators, or other sound dampening supplements.
- Turn off all idling equipment when not in use.
- Maintain uniform noise levels and avoid impulsive noises.
- Maintain good relationships with the community and publish/distribute notices before noisy operations occur, and provide the community with frequent updates as to when and where construction actions would take place.

Because of the temporary nature of construction activities, it is anticipated that noise beyond ambient levels would cease following completion of all construction and repair activities. No new operational noise sources are proposed as part of the Proposed Action. During drill weekends, traffic noise would temporarily increase in the vicinity of the east gate. Because training already occurs in the East Training Area, the east gate has previously been in use, east gate use would only occur approximately two times a month, and traffic noise is common along Aviation Road, negligible, direct impacts on NPS housing would be expected as a result of operational changes with replacement of the east gate.

3.4.3.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, proposed construction and repair activities would not occur and no noise beyond ambient levels would result. Therefore, no impacts on noise under the No Action Alternative would be expected.

3.5 Air Quality

3.5.1 Definition of the Resource

The definition of air quality was described in the 2016 MCRC Brooklyn EA; therefore, this information is incorporated herein by reference. Revised draft guidance from CEQ, dated June 21, 2019, recommends that agencies should attempt to quantify a proposed action's projected direct and foreseeable indirect greenhouse gas (GHG) emissions when the amount of those emissions is substantial enough to warrant quantification. If the agency were to determine that a quantitative analysis of GHG emissions is not warranted, CEQ recommends that a qualitative analysis be included (CEQ 2019).

3.5.2 Affected Environment

Air Emissions. MCRC Brooklyn is in Kings County, New York, which is part of the New-Jersey-New York-Connecticut Interstate Air Quality Control Region (40 CFR § 81.13). Kings County is

designated by the U.S. Environmental Protection Agency (USEPA) as serious nonattainment for the 2008 8-hour ozone (O₃) National Ambient Air Quality Standard (NAAQS) and as moderate nonattainment for the 2015 8-hour O₃ NAAQS. Kings County is also designated as maintenance for carbon monoxide (CO) and particulate matter less than or equal to 2.5 microns in diameter (PM_{2.5}) and unclassified/attainment for all other criteria pollutants (USEPA 2020). As such, the General Conformity Rule is potentially applicable for emissions of nitrogen oxides (NO_x), volatile organic compounds (VOC), CO, PM_{2.5}, and sulfur dioxide (SO₂). The General Conformity Rule also is potentially applicable to emissions of ammonia because it is a precursor for PM_{2.5}. However, the air emission sources for this Proposed Action would produce negligible amounts of ammonia; therefore, it does not warrant further discussion in this SEA. The state of New York is within an O₃ transport region.

Climate Change and Greenhouse Gases. Ongoing climate change in the Northeast U.S. region, including Kings County, New York, has the potential to increase average temperatures, rainfall intensity, and flooding and decrease seasonality. Because Kings County is located in an urban environment, with an abundance of concrete and a relative lack of vegetation, the area tends to have higher temperatures than non-urban regions. Increased average temperatures from climate change combined with the increased temperatures of urban environments could reduce air quality and lead to impairments of public health. Increased extreme weather events and rainfall could increase flood frequency and intensity, which could lead to damaged infrastructure, soil erosion, and coastal erosion.

3.5.3 Environmental Consequences

For analyzing the potential effects on air quality, the evaluation criteria are based on estimated direct and indirect emissions associated with a proposed action. Impacts on air quality would be significant if a proposed action were to exceed the applicable General Conformity Rule *de minimis* level thresholds. Based on compliance with the NAAQS, the General Conformity Rule is applicable in Kings County to emissions of NO_x, VOC, CO, PM_{2.5}, and SO₂. The applicable *de minimis* thresholds are shown in **Table 3-3**. While the General Conformity Rule is not applicable to emissions of particulate matter less than or equal to 10 microns in diameter (PM₁₀), 100 tons per year (tpy) also can be used as a surrogate to determine the level of impacts under NEPA. Additionally, significant impacts would occur if a proposed action meaningfully contributed to the potential effects of global climate change.

Table 3-3. General Conformity *De minimis* Thresholds for Kings County, New York

Area	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Kings County	50	50	100	100	NA	100

Source: 40 CFR § 93.153(b)

Notes: All values are in tpy. NA = not applicable

3.5.3.1 PROPOSED ACTION

Short-term, minor, adverse impacts on air quality would result from the construction and repair activities associated with the Proposed Action. Short-term emissions of criteria pollutants would

be produced from on-road (e.g., personnel and contractor vehicles, deliveries) and off-road (e.g., backhoes, dozers, portable generators) vehicles or equipment associated with construction (e.g., excavating, paving, site grading activities) for the Proposed Action. Such emissions would be temporary and would occur only when the construction activities take place.

Sources of construction emissions would include the operation of heavy equipment, workers commuting to and from project area in their personal vehicles, heavy duty diesel vehicles hauling materials and debris to and from project area, and ground disturbance activities. Particulate matter air emissions, such as fugitive dust, would be produced from ground disturbance activities and the combustion of fuels, and would be greatest during the initial site preparation activities and would vary from day to day depending on the work phase, level of activity, and prevailing weather conditions. BMPs and environmental control measures (e.g., wetting the ground surface) would be incorporated into construction and repair activities to minimize fugitive dust emissions. Additionally, work vehicles would be well-maintained and use diesel particulate filters to reduce emissions of criteria pollutants.

The Air Conformity Applicability Model, version 5.0.13, was used to estimate the air emissions from each component of the Proposed Action. **Table 3-4** shows the total air emissions from construction. To estimate air emissions, each project component was assumed to begin in January 2021 with a construction period of one year.

Table 3-4. Estimated Air Emissions from the Proposed Action

Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}	CO _{2e}
2021	1.836	10.991	11.693	0.027	32.779	0.500	2,649.4
Significance Criteria	50	50	100	100	100	100	N/A

Notes: All values are in tpy. SO_x = sulfur oxides, CO_{2e} = carbon dioxide equivalent

As stated in **Section 3.5.1.2**, Kings County is designated by the USEPA as serious nonattainment for the 2008 8-hour O₃ NAAQS and as moderate nonattainment for the 2015 8-hour O₃ NAAQS. Subsequently, the General Conformity Rule is potentially applicable to O₃ and the *de minimis* thresholds for VOC and NO_x is 50 tpy. Kings County is also designated as maintenance for CO and PM_{2.5}, so the General Conformity Rule is potentially applicable to emissions of CO, PM_{2.5}, and SO₂ and the *de minimis* threshold for these pollutants is 100 tpy. As demonstrated in **Table 3-4**, emissions of VOC, NO_x, CO, PM_{2.5}, and SO_x would be below the *de minimis* threshold levels. Therefore, the requirements of the General Conformity Rule would not be applicable. While the General Conformity Rule is not applicable to emissions of PM₁₀, **Table 3-4** demonstrates that emissions of PM₁₀ also would be less than 100 tpy, resulting in no significant impacts.

Because no operational activities are anticipated under the Proposed Action, no air emissions would be produced following the completion of the infrastructure improvements and no additional air emissions would be produced at MCRC Brooklyn during and following the year 2022. Therefore, no long-term impacts on air quality at MCRC Brooklyn would result from the Proposed Action.

Climate Change and Greenhouse Gases. The Proposed Action would produce GHGs from construction associated with each project component. Construction would produce approximately 2,649 tons of CO₂e during 2021. By comparison, 2,649 tons of CO₂e is approximately the GHG footprint of 563 passenger vehicles driven for one year or consumption of 298,121 gallons of gasoline (USEPA 2019). Long-term GHG emissions would not result from the Proposed Action as all emissions producing activities would cease upon completion of construction activities.

Ongoing changes to climate patterns in the Northeast region are unlikely to affect MARFORRES's ability to implement the components of the Proposed Action at MCRC Brooklyn. Because climate change could increase the frequency and severity of rainfall and flooding events in the Northeast U.S. region, repairs to the stormwater drainage infrastructure at MCRC Brooklyn would serve as a climate change resiliency action to decrease the potential for flood damage on the installation in the event of a severe flooding event.

3.5.3.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the proposed project components would not be implemented and no construction activities would take place. Consequent air emissions would not occur and air quality conditions would remain unchanged from the existing condition described in **Section 3.6.1.2**. Therefore, no additional air emissions under the No Action Alternative would be expected.

3.6 Geological Resources

3.6.1 Definition of the Resource

The definition of geological resources was previously described in the 2016 MCRC Brooklyn EA; therefore, the information is incorporated herein by reference.

3.6.2 Affected Environment

The existing conditions for geological resources were described previously in the 2016 MCRC Brooklyn EA and remain largely the same in this SEA; therefore, these existing conditions are incorporated herein by reference. The Proposed Action in this SEA would affect geological resources presented in the 2016 MCRC Brooklyn EA. Resources requiring additional detail based on the physical location of improvements in the Proposed Action in this SEA (soils) are discussed in this section. Prime farmland and geologic hazards were analyzed in the 2016 MCRC Brooklyn EA, and the Proposed Action would have no impact on those specific resources, so these resources are not discussed further in this SEA.

Six soil types make up the project area at MCRC Brooklyn, two of which make up the majority of currently developed areas of the property (see **Figure 3-2; Table 3-5**). These two soils are Hooksan-Verrazan-Urban land complex, 0 to 8 percent slopes and Urban land, sandy substratum, 0 to 3 percent slopes. Hooksan-Verrazano-Urban land complex, 0 to 8 percent slopes is characteristic of portions of developed land. This soil type is excessively drained with no frequency of ponding or flooding. Similarly, Urban land complex, 0 to 8 percent slopes is also characteristic of developed land. The parent material for this soil type is comprised of asphalt

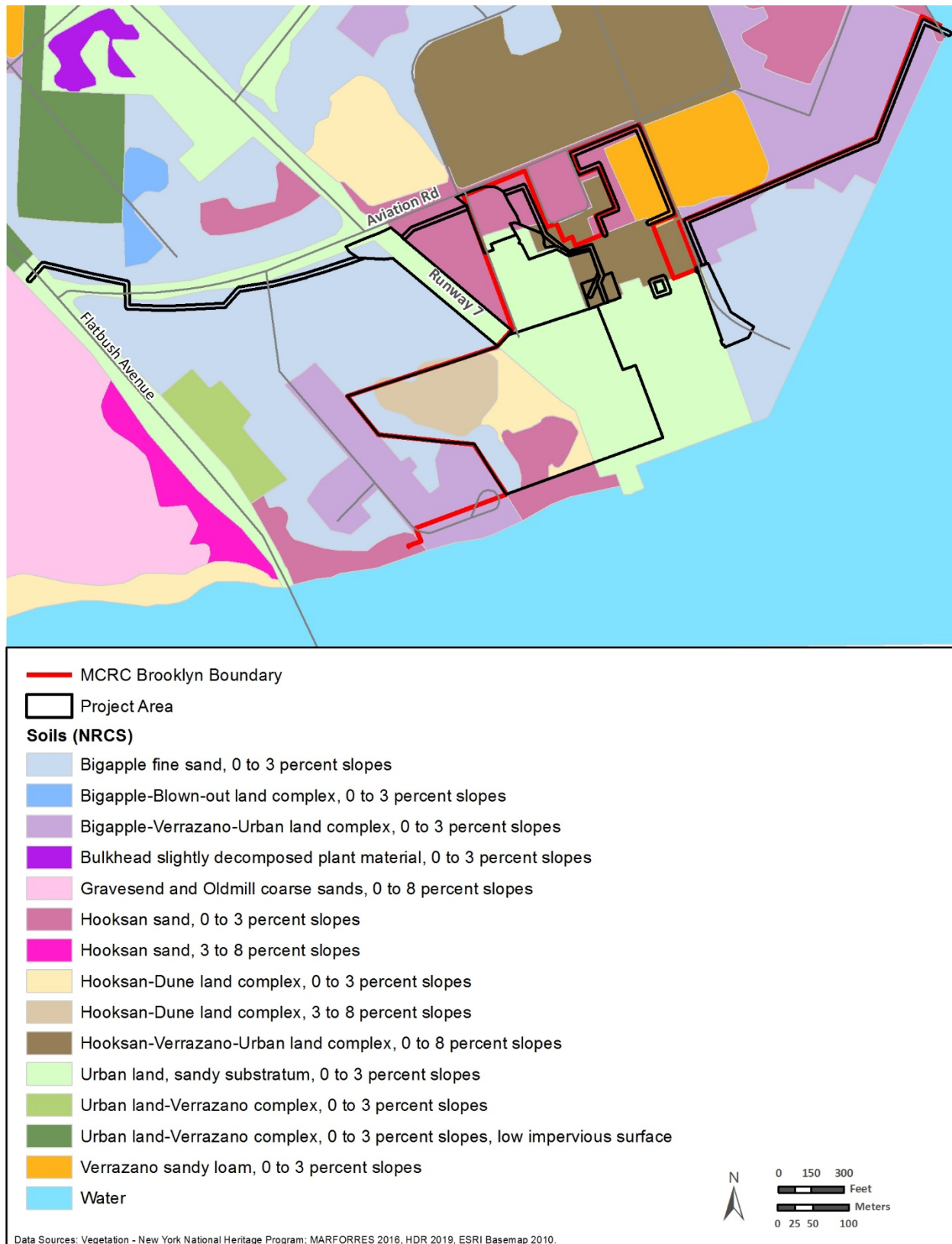


Figure 3-2. Soil Mapping Units in the Vicinity of the Project Area

Table 3-5. Soil Map Unit Coverage of the Project Area

Soil Map Unit	Project Area Coverage (Acres)
Bigapple fine sand, 0 to 3 percent slopes	3.6
Bigapple-Verrazano-Urban land complex, 0 to 3 percent slopes	0.8
Hooksan sand, 0 to 3 percent slopes	3.3
Hooksan-Dune land complex, 0 to 3 percent slopes	2.3
Hooksan-Dune land complex, 3 to 8 percent slopes	3.2
Hooksan-Verrazano-Urban land complex, 0 to 8 percent slopes	0.8
Urban land, sandy substratum, 0 to 3 percent slopes	8.4
Verrazano sandy loam, 0 to 3 percent slopes	0.2

over human-transported material and has a very high runoff class. The proposed POV parking lot is in an area of Hooksan-Dune land complex, divided approximately equally between 0 to 3 and 3 to 8 percent slopes. Hooksan-Dune land complex has a very low runoff class, rare frequency of flooding, and no frequency of ponding. Additional soils that occur within the utility corridor or areas proposed for fencing repair or installation includes Hooksan fine sand, 0 to 3 percent slopes and Bigapple fine sand, 0 to 3 percent slopes. Hooksan fine sand, 0 to 3 percent slopes and Bigapple fine sand 0 to 3 percent slopes are excessively and well drained, respectively and neither has a frequency to pond or flood (USDA NRCS 2020).

3.6.3 Environmental Consequences

For analyzing potential effects on geological resources, evaluation criteria are based on the protection of unique geological features, minimization of soil erosion, the siting of facilities in relation to potential geologic hazards, and associated regulations. An action could have a significant impact on geological resources if it were to substantially disturb and compact soil, threaten unique geological features, place a facility in proximity to a substantial geologic hazard, or result in noncompliance with laws, regulations, or orders protecting geological resources.

3.6.3.1 PROPOSED ACTION

Under the Proposed Action, short-term, negligible, adverse impacts on geological resources would result from temporary disturbance of ground surfaces during construction, including grading and ground moving activities. Construction activities would include soil excavation, vegetation removal, and exposure of soils to erosion. Long-term, minor, adverse impacts from the increase of approximately 3.7 acres of impervious surfaces at MCRC Brooklyn would also be expected. Reduced soil infiltration and soil productivity and increased runoff from additional impervious surfaces would occur.

Short-term, negligible impacts on topography may occur during construction of new fencing in areas without existing fencing. Minimal grading and vegetation clearing may be necessary in those areas. At the west and north gates, the existing soil berm would be removed.

Short-term, negligible, adverse impacts of soils would be expected to include localized soil compaction during construction. Areas of compaction would be associated with fenceline construction, the fire suppression facility, and stormwater drainage improvements due use of heavy construction equipment and currently exposed soils at those locations. West and north

gate improvements would occur on existing paved surfaces and would not impact geological resources.

Long-term, negligible to minor, adverse and beneficial impacts on soil erosion would be anticipated from regrading associated with the stormwater drainage improvements and expansion of impervious surfaces associated with the proposed POV parking lot and east gate improvements. Construction and infrastructure improvements would increase impervious surfaces by approximately 3.7 acres, increasing runoff from impervious surfaces. The proposed POV parking lot would be constructed on Hooksan-Dune land complex and Hooksan Sand and the new road at the East Gate would be constructed on Bigapple fine sand. While the new impervious surfaces proposed to be added represent a significant addition, additional runoff from the proposed lot is anticipated to drain excessively in these near shore, sandy soils. Stormwater drainage improvements and implementation of a SWPPP would improve water quality and reduce stormwater runoff on the installation, thereby reducing soil erosion.

Generally, soil erosion would be minimized by appropriately siting and designing facilities to account for soil limitations, employing construction and stabilization techniques appropriate for soil and climate, and implementing BMPs and temporary and permanent erosion control measures.

3.6.3.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the infrastructure improvements would not occur. Therefore, no impacts on geological resources would be anticipated under the No Action Alternative.

3.7 Water Resources

3.7.1 Definition of the Resource

The definition of water resources was described in the 2016 MCRC Brooklyn EA; therefore, this information is incorporated herein by reference. EO 13690, *Establishing a Federal Flood Risk Management Standard*, was since revoked by EO 13807, *Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure* (USACE 2020).

3.7.2 Affected Environment

The affected environment for water resources was discussed previously in the 2016 MCRC Brooklyn EA and remains largely the same in this SEA; however, the Proposed Action in this SEA would affect resources not previously described. Resources with changes (surface water) are discussed in this section; other resources are incorporated by reference.

The western portion of Jamaica Bay and its tributaries within the Southern Long Island Watershed are not included in New York State's 2018 Section 303(d) Draft List of Impaired Waters (NYSDEC 2018); however, the waterbody has been recommended for consideration on this list as an impaired waterbody for which TMDL development could be deferred (NYSDEC 2017). Pollutants within the waterbody are primarily influenced by combined sewer overflows, deicing, habitat alternation and municipal discharges. Known pollutants include pathogens,

nitrogen, and low dissolved oxygen/oxygen demand. Suspected impairments include priority organics (PCBs/migratory fish). As a result, habitat and hydrology are considered poor in western Jamaica Bay, while public bathing, recreation, aquatic life, and fish consumption have been classified as stressed (NYSDEC 2017).

3.7.3 Environmental Consequences

For analyzing potential effects on water resources within the project area, the evaluation criteria are based on water availability, quality, hydrology, and use, and associated regulations. An action could have a significant impact on water resources if it were to substantially reduce water availability or affect water quality; threaten or damage unique hydrologic characteristics; or result in noncompliance with laws, regulations, or orders protecting water resources.

3.7.3.1 PROPOSED ACTION

Groundwater. Long-term, negligible, adverse impacts on groundwater would be expected as a result of the Proposed Action. A net increase in impervious surfaces would occur from the construction of the proposed POV parking lot and proposed gate changes. BMPs, established in a SWPPP that would be developed for the Proposed Action, would be implemented to maintain the average annual predevelopment groundwater recharge volume for the sites (NYSDEC 2020a). This could be accomplished by infiltrating runoff from impervious surfaces back into the groundwater through the use of nonstructural (e.g., filter strips, vegetative swales, tree planting, and minimization of impervious surfaces) and structural (e.g., green roofs, stormwater planters, and porous pavement) methods, if necessary. Infiltration basins would be constructed adjacent to the POV lot and east gate projects, which would minimize the impacts of increased stormwater runoff. These changes in drainage would be highly localized, site-specific, and minor. Stormwater drainage improvements would result in negligible, beneficial impacts through improved groundwater infiltration.

Construction activities associated with the Proposed Action would minimally increase the risk of hazardous spills or leaks from fuel or other construction-related products and the potential to impact groundwater quality. Potential groundwater infiltration would be managed through proper handling of construction equipment and implementation of BMPs and procedures as outlined in MCRC Brooklyn's SPCC Plan (MARFORRES 2019).

Surface Water. No surface waterbodies exist in the project area (see **Figure 3-3**), but Jamaica Bay borders the installation to the east and south. A net increase in impervious surfaces would occur as a result of construction of the proposed POV parking lot and the proposed gate improvements. Therefore, long-term, negligible, adverse impacts on surface water would result from the Proposed Action. Specific details on stormwater management on NPS property for the projects under the Proposed Action is discussed in **Section 3.3.3.1**. MCRC Brooklyn would adhere to the stormwater sizing criteria outlined in the New York State Stormwater Management Design Manual to reduce potential runoff, erosion, and overbank flooding. A stormwater management plan is currently in development for MCRC Brooklyn, which would outline BMPs to reduce increases in stormwater runoff and pollution. Infiltration basins would be constructed adjacent to the POV lot and east gate projects, which would minimize the impacts of increased

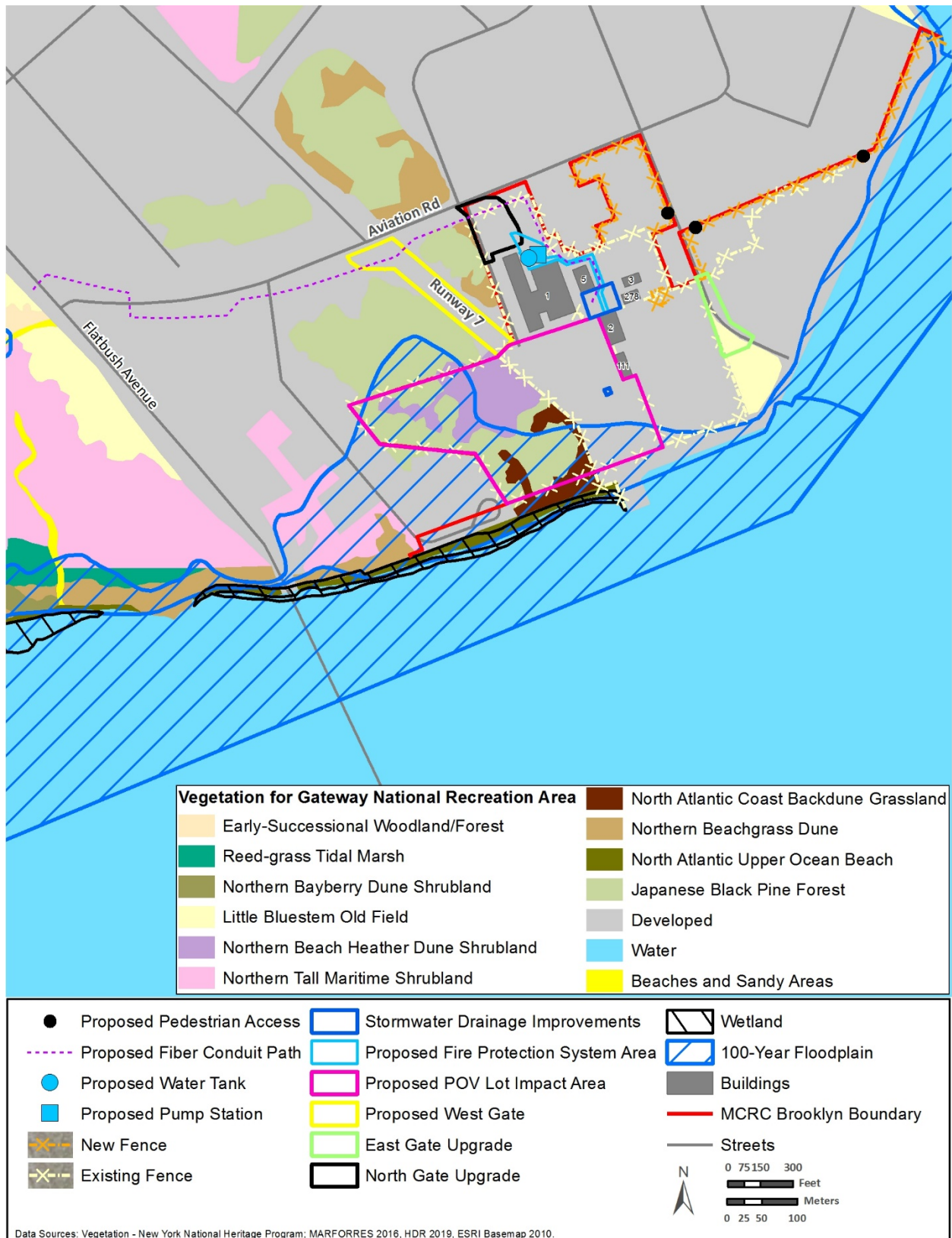


Figure 3-3. Vegetative Communities and Water Resources Associated with the Proposed Action

stormwater runoff. In turn, the surface water quality of Jamaica Bay would not be expected to degrade.

Post-construction runoff would be reduced by infiltration, groundwater recharge, reuse, recycle, and evaporation/evapotranspiration of 100 percent of the post-development water quality volume. Pre-development hydrology would be replicated by maintaining pre-construction infiltration, peak runoff flow, discharge volume, and minimizing concentrated flow by using runoff control techniques to provide treatment in a distributed manner before runoff reaches the collection system, as practicable. BMPs that are outlined in the installation SWPPP would be used to reduce runoff, erosion, and sedimentation.

Construction activities associated with the Proposed Action would increase the risk of hazardous spills or leaks from fuel or other construction-related products and the potential to impact surface water quality. Risks to water quality would be reduced through proper handling of construction equipment, implementation of BMPs, the SWPPP, a General Permit for Stormwater Discharges from Construction Activity to be obtained, and procedures as outlined in MCRC Brooklyn's SPCC Plan (NYSDEC 2020a; MARFORRES 2019). All bulk storage containers would meet general secondary containment requirements and would be located at least 300 feet away from stormwater drains with spill kits located nearby. Appendix C of the SPCC Plan contains a specific drainage drawing for the facility and depicts the lines of natural drainage indicating potential spill pathways, which could be useful in preventing the spread of a release should one occur. The SPCC Plan would be updated to reflect changes on the installation as a result of the Proposed Action, including revised drainage pathways and new infiltration basins. BMPs would be implemented to contain any spill and minimize the potential for, and extent of, associated contamination. Any discharge would be immediately reported to MARFORRES headquarters.

Wetlands and Floodplains. There are no wetlands within the project area; however approximately 3 acres of estuarine wetlands occur adjacent to the southwest corner of the installation. Direct impacts on wetlands and other waters of the U.S. would be avoided. Implementation and proper maintenance of an erosion and sediment control plan and stormwater management would minimize the potential for indirect impacts. Therefore, no impacts on wetlands would be expected.

Construction of the proposed POV parking lot would occur within approximately 7.9 acres of 100-year floodplains on MARFORRES property, and construction of additional fenceline in the easternmost portion of MCRC Brooklyn would impact approximately 0.02 acre of the 100-year floodplain (see **Figure 3-3**). Construction of additional impervious surfaces within the floodplain would increase the overall flood risk by reducing the area available for runoff infiltration and modifying existing flood flow and volume characteristics. This could cause an increase in runoff and storm-related damages to facilities and possibly result in human safety risks. Therefore, long-term, moderate, adverse impacts on floodplains would be expected. Refill and repaving of areas of stormwater drainage concern and improved stormwater management controls, such as construction of infiltration basins adjacent to the proposed POV lot and east gate, would reduce existing ponding. MCRC Brooklyn would adhere to the stormwater sizing criteria outlined in the

New York State Stormwater Management Design Manual to reduce potential runoff and erosion and overbank flooding. Environmental protection measures, such as permeable pavement, rain gardens, or bioswales, could be implemented to further minimize adverse impacts on floodplains. All vegetation planted as a result of environmental protection measures would consist of native species.

3.7.3.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the Proposed Action would not be implemented. Therefore, no impacts on water resources under the No Action Alternative would be expected.

3.8 Biological Resources

3.8.1 Definition of the Resource

The definition of biological resources was described in the 2016 MCRC Brooklyn EA; therefore, this information is incorporated herein by reference.

3.8.2 Affected Environment

The vegetation, wildlife, and rare, threatened, and endangered species in the project area were discussed previously in the 2016 MCRC Brooklyn EA and have not changed since then; therefore, that description of the affected environment is incorporated herein by reference. Changes to species status on the New York State Threatened and Endangered Species list have been proposed and are currently in review. These changes have been added to **Table 3-6**, which lists all the federal and state-listed threatened and endangered species that could occur within the Project Area.

Table 3-6. Federal- and State-Listed Threatened and Endangered Species that could occur within the Project Area

Common Name	Scientific Name	Federal Status	State Status	Habitat
Birds				
Piping plover	<i>Charadrius melodus</i>	T	E	Wide, flat, open sandy beaches
Red knot	<i>Calidris canutus rufa</i>	T	T	Intertidal marine habitats near coastal inlets
Roseate tern	<i>Sterna dougallii dougallii</i>	E	E	Rocky offshore islands, barrier beaches, and salt marsh islands
Least tern	<i>Sternula antillarum</i>	–	T	Estuaries, lagoons, sandy or gravelly beaches, and banks of rivers or lakes
Common tern	<i>Sterna hirundo</i>	–	T	Sand and shell beaches, grassy uplands and rocky inland shores
Northern harrier ^{1, 2}	<i>Circus cyaneus</i>	–	T	Freshwater and brackish marshes, tundra, fallow grasslands, meadows and cultivated fields
Peregrine falcon ^{1, 2}	<i>Falco peregrinus</i>	–	E	Open country from tundra, savannah and sea coasts, to high mountains, and open forests and tall buildings

Common Name	Scientific Name	Federal Status	State Status	Habitat
Short-eared owl	<i>Asio flammeus</i>	–	E	Open prairie, meadows, marshes, and open woodland
Least bittern	<i>Ixobrychus exilis</i>	–	T	Freshwater and brackish marshes with tall, dense emergent vegetation
Pied-billed grebe ²	<i>Podilymbus podiceps</i>	–	T	Marshes, dense stands of deep water emergent vegetation close to open water
Common Nighthawk ³	<i>Chordeiles minor</i>	–	–	Coastal sand dunes and beaches, logged forest, recently burned forest, woodland clearings, prairies, plains, sagebrush, grasslands, open forests, and rock outcrops; Nest on flat gravel rooftops
Yellow-breasted chat ³	<i>Icteria virens</i>	–	–	Dense shrubbery, including abandoned farm fields, clearcuts, powerline corridors, fencerows, forest edges and openings, swamps, and edges of streams and ponds
Mammals				
Northern long-eared bat	<i>Myotis septentrionalis</i>	T	T	Caves and mines in winter; Cavities or crevices of trees in old growth forests during the summer.
Tri-colored bat ⁴	<i>Perimyotis subflavus</i>	–	–	Open woods near water; Crevices of cliffs and rocks, Clusters of dead leaves in live or recently dead trees, such as oaks or pines
Plants				
Seabeach amaranth	<i>Amaranthus pumilus</i>	T	T	Barrier islands on coastal overwash flats at the ends of island and lower foredunes. Lower foredunes on ocean beaches above high tide.
Dune sandspur	<i>Cenchrus tribuloides</i>	–	T	Maritime sand dunes and beaches
Minute duckweed	<i>Lemna perpusilla</i>	–	E	Kettlehole ponds, the surface of rivers, in ponds, springs, rivers and lakes, particularly quiet waters
Retorse flatsedge	<i>Cyperus retrorsus</i> var. <i>retrorsus</i>	–	E	Sandy coastal habitats including maritime dunes and the upper edges of a salt marsh
Roland's sea-blite	<i>Suaeda rolandii</i>	–	E	Open, salt-influenced wetlands, including the upper portions of high salt marshes, in salt pannes or swales within brackish tidal marsh
Willow oak	<i>Quercus phellos</i>	–	E	Floodplain forests, maritime grasslands, and roadside forests and woodlands
Yellow flatsedge	<i>Cyperus flavescens</i>	–	E	Salt marshes, coastal plain pond shores, wet, sandy, weedy roadsides

Sources: NPS 2014, NYSDEC 2008, USFWS 2020a, USFWS 2020b, NPS 2008, NYSDEC 2020b, NYSDEC 2020c, NYSDEC 2020d, All About Birds 2020a, All About Birds 2020b

¹ Recorded in the 2nd New York State Breeding Bird Atlas surrounding the project area

² Proposed relegation of New York species status to species of special concern in 2020

³ Proposed addition to New York Threatened & Endangered species list in 2020 as Threatened from Special Concern

⁴ Proposed addition to New York Threatened & Endangered species list in 2020 as Threatened

Key: E = Endangered; T = Threatened

3.8.3 Environmental Consequences

For analyzing potential effects on biological resources within the project area, evaluation criteria used are based on disturbance, injury, or mortality of individual plants or animals; habitat removal, damage, or degradation; and associated regulations. An action could have a significant effect on biological resources if it were to substantially reduce available suitable habitat, affect a species or population adversely, or result in noncompliance with laws, regulations, or orders protecting biological resources.

3.8.3.1 PROPOSED ACTION

Vegetation. Long-term, moderate, direct, adverse impacts on vegetation would be expected from construction and demolition activities (e.g., trampling, crushing, and removal) associated with the proposed POV parking lot, gate changes and additions, fire protection system upgrades, and fiber optic communication line and fence installation. Removal of the existing earthen berm would not occur within any significant vegetative communities. Construction of the proposed POV parking lot would temporarily disturb or permanently remove approximately 8.9 acres of natural communities on MARFORRES property, including Japanese Black Pine Forest, North Atlantic Coast Backdune Grassland, and Northern Beach Heather Dune Shrubland, as identified in **Table 3-7**. The proposed east gate improvements could temporarily or permanently remove approximately 0.3 acre of little bluestem old field. The proposed north gate improvements could temporarily or permanently remove less than 0.1 acre each of Japanese Black Pine Forest and Northern Beachgrass Dune on MARFORRES property.. Native vegetation would be replanted where possible upon conclusion of construction activities. Some permanent loss in vegetation would be expected due to conversion of native vegetation communities to impervious surfaces.

The addition of impervious surfaces associated with the proposed west gate and north gate would result in the permanent loss of approximately 0.1 acre of largely lawn vegetation on NPS property (see **Table 3-7**). No natural communities on NPS property would be permanently affected, but temporary disturbance of less than 0.1 acre of Northern Beachgrass Dune and Japanese Black Pine Forest could occur during replacement of the north gate and installation of the proposed fiber optic line, respectively. Temporary disturbance, such as trampling, crushing, or removal of approximately 2.8 acres of developed/maintained landscaped areas on NPS property could also occur during construction of the west gate, replacement of the north gate, and installation of perimeter boundary fencing and the fiber optic line. NPS-approved locally sourced native species would be replanted upon completion of construction.

A variety of nonnative and invasive vegetation occurs throughout Floyd Bennett Field, which is partially due to prior human disturbance. Construction activities would include the following BMPs to prevent changes in vegetative community types:

- Inspect and clean construction equipment to remove soil, plants, and seeds
- Stage equipment in areas free of nonnative plant species, such as on the paved POV lot
- Use certified weed-free materials (e.g., grass seed, mulch, gravel, sand).

Table 3-7. Natural Vegetation Communities Impacted under the Proposed Action

Native Vegetation Community Affected	MARFORRES Acres Affected	NPS Acres Affected
Northern Beach Heather Dune Shrubland	3.1	0.0
North Atlantic Coast Backdune Grassland	1.0	0.0
Japanese Black Pine Forest	4.8	<0.1
Little Bluestem Old Field	0.3	0.0
Northern Beachgrass Dune	<0.1	<0.1
Vegetation Community Subtotal	9.2	<0.1
Developed/Maintained Landscaped Areas	10.4	2.9
Total	19.6	3.0

Wildlife. Short-term, minor, direct, adverse impacts on wildlife due to noise disturbances from construction activities would be similar to those described in the 2016 MCRC Brooklyn EA and are incorporated by reference.

Short-term, and long-term, minor, direct and indirect, adverse impacts on wildlife would be expected due to habitat removal under the Proposed Action. The vast majority of construction activities would occur on previously disturbed areas. Construction of the proposed POV parking lot and east gate changes would temporarily or permanently remove approximately 8.9 acres of native habitat. Reestablishment of native habitat where possible would occur once construction activities were completed, but a portion would be permanently converted to impervious surfaces. Displaced wildlife would likely move to the reestablished or nearest available habitat in the surrounding area.

Additional lighting for the POV lot could deter wildlife from the area and also draw other wildlife typically attracted to lights such as insects, along with bird and bat species that feed on them. Lighting already exists in the adjacent existing POV lot and the lumens for the proposed poles would be oriented downward. The lighting would be Dark Sky Friendly in accordance with International Dark Sky Association seal of approval requirements as described in **Section 2.1.1**, would not appear brighter than existing site lighting, and would be controlled to dim during periods of inactivity on MCRC Brooklyn, further reducing potential impacts on wildlife. Therefore, negligible, indirect, adverse impacts on wildlife could occur as a result of the addition of POV lot lighting.

Rare, Threatened, and Endangered Species. Impacts on rare, threatened, and endangered species under the Proposed Action would be similar to those described in the 2016 MCRC Brooklyn EA. The species proposed to be added to the New York Threatened and Endangered Species List in 2020 have not been identified on MCRC Brooklyn, but habitat associated with these species does occur within project area. Loss of habitat due to temporary and permanent removal of vegetation and natural vegetation communities could adversely impact rare, threatened, and endangered species. Habitat loss would be minimal and displaced species would move to the nearest available habitat in the surrounding area. Impacts due to habitat loss could be reduced through the implementation of seasonal restrictions on vegetation removal, generally from March to September depending on species. Although unlikely, if a population of state-listed species were discovered within the project area, it would be protected from disturbance to the greatest extent practicable. Therefore, no significant impacts on rare,

threatened, and endangered species would be expected under the Proposed Action. Section 7 consultation with the U.S. Fish and Wildlife Service for concurrence on this finding of “no effect” on federally listed species is in progress.

3.8.3.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the Proposed Action would not be implemented. Therefore, no impacts on biological resources under the No Action Alternative would be expected.

3.9 Cultural Resources

3.9.1 Definition of the Resource

The definition of cultural resources was previously described in the 2016 MCRC Brooklyn EA; therefore, the information is incorporated herein by reference. Visual resources include the natural and man-made physical features that give a particular landscape its character, including in the context of historic resources and their viewsheds. The features that form the overall visual impression a viewer receives include landforms, water, color, adjacent scenery, and man-made modifications.

3.9.2 Affected Environment

The existing conditions for cultural resources were described previously in the 2016 MCRC Brooklyn EA and remain largely the same in this SEA; therefore, these existing conditions are incorporated herein by reference. The Proposed Action in this SEA would affect cultural resources presented in the 2016 MCRC Brooklyn EA and resources not previously reported. Resources not previously analyzed are summarized in this section and other resources are incorporated by reference.

The project area for this SEA incorporates several resources outside of the project area for the 2016 MCRC Brooklyn EA. As noted in the EA, all buildings and structures associated with the period of ownership as an armed forces reserve center were surveyed and evaluated in 2003 for NRHP eligibility and determined not eligible (HHM 2004). The boundaries of the NRHP-listed Floyd Bennett Field Historic District were proposed to be expanded in a 2009 Cultural Landscape Report (Olmsted Center 2009) and a 2011 NRHP Nomination (NPS 2011). The 2011 nomination expanded the boundary to include areas south of the runways to encompass the World War II history, but excluded the MCRC Brooklyn property.

Additional resources not discussed previously are Seaplane Taxiway 7, Seaplane Parking Apron, and Married Officer Quarters C through E (Buildings 268-270). MARFORRES initiated consultation with the NY SHPO on February 14, 2020, with determinations of not eligible for NRHP listing for Seaplane Taxiway 7, Seaplane Parking Apron, and Married Officer Quarters C-E. Married Officer Quarters C-E were constructed circa 1960, outside the period of significance for the Floyd Bennett Field Historic District, and have been determined not eligible individually due to a lack of significance. The NY SHPO responded in correspondence dated March 6, 2020, stating the project area is within the boundaries of the State Register-listed Floyd Bennett Field Historic District, that Married Officers Quarters A and B are contributing to the historic district, and that the Seaplane Taxiway 7 and Seaplane Parking Apron are non-contributing

structures (see **Appendix A**). **Figure 3-4** provides photographs of the viewsheds from the Floyd Bennett Field Historic District and Jacob Riis Park on the south side of Jamaica Bay to MCRC Brooklyn.



Figure 3-4. Current Viewshed from Aviation Road (top) and the Riis District across Jamaica Bay (bottom) to MCRC Brooklyn

3.9.3 Environmental Consequences

Adverse effects on cultural resources can include 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 that alter its setting; neglecting the resource to the extent that it deteriorates or is destroyed; or the sale, transfer, or lease of the property out of agency ownership (or control) without adequate legally enforceable restrictions or conditions to ensure preservation of the property's historic significance.

3.9.3.1 PROPOSED ACTION

Under the Proposed Action, impacts on cultural resources would range from no impacts to minor, direct, adverse impacts on archaeological and visual resources under NEPA. MARFORRES initiated Section 106 consultation with the NY SHPO on February 14, 2020, with a determination of No Adverse Effect on historic properties under the NHPA. The NY SHPO concurred with the No Adverse Effect determination in correspondence dated March 6, 2020 (see **Appendix A**).

Archaeological Resources. No impacts on archaeological resources are expected as a result of the Proposed Action. MCRC Brooklyn does not contain archaeological sites and the potential for buried archaeological deposits is very low. Ground disturbance associated with the fiber optic line project would be monitored by an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for Archeology. The proposed POV parking lot and new west gate, which would include new pavement adjacent to the Seaplane Parking Apron, would have no direct or indirect impacts on archaeological resources. With the exception of the removal of a non-historic berm that separates the Seaplane Taxiway 7 from Aviation Road, all facilities associated with the west gate to be placed on the Taxiway would be removable.

Should archeological deposits be discovered during ground-disturbing activities, construction would be immediately halted and the location secured and protected from further disturbance. MARFORRES would immediately contact NPS and the NY SHPO for further consultation.

Visual Resources. Visual impacts on historic resources under the Proposed Action would be permanent but negligible to minor. The proposed Fire Suppression Facility is in the viewshed of the Married Officer Quarters A and B (Buildings 157 and 158), both contributing properties to the Floyd Bennett Field Historic District. While the new construction is in the viewshed of the two structures, the facility would be constructed between two non-historic buildings and screened from view by mature vegetation.

Fenceline upgrades would be expected to introduce negligible to minor, direct, visual impacts on contributing resources to the Floyd Bennett Field Historic District near MCRC Brooklyn. All new fencing would match the height and material of existing fencing (see **Figure 3-4**), and vegetation within 10 feet along the MCRC Brooklyn side of the fence would be mowed/maintained to meet AT/FP requirements. The proposed stormwater drainage improvements would have no impact on cultural resources.

The addition of POV parking lot lighting would present negligible impacts on the viewshed of historic resources because the light poles would be half as tall as the existing light poles and the lights would be oriented downward. The lighting would be Dark Sky Friendly in accordance with International Dark Sky Association seal of approval requirements as described in **Section 2.1.1**, would not appear brighter than existing site lighting, and would be controlled to dim during periods of inactivity on MCRC Brooklyn. Due to the presence of vegetation, the lighting would be visible only to a limited extent to the north of the proposed POV lot. The vegetation south of the POV lot and existing infrastructure could also obscure the new lighting in the viewshed from Jacob Riis Park across Jamaica Bay; given the limited height and visibility of the new light poles, the view to the Manhattan skyline from the park would be largely unchanged. **Figure 3-4** shows the existing viewshed visible from the park. Therefore, negligible, direct, adverse viewshed impacts would be expected from the proposed POV lot lighting.

The removal of the berm along Aviation Road and the addition of removable cement jersey barriers and signage for the approach lanes to the proposed west gate would have negligible, direct, adverse visual impacts because all the changes would be low to the ground and visible primarily from Aviation Road and a small portion of Floyd Bennett Field. No impacts on historic district visual resources would be expected from the installation of handholes associated with the fiber optic line because they would be small boxes occurring approximately every 200 feet and flush with pavement.

3.9.3.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the infrastructure improvements would not occur. Therefore, no impacts would be anticipated on cultural resources under the No Action Alternative.

3.10 Cumulative Impacts

Cumulative impacts are the incremental impacts of a proposed action when added to the aggregate impacts of other past, present, and reasonably foreseeable future actions. The Proposed Action would supplement ongoing infrastructure improvements at MCRC Brooklyn. Additional infrastructure improvements would ensure MCRC Brooklyn meets current and future mission requirements. The analysis area for cumulative effects is Floyd Bennett Field, although a larger area has been considered for some resources.

Other Current and Future Projects for Analysis. Identification of projects occurring at the installation and the surrounding areas during the same time as the Proposed Action would ensure that all present and reasonably foreseeable future activities that have the potential to result in cumulative effects are taken into account. For most resource areas, the present effects of past actions are now part of the existing environment described in the previous sub-sections. Current and future projects are identified in **Table 3-8**.

The following analysis examines the cumulative effects on the environment that would result from the incremental impacts of the Proposed Action, in addition to other current and reasonably foreseeable future actions. This analysis assesses the potential for an overlap of impacts with respect to project schedules or affected areas. Under the No Action Alternative, current projects at MCRC Brooklyn would still be implemented, and there would be no change in the baseline

Table 3-8. Current and Future Projects at or Near MCRC Brooklyn

Type of Action	Description of Action	Distance from Proposed Action	Impact area
Construction	MARFORRES is constructing a new SATCOM maintenance warehouse.	0 (at MCRC Brooklyn)	8,000 ft ²
Renovation	MARFORRES is currently renovating the exterior of the Administration Building, including replacing damaged exterior materials, adding a new roof, and removing and reinstalling the PV array system. Additionally, MARFORRES is renovating the original VMF and technical storage warehouse, including repairing and replacing metal siding, installation of PV panels, and installing a new anchored racking system.	0 (at MCRC Brooklyn)	0 ft ²
Improvement	<ul style="list-style-type: none"> NPS has and will continue to use leasing for the rehabilitation of historic structures and revitalization of the Floyd Bennett Field Historic District. The Federal Highways Administration is resurfacing roads within Floyd Bennett Field 	As near as adjacent to the installation	Unknown
Demolition	NPS is currently in the process of demolishing Job Corp Buildings 129, 130, 131 and 132.	North of the installation.	Unknown
Utility	NPS is upgrading underground power lines throughout Floyd Bennett Field	As near as adjacent to the installation	Throughout Floyd Bennett Field
Land Use	NPS is entering into a lease with NYPD to provide for continued operations on Floyd Bennett Field	As near as adjacent to the installation	Unknown
Improvement	The Hudson River Foundation has identified portions of Gateway NRA adjacent to MCRC Brooklyn as areas of opportunity for coastal and maritime forests, shorelines and shallows, sedimentation, and public access improvements.	As near as immediately adjacent to the installation	unknown

Sources: NPS 2014, HRF 2020

conditions for any resource areas. Therefore, the No Action Alternative would not contribute to cumulative effects.

Impacts associated with the Proposed Action combined with other reasonably foreseeable future projects would be minor and primarily temporary, and would be reduced through use of

BMPs and other measures for reducing environmental impacts. Analyses of specific resource areas with cumulative impacts are below, followed by those resource areas with unavoidable impacts from the Proposed Action.

Land Use and Recreation. Long-term, beneficial impacts on land use and recreation would be expected from improvements at MCRC Brooklyn and Floyd Bennett Field as detailed in **Table 3-8**, which would optimize land use within MCRC Brooklyn and the Gateway National Recreation Area and improve access to recreational resources.

Coastal Zone Management. A CCD has been developed for the Proposed Action in accordance with 15 CFR § 930.39 under the CZMA, and the New York State and New York City enforceable coastal policies. No significant cumulative effects on the coastal zone would be expected from the Proposed Action when combined with the cumulative projects.

Noise. Noise from construction would be limited primarily to particular work days and work hours. Vehicle traffic would primarily be concentrated on weekend days due to the presence of reservists two weekends per month and would be scheduled to minimize or avoid overlap with construction activities. Due to the short-term nature of noise exposure, it is unlikely that a helicopter from the NYPD landing pad at Floyd Bennett Field, an airplane from John F. Kennedy International Airport, high volumes of vehicle traffic, and heavy construction equipment would all occur at the same time for an extended timeframe. Therefore, no significant impacts on personnel at MCRC Brooklyn or sensitive noise receptors would be expected. No significant cumulative effects on sensitive noise receptors would be expected from the Proposed Action or the additional projects.

Geological Resources. The addition of impervious surfaces as a result of the Proposed Action and additional current and future projects would increase stormwater runoff and reduce soil infiltration and productivity. Construction activities would also increase soil compaction and erosion. Implementation of BMPs combined with revegetation projects on Floyd Bennett Field would reduce these adverse impacts and benefit soil productivity in the long-term. Therefore, no significant cumulative effects on the geological resources would be expected from the Proposed Action or the cumulative projects.

Cultural Resources. No impacts on archaeological resources would occur as a result of the Proposed Action and additional current and future projects, and long-term, negligible to minor, adverse impacts on the viewshed would be expected. New construction, such as the Fire Suppression Facility and new SATCOM building at MCRC Brooklyn and new visitor facilities and food service facility at Floyd Bennett Field, would alter the viewshed at Floyd Bennett Field. The facilities would be constructed to blend in with the existing viewshed through construction using the materials and colors already in use for buildings, including on MCRC Brooklyn. No significant cumulative effects on cultural resources would be expected from the Proposed Action or the cumulative projects.

3.10.1 Unavoidable Adverse Effects

Infrastructure and Transportation. Solid waste generation from construction activities associated with the Proposed Action and additional current and future projects would be an

unavoidable, but minor, adverse effect that could be offset, to a certain extent, by incorporating recycling practices, energy conservation efforts, and sustainable principles such as life-cycle, cost-effective practices and Energy Policy Act of 2005 features. It is likely that traffic at Gateway NRA would naturally increase over the long-term, but between increased parking availability and traffic management resulting from the addition or upgrade of existing gates at MCRC Brooklyn and the development of a transportation hub by NPS, traffic flow and volume would be greatly improved particularly during drill weekends for the area.

Water Resources. The increase in impervious surfaces associated with the Proposed Action would result in unavoidable, but minor adverse impacts on water quality through runoff. Sedimentation and erosion from runoff would be addressed with continued maintenance and repair of current stormwater management structures. Construction of additional impervious surfaces within floodplains would have adverse impacts; however, stormwater management improvement measures proposed by MARFORRES, including construction of infiltration basins, and wetland restoration and revegetation actions by NPS and the Hudson River Foundation on Floyd Bennett Field would help minimize these adverse impacts (MARFORRES 2016; HRF 2020).

Biological Resources. The increase of impervious surface associated with the Proposed Action and additional current and future projects would result in unavoidable loss of vegetation for the installation and Floyd Bennett Field. Loss of habitat resulting from vegetation removal would displace wildlife, but displaced wildlife would move to the nearest available habitat in the surrounding area. Native vegetation would be replanted where applicable upon completion of construction. The implementation of seasonal restrictions on vegetation removal, generally from March to September depending on species, would reduce adverse impacts on any rare, threatened, or endangered species in the area.

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

Infrastructure improvements, supplementing ongoing modernization and renovation activities, would be consistent with existing and foreseeable future uses at MCRC Brooklyn. There would be no change to current land use practices on the installation as a result of the Proposed Action.

3.10.3 Relationship between the Short-term Uses of the Environment and Long-term Productivity

Potential short-term, adverse impacts of the Proposed Action include noise generation, air emissions, solid waste generation, soil erosion, stormwater runoff, traffic congestion, and air contaminant and fugitive dust emissions. However, the Proposed Action would help meet long-term, mission-related needs of the installation and improve the efficiency of daily operations at MCRC Brooklyn.

3.10.4 Irreversible and Irrecoverable Commitment of Resources

Construction Materials. Material resources irretrievably used would include steel, concrete, and other construction materials. Such materials are not presently in short supply and would not

be expected to limit other unrelated construction activities. The irretrievable use of material resources would not be considered significant.

Hazardous Materials and Wastes. The use of hazardous materials, generation of hazardous wastes, and potential for releases of these materials is unavoidable. The quantities of hazardous materials and wastes associated with operation of the Proposed Action would be minimal.

Energy Resources. The Proposed Action would require the use of fossil fuels, a nonrenewable natural resource. Small amounts of energy resources would be committed to the construction and operation of the Proposed Action and are not considered significant. Energy resources including natural gas, petroleum-based products (e.g., gasoline, diesel, lubricants), and electricity would be irretrievably lost. Gasoline, diesel, and lubricants would be used for the operation of construction vehicles. Consumption of these energy resources would not place a significant demand on their availability in the region. Therefore, no significant impacts would be expected.

Human Resources. The use of human resources for construction is considered an irretrievable loss only in that it would preclude such personnel from engaging in other work activities. However, the use of temporary construction workers for the Proposed Action would represent employment opportunities and is considered beneficial but not significant.

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A

Agency Coordination



Appendix A: Agency Coordination

MARFORRES Outreach

- Stakeholder and Government Distribution List
- Scoping Letter for Interested Parties
- Letter to State Historic Preservation Office
- Section 106 Consulting Parties Request Letter to NPS
- DSEA General Transmittal Letter
- Letter to New York Department of State
- Example government-to-government consultation letter to Tribes
- Section 7 Consultation Letter to USFWS
- Agency Responses

Stakeholder and Government Distribution List

Federal Agency Contacts

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New York State Division for Historic
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Peebles Island State Park
P.O. Box 189
Waterford, NY 12188-0189

NYSDEC
Office of Planning and Development
Attn: Consistency Review Unit
Suite 1010

One Commerce Place,
99 Washington Avenue
Albany, New York 12231-0001

Mr. Stephen Watts, RPA
NYSDEC Region 2
47-40 21st Street
Long Island City, NY 11101-5401

Local Agency Contacts

NYPD Air Unit
50 Aviation Road
Brooklyn, NY 11234

Local Stakeholders and Libraries

Mr. Saul Needle, Chair
Brooklyn Community Board 18
1097 Bergen Avenue
Brooklyn, NY 11234-4841

Scoping Letter for Interested Parties



UNITED STATES MARINE CORPS

MARINE FORCES RESERVE
2000 OPELOUSAS AVENUE
NEW ORLEANS, LOUISIANA 70114

IN REPLY REFER TO:
5090
FAC
13 Feb 2020

From: United States Marine Corps Forces Reserve
Environmental and Energy Program Manager
To: Distribution List

Subj: PROPOSED SUPPLEMENTAL CONSOLIDATION AND RENOVATION
AT MARINE CORPS RESERVE CENTER (MCRC) BROOKLYN, NEW YORK

Encl: (1) Project Location Maps MCRC Brooklyn, New York

The U.S. Marine Corps Forces Reserve (MARFORRES) is developing a Supplemental Environment Assessment (SEA) under the National Environmental Policy Act of 1969, as amended (NEPA). The SEA will evaluate the potential environmental effects associated with infrastructure improvements to supplement consolidation and renovation already approved and undertaken at the Marine Corps Reserve Center (MCRC) Brooklyn. MCRC Brooklyn is located at the National Park Service Gateway National Recreation Area at Floyd Bennett Field.

To supplement infrastructure projects previously approved to accommodate relocation of approximately 900 active-duty and reserve personnel from the MCRC Garden City, New York and MCRC Farmingdale, New York to MCRC Brooklyn, New York, MARFORRES proposes additional infrastructure improvements. Previous projects evaluated and implemented include renovation of the interior of the MCRC Brooklyn Administration Building, the original vehicle maintenance facility (VMF), and the existing Technical Storage Warehouse, construction of a new VMF and satellite communications (SATCOM) vehicle storage building, installation of two temporary armories and a covered weapons cleaning area, and installation of a 100-kilowatt demand response metering system.

Supplemental projects analyzed in this SEA include construction of a new privately-owned vehicle (POV) parking lot and a new west gate to accommodate unanticipated traffic demands on drill weekends. The new POV lot would occur within the existing MARFORRES land hold. The majority

Subj: PROPOSED SUPPLEMENTAL CONSOLIDATION AND RENOVATION
AT MARINE CORPS RESERVE CENTER (MCRC) BROOKLYN, NEW YORK

of the west gate would also occur within the existing MARFORRES land hold, though a small portion to the north of the west gate is within the National Park Service's (NPS') land hold.

MARFORRES would replace and upgrade the existing east and north gates to comply with minimum standards from DoD Unified Facilities Criteria for Anti-Terrorism/Force Protection. The east gate would be upgraded and include resurfacing an existing paved road to the gate within the training area east of the developed portion of MCRC Brooklyn, allowing for safer movement of tactical equipment and increasing available parking in the POV lot. The existing north gate would be upgraded by replacing the sliding gate, access controls, lighting, communication services, and guard house; relocating the entry point further back to allow for more queuing room; and repairing and adding perimeter fence. Portions of the perimeter fence would be repaired to meet AT/FP minimum security measures and additional fencing would be installed to enclose open portions of the property.

MARFORRES would install a new fire suppression facility on the installation. Construction would involve installation of a new water storage tank, and pump house and associated infrastructure, to accommodate fire suppression and sprinkler systems in the MCRC building and both vehicle maintenance facility buildings.

MARFORRES would install fiber optic service to the Reserve Training Center. The proposed fiber optic communication line would tie into an existing Verizon fiber optic line near the intersection of Flatbush Avenue and Aviation Road and would use the same right-of-way (ROW) as the utility corridor analyzed in the 2016 EA for an electrical line.

Additionally, MARFORRES would regrade and fill the areas on the existing POV lot in the vicinity of a warehouse east of the Administration Building to improve and facilitate

Subj: PROPOSED SUPPLEMENTAL CONSOLIDATION AND RENOVATION
AT MARINE CORPS RESERVE CENTER (MCRC) BROOKLYN, NEW YORK

drainage of the warehouse and parking area to the southern portion of the installation. Improved stormwater management controls, including regrading surfaces and diverting runoff from surrounding facilities, would be implemented to further reduce potential impacts from runoff on water quality.

In accordance with Executive Order 12372, Intergovernmental Review of Federal Programs, we request your participation and feedback on the Proposed Action. Your comments will help us develop the scope of our environmental review, which is being conducted in accordance with the National Environmental Policy Act and its implementing regulations. MARFORRES anticipates publishing the Draft EA in the spring of 2020.

Please provide your written questions or comments at your earliest convenience, but no later than 30 days from the date of this correspondence. Address all questions and comments to Mr. Christopher Hurst, MARFORRES Environmental proponent, by email to christopher.a.hurst@usmc.mil. For further information, please call Mr. Hurst at (504) 697-9892.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Godchaux', with a stylized flourish at the end.

RICHARD GODCHAUX

Enclosure 1 - Project Location Maps MCRC Brooklyn, New York





Letter to State Historic Preservation Officer

February 13, 2020

To: New York Division for Historic Preservation
PO Box 189
Waterford, NY 12188-0189

RE: Infrastructure Improvements at Marine Corps Reserve Center
Brooklyn, 1 Aviation Road, Brooklyn, NY 11234
Project Number: Y5JTML1YF6VN

This technical memorandum provides information on a proposed project at the Marine Corps Reserve Center (MCRC) Brooklyn in support of consultation under Section 106 of the National Historic Preservation Act of 1966 and the National Environmental Policy Act of 1969. This project is also being addressed as part of a Supplemental Environmental Assessment, following completion of an Environmental Assessment addressing consolidation and renovation actions at MCRC Brooklyn in 2016. Figure 1 in Enclosure 1 shows the location of MCRC Brooklyn.

Project Description

Project components being considered under the proposed project:

- 1) New Privately Owned Vehicle (POV) Parking Lot.
 - a. MARFORRES proposes to construct a POV parking lot for up to 325 new spaces. The proposed POV parking lot would be on the western side of MCRC Brooklyn, entirely within the installation). Access to the POV parking lot would occur via the proposed west gate (see Figure 2 in Enclosure 1). Reserve duty personnel attending installation drill weekends created a higher demand for POV parking than originally anticipated, and additional parking spaces would accommodate reservists attending training activities. The proposed parking lot would improve long-term sustainable unit readiness by increasing efficiency for accessing the installation and allowing for more time for coordinated training requirements during drill weekends.
- 2) New West Gate Construction and Replacement of East and North Gates
 - a. New West Gate. A new west gate would be constructed near the proposed POV parking lot to provide more efficient access to the installation during drill weekends (see Figure 2). The west gate would be located along the installation boundary on a former airfield runway that can provide access to the installation from Aviation Road. The runway was constructed more than 50 years ago and, therefore, consultation with the New York State Historic Preservation Office is occurring. The

west gate would include a portable guard house to avoid construction of permanent facilities on the historic taxiway. West gate access would only be used from 5:30 a.m. to 7:30 a.m. during drill weekends approximately once a month to provide access to the proposed POV parking lot. The new gate would allow for greater queuing off Aviation Road. The gate would be one-way inbound only with a rejection lane. Following training activities, reservists would exit the installation through the existing north gate. The design of the gate would include access control point antiterrorism/force protection (AT/FP) features and comply with AT/FP regulations and physical security mitigation in accordance with Unified Facilities Criteria (UFC) 4-010-01, DoD Minimum Antiterrorism Standards for Buildings. Best management practices (BMPs) would be used to minimize lighting impacts from the gate. Construction of the west gate would require removal of an existing earthen berm on the north side of the taxiway and a model car racetrack on the taxiway. The soil from the berm would either be stored onsite or be repurposed for use in other NPS projects. Two trees could also be removed during construction to allow for wider access lanes to and from the gate.

- b. Replacement of North and East Gates. MARFORRES also proposes the replacement of the existing east and north gates on the installation. The east gate along the eastern fenceline of the installation would be upgraded, which would include resurfacing an existing paved road to the gate within the training area east of the developed portion of MCRC Brooklyn (see Figure 2). This new gate would allow for more efficient movement of tactical vehicles and trailers on and off the installation by avoiding having to use the north gate. Currently, travel lanes set aside for tactical equipment on the installation take up space that could otherwise be used for POV parking. The installation of the separate gate and access road for tactical equipment would effectively increase available parking in the POV lot and allow for the safer movement of tactical equipment. The existing north gate would be upgraded by replacing the sliding gate, access controls, lighting, communication services, and guard house; relocating the entry point further back to allow for more queuing room; and repairing and adding perimeter fence.

3) New Fire Suppression Facility.

- a) MARFORRES would construct a new fire suppression facility for the installation that would consist of a new water storage tank, pump house, and fire water pump north of the Drill Hall in MCRC Brooklyn's Administration Building (Building 1). The new 200,000-

gallon water storage tank would accommodate fire suppression and sprinkler systems in the Administration Building and both Vehicle Maintenance Facility buildings (Buildings 5 and 111). The fire suppression facility would be designed to blend in with the existing facilities and would not be more than two stories high.

4) New Fiber Optic Communication Service.

- a) A new fiber optic communication line to the installation would be constructed to ensure adequate network bandwidth for the 6th Communications Battalion and the 2/25 that transferred to MCRC Brooklyn as addressed in the 2016 EA. The current fiber optic line capacity does not meet increased bandwidth requirements, and the existing conduit for the fiber optic line is at capacity. The proposed fiber optic communication line would tie into an existing Verizon fiber optic line near the intersection of Flatbush Avenue and Aviation Road, and extend east from the entrance of the MCRC (see Figure 3). The new fiber optic line would use the same ROW as the utility corridor analyzed in the 2016 EA for an electrical line. An additional approximately 100 feet of ROW would be required to connect the fiber optic line to the existing Verizon line along Flatbush Avenue. The fiber optic line would be installed primarily by open trenching, with horizontal directional boring used as required. Archaeological monitoring during installation of the fiber optic communication line in the ROW would be required.

5) Fenceline Upgrades.

- a) MARFORRES would repair or install new chain-link fencing around the perimeter of the installation to meet AT/FP minimum security measures as outlined in the DoD Minimum Antiterrorism Standards for Buildings. The fencing would be 8 feet tall, with 1 foot buried in the ground and topped with barbed wire, and at least 82 feet from any building on the installation. To improve visual aesthetics and reduce any noise and dust impacts from MARFORRES operations, MARFORRES would also install privacy fencing along the ranger housing.

6) Stormwater Drainage Improvements.

- c. Stormwater drainage in the vicinity of a warehouse east of the Administration Building and in spots on the existing POV lot has caused severe damage to paved structures, which is resulting in localized ponding and sinkholes (see photographs in Enclosure 2, Figure 4 and Figure 5). Fill material under the concrete is unconsolidated and has shifted over the years, resulting in low spots in paved area. In addition, in winter months these areas collect water that freezes, resulting in hazardous driving and walking conditions. MARFORRES would regrade and fill these areas to improve and facilitate drainage

of the warehouse and parking area to the southern portion of the installation. Improved stormwater management controls, including regrading surfaces and diverting runoff from surrounding facilities, would be implemented to further reduce potential impacts from runoff on water quality.

Area of Potential Effects

MARFORRES has defined the Area of Potential Effects (APE) for the proposed project to include all areas where there may be direct and/or indirect effects. The APE includes the entire MCRC Brooklyn installation on the southeast end of Floyd Bennett Field, areas where proposed construction may be visible outside the MCRC Brooklyn installation, and areas where the proposed new West Gate and fiber optic conduit path extend outside of the MCRC Brooklyn installation (see Figure 2 and Figure 3).

Identification and Evaluation of Historic Properties

MCRC Brooklyn is located immediately south and east of the Floyd Bennett Field Historic District, which encompasses the area of the former Floyd Bennett Field municipal airport and civilian airfield and Naval Air Station (NAS) New York, a World War II-era airfield. The historic district was listed in the NRHP in 1980 and originally included 329 acres that encompassed the Floyd Bennett Field municipal airport and civilian airfield. A Cultural Landscape Report was prepared in 2009 by the National Park Service that recommended expansion of the NRHP-listed district boundaries to include World War II areas of development east of the runways, but excluded the South Administration area, due south of the runways (NPS 2009). In 2011, a NRHP nomination was prepared to expand the boundaries of the historic district to encompass more than 1,121 acres of NAS New York. The expanded 2011 historic district boundaries were approved by the State Review Board but were never submitted for inclusion in the NRHP and are therefore are listed only in the New York State Register of Historic Places. These boundaries extend south to, but exclude, the MCRC Brooklyn property boundary. Outside of the MCRC Brooklyn property boundaries and south of Aviation Road are the adjacent vacant Married Officers' Quarters A and B (Buildings 157 and 158, constructed c. 1942) and C, D, and E (Buildings 268, 269, 270, constructed c. 1960).

MCRC Brooklyn was intensively surveyed (Phase 1) in 2003 for archaeological resources as part of compliance with Section 110 of the NHPA. The survey indicated extensive surface and subsurface disturbance, likely due to the extensive infilling of the marshes on the south end of Barren Island in the late nineteenth and early twentieth centuries and during construction of NAS New York in the

1940s. The report determined that the potential for intact archaeological deposits was very low and additional archaeological investigations at MCRC Brooklyn were not recommended (MARFORRES 2013).

MCRC Brooklyn was also surveyed in 2003 for architectural resources under Section 110 of the NHPA (HHM 2004). The report determined all six buildings and structures surveyed were constructed between 1977 and 2000 and were not eligible for listing in the NRHP (see Table 1). The surveyed resources did not meet the 50-year threshold typically required for listing in the NRHP, nor did they meet any of the NRHP criteria. The resources were also evaluated under Criteria Consideration G for their potential association with the Cold War era; however, they were found to lack the exceptional significance required under that criteria (HHM 2004). There are no traditional cultural properties or areas of Native American concern at MCRC Brooklyn or in the surrounding area.

Table 1. NRHP Status of Buildings at MCRC Brooklyn

Building No.	Name	Date of Construction	NRHP Eligibility
1	Administration/Reserve Training Building	1977	Not Eligible
2	Vehicle Maintenance Building	1977	Not Eligible
3	Technical Storage Facility	1982	Not Eligible
--	Storage (Butler Building)	--	Not Eligible
--	Oil Tank Shelter	2000	Not Eligible
--	Flagpole	1977	Not Eligible

Although all buildings associated with MCRC Brooklyn have been determined Not Eligible for NRHP listing, the MCRC property and adjacent areas contain several resources that predate the installation's use of the property and are associated with the World War II construction at NAS New York. Table 2 summarizes those resources that predate MCRC Brooklyn and are within the APE for the present undertaking.

Table 2. NRHP Status of Buildings within APE

Building No.	Name	Date of Construction	NRHP Eligibility
157	Married Officer Quarters B	c.1942	Contributing to FBF HD
158	Married Officer Quarters A	c.1942	Contributing to FBF HD
268	Married Officer Quarters C	c.1960	Not Contributing to FBF HD
269	Married Officer Quarters D	c.1960	Not Contributing to FBF HD
270	Married Officer Quarters E	c.1960	Not Contributing to FBF HD
--	Seaplane Ramp A	c.1942	Contributing to FBF HD
--	Seaplane Taxiway 7	c.1942	Not Contributing to FBF HD
--	Seaplane Base Parking Apron	c.1942	Not Contributing to FBF HD

Married Officer Quarters A and B (Buildings 158 and 157) are outside of the north fenceline of MCRC Brooklyn and are Contributing properties to the Floyd Bennett Field Historic District. Married Officer Quarters C, D, and E (Buildings 268, 269, and 270) were constructed circa 1960 and are outside the east fenceline of MCRC Brooklyn. These three buildings were constructed after the district's period of significance, expanded to include the World War II-era construction at NAS New York, and are therefore Not Contributing properties to the Floyd Bennett Field Historic District.

Additionally, there are three structures—a taxiway, a parking apron, and a ramp—constructed circa 1942 as part of NAS New York and associated with the south end use as a seaplane base. Only Seaplane Ramp A has sufficient historic integrity to contribute to the significance of the Floyd Bennett Field Historic District. Taxiway 7 was made discontinuous with the portion north of Aviation Road that leads to the hangar row area of the historic district through construction of Aviation Road and an earthen berm. Other former taxiways have become roadways in the Gateway Recreation Area. The 2009 Cultural Landscape Report and the 2011 boundary expansion NRHP nomination both recommended Taxiway 7 as a non-contributing structure to the historic district. The Parking Apron is presently used as a

motor vehicle parking area and two buildings have been constructed on the former apron.

Effect Determinations

The proposed new POV lot would have no effect on historic properties. The lot would be constructed on approximately two-thirds undeveloped land, the southern third of Taxiway 7, and the western third of the parking apron (see Figure 6 and Figure 7). New impervious surfaces would be added to the previously undeveloped area. The portion of Taxiway 7 would be resurfaced, but no additional pavement or resurfacing is planned for the Parking Apron area. Neither Taxiway 7 nor the Parking Apron retain sufficient integrity to convey the significance of Floyd Bennett Field and therefore the proposed work would have no effect on the NRHP-listed historic district.

The construction of a new West Gate will have no effect on historic properties. The new West Gate construction would include removal of the earthen berm at the north end of Taxiway 7 and reconnection with the intersection of Aviation Road (see Figure 8). The gate would consist of non-permanent facilities, including a portable guard house and moveable jersey barriers. Cracks in the existing pavement on Taxiway 7 would be sealed and new asphalt paving would only be added in the vicinity of the removed berm. Taxiway 7 does not retain sufficient integrity to convey the significance of Floyd Bennett Field and the infrastructure associated with this project is predominantly temporary and moveable. Therefore, the proposed work would have no effect on the NRHP-listed historic district.

The replacement of the East and North Gates will have no effects on historic properties. Upgrades to the North Gate includes replacement of the sliding gate, lighting, communication services and guard house; relocation of the entry point further from Aviation Road; and repair and addition of new perimeter fence. The replacement of infrastructure would be identical or similar to existing infrastructure at the gate and would result in a negligible visual change from the existing condition to properties on both sides of Aviation Road that contribute to the significance of the FBF historic district. Replacement of the East Gate would include replacement of the existing gate, resurfacing of an existing paved road, and associated pavement removal to connect the road with the east side of the former Parking Apron (see Figure 9). The East Gate exits the MCRC Brooklyn property to the south of the Married Officer Quarters C, D, and E, which are non-contributing properties to the FBF historic district. Replacement of the East Gate would have no effect on historic properties.

The construction of a new fire suppression facility will have no adverse effect on historic properties. The associated infrastructure would be constructed off the northeast corner of Building 1 at MCRC Brooklyn. The water tank and associated pump apparatus would be installed approximately 150 feet west of Married Officer Quarter B (Building 157) and is separated by the existing fenceline and several mature trees. While the fire suppression facility would be visible to and from Building 157, it does not present an appreciable visual change that would impact Building 157's historic integrity of setting, feeling, location, nor association. Therefore, MARFORRES has determined No Adverse Effect would occur on Building 157. Building 157 screens the fire suppression facility from the Married Officer Quarters A (Building 158); therefore this element of the undertaking would have No Effect on Building 158. Any trenching associated with construction of the fire suppression system would be monitored by a SOI-qualified archaeologist.

The construction of a new fiber optic communication service will have no effect on historic properties. The fiber optic cable would be laid in an existing trench off of the MCRC Brooklyn property. This corridor has been previously surveyed and a ground-penetrating radar (GPR) survey of the corridor was conducted in August 2018. The GPR survey found high levels of sub-surface disturbance associated with extensive infill and leveling during World War II of the marshland area. Portions of the corridor on MCRC Brooklyn property are in areas surveyed in 2013 for archaeological resources. An archaeological monitor would be present during construction of the fiber optic trench on the MCRC Brooklyn property.

The proposed repair of existing and installation of new fenceline will have no adverse effect on historic properties. New fenceline is proposed along the MCRC Brooklyn property boundary at the Married Officer Quarters A (Building 158) and continuing around the Married Officer Quarters C, D, and E (Buildings 268, 269, and 270) and extending east to the shoreline. The effects from this new fenceline were analyzed in the Section 106 consultation for the previous EA in June 2016 and April 2016. Under the current undertaking, the portion of the fenceline paralleling Aviation Road will be moved closer to the road to follow the installation boundary. The construction of new fenceline around Building 158 would introduce a new visual element but would not alter a characteristic of the property or the FBF historic district that would diminish either's historic integrity. The new fenceline would also be visible to properties across Aviation Road that contribute to the FBF historic district's significance. However, these visual effects would be negligible and not alter characteristics

of those properties or the FBF historic district that would diminish either's historic integrity. Therefore, MARFORRES has determined the fenceline upgrades would have No Adverse Effect on historic properties.

The proposed stormwater drainage improvements will have no effect on historic properties. The drainage improvements are planned for the area between Buildings 2 and 5 and at a localized spot on the former Parking Apron. The proposed work would include filling and regrading soil and stormwater diversion. Similar stormwater improvements at a different location on the former parking apron were analyzed in the 2015/2016 consultation for the previous EA for MCRC Brooklyn. Therefore, MARFORRES has determined the current stormwater improvements would result in No Effect on historic properties.

The proposed projects described previously would have minor to negligible visual impacts on Buildings 157 and 158 and the historic district and temporary effects during construction including noise, vibration, and changing traffic patterns. Minor, visual impacts on cultural resources would result from the installation of new fencing and gates. MARFORRES would have a Secretary of the Interior-Qualified archaeologist on-site to monitor any trenching for the fiber optic cable that occurs outside of the existing utility corridor. Should archaeological deposits be discovered during ground-disturbing activities, construction would immediately be halted and the location would be immediately secured and protected from damage and/or disturbance. MARFORRES would immediately contact the New York SHPO and the Superintendent of Gateway National Recreation Area for further guidance. Materials would be left in place and not removed until appropriate consultation has occurred and an action plan has been developed.

After considering the entirety of the potential project effects, MARFORRES has determined this undertaking will have no adverse effects on historic properties.

Should you need additional information or clarification regarding the proposed projects, please contact Mr. Christopher Hurst, NEPA Project Manager for MARFORRES at (504)697-9892 or via email at Christopher.A.Hurst@usmc.mil. MARFORRES invites your comments and seeks your concurrence on the finding of no adverse effect. We appreciate your attention to this matter and look forward to your response.

Enclosures:

- 1) Figures of Proposed Project Locations and Area of Potential Effect
- 2) Photographs of Project Area

CC:

Ms. Jennifer Nersessian, Superintendent
Gateway NRA
National Park Service
210 New York Avenue
Staten Island, NY 10305

References

- HHM 2004 Hardy, Heck, and Moore Inc (HHM). 2004. *Final Marine Forces Reserve Historic Resources Survey of the Armed Forces Reserve Center Brooklyn, New York*. Prepared for the Department of the Navy, NAVFAC Engineering Field Division South, Charleston, SC.
- MARFORRES 2013 U.S. Marine Forces Reserve (MARFORRES). 2013. *Draft Tiered Environmental Assessment United States Marine Corps Forces Reserve Wind Energy Program Site: Marine Forces Reserve Center, Brooklyn, New York*. February 2013.
- NPS 2009 National Park Service (NPS). 2009. *Cultural Landscape Report for Floyd Bennett Field, Gateway National Recreation Area, Brooklyn, New York*. Prepared by Olmsted Center for Landscape Preservation, National Park Service, Boston, Massachusetts. Authored by Sarah Cody and John Auwaerter.

Enclosure 1 - Proposed Project Locations and Area of Potential Effects

Figure 1. Location of MCRC Brooklyn and Surrounding Areas



Figure 2. Proposed Project Locations and Area of Potential Effects



Figure 3. Location of Proposed Fiber Optic Line and Area of Potential Effects



Enclosure 2 - Photographs of Project Area

Figure 4. Stormwater drainage issue of low spot created by shifted fill.



Figure 5. Stormwater drainage issue of erosion and sinkhole between Buildings 2 and 5.



Figure 6. South edge of Taxiway 7, view to Southeast.



Figure 7. View of MCRC Brooklyn Training Facility, Building 1, view to northeast from west edge of property.



Figure 8. View of Taxiway 7 south of Aviation Road and earthen berm, view to northwest.



Figure 9. View to north of proposed East Gate upgrade location.



Section 106 Consulting Parties Request Letter to NPS



UNITED STATES MARINE CORPS

MARINE FORCES RESERVE
2000 OPELOUSAS AVENUE
NEW ORLEANS, LOUISIANA 70114

IN REPLY REFER TO:
5090
FAC
15 Apr 2020

From: United States Marine Corps Forces Reserve
Environmental and Energy Program Manager
To: Jennifer Nersesian, Superintendent, Gateway National
Recreation Area, National Park Service (NPS)
Subj: SECTION 106 CONSULTATION REGARDING PROPOSED
SUPPLEMENTAL CONSOLIDATION AND RENOVATION AT MARINE
CORPS RESERVE CENTER (MCRC) BROOKLYN, NEW YORK
Encl: (1) Finding of Effect, dated 13 February 2020
(2) New York Division for Historic Preservation
correspondence, dated 6 March 2020

The U.S. Marine Corps Forces Reserve (MARFORRES) is proposing infrastructure improvements at Marine Corps Reserve Center (MCRC) Brooklyn, located at the National Park Service Gateway National Recreation Area at Floyd Bennett Field. Per the request from the National Park Service (NPS) received on 5 March 2020 to participate as a consulting party in MARFORRES's Section 106 consultation for this undertaking, enclosed with this correspondence are MARFORRES's determination of effects memorandum that was submitted for review and concurrence by the New York State Historic Preservation Officer (SHPO), New York Division for Historic Preservation on 14 February 2020 and the New York SHPO's concurrence with MARFORRES's determination, dated 6 March 2020.

Enclosure #1 includes details on the infrastructure improvements proposed for this undertaking, the Area of Potential Effects (APE), identification and evaluation of historic properties within the APE, determinations of effects on each historic property, and relevant maps and photographs. MARFORRES determined the proposed undertaking would have no adverse effect on historic properties and the NY SHPO concurred with this determination in correspondence dated 6 March 2020 (Enclosure #2). MARFORRES has invited government-to-government consultation to request information and comments under the National Environmental Policy Act (NEPA) and Section 106 of the NHPA with the

Subj: PROPOSED SUPPLEMENTAL CONSOLIDATION AND RENOVATION AT MARINE CORPS
RESERVE CENTER (MCRC) BROOKLYN, NEW YORK

Delaware Nation, the Delaware Tribe of Indians, the Eastern
Shawnee Tribe of Oklahoma, the Shawnee Tribe, and the
Stockbridge Munsee Community.

Please provide your written questions or comments
regarding MARFORRES' determination of effects under Section
106 at your earliest convenience, but no later than 30 days
from the date of this correspondence. Address all questions
and comments to Mr. Christopher Hurst, MARFORRES
Environmental proponent, by email to
christopher.a.hurst@usmc.mil. For further information,
please call Mr. Hurst at (504) 697-9892.

Sincerely,

GODCHAUX.RICHARD
ARD.L.1230847602

Digitally signed by
GODCHAUX RICHARD L.123084
7602
Date: 2020.04.15 11:22:50 -0500

GODCHAUX, R.

Copy to:
Gay Vietzke, Regional Director, Region 1, North Atlantic
Appalachian, NPS

DSEA General Transmittal Letter



UNITED STATES MARINE CORPS

MARINE FORCES RESERVE
2000 OPELOUSAS AVENUE
NEW ORLEANS, LOUISIANA 70114

IN REPLY REFER TO:

FAC

6 August 2020

From: United States Marine Corps Forces Reserve
Environmental and Energy Program Manager

To: SEA Distribution List

Subj: DRAFT SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT
ADDRESSING INFRASTRUCTURE IMPROVEMENTS AT MARINE
CORPS RESERVE CENTER BROOKLYN, NEW YORK

Encl: Draft Supplemental Environmental Assessment

The U.S. Marine Corps Forces Reserve (MARFORRES) has prepared a Draft Supplemental Environment Assessment (SEA) under the National Environmental Policy Act of 1969, as amended (NEPA). MARFORRES evaluated the potential environmental effects associated with infrastructure improvements to supplement consolidation and renovation already approved and undertaken at Marine Corps Reserve Center (MCRC) Brooklyn.

This SEA analyzes the potential for significant environmental impacts associated with the Proposed Action and the No Action Alternative. Under the Proposed Action, MARFORRES would supplement ongoing infrastructure improvements at MCRC Brooklyn with the construction of an additional privately owned vehicle parking lot, construction of a new west gate, replacement of the east and north gates, installation of a new fire suppression facility, installation of fiber optic communication service to the MCRC, upgrade of property boundary fencing, and stormwater drainage improvements.

MARFORRES respectfully requests your participation and feedback on the Draft SEA. Your comments will help us further conduct our environmental review, which is being conducted in accordance with the National Environmental Policy Act and its implementing regulations. MARFORRES anticipates publishing the Final EA in fall 2020.

Subj: DRAFT SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT
ADDRESSING INFRASTRUCTURE IMPROVEMENTS AT MARINE
CORPS RESERVE CENTER (MCRC) BROOKLYN, NEW YORK

The Draft SEA is enclosed or available online at
<http://www.marforres.marines.mil/GeneralSpecialStaff/Facilities.aspx>. Hard copies are available upon request.

Please provide your written questions or comments on the enclosed Draft SEA at your earliest convenience, but no later than 30 days from the date of this correspondence. Please address all questions and comments to Mr. Christopher Hurst, MARFORRES Environmental proponent, by email to christopher.a.hurst@usmc.mil. For further information, please call Mr. Hurst at (504) 697-9892.



R. GODCHAUX

Letter to New York Department of State (CZMA)



UNITED STATES MARINE CORPS

MARINE FORCES RESERVE
2000 OPELOUSAS AVENUE
NEW ORLEANS, LOUISIANA 70114

In reply refer to:
FAC
6 August 2020

From: Marine Corps Forces Reserve (MARFORRES),
Environmental and Energy Program Manager

To: Consistency Review Unit, New York State Department of
Environmental Conservation, Office of Planning and
Development, Once Commerce Plaza-Suite 1010, 99
Washington Avenue, Albany, New York 12231

Subj: FEDERAL CONSISTENCY NEGATIVE DETERMINATION FOR
INFRASTRUCTURE IMPROVEMENTS AT MARINE CORPS RESERVE
CENTER (MCRC) BROOKLYN, NEW YORK

Encl: (1) Proposed Project Description
(2) Site Location and Photographs
(3) Basis of Determination, New York State Coastal
Policies (New York State Coastal Management
Program)

Dear Sir/Madam:

In accordance with the Federal Coastal Zone Management Act (CZMA) of 1972, as amended, U.S. Marine Corps Forces Reserve (MARFORRES) requests concurrence with its Negative Determination addressing infrastructure improvements at MCRC Brooklyn, New York.

Enclosures (1) through (3) provide the proposed project description, site location, and the basis for this Negative Determination in relation to the New York State and New York City enforceable coastal policies, respectively.

If you have any questions or concerns, please contact Chris Hurst at (504) 697-9892 or Christopher.a.hurst@usmc.mil. Thank you in advance for your assistance in this effort.


R. Godchaux

Enclosure 1: Proposed Project Description

a) PROJECT LOCATION - Marine Corps Reserve Center (MCRC) Brooklyn occupies 70 acres (28 hectares [ha]) and is in the New York City Borough of Brooklyn (Kings County), New York, on Rockaway Inlet, which connects the Atlantic Ocean and Jamaica Bay (Figure 1). MCRC Brooklyn is located within the Jamaica Bay Unit of the Gateway National Recreation Area on the southernmost end of the former U.S. Naval Air Station Brooklyn, New York, now known as Floyd Bennett Field. Currently, MCRC Brooklyn houses three separate Marine Forces Reserve (MARFORRES) companies within the 6th Communications Battalion, including Headquarters, General Support Communications, and Service companies.

b) PROJECT DESCRIPTION - MARFORRES proposes the following infrastructure improvements to supplement ongoing modernization and infrastructure improvements analyzed in a previous 2016 EA at MCRC Brooklyn: construction of an additional privately owned vehicle (POV) parking lot, construction of a new west gate, replacement of the east and north gates, installation of a new fire suppression facility, installation of fiber optic communication service to the MCRC, upgrade to the existing property boundary fencing, and stormwater drainage improvements.

To complete training requirements, the buildings, utilities, and assets on MCRC Brooklyn require ongoing maintenance and facility upgrades. The Proposed Action will improve long-term sustainable unit readiness through coordinated training and prepare for future mission requirements. To complete training requirements, the facilities, utilities, and assets on MCRC Brooklyn require ongoing maintenance and utility upgrades. Infrastructure on the installation is aging and requires capital investment to address deficiencies in the buildings and meet current and future mission requirements.

c) PUBLIC PARTICIPATION - The Draft SEA will be released for a 30-day public review and comment period, which is expected to occur in June 2020. The notification of availability of the Draft SEA will be published in the *Federal Register* and the *Brooklyn Daily Eagle*. The Draft EA will be available through the Brooklyn Community Board 18 and will be posted on the MARFORRES website.

d) OTHER CONSULTATIONS - Consultations with the New York SHPO, New York State DEC, and other appropriate entities are complete or currently ongoing.

Enclosure 2: Site Location and Photographs



Figure 1. Location of MCRC Brooklyn and Surrounding Areas



Figure 2. Map of Proposed Project Locations on the Installation



Figure 3. Map of Fiber Optic Communication Line Conduit Path

Photos of Infrastructure Improvement Project Sites at MCRC
Brooklyn



Figure 4. Site of the Proposed POV Lot



Figure 5. View of Runway 7, Site of Proposed
West Gate from on the Installation



Figure 6. Runway 7 View of Runway 7, Site of Proposed West Gate
from the Berm to be Removed outside the Installation



Figure 7. View of Existing East Gate on Enterprise Avenue
from on the Installation



Figure 8. View of Existing Gate between Tactical Lot and East Training Area



Figure 9. Site of Proposed Fire Suppression Upgrades



Figures 10-11. Site of Stormwater Drainage Issues near the VMF



Figure 12. Site of Stormwater Drainage Issues
in the Existing POV Lot

Enclosure 3: Basis of Determination
New York State Policies (New York State Coastal Management Program)

Policy #	Enforceable Policy	Relevant to Project (Yes/No)	Consistency with Policy
Development			
1	Restore, revitalize, and redevelop deteriorated and underutilized waterfront areas	No	
2	Facilitate water dependent uses and facilities on or adjacent to coastal waters	Yes	MCRC Brooklyn would not construct any water dependent uses and facilities. The installation and shoreline are not currently available for water dependent uses due to the existing activities that occur at the installation.
3	Further develop the State's major ports (Albany, Buffalo, New York, Ogdensburg, and Oswego)	No	
4	Strengthen the economic base of smaller harbor areas	No	
5	Encourage development in areas with adequate public services and facilities	No	
6	Expedite permit procedures in order to facilitate the siting of development activities at suitable locations	No	

Fish and Wildlife			
7	Protect, preserve and where practical restore significant coastal fish and wildlife habitats	Yes	Jamaica Bay, located west of MCRC Brooklyn, is a Significant Fish and Wildlife Habitat. Consolidation and infrastructure improvement activities at MCRC Brooklyn would have no effects on the long-term viability of coastal fish and wildlife habitats. None of the proposed construction, renovation, or operations activities would occur in areas designated as significant fish and wildlife habitat.
8	Protect fish and wildlife resources from hazardous wastes and other pollutants	No	
9	Expand recreational use of fish and wildlife resources	No	
10	Further develop commercial finfish, shellfish, and crustacean resources	No	
Flooding and Erosion Hazards			
11	Building and structures will be sited to minimize damage caused by flooding and erosion	No	MCRC Brooklyn is not in a Coastal Erosion Hazard Area; however, portions of the installation are within the 100-year and 500-year floodplains. The POV parking lot would affect approximately 7.7 acres of the 100-year floodplain. Property boundary fencing upgrades would impact approximately 0.01 acre of the 100-year floodplain. Additionally,

		<p>construction of the new west gate and fence repair would occur within the 500-year floodplain. Additional impervious surface would be constructed within the 500-year floodplain.</p> <p>Stormwater and site drainage improvements would be implemented at MCRC Brooklyn in accordance with alternative stormwater management practices for redevelopment outlined in the <i>New York State Stormwater Management Design Manual</i>.</p> <p>Stormwater controls, including infiltration basins, would be installed as part of the renovation of the POV parking lot, east gate, and the stormwater improvements. Implementation of these controls and BMPs, established in a site-specific Stormwater Pollution Prevention Plan (SWPPP), would further reduce potential impacts from runoff. An approved stormwater management/erosion and sediment control plan would be obtained before starting demolition and construction to minimize impacts to state coastal resources.</p>
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12	Protection of natural protective features including beaches, dunes, barrier islands and bluffs	Yes	No natural protection features would be affected by infrastructure improvements at MCRC Brooklyn.
13	Construction or reconstruction of erosion protection structures if reasonable profitability to controlling erosion for a minimum of thirty years	No	
14	Construction or reconstruction of erosion protection structures so there will be no measurable increase in erosion or flooding	Yes	See Policy 11.
15	Mining, excavation or dredging in coastal water shall not interfere with the natural coastal processes	No	
16	Public funds shall only be used for erosion protective structures where necessary to protect human life	No	
17	Non-structural measures to minimize damage to natural resources and property from flooding and erosion shall be used whenever possible	Yes	Alternative stormwater management practices for redevelopment would be implemented during concrete drainage installation or replacement at the POV parking lot based on stormwater criteria in the New York State Stormwater Management Design Manual, as applicable. Also, see Policy 11.
General			
18	Consideration of State and public interests for all major coastal activities	No	
Public Access			

19	Protect, maintain, and increase access to public water related recreation and facilities	No	
20	Access to publicly-owned foreshore and lands immediately adjacent to the foreshore or water's edge	Yes	The Proposed Action would not impede beach access immediately adjacent to the west of the MCRC Brooklyn facility.
Recreation			
21	Water dependent and water enhanced recreation will be encouraged and facilitated.	Yes	See Policy 2. Floyd Bennett Field, which is part of the Gateway National Recreation Area, surrounds MCRC Brooklyn and provides various water dependent and water enhanced recreation opportunities.
22	Provide for water-related recreation	Yes	See Policy 2.
Historic and Scenic			
23	Protect, enhance and restore structures, districts, areas or sites that are of significance in the history, architecture, archeology or culture of the State, its communities, or the Nation	Yes	MCRC Brooklyn is located immediately south and east of the Floyd Bennett Field Historic District, which encompasses the area of the former Floyd Bennett Field municipal airport and civilian airfield and Naval Air Station New York, and was determined eligible for listing in the National Register of Historic Places. MCRC Brooklyn is not within the historic district.

			Construction of a POV parking lot, new fire suppression facility, and installation and replacement of new fencing and gates would have indirect visual impacts on these historic properties and the Floyd Bennett Field Historic District. Other proposed activities, including infrastructure and stormwater improvements, fiber optic communication services, would have indirect impacts on a warehouse and Administration Building, and the historic district resulting from construction noise, vibration, and changing traffic patterns, but these effects would only be temporary during construction. No adverse effect on historic properties would be expected.
24	Prevent impairment of scenic resources of statewide significance	No	
25	Protect, restore, or enhance natural and man-made resources that are not identified as being of statewide significance, but which contribute to the overall scenic quality of the coastal area.	Yes	Although MCRC Brooklyn is not within a Scenic Area of Statewide Significance, it is located onshore in the coastal area. The proposed infrastructure improvement activities at MCRC Brooklyn would not impair or further degrade the scenic quality of the area. Most construction activities and the resulting new

			structures would be obscured from public view. Additionally, all new structures would be consistent with the existing visual setting at MCRC Brooklyn.
Agricultural Lands			
26	Conserve and protect agricultural lands in the State's coastal area.	No	
27	Siting and construction of major energy facilities in the coastal area will be based on public energy needs, compatibility of such facilities with the environment, and the facility's need for a shorefront location.	No	
28	Ice management practices shall not interfere with the production of hydroelectric power, damage significant fish and wildlife, and their habitats, or increase shoreline erosion or flooding.	No	
29	Offshore uses and resources, including renewable energy resources, shall accommodate New York's long-standing ocean and Great Lakes industries	No	
Water and Air Resources			
30	Municipal, industrial, and commercial discharge of pollutants, including but not limited to, toxic and hazardous substances, into coastal waters will conform to State and National water quality standards.	No	

31	State coastal area policies and management objectives of approved local Waterfront Revitalization Programs will be considered while reviewing coastal water classifications and while modifying water quality standards.	No	
32	Encourage the use of alternative or innovative sanitary waste systems in small communities	No	
33	Best management practices will be used to ensure the control of stormwater runoff and combined sewer overflows draining into coastal waters.	Yes	The Proposed Action would result in a net increase of 159,300 ft ² of impervious surfaces at MCRC Brooklyn. An approved stormwater management/ erosion and sediment control plan would be obtained before starting construction to minimize impacts to state coastal resources. This plan would include appropriate best management practices and stormwater management practices to minimize runoff. Additionally, environmental site design, such as the construction of infiltration basins adjacent to the POV lot and east gate projects, would be implemented to maintain the predevelopment runoff characteristics after development has occurred and to reduce stream channel erosion, pollution, siltation and sedimentation, and flooding. MARFORRES would obtain and comply with all relevant permits required

			under the Clean Water Act and by New York State and New York City.
34	Limit discharge of waste materials into coastal waters from vessels subject to State jurisdiction into coastal waters	No	
35	Dredging and filling in coastal waters and disposal of the dredged material will be undertaken in a manner that meets existing State dredging permit requirements, and protects significant fish and wildlife habitats, scenic resources, natural protective features, important agricultural lands, and wetlands.	No	
36	Activities related to the shipment and storage of petroleum and other hazardous materials will be conducted in a manner that will prevent or at least minimize spills into coastal waters	Yes	Proposed infrastructure improvement activities and operations at MCRC Brooklyn would require the delivery, use, and storage of minimal amounts of petroleum products and certain hazardous materials. Contractors would be responsible for managing petroleum products and hazardous materials during construction and renovation activities in accordance with federal, state, and local regulations.
37	Use best management practices (BMPs) to minimize the non-point discharge of excess nutrients, organics, and eroded soils into coastal waters.	Yes	BMPs and other measures would be implemented during construction and renovation activities to provide erosion and sediment control and stormwater management on the active

			<p>work sites. Impacts from construction activities would be minimized to the greatest extent practicable through the implementation of these BMPs and the development and implementation of a Stormwater Pollution Prevention Plan. The contractor would obtain all necessary construction permits and comply with the requirements and guidelines set forth in those permits to minimize the potential for adverse impacts on coastal water resources. The stormwater management/erosion and sediment control plan would identify the BMPs and other measures that would be implemented to minimize or prevent soil erosion during construction by stormwater runoff and to prevent sedimentation of storm sewers or receiving streams. Additionally, the contractor would develop a site-specific stormwater pollution prevention plan prior to construction.</p>
38	The quality and quantity of surface water and groundwater supplies will be conserved and protected	Yes	<p>The proposed construction and operational activities would not affect surface water or groundwater quantity. BMPs in SWPPP to be developed would be implemented to maintain the average annual predevelopment infiltration/</p>

			groundwater recharge volume, and minimize erosion and sedimentation to ensure that soils disturbed during construction activities do not pollute nearby water bodies. Good housekeeping, maintenance of equipment, and containment of fuels and other potentially hazardous materials would be conducted to minimize the potential for releases to surface water and groundwater. If a spill or leak were to occur, BMPs identified in the SWPPP would be implemented to contain the spill and minimize the potential for, and extent of, associated contamination.
39	The transport, storage, treatment and disposal of solid wastes, particularly hazardous wastes, within coastal areas will be conducted in such a manner so as to protect groundwater and surface water supplies, significant fish and wildlife habitats, recreation areas, important agricultural lands, and scenic resources.	Yes	Solid waste, mainly of building materials would be generated during proposed infrastructure improvements. Contractors would be required to recycle debris to the greatest extent possible. Any solid hazardous wastes generated during the construction and renovation activities would be disposed of in accordance with federal and state laws and regulations.
40	Effluent discharged from major steam electric generating and industrial facilities into coastal waters	No	

41	Land use or development in the coastal area will not cause national or State air quality standards to be violated	Yes	The Proposed Action would obtain all applicable air quality permits, and no violations of national or state air quality standards during its construction or operation stages would be expected.
42	Coastal Management policies will be considered if the State reclassifies land areas pursuant to the prevention of significant deterioration regulations of the Federal Clean Air Act.	No	
43	Land use or development in the coastal area must not cause the generation of significant amounts of the acid rain precursors: nitrates and sulfates.	No	
Wetlands			
44	Preserve and protect tidal and freshwater wetlands and preserve the benefits derived from these areas.	Yes	There are no wetlands within the project area; however, approximately 3 acres of estuarine wetlands occur southwest of MCRC Brooklyn. Impacts on wetlands would be avoided. Implementation and proper maintenance of an erosion and sediment control plan, stormwater management practices, and SWPPP BMPs along with strict adherence to federal and state permit requirements would minimize the potential for indirect impacts on wetlands.

New York City Waterfront Revitalization Program Policies

Policy #	Enforceable Policy	Relevant to Project (Yes/No)	Consistency with Policy
1	Residential and Commercial Development	No	
2	Maritime and Industrial Development	Yes	Water dependent uses and facilities (including recreation uses) would not be constructed. MCRC Brooklyn is an existing long-term military facility that does not include water dependent uses. The installation and its shoreline are not currently available for water dependent uses, including recreation, nor are they suitable for or compatible with these uses due to the existing activities at occur on the installation.
3	Use of the waterways	No	
4	Ecological resources	Yes	Jamaica Bay, which is west of MCRC Brooklyn, is a Significant Fish and Wildlife Habitat. Infrastructure improvement activities at MCRC

			<p>Brooklyn would have no effects on the long-term viability of coastal fish and wildlife habitats. None of the proposed construction, replacement, or operations activities would occur in areas designated as significant fish and wildlife habitat. Operation of the Proposed Action is not expected to result in any impacts to the Jamaica Bay Significant Fish and Wildlife Habitat or other coastal ecological systems.</p> <p>There are no wetlands within the project area; however approximately 3 acres of estuarine wetlands occur southwest of MCRC Brooklyn.</p> <p>Impacts on wetlands would be avoided.</p> <p>Implementation and proper maintenance of an erosion and sediment control plan, stormwater management practices, and SWPPP BMPs along with strict adherence to federal and state permit requirements would minimize the potential for indirect impacts on wetlands.</p> <p>No significant impacts on rare, threatened, and endangered species would be expected. Several federally listed species are known to occur in Kings County. These species have not been identified within the project area, but could occasionally be found in habitat associated with the project area. Temporary impacts on state-listed species could occur from noise and ground disturbing activities associated with construction activities.</p>
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5	Water Quality	Yes	An approved SWPPP and erosion and sediment control plan would be developed before starting construction to prevent erosion and sedimentation, and minimize impacts to state coastal resources. This plan would include appropriate BMPs and stormwater management practices to minimize runoff. Additionally, environmental site design would be implemented to maintain the predevelopment runoff characteristics after development has occurred and to reduce stream channel erosion, pollution, siltation and sedimentation, and flooding. Stormwater controls would be implemented to further reduce potential impacts from runoff on water quality. MARFORRES would obtain and comply with all relevant permits required under the Clean Water Act and by New York State and New York City.
6	Flooding and Erosion	Yes	See Policy 5. MCRC Brooklyn is within the 100-year floodplain and 500-year floodplain boundaries. Construction of the proposed POV parking lot would occur within approximately 7.7 acres of 100-year floodplains, and property boundary fencing upgrades would impact approximately 0.01 acre of the 100-year floodplain. Additionally, construction of the new west gate and fence repair would occur within the 500-year floodplain. Additional impervious surface would be constructed within the 500-year floodplain. The Proposed Action would not affect any erosion

			control structures, including barrier landforms or natural shoreline features. Stormwater improvements would be implemented in parking areas to improve and facilitate drainage to the southern portion of the installation.
7	Hazardous Materials	Yes	<p>The Proposed Action would require the delivery, use, and storage of minimal amounts of petroleum products and certain hazardous materials. Contractors would be responsible for managing petroleum products and hazardous materials during construction and renovation activities in accordance with federal, state, and local regulations.</p> <p>MCRC Brooklyn was previously occupied by various Department of Defense tenants and used for numerous purposes over several decades. Industrial operations such as vehicle fueling and maintenance activities still occur today. There is no known contamination at the proposed work sites. Solid waste, mainly of building materials, soil piles, and yard debris, would be generated during proposed activities. Contractors would be required to recycle debris to the greatest extent possible. Any solid hazardous wastes generated during the construction and renovation activities would be disposed of in accordance with Federal and state laws and regulations.</p>
8	Public Access	Yes	The Proposed Action would occur on the shoreline, but would not include new water

			enhanced or water-dependent recreational space. Public access to and public water dependent uses (including recreation uses) would not be constructed; however, MCRC Brooklyn is an existing long-term military facility. MCRC Brooklyn and the adjacent shoreline are not currently publicly accessible or available for public uses, nor are they suitable for or compatible with these uses due to the existing activities that occur at the installation. Floyd Bennett Field surrounds MCRC Brooklyn and is publicly accessible for various uses. The Proposed Action would not affect public access to Floyd Bennett Field or New York City's coastal waters.
9	Scenic Resources	No	
10	Historical and Cultural Resources	Yes	<p>MCRC Brooklyn is located immediately south and east of the Floyd Bennett Field Historic District, which encompasses the area of the former Floyd Bennett Field municipal airport and civilian airfield and Naval Air Station New York, and was determined eligible for listing in the National Register of Historic Places. MCRC Brooklyn is not within the historic district.</p> <p>Construction of a new fire suppression facility, west gate, and POV parking lot; property boundary fencing upgrades; north and east gate upgrades; and fiber optic communication services would have indirect visual impacts on these historic properties and the Floyd Bennett Field</p>

			<p>Historic District. Other proposed construction activities, including infrastructure and stormwater improvements, would have indirect impacts on the Floyd Bennett Field historic district resulting from construction noise, vibration, and changing traffic patterns, but these effects would only be temporary during construction.</p>
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Example government-to-government consultation letter to Tribes



UNITED STATES MARINE CORPS

MARINE FORCES RESERVE
2000 OPELOUSAS AVENUE
NEW ORLEANS, LOUISIANA 70114

IN REPLY REFER TO:
FAC
1 July 2020

From: United States Marine Corps Forces Reserve
Environmental and Energy Program Manager

To: Deborah Dotson
President
Delaware Nation
P.O. Box 825
Anadarko, OK 73005

Subj: PROPOSED SUPPLEMENTAL CONSOLIDATION AND RENOVATION
AT MARINE CORPS RESERVE CENTER (MCRC) BROOKLYN, NEW
YORK

Encl: (1) Project Location Maps MCRC Brooklyn, New York

The U.S. Marine Corps Forces Reserve (MARFORRES) is proposing infrastructure improvements at Marine Corps Reserve Center (MCRC) Brooklyn, New York, located at the Gateway National Recreation Area at Floyd Bennett Field managed by the National Park Service (NPS). Accordingly, MARFORRES is developing a Supplemental Environment Assessment (SEA) under the National Environmental Policy Act (NEPA) of 1969, as amended, and complying with Section 106 of the National Historic Preservation Act (NHPA). In accordance with the NHPA (36 CFR 800) and Executive Order 13175, this letter initiates government-to-government consultation with Delaware Nation and constitutes a request for your input in identifying any issues or areas of concern you feel should be addressed in the environmental analysis and consultation with you regarding MARFORRES' determination of effects under Section 106.

To supplement infrastructure projects previously analyzed in a 2016 EA and to further accommodate the relocation of approximately 900 active-duty and reserve personnel to MCRC Brooklyn, MARFORRES proposes additional infrastructure improvements. Supplemental projects being analyzed in the SEA include construction of a new privately-owned vehicle (POV) parking lot and a new west gate to accommodate unanticipated traffic demands on drill weekends. The new POV lot would occur within the existing MARFORRES land

Subj: PROPOSED SUPPLEMENTAL CONSOLIDATION AND RENOVATION
AT MARINE CORPS RESERVE CENTER (MCRC) BROOKLYN, NEW
YORK

hold. The majority of the west gate would also occur within the existing MARFORRES land hold, though a small portion to the north of the west gate, which would be used for access to the gate, is within the NPS land hold.

MARFORRES would also replace and upgrade the existing east and north gates to comply with minimum standards from DoD Unified Facilities Criteria for Anti-Terrorism/Force Protection. The east gate would be upgraded and include resurfacing an existing paved road to the gate within the training area east of the developed portion of MCRC Brooklyn, allowing for safer movement of tactical equipment and increasing available parking in the POV lot. The existing north gate would be upgraded by creating a second gate and driveway, replacing the sliding gate, access controls, lighting, communication services, U.S. Marine Corps signage and guard house; relocating the entry point further back to allow for more queuing room; and repairing and adding perimeter fence. Portions of the perimeter fence would be repaired to meet AT/FP minimum security measures and additional fencing would be installed to enclose open portions of the property.

MARFORRES would install a new fire suppression facility on the installation. Construction would involve installation of a new water storage tank, and pump house and associated infrastructure, to accommodate fire suppression and sprinkler systems in the MCRC building and both vehicle maintenance facility buildings.

MARFORRES would install fiber optic service to the Reserve Training Center. The proposed fiber optic communication line would tie into an existing Verizon fiber optic line near the intersection of Flatbush Avenue and Aviation Road and would use the same right-of-way (ROW) as the utility corridor analyzed in the 2016 EA for an electrical line.

Additionally, MARFORRES would regrade and fill the areas on the existing POV lot in the vicinity of a warehouse east of the Administration Building to improve and facilitate drainage of the warehouse and parking area to the southern portion of the installation. Improved stormwater management controls, including regrading surfaces and diverting runoff

Subj: PROPOSED SUPPLEMENTAL CONSOLIDATION AND RENOVATION
AT MARINE CORPS RESERVE CENTER (MCRC) BROOKLYN, NEW
YORK

from surrounding facilities, would be implemented to further reduce potential impacts from runoff on water quality.

MARFORRES is initiating government-to-government consultation regarding the infrastructure improvements at MCRC Brooklyn. MARFORRES requests your input in identifying any issues or areas of concern you feel should be addressed in the environmental analysis. MARFORRES initiated Section 106 consultation with the New York State Historic Preservation Officer (SHPO) on February 13, 2020 and determined the present undertaking would have No Adverse Effect on historic properties. The NY SHPO concurred with this determination on March 6, 2020. MARFORRES is consulting with Delaware Nation regarding any concerns you may have regarding historic properties; your advisement on the identification of any properties or sites of traditional religious and cultural importance; and your views on this undertaking's potential effects to such properties, should they exist at MCRC Brooklyn.

Please provide your written questions, comments, or concurrence with MARFORRES' determination of effects under Section 106 at your earliest convenience, but no later than 30 days from the date of this correspondence. Address all questions and comments to Mr. Christopher Hurst, MARFORRES Environmental proponent, by email to christopher.a.hurst@usmc.mil. For further information, please call Mr. Hurst at (504) 697-9892.


R. GODCHAUX

Enclosure 1: Project Location Maps MCRC Brooklyn, New York





Section 7 Consultation Letter to USFWS



UNITED STATES MARINE CORPS

MARINE FORCES RESERVE
2000 OPELOUSAS AVENUE
NEW ORLEANS, LOUISIANA 70114

In reply refer to:
FAC
06 August 2020

From: Marine Corps Forces Reserve (MARFORRES),
Environmental and Energy Program Manager

To: Mr. Steve Papa, United States Fish and Wildlife
Service, Long Island Field Office, 340 Smith Road,
Shirley, NY 11967

Subj: SECTION 7 CONSULTATION FOR PROPOSED SUPPLEMENTAL
INFRASTRUCTURE IMPROVEMENTS AT MARINE CORPS RESERVE
CENTER BROOKLYN, NEW YORK

Encl: (1) Maps of Project Area and Proposed Projects

Dear Mr. Papa:

The U.S. Marine Corps Forces Reserve (MARFORRES) is preparing a Supplemental Environmental Assessment (SEA) to evaluate potential environmental impacts associated with infrastructure improvements supplemental to ongoing modernization and infrastructure improvements at Marine Corps Reserve Center (MCRC) Brooklyn, New York previously analyzed in a 2016 EA Addressing Consolidation and Renovation at MCRC Brooklyn. In accordance with Section 7 of the Endangered Species Act (ESA) of 1973 (16 USC 1531-1544), MARFORRES, headquartered at Marine Corps Support Facility New Orleans, respectfully request your concurrence on the determination that potential adverse environmental effects associated with infrastructure improvements are not likely to adversely affect the following species: Piping Plover (*Charadrius melodus*), Red Knot (*Calidris canutus rufa*), Roseate Tern (*Sterna dougallii dougallii*), Northern Long-eared Bat (*Myotis septentrionalis*), and Seabach Amaranth (*Amaranthus pumilus*).

Subj: SECTION 7 CONSULTATION FOR PROPOSED SUPPLEMENTAL
INFRASTRUCTURE IMPROVEMENTS AT MARINE CORPS RESERVE
CENTER BROOKLYN, NEW YORK

Proposed Action

Marine Corps Reserve Center (MCRC) Brooklyn occupies 70 acres (28 hectares [ha]) and is in the New York City Borough of Brooklyn (Kings County), New York, on Rockaway Inlet, which connects the Atlantic Ocean and Jamaica Bay (Figure 1). MCRC Brooklyn is located within the Jamaica Bay Unit of the Gateway National Recreation Area on the southernmost end of the former U.S. Naval Air Station Brooklyn, New York, now known as Floyd Bennett Field. Currently, MCRC Brooklyn houses three separate Marine Forces Reserve (MARFORRES) companies within the 6th Communications Battalion, including Headquarters, General Support Communications, and Service companies.

MARFORRES proposes the following infrastructure improvements to supplement ongoing modernization and infrastructure improvements analyzed in the previous 2016 EA at MCRC Brooklyn: construction of an additional privately owned vehicle (POV) parking lot, construction of a new west gate, replacement of the east and north gates, installation of a new fire suppression facility, installation of fiber optic communication service to the MCRC, upgrade to property boundary fencing, and stormwater drainage improvements.

To complete training requirements, the buildings, utilities, and assets on MCRC Brooklyn require ongoing maintenance and facility upgrades. The Proposed Action would improve long-term sustainable unit readiness through coordinated training and prepare for future mission requirements. To complete training requirements, the facilities, utilities, and assets on MRCR Brooklyn require ongoing maintenance and utility upgrades. Infrastructure on the installation is aging and requires capital investment to address deficiencies in the buildings and meet current and future mission requirements.

Subj: SECTION 7 CONSULTATION FOR PROPOSED SUPPLEMENTAL
INFRASTRUCTURE IMPROVEMENTS AT MARINE CORPS RESERVE
CENTER BROOKLYN, NEW YORK

Threatened, Endangered, and Candidate Species and Critical Habitat

The USFWS Information for Planning and Consultation System (IPaC) was reviewed and the New York Natural Heritage Program Nature Explorer was consulted to determine if any federally-listed species potentially occur in the vicinity of the Proposed Action (Project Area). The following species are federally listed and have the potential to occur in the Project Area (Table 1).

Table 1: Federally Listed Species with the Potential to Occur in the Project Area

Common Name	Scientific Name	Status	Preferred Habitat	Likelihood of Occurrence
Piping Plover	<i>Charadrius melodus</i>	T	Wide, flat, open sandy beaches.	Not likely to occur within the Project Area due to a lack of suitable habitat.
Red knot	<i>Calidris canutus rufa</i>	T	Intertidal marine habitats near coastal inlets.	Not likely to occur within the Project Area due to a lack of suitable habitat.
Roseate tern	<i>Sterna dougallii dougallii</i>	E	Rocky offshore islands, barrier beaches, and salt marsh islands.	Not likely to occur within the Project Area due to a lack of suitable habitat.

Subj: SECTION 7 CONSULTATION FOR PROPOSED SUPPLEMENTAL
INFRASTRUCTURE IMPROVEMENTS AT MARINE CORPS RESERVE
CENTER BROOKLYN, NEW YORK

Common Name	Scientific Name	Status	Preferred Habitat	Likelihood of Occurrence
Northern Long-eared Bat	<i>Myotis septentrionalis</i>	T	Roost singly or in colonies underneath bark, in cavities, or in crevices of both live and dead trees during the summer. Hibernates in caves and mines called hibernacula during the winter. Typically use large caves or mines with large passages and entrances.	Not likely to occur within the Project Area due to a lack of suitable habitat and distance to any known hibernacula or roosting sites.
Seabeach amaranth	<i>Amaranthus pumilus</i>	T	Barrier islands on coastal overwash flats at the ends of island and lower foredunes. Lower foredunes on ocean beaches above high tide.	Not likely to occur within the Project Area due to a lack of suitable habitat.

Notes:

E = Endangered; T = Threatened

The Proposed Action would have no effect on federally listed species. No listed or candidate species have been recorded on or near the Project Area and no suitable habitat exists within the Project Area for the federally listed species that have the potential to occur in the Project Area.

Therefore, MARFORRES has determined that infrastructure improvements would not affect the Piping Plover, Red Knot, Roseate Tern, Northern Long-eared Bat, and Seabeach Amaranth. We request written concurrence with our determination as part of the informal consultation process.

Subj: SECTION 7 CONSULTATION FOR PROPOSED SUPPLEMENTAL
INFRASTRUCTURE IMPROVEMENTS AT MARINE CORPS RESERVE
CENTER BROOKLYN, NEW YORK

If you have any questions or concerns, please contact Mr.
Christopher Hurst, MARFORRES Environmental proponent, by
email to christopher.a.hurst@usmc.mil or by phone at (504)
697-9892. Thank you in advance for your assistance in this
effort.



R. Godchaux

Enclosure 1: Maps of Project Area and Proposed Projects



Figure 1. Map of Project Area



Figure 2. Map of Proposed Projects



Figure 3. Map of Proposed Fiber Conduit Line

Agency Responses



ANDREW M. CUOMO
Governor

Parks, Recreation, and Historic Preservation

ERIK KULLESEID
Commissioner

March 6, 2020

Chris Hurst
NEPA Project Manager
U.S. Marine Forces Reserve
Marine Corps Support Facility
2000 Opelousas Avenue
New Orleans, LA 70114

Re: USMC
Infrastructure Improvements at Marine Corps Reserve Center Brooklyn
20PR01053

Dear Mr. Hurst:

Thank you for requesting the comments of the New York State Historic Preservation Office (SHPO). We have reviewed the provided documentation in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources. They do not include other environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the National Environmental Policy Act and/or the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8).

We note that the project area is located within the State Register listed Floyd Bennett Field Historic District. We further note that Married Officers' Quarters A and B are contributing resources to the Historic District. We have reviewed the project description and supporting documentation that was provided to our office on February 14th, 2020. Based upon our review, we concur with the lead federal agency determination that the proposed undertaking will have No Adverse Effect upon historic resources.

If additional information or correspondence is required regarding this project it should be provided via our Cultural Resource Information System (CRIS) at <https://cris.parks.ny.gov/>. Once on the CRIS site, you can log in as a guest and choose "submit" at the very top menu. Next choose "submit new information for an existing project" at the very bottom of the page. You will need this project number and your e-mail address. If you have any questions, I can be reached at (518) 268-2182.

Sincerely,

A handwritten signature in black ink, appearing to read "Olivia Brazee".

Olivia Brazee
Historic Site Restoration Coordinator
olivia.brazee@parks.ny.gov

via e-mail only

Division for Historic Preservation

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • parks.ny.gov



The Delaware Nation
Historic Preservation Department
31064 State Highway 281
Anadarko, OK 73005
Phone (405)247-2448

July 23, 2020

To Whom It May Concern:

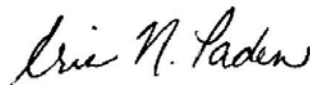
The Delaware Nation Historic Preservation Department received correspondence regarding the following referenced project(s).

Project(s): Proposed Supplemental Consolidation and Renovation at Marine Corps Reserve Center Brooklyn, New York

Our office is committed to protecting tribal heritage, culture and religion with particular concern for archaeological sites potentially containing burials and associated funerary objects.

The Lenape people occupied the area indicated in your letter prior to European contact until their eventual removal to our present locations. According to our files, the location of the proposed project does not endanger cultural, or religious sites of interest to the Delaware Nation. **Please continue with the project as planned** keeping in mind during construction should an archaeological site or artifacts inadvertently be uncovered, all construction and ground disturbing activities should immediately be halted until the appropriate state agencies, as well as this office, are notified (within 24 hours), and a proper archaeological assessment can be made.

Please note the Delaware Nation, the Delaware Tribe of Indians, and the Stockbridge Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these three tribes. We appreciate your cooperation in contacting the Delaware Nation Historic Preservation Office to conduct proper Section 106 consultation. Should you have any questions, feel free to contact our offices at 405-247-2448 ext. 1403.



Erin Paden
Director of Historic Preservation
Delaware Nation
31064 State Highway 281
Anadarko, OK 73005
Ph. 405-247-2448 ext. 1403
epaden@delawarenation-nsn.gov



B

Air Conformity Applicability
Model (ACAM) Report



AIR CONFORMITY APPLICABILITY MODEL REPORT

RECORD OF CONFORMITY ANALYSIS (ROCA)

1. General Information: The Air Force's Air Conformity Applicability Model (ACAM) was used to perform an analysis to assess the potential air quality impact/s associated with the action in accordance with the Air Force Instruction 32-7040, Air Quality Compliance And Resource Management; the Environmental Impact Analysis Process (EIAP, 32 CFR 989); and the General Conformity Rule (GCR, 40 CFR 93 Subpart B). This report provides a summary of the ACAM analysis.

a. Action Location:

Base: NO BASE

State: New York

County(s): Kings

Regulatory Area(s): New York-N. New Jersey-Long Island, NY-NJ-CT

b. Action Title: Infrastructure Improvements at MCRC Brooklyn

c. Project Number/s (if applicable):

d. Projected Action Start Date: 1 / 2021

e. Action Description:

See Section 2.1 of EA.

f. Point of Contact:

Name: Carolyn Hein

Title: Contractor

Organization: HDR

Email:

Phone Number:

2. Analysis: Total combined direct and indirect emissions associated with the action were estimated through ACAM on a calendar-year basis for the "worst-case" and "steady state" (net gain/loss upon action fully implemented) emissions. General Conformity under the Clean Air Act, Section 1.76 has been evaluated for the action described above according to the requirements of 40 CFR 93, Subpart B.

Based on the analysis, the requirements of this rule are: _____ applicable
__X__ not applicable

Conformity Analysis Summary:

2021

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
New York-N. New Jersey-Long Island, NY-NJ-CT			
VOC	1.836	50	No
NO _x	10.991	50	No
CO	11.693	100	No
SO _x	0.027	100	No
PM ₁₀	32.779		
PM _{2.5}	0.500	100	No
Pb	0.000		
NH ³	0.006	100	No
CO _{2e}	2649.4		

AIR CONFORMITY APPLICABILITY MODEL REPORT

RECORD OF CONFORMITY ANALYSIS (ROCA)

2022 - (Steady State)

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
New York-N. New Jersey-Long Island, NY-NJ-CT			
VOC	0.000	50	No
NO _x	0.000	50	No
CO	0.000	100	No
SO _x	0.000	100	No
PM ₁₀	0.000		
PM _{2.5}	0.000	100	No
Pb	0.000		
NH ³	0.000	100	No
CO _{2e}	0.0		

None of estimated emissions associated with this action are above the conformity threshold values established at 40 CFR 93.153 (b); Therefore, the requirements of the General Conformity Rule are not applicable.