FINAL

ENVIRONMENTAL ASSESSMENT

FOR

EXPANDED OPERATIONS AT THE OREGON ARMY NATIONAL GUARD'S CAMP UMATILLA OREGON (CUO)

OREGON NATIONAL GUARD

OREGON MILITARY DEPARTMENT
1776 MILITIA WAY SE
SALEM, OR 97309

CONTRACT # W912JV15C3001

AUGUST 30, 2018

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ENVIRONMENTAL ASSESSMENT SIGNATURE PAGE

LEAD AGENCY: National Guard Bureau (NGB)

COOPERATING AGENCIES: None

TITLE OF PROPOSED ACTION: Expanded Operations at the Oregon National Guard's Camp Umatilla Oregon (CUO)

AFFECTED JURISDICTION: Umatilla, Umatilla and Morrow Counties, Oregon

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DOCUMENT DESIGNATION: Final Environmental Assessment

ABSTRACT: This Environmental Assessment (EA) analyzes the potential environmental effects that would be likely to occur as a result of the expansion of military training operations and related infrastructure development, by the Oregon National Guard, on a portion of the former United States Army

Umatilla Chemical Depot (UCD). The EA follows a land reassignment, completed in December 2017, allowing the Oregon Army National Guard (ORARNG) and the Oregon Military Department control and use of 7,500 acres of the former UCD.

EXECUTIVE SUMMARY

This Environmental Assessment (EA) analyzes the potential environmental effects that would be likely to occur as a result of the expansion of military training operations and related infrastructure development, by the Oregon National Guard, on a portion of the former United States Army Umatilla Chemical Depot (UCD) using both federal and state funding. The EA follows a land reassignment, completed in November 2017, allowing the Oregon Army National Guard (ORARNG) and the Oregon Military Department (OMD) control and use of 7,500 acres of the former UCD.

This EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code [USC] 4321 et seq.) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and is consistent with Title 32 CFR Part 651, Army Regulation (AR) 200-1, U.S. Army National Guard (ARNG) NEPA Handbook Volumes I-III, and Oregon Army National Guard (ORARNG) Pamphlet (PAM) 200-1.

Proposed Action

The Proposed Action consists of expanded military training operations and associated infrastructure development that would occur over approximately the next 5 years on Camp Umatilla Oregon (CUO). CUO refers to the 7,500 acres of the former Umatilla Chemical Depot that have been reassigned to the ORARNG and OMD. The purpose of the Proposed Action is to support the core training and readiness objectives for all ORARNG elements as part of the Combined Arms Training Strategy, along with the U.S. Army Training and Doctrine Command (TRADOC) Programs of Instruction (POI) required for the RTI, by maximizing the training opportunities available on the 7,500-acre CUO in an economically feasible way. Three geographic “Use Areas” have been identified where general types of military training or other activities and associated facilities would occur: the Cantonment Use Area, the Live-Fire Use Area, and the Maneuver Use Area. Each of these Use Areas would require some construction to support the military training or other activities proposed for that Use Area. Construction efforts using a combination of federal and state funds would include new construction of purpose-built modern facilities, and modification and re-use of existing structures to house or support military training. In general, the strategy for development of CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, igloo complexes, etc.) where possible to accomplish the required training or other use, and to reduce the environmental impacts associated with native habitat conversion. The Proposed Action also includes required infrastructure improvements that cut across Use Areas. These infrastructure improvements are mostly utilities–related, and would include the potable water system, wastewater treatment system, transportation system, and enhanced firebreak system.

Under the Proposed Action, military training activities at CUO would be expanded to fully support the training requirements of multiple battalions. The CUO would have a capacity to support 620 transient personnel, with surges up to 1,240 transient personnel. The operational capabilities would accommodate company-sized maneuvers, along with weapons live-fire range capability for individual qualifications. The support facilities, training areas, weapons ranges, and full-time staff would support the core training and readiness objectives for all ORARNG elements as part of the Combined Arms Training Strategy, along with the U.S. Army Training and Doctrine Command (TRADOC) Programs of Instruction required for the Regional Training Institute (RTI).

According to the Range Facility Management Support System (RFMSS), annual throughput of all combined personnel at CUO has averaged approximately 22,000 man-days over the last 5 years.

Implementation of the Proposed Action anticipates average annual throughput of Soldier man-days at 40,000 to 50,000, based on increased training exercises by ORARNG units and increased training schedules by the RTI.

Whether analyzing for the maximum occupancy at one time or the annual throughput in man-days, the users would likely cycle through all three of the major Use Areas described in this EA during their stay at CUO. Soldiers and students would be billeted in the Cantonment Use Area; conduct weapons live-fire training and qualification in the Live-Fire Use Area; and conduct mounted and dismounted maneuver training in the Maneuver Use Area.

Infrastructure development, military training activities, and potential disturbed acreage included under the Proposed Action are summarized below in Table ES.1. Best Management Practices (BMPs) that OMD employs as part of its standard operating procedures that would minimize impacts associated with the Proposed Action are included in the Section 2 narrative.

Table ES.1: List of Individual Projects Included in the Proposed Action

Project Description	Total Acres	Acres New Disturbance	Funding Source	Planned Date
Live Fire Use Area				
Construct and operate up to four additional firing lanes at the Modified Record Fire (MRF) range (NG PAM 415-12)	20	8	SRM	2020
Cantonment Use Area				
Construct and operate a large, gravel tent pad site for a battalion element/multiple companies with adjacent latrine/ shower buildings, covered training/mess shelters, and pads for Mobile Containerized Kitchens (NG PAM 415-12)	10	10	SRM/ Troop Labor	2019
Maneuver Use Area				
Construct and operate a large Military Operations on Urbanized Terrain (MOUT) site (urban and/or rural village) (NG PAM 415-12 and RTI POI)	556	100	SRM/ Troop Labor	2018-2022
Construct and operate helicopter landing zones (HLZ) and two parachute drop zones (DZ) for personnel and cargo (NG PAM 415-12)	210	10	G3	2019
Construct and operate an Ammunition Supply Point (ASP) by repurposing 4 to 12 existing Igloos (NG PAM 415-12)	50	10	SRM	2021
Construct and operate new maneuver lanes and a tracked/fighting vehicle maneuver course (non-live fire), including new connector trails, staging areas, and enhanced firebreaks as needed (NG PAM 415-12)	166	116	G3/ Troop Labor/ SRM	2019-2021
Utility and Transportation Projects that cut across Use Areas				
Repair and operate the potable Water System (NG PAM 415-12)	8	8	SRM/ UMMC	2018
Repair and operate the Wastewater System (NG PAM 415-12 MILCON PN411503)	5	5	Milcon/ UMMC	2018
Construct perimeter roads, fencing, and firebreaks (NG PAM 415-12)	110	110	SRM/ Troop Labor	2019-2022

Note: A total potential new disturbance of approximately 360 acres may result from the Proposed Action, due to 17 acres of overlap of individual actions in the above table.

Alternatives

NEPA, CEQ regulations, and 32 CFR 651 require all reasonable alternatives to be explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified, along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered "reasonable" only if it would enable the ORARNG to accomplish mission requirements and meet the purpose of and need for the Proposed Action. "Unreasonable" alternatives would not enable the ORARNG to meet the purpose of and need for the Proposed Action. The ORARNG considered the following alternatives: 1) implement the Proposed Action at locations other than CUO (existing military installations--Camp Rilea, Camp Adair, Biak Training Center, Naval Weapons System Training Facility Boardman; Private Lands; federal lands; and state lands), 2) simulated training, and 3) rearrange the three major Use Areas. These alternatives were eliminated from further consideration because they did not meet one or more of the screening criteria.

The ORARNG applied the following criteria to screen and evaluate possible alternatives for the Proposed Action. The ORARNG identified that a suitable alternative would need to meet all of the following criteria:

1. Meets the purpose and need
2. Economically feasible (within the realm of historic recorded funding levels)
3. Controllable variables (e.g., alternatives that require Congressional action would be outside ORARNG's control)
4. Safety (e.g., live-fire ranges must be sited with adequate Surface Danger Zones [SDZ])
5. Minimize adverse impacts to the environment

Through application of these screening criteria, the ORARNG determined that the Proposed Action is the only alternative capable of meeting the screening criteria. This EA examines two alternatives in-depth: the Proposed Action Alternative, and the No Action Alternative.

- The Proposed Action would expand ORARNG military training activities at CUO and infrastructure development required over the next 5 years.
- The No Action Alternative would continue ORARNG military training activities at CUO at present and historic levels, including typical incremental improvements and fluctuations in training cadence and intensity that normally occur.

The Proposed Action was designed by ORARNG staff to meet the purpose and need by accomplishing the required military training, while attempting to minimize environmental impacts associated with native habitat conversion by reusing and repurposing existing disturbed areas (buildings, roads, igloo complexes, etc.) where possible. The No Action Alternative would not meet the purpose and need. However, the No Action Alternative is comparatively analyzed in this EA, as required under Federal Law.

Affected Environment

The CUO study area is in the Pleistocene Lake Basin Level IV ecoregion, which covers approximately 1,407 square miles in eastern Oregon. The Pleistocene Lake Basin is a sub-region of the Columbia Plateau Level III ecoregion, which includes portions of Oregon and Washington, with small areas extending over the Idaho state border and into British Columbia. The Pleistocene Lake Basin ecoregion is defined by a nearly level to undulating plain shaped by Pleistocene lakes and floodwaters from glacial lakes Missoula and Columbia. The topography of this ecoregion slopes to the Columbia River. The low,

rolling topography and Shrub-Steppe habitat of CUO includes elevations ranging from 400 to 677 feet above mean sea level. Vegetation communities in the CUO study area are predominantly cheatgrass-dominated grasslands interspersed with native perennial grasslands and areas of sagebrush and antelope bitterbrush shrublands.

Existing training activities are organized in three different categories: live-fire weapons training and qualification, mounted and dismounted maneuver training, and classroom and simulations training. There are approximately 20 full-time ORARNG Range operation and training staff who regularly work at CUO. Over the last 5 years, the ORARNG training enclave averaged approximately 22,000 man-days of training per year. The general training categories are summarized as follows:

- Live-fire weapons training occurs in the existing Live-Fire Use Area, in the southwestern corner of the property along Range Road, with the direction of fire oriented to the north. The former Ammunition Disposal Area (ADA) that encompasses approximately 1,750 acres to the north of the live-fire ranges serves as the SDZ for all existing live-fire ranges, per AR 385-63.
- Classroom and simulation training is performed in buildings and structures in the Cantonment Use Area. Basic functional activities include administrative, classroom, storage, billeting, dining, physical fitness, and supporting vehicle parking areas.
- Maneuver training occurs in the maneuver area, and includes both mounted (on road only) and dismounted maneuver.

Environmental Consequences

The Proposed Action was evaluated to determine its potential direct or indirect impact(s) on the physical, environmental, cultural, and socioeconomic aspects of CUO and the surrounding area. Technical areas evaluated include: land use; air quality; noise; geology, topography, and soils; water resources; biological resources; cultural resources; socioeconomics; environmental justice; regional infrastructure; hazardous and toxic materials and waste; and wildland fire. The Proposed Action Alternative and No Action Alternative would result in the impacts summarized in Table ES.2.

Mitigation Measures

Mitigation measures are defined as project-specific requirements, not routinely implemented by the ORARNG, that are necessary to reduce identified potentially significant adverse environmental impacts to *less-than-significant* levels. BMPs are regulatory compliance measures that the ORARNG regularly implements as part of their activities, as appropriate, across the State of Oregon. Per established protocols, procedures, and requirements, the ORARNG will satisfy all applicable regulatory requirements associated with the proposed construction, renovation, conversion, and demolition projects. These BMPs are summarized in Section 2.2.7 of this EA, and are included as components of the Proposed Action Alternative. To reduce impacts associated with the Proposed Action Alternative to *less-than-significant* levels, the project-specific mitigation measures are required.

Table ES.2: Comparison of Environmental Impacts of Each Alternative

Resource	Alternatives	
	No Action	**Proposed Action**
Land Use	**No Impact.** No new installation infrastructure and no change to use type or levels.	**Less than significant.** No conflict with overall authorized land use. Site activities would not change, but would be expanded in scope. Long-term positive impact would occur through development of the CUO consistent with existing land use and zoning.
Air Quality	**No Impact.** Training and operations would continue under current conditions at current locations and levels; no change to pollutant emissions.	**Less than significant.** Short-term, less-than-significant, adverse impacts due to the potential for dust generation and air emissions from construction activities. Long-term, less-than-significant, adverse impacts from emissions associated with increased equipment and vehicle use and increased fugitive dust during training operations.
Noise	**No Impact.** Training and operations would continue under current conditions at current locations and levels; no change to local noise environment.	**Less than significant.** Short-term, less-than-significant adverse impacts due to construction noise. Long-term, less-than-significant adverse impacts due to increased noise generation from increased training activities that would be performed consistent with the Statewide Operational Noise Management Plan (SONMP) and existing noise-related Right-of-Way, and would not impact sensitive land uses.
Geology, Topography, and Soils	**Less than significant.** No short-term impacts would occur. Long-term, less-than-significant, adverse impacts due to soil compaction from continued training activities.	**Less than significant.** Short-term, less-than-significant adverse impact through vegetation removal, ground disturbance, and potential compaction during construction. Long-term, less-than-significant, adverse impacts through loss of soil function resulting from creation of impervious surfaces. Proposed ground disturbance in identified areas of severe soil hazards would be conducted using erosion control best management practices (BMPs).
Water Resources	**Less than significant.** No short-term impacts would occur. Long-term, less-than-significant, adverse impacts due to soil erosion during training operations and continued water usage at current levels.	**Less than significant.** Short-term, less-than-significant adverse impacts due to the potential for release of toxic or hazardous materials during construction, which would be completed in accordance with permit requirements. Long-term, less-than-significant adverse impacts due to increased water usage that would remain within allocated water rights. Contamination to groundwater from operations, including the proposed wastewater treatment plant, would be unlikely to occur due to implementation of BMPs.

Table ES.2: Comparison of Environmental Impacts of Each Alternative

Resource	Alternatives	
	No Action	**Proposed Action**
Biological (Vegetation, Fish and Wildlife, and Wildland Fire)	**Less than significant.** No short-term impacts would occur. Long-term, less-than-significant, adverse impacts due to trampling and degradation of non-native vegetation during training activities and impacts to species due to continued human presence in areas previously disturbed by current training and operational activities. Long-term, less-than-significant adverse impacts would occur due to lack of firebreaks at CUO; however, an Integrated Wildland Fire Management Plan would be created for the site.	**Less than significant.** Short-term, less-than-significant, adverse impacts due to vegetation removal and disturbance, habitat loss and degradation during construction, and potential for more frequent fire starts. Long-term, less-than-significant adverse impacts due to vegetation removal and disturbance during operations and training that would occur primarily in areas dominated by non-native and invasive species, and due to habitat conversion, noise, and/or human presence from training and operational activities to be conducted in accordance with the Integrated Natural Resource Management Plan (INRMP). Impacts would be reduced by implementation of exotic/invasive species reduction goals established in the INRMP. Long-term, less-than-significant adverse impact due to increased fire risk from increased training; however, offset by incorporation of BMPs, including firebreaks and creation of the Integrated Wildland Fire Management Plan.
Cultural Resources	**Less than significant.** Short-term impacts would not occur. Long-term, less-than-significant adverse impacts due to continued training and operations activities that could potentially result in occasional cultural resource discoveries and required building maintenance/upkeep that would be performed in existing management plan.	**Mitigated to less than significant**. Short-term, less-than-significant adverse impacts due to the potential for cultural resource discovery during construction. Long-term, significant adverse impacts due to impacts to 563 National Register of Historic Places (NRHP)-eligible buildings and structures associated with the Umatilla Chemical Depot (UCD) Historic District; an NRHP-eligible wagon road; and a potentially eligible property of traditional religious and cultural significance identified by the Confederated Tribes of the Umatilla Indian Reservation. Impacts would be reduced to less-than-significant levels with implementation of mitigation measures discussed in Section 4 and the 2018 Programmatic Agreement.
Socioeconomics	**No impact.** Economic activity associated with current uses of Camp Umatilla Oregon (CUO) would continue, and use levels of CUO would not change.	**Less than significant.** Short-term positive impact due to increased economic activity during construction. Long-term positive impact due to increased long-term employment, income, and population levels and corresponding purchases of goods and services.
Environmental Justice	**No impact.** Activity and use levels would remain the same; no impacts to environmental justice populations.	**No impact.** No disproportionate adverse environmental, economic, or health-specific impact to minority or low-income populations. No disproportionate environmental or health risks to children.
Infrastructure	**Less than significant.** Minor improvements to water and wastewater systems to accommodate CUO use levels would result in short- and long-term positive impacts due to improvements to the potable water system and wastewater system to accommodate existing uses.	**Less than significant.** Short- and long-term positive impacts due to improvements of existing infrastructure and construction of additional on-site utility infrastructure with sufficient capacity to accommodate increased activity levels.
Hazardous and Toxic Materials/ Wastes	**Less than significant.** Long-term positive impacts due to management of Regulated Building Material (RBM) and hazardous wastes remaining at the site.	**Less than significant.** Short- and long-term beneficial impacts would occur due to abatement of existing RBM and management of hazardous materials during operations.

Mitigation measures consist of the cultural resources actions identified in the 2018 Programmatic Agreement:

- Designate a representative historic district within a 15.5-acre area in the central cantonment and an 8-acre area of Igloos and maintain the integrity of those historic buildings and structures for the foreseeable future.
- Develop a historic district management manual for the newly designated representative district.
- Protect the property of traditional religious and cultural significance (PTRCS) site identified by the CTUIR as though it is NRHP-eligible by limiting off-road vehicular traffic or new construction within the PTRCS site and by consulting with the CTUIR to develop a protocol allowing tribal member access to carry out cultural practices or prior to unavoidable ground-disturbing actions.
- Complete additional archaeological surveys in previously undisturbed areas prior to any CUO Expansion and Development ground-disturbing actions in that area.
- Photo-document the wagon road (35UM497), update the site form, and complete a Light Intensity Distance and Ranging (LIDAR) study to better document its track across the CUO.

Agency and Public Involvement

Letters were sent out on August 12, 2016, to multiple local, state, and federal agencies notifying them of the project and the scope of this EA, and providing an opportunity for involvement in the environmental review process. If an FNSI is determined to be appropriate, the Final EA and FNSI will be made available for public review. Public and stakeholder comments will be considered prior to a decision and issuance of an FNSI.

Conclusions

The scope of this EA includes analysis of the current military training activities (No Action) and those proposed increased military training activities and related infrastructure development projects over the next 5 years (Proposed Action). The evaluation performed in this EA concludes there would be *no significant adverse impact*, either individually or cumulatively, to the local environment or quality of life as a result of implementing the Proposed Action Alternative, provided BMPs and mitigation measures specified in this EA are implemented. This EA's analysis determines, therefore, an Environmental Impact Statement is unnecessary for implementing the Proposed Action, and that a mitigated Finding of No Significant Impact is appropriate. The Proposed Action Alternative was determined by the ORARNG to provide the best combination of land and resources to sustain quality military training, and to maintain and improve the units' readiness postures. The No Action Alternative was not found to satisfy the purpose of and need for the project. This alternative would limit the capability of the ORARNG to carry out its assigned mission. Therefore, this EA recommends implementation of the Proposed Action Alternative.

Because the CUO expanded training project would be implemented over an extended period of time (approximately 5 years), the ORARNG will review this NEPA analysis periodically, in consultation with ARNG's Installations and Environment Directorate (ARNG-I&E), to ensure no substantial changes have occurred to environmental resources or regulatory requirements since the completion of this EA. If changes have occurred, the ORARNG would prepare an updated NEPA analysis in the form of a Supplemental EA or tiered Categorical Exclusion. This original EA would be used as the foundation for the updated analysis, and supplemental NEPA analyses would focus on those issues that have changed.

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ACRONYMS AND ABBREVIATIONS

ºF	degrees Fahrenheit
ACHP	Advisory Council of Historic Preservation
ACM	Asbestos-containing material
ADA	Ammunition Disposal Area
ADNL	A-weighted day-night level
AEDB-R	Army Environmental Database-Restoration
AGL	above ground level
ARNG	Army National Guard
ASP	Ammunition Supply Point
AST	Aboveground storage tank
AR	Army Regulation
B2H	Boardman to Hemingway
BCC	Birds of Conservation Concern
BCR	Bird Conservation Region
BLM	Bureau of Land Management
BMP	best management practice
BRAC	Base Realignment and Closure
BTC	Biak Training Center
ca.	circa
CAA	Clean Air Act
CAFO	Concentrated Animal Feeding Operation
CDA	Columbia Development Authority
CDNL	C-weighted day-night level
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESQG	Conditionally Exempt Small Quantity Generator
CFR	Code of Federal Regulations
CMA	Chemical Materials Activity
CPQC	Combat Pistol/Military Police Firearms Qualification Course
CRO	
CTUIR	Confederated Tribes of the Umatilla Indian Reservation
CUO	Camp Umatilla Oregon
dB	decibel
dBA	A-scale decibel
DEQ	Oregon Department of Environmental Quality
DNL	day-night level
DoD	Department of Defense
DZ	drop zone
EA	Environmental Assessment
EBS	Environmental Baseline Survey
ECOP	Environmental Condition of Property
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FAA	Federal Aviation Administration
FFA	Federal Facilities Agreement
FNSI	Finding of No Significant Impact
FP	Firing Point
gpcpd	gallons per capita per day
gpd	gallons per day
gpm	gallons per minute
GWMA	Groundwater Management Area
HLZ	helicopter landing zone
HMWSMP	Hazardous Material, Waste, and Spill Management Plan
HTMW	Hazardous and Toxic Materials and Wastes
I	Interstate
ICIS-Air	Integrated Compliance Information System for Air
IPMP	Integrated Pest Management Plan
IWFMP	Integrated Wildland Fire Management Plan
ICRMP	Integrated Cultural Resource Management Plan
IMILES	Instrumentable Multiple Integrated Laser Engagement System

INRMP	Integrated Natural Resource Management Plan
ISC	Installation Spill Contingency
ITAM	Integrated Training Area Management
JBLM	Joint Base Lewis McChord
LRA	Local Reuse Authority
LUB	Lower Umatilla Basin
LUC	land use control
mg/L	milligram per liter
M-S	Mission Sensitive
MBTA	Migratory Bird Treaty Act
mm	millimeter
MOU	Memorandum of Understanding
MOUT	Military Operations in Urbanized Terrain
MRF	Modified Record Fire
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NFA	No Further Action
NGB	National Guard Bureau
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWSTF	Naval Weapons System Training Facility
OAR	Oregon Administrative Rule
OCTC	Orchard Combat Training Center
ODA	Oregon Department of Agriculture
ODFW	Oregon Department of Fish and Wildlife
OMD	Oregon Military Department
ORARNG	Oregon Army National Guard
ORBIC	Oregon Biodiversity Information Center
OWRD	Oregon Water Resources Department
OU	Operable Unit
PA	Programmatic Agreement
PAM	Pamphlet
PCB	polychlorinated biphenyl
POI	Programs of Instruction
PTRCS	property of traditional religious and cultural significance
RBM	Regulated Building Material
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
RTI	Regional Training Institute
SAW	Squad Automatic Weapon
§	Section
SDZ	Surface Danger Zone
sf	square feet
SHPO	State Historic Preservation Office
SONMP	Statewide Operational Noise Management Plan
SPCC	Spill Prevention, Control, and Countermeasure
SWMU	Solid Waste Management Unit
TCPC	Tank Commanders Proficiency Course
TRADOC	U.S. Army Training and Doctrine Command
TSCA	Toxic Substance Control Act
U.S.C.	United States Code
UAS	Unmanned Aerial System
UCD	Umatilla Chemical Depot
UEC	Umatilla Electric Cooperative
UIC	underground injection control
UMAD	Umatilla Army Depot
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
WPCF	Water Pollution Control Facility
WWII	World War II
YTC	Yakima Training Center

SECTION 1: PURPOSE AND NEED FOR THE PROPOSED ACTION

1.1 Introduction

This Environmental Assessment (EA) analyzes the potential environmental effects that would be likely to occur as a result of the expansion of military training operations and related infrastructure development on a portion of the former United States Army Umatilla Chemical Depot (UCD). The EA follows a recently completed land reassignment (November 27, 2017), allowing the Oregon Army National Guard (ORARNG) and the Oregon Military Department (OMD) control and use of 7,500 acres of the former UCD. This EA was prepared in accordance with the National Environmental Policy Act (NEPA) and the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (CEQ Regulations, 40 Code of Federal Regulations [CFR] Parts 1500-1508), and is consistent with Title 32 CFR Part 651, Army Regulation (AR) 200-1 (U.S. Army 2007), U.S. Army National Guard (ARNG) NEPA Handbook Volumes I-III (ARNG 2011), and Oregon Army National Guard Pamphlet (PAM) 200-1 (ORARNG 2012).

The UCD was an Army ordnance depot from 1941 until 2011, used for management and storage of munitions and chemical agents. Most recently, it was used for decommissioning and disposal of chemical agents. In 1998 and 2005, Base Realignment and Closure (BRAC) legislation recommended the UCD for closure on completion of the chemical demilitarization mission. That mission was completed in late 2011, when the last of the munitions stored on UCD were destroyed through incineration (Kennedy/Jenks Consultants 2014). The Army closed the UCD as an active military installation on August 1, 2012, and is proceeding with disposal of the property through a variety of land conveyances consistent with the requirements of the 2005 BRAC process. The ORARNG maintained an enclave on the property since the early 1980s to support various military training activities of ORARNG Soldiers. That enclave included 2,100 acres of property and several buildings licensed from the Army to the ORARNG.

Ongoing ORARNG activities at Camp Umatilla Oregon (CUO) include training and administrative uses. Training activities are generally organized into three different categories: live-fire weapons training and qualification, mounted and dismounted maneuver training, and classroom and simulations training. There are approximately 20 full-time ORARNG range operation and training staff working on CUO. Over the last 5 years, CUO has averaged approximately 22,000 man-days[1] of training, based on Range Facility Management Support System data. This includes ORARNG Inactive Duty Training, or “weekend drill,” and Annual Training, or 2-week “Summer Training”; Regional Training Institute (RTI) students; Army Active Duty; and other training. CUO is open for training activities year round. Training activities are intermittent, and range from small units (50 to 60 people) over a weekend to company or battalion-sized activities (several hundred people) over a 2-week period. RTI has regular use of two existing buildings for classrooms and RTI Headquarters and cadre administration, as well as shared use of the existing barracks and dining facility. RTI offers four or five cycles of three different courses running concurrently several times per year, and each cycle runs 3 weeks. The courses offered by RTI are the Infantry Transition Course, Infantry Qualification Course, and the Advanced Leader’s Course for Infantry.

The approved BRAC disposal plan calls for approximately 9,555 acres to be turned over to a number of local government entities to be developed for commercial and industrial uses; this includes approximately

[1] Soldiers on-site per day. For example, 50 Soldiers training on-site for a 2-day weekend is 100 man-days.

5,700 acres on the eastern side of the former UCD that will be conserved as wildlife habitat. The Army retained the balance of the installation, approximately 7,500 acres, as an expanded training area for and under the control of the ORARNG, currently identified as CUO. CUO training activities are managed by the ORARNG and support individual and collective training through weapons proficiency and company-sized maneuvers. The CUO property is federally owned, and training activities and related development are conducted using both federal and state funding. The scope of this EA includes analysis of the current military training activities (No Action), and those proposed increased military training activities and related infrastructure development projects over the next 5 years (Proposed Action). As individual projects are funded and designed over the next 5 years, the ORARNG would review this EA to determine if updated NEPA analysis is required by tiering or supplement, as needed. The NEPA analysis for the BRAC real estate transfer of the balance of the property to local governments is currently being addressed by the Army in a separate EA *(Environmental Assessment for Disposal and Reuse of Umatilla Chemical Depot,* August 2016) and is outside the scope of this document. The NEPA analysis for reassignment of 7,500 acres for ORARNG use was completed by BRAC under a categorical exclusion in February 2017.

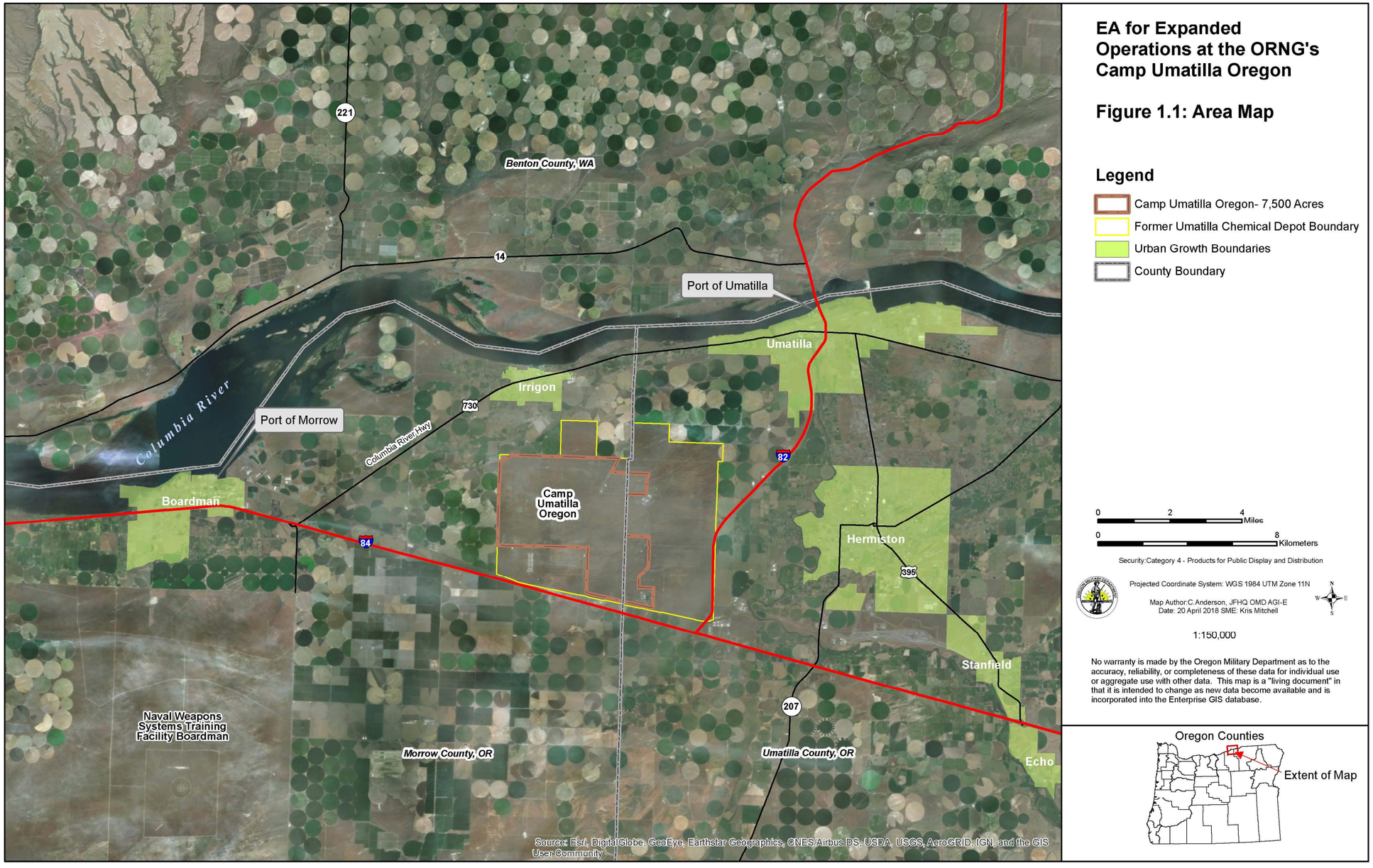
1.2 Background–Former Umatilla Chemical Depot

1.2.1 Location

The former UCD consists of 19,728 acres at the northwestern corner of Interstate (I)-82 and I-84, situated in both Morrow County, Oregon (53 percent), and Umatilla County, Oregon (47 percent). The installation is about 5 miles southwest of the City of Umatilla, 4 miles west of the City of Hermiston, and 0.75 mile southeast of the City of Irrigon (see Figures 1.1 and 1.2).

1.2.2 History

The UCD property was obtained by the United States government in 1940 for an ammunition and supply depot (Dodd n.d.:231; Umatilla Army Depot n.d.:3). Construction was completed in 1941, and included 1,000 ammunition storage igloos, along with shops, offices, warehouses, family housing, barracks, and miles of railroad siding and roads (Hightower 1984:15; Macnab 1975:248-249; Umatilla Army Depot n.d.:3). The original purpose of the UCD was the storage and processing of military vehicles, and storage and issue of lend-lease quartermaster supplies, ammunition, small arms, and components to support America's involvement in World War II (WWII; U.S. Department of the Army 1982:2). In 1962, the purpose of the UCD changed to include receiving, storing, issuing, and maintaining chemical munitions (U.S. Department of the Army 1982:2). In 2004, the UCD mission changed to destruction of its chemical munitions stockpile to fulfill United States treaty obligations. When the BRAC Commission recommended the UCD for realignment in 1998, a Local Reuse Authority (LRA) was formed with representatives from the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), Port of Morrow, Port of Umatilla, Morrow County, and Umatilla County. In 2005, when the UCD was once again placed on the BRAC list, the LRA reconvened to map out a strategy to convert existing military structures and land to public and commercial uses. In 2014, the LRA was recognized by the Department of Defense (DoD), and was renamed the Columbia Development Authority (CDA).


221
Benton County, WA
14
Port of Umatilla
Umatilla
Irrigon
730
Port of Morrow
Columbia River
Columbia River Hwy
82
Boardman
Camp Umatilla Oregon
84
Hermiston
395
Stanfield
207
Naval Weapons Systems Training Facility Boardman
Morrow County, OR
Umatilla County, OR
Echo
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
EA for Expanded Operations at the ORNG's Camp Umatilla Oregon
Figure 1.1: Area Map
Legend
Camp Umatilla Oregon- 7,500 Acres
Former Umatilla Chemical Depot Boundary
Urban Growth Boundaries
County Boundary
0 2 4 Miles
0 8 Kilometers
Security:Category 4 - Products for Public Display and Distribution
Projected Coordinate System: WGS 1984 UTM Zone 11N
Map Author:C.Anderson, JFHQ OMD AGI-E
Date: 20 April 2018 SME: Kris Mitchell
1:150,000
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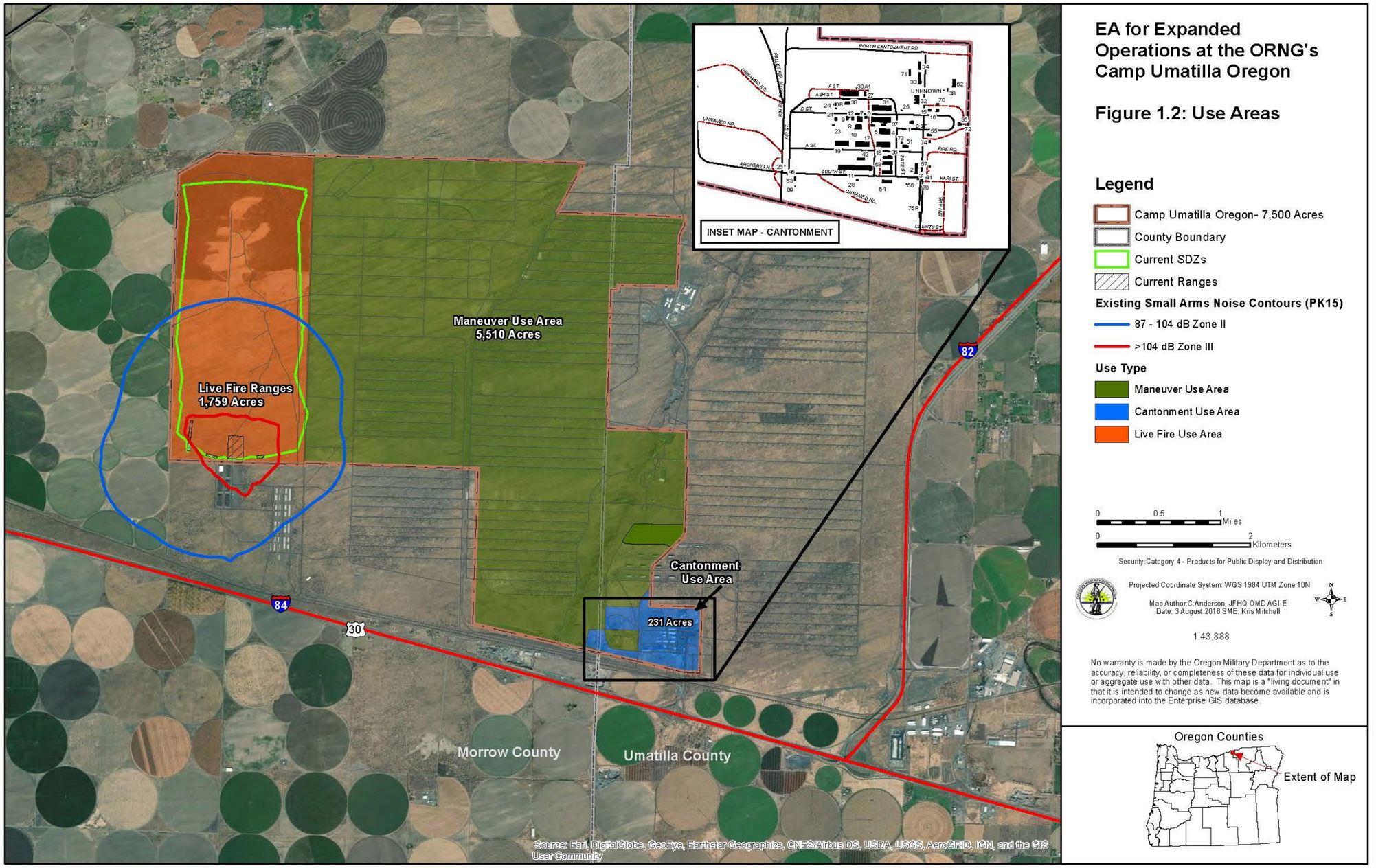
Oregon Counties
Extent of Map



EA for Expanded Operations at the ORNG's Camp Umatilla Oregon

Figure 1.2: Use Areas

Legend

- Camp Umatilla Oregon- 7,500 Acres
- County Boundary
- Current SDZs
- Current Ranges

Existing Small Arms Noise Contours (PK15)

- 87 - 104 dB Zone II
- >104 dB Zone III

Use Type

- Maneuver Use Area
- Cantonment Use Area
- Live Fire Use Area

0 0.5 1 Miles
0 2 Kilometers

Security:Category 4 - Products for Public Display and Distribution

Projected Coordinate System: WGS 1984 UTM Zone 10N

Map Author:C.Anderson, JFHQ OMD AGI-E
Date: 3 August 2018 SME: Kris Mitchell

1:43,888

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Oregon Counties

Extent of Map

To help foster the redevelopment, the CDA was charged with obtaining public input from parties potentially interested in the property, including state, local, and public organizations and agencies interested in applying for public and economic benefit through conveyance of the property. In addition, the CDA was tasked to develop the base reuse plan (to establish zoning), conduct property due diligence studies, prepare a market and facilities assessment of the property, and identify existing assets. The CDA was also assigned the task of negotiating the disposition of the base with the Army, and of gaining the Army's approval of its plan for the area to be released for public and commercial development. The ORARNG subsequently participated in negotiations with the CDA to preserve a portion of the UCD, and a plan was developed to accommodate the ORARNG's military training. The BRAC transfer of 7,500 acres to the ORARNG was completed in December 2017.

The approximately 20,000-acre property has been managed by a Caretaker, contracted by BRAC, since it was officially closed by the Army in 2012. BRAC will continue to use a Caretaker-like arrangement to manage the balance of the property until each parcel is transferred to the new owners or license. The built environment in the former UCD includes more than 1,500 structures built during WWII and the Cold War-era to support the storage and maintenance of munitions and chemical agents. Although some of the buildings are still in use and remain in good condition, many of the structures are not currently used and are in various states of disrepair.

1.3 Purpose and Need for the Proposed Action

The Proposed Action for this EA is the expansion of existing military training operations and related infrastructure improvements at CUO. The purpose of the Proposed Action is to support the core training and readiness objectives for all ORARNG elements as part of the Combined Arms Training Strategy, along with the U.S. Army Training and Doctrine Command (TRADOC) Programs of Instruction (POI) required for the RTI by maximizing the training opportunities available on the 7,500-acre CUO in an economically feasible way. The need for the Proposed Action stems from the State of Oregon's lack of in-state training installations necessary to provide ORARNG Soldiers with adequate infantry and maneuver training opportunities. The ORARNG shortage of training and maneuver land (need for the Proposed Action) was validated by the National Guard Bureau (NGB) Training Support Systems Division in a Memorandum dated 5 February 2013.[2] This memorandum supported the acquisition of CUO to meet ORARNG training requirements. The individual projects listed in Table 2.1 have been validated by the NGB separately, and are authorized by NGB PAM 415-12.

The ORARNG has a dual state and federal mission to "provide the State of Oregon and the United States with a ready force of Citizen-Soldiers, Airmen, and Civilians trained and equipped to respond to any contingency" (ORNG 2016). The National Guard has a federal mission to "to provide trained units and qualified persons available for active duty in the armed forces, in time of war or national emergency, and at such other times as the national security may require, to fill the needs of the armed forces whenever more units and persons are needed than are available in the regular components" (Army, Navy, Marine Corps, or Air Force) (Title 10 United States Code [U.S.C.] Section [§]10102). At the state level, the ORARNG's mission is to provide assistance during emergencies caused by natural disasters, civil disturbances, acts of terrorism, and other threats to life, property, or civil order as directed by the State Governor (OMD 2016b).

[2] Macia, Thomas E., Chief Training Support System Division, NGB. 5 Feb 2013.

The complexity of modern warfare, weaponry, and security requires regular training by military personnel to obtain and maintain proficiency in the use, operation, capabilities, and limitations of weapons, equipment, and military actions. Modern military actions require teamwork between numerous people, equipment, and vehicles, which requires regular training exercises for military personnel to work seamlessly as a team in a variety of environments and circumstances. Military training doctrine and procedures are based on requirements for deployment of forces and are modeled as a continuum, from basic and specialized individual military skills, to intermediate skills or small unit training, to advanced, integrated training events; this continuum is sometimes referred to as "crawl, walk, run."

The ORARNG must provide its Soldiers with adequate training, as described above, to achieve the Army's mission to fight and win our nation's wars by providing prompt, sustained land dominance across the full range of military operations and the spectrum of conflict in support of combatant commanders. The purpose of the Proposed Action is to support the training requirements of multiple battalions, ranging in size from 350 to 750 personnel, by maximizing the infantry and maneuver training opportunities available at the 7,500-acre CUO, in an economically feasible way. The operational capabilities would accommodate company-sized maneuvers, along with live-fire range capability for individual qualifications. The ORARNG and OMD would meet infantry and maneuver training requirements by expanding the existing Modified Record Fire (MRF) Range; constructing and operating a large Military Operations in Urbanized Terrain (MOUT) site, maneuver course with staging areas, a large tent pad site, ammunition supply point, Drop Zones, and helicopter landing zones; and by replacing supporting potable water, wastewater, and transportation infrastructure, over the next 5 years, as funding is available.

The need for the Proposed Action is to remedy the existing shortfall of infantry and maneuver training capabilities in the State of Oregon to more efficiently meet company- and battalion-level training requirements and Mission-Essential Task Lists. Efficiency would be gained by increasing training time and resources through reducing time and costs associated with extended movements to other out-of-state training complexes. As an in-state training complex, CUO would be closer to ORARNG units than either Joint Base Lewis McChord (JBLM)/Yakima Training Center (YTC) in Washington or Orchard Combat Training Center (OCTC) in Idaho, and would have the advantage of priority range scheduling for Oregon units, unlike JBLM/YTC or OCTC.

1.4 Scope of the EA

This EA evaluates expanded military training operations for the ORARNG, including related infrastructure development required over the next 5 years. This EA evaluates potential impacts that could occur as a result of the alternatives in the following resource categories:

- Land Use
- Air Quality
- Noise
- Geology, Topography, and Soils
- Water Resources
- Biological Resources
- Cultural Resources
- Socioeconomics
- Environmental Justice
- Infrastructure
- Hazardous and Toxic Materials and Wastes

1.5 Decision Making

Pursuant to DoD Directive 5105.77, dated October 30, 2015, the NGB serves as the principal advisor on matters involving the ORARNG, and is responsible for implementing DoD guidance on the structure and strength authorizations of the ARNG. The NGB is responsible for ensuring that ARNG activities are performed in accordance with applicable policies and regulations. Therefore, the NGB is the lead federal agency responsible for preparation of NEPA-compliant documentation on projects for which the ORARNG is the proponent. In that capacity, the NGB is ultimately responsible for environmental analyses and documentation; however, the local responsibility for NEPA document preparation falls on the ORARNG (DoD Directive 5105.77).

This EA analyzes the potential for significant environmental effects associated with the Proposed Action and alternatives, including the No Action Alternative. If the analyses presented in this EA indicate that the Proposed Action would not result in significant environmental or socioeconomic effects, then a Finding of No Significant Impact (FNSI) will be prepared. An FNSI briefly presents the reasons why a proposed action would not have a significant effect on the human environment, and why an Environmental Impact Statement (EIS) would not be necessary. If the analyses presented in this EA indicate that significant environmental effects would result from the Proposed Action that cannot be mitigated to insignificance, a Notice of Intent to prepare an EIS would be required, or no action would be taken.

1.6 Public and Agency Involvement

Letters were sent out on August 12, 2016, to multiple local, state, and federal agencies notifying them of the project and the scope of this EA, and providing an opportunity for involvement in the environmental review process. The letter and mailing list are provided in Section 9 of this EA. If an FNSI is determined to be appropriate, the Final EA and FNSI will be made available for public review. Public and stakeholder comments will be considered prior to a decision and issuance of an FNSI.

1.7 Related NEPA, Environmental, and Other Documents and Processes

No EAs or EISs have been prepared by the ORARNG for CUO. The *Environmental Assessment for Disposal and Reuse of Umatilla Chemical Depot* (August 2016), with a draft FNSI, was prepared for the land transfer to local governments associated with the BRAC process. The *Military Readiness Activities at Naval Weapons Systems Training Facility Boardman, Final Environmental Impact Statement* (December 2015) was prepared for military readiness activities proposed at the Naval Weapons Systems Training Facility (NWSTF) Boardman, which is approximately 6 miles west-southwest of the former UCD. The NWSTF Final EIS was used in this EA to evaluate cumulative impacts, as discussed in Chapter 4 (U.S. Navy 2016).

1.8 Regulatory Framework

Various federal and state laws, ordinances, rules, regulations, and policies are pertinent to implementation of the Proposed Action. These include, but are not limited to, the following:

- NEPA of 1969
- CEQ Regulations 40 CFR Parts 1500-1508
- Clean Air Act (CAA)
- Clean Water Act, Sections 401 and 404 (33 U.S.C. 1251 et seq.)
- Endangered Species Act (ESA) (16 U.S.C. 1531 et seq., as amended)
- Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712)
- Executive Order (EO) 13186 (Responsibilities of Federal Agencies to Protect Migratory Birds)
- National Historic Preservation Act of 1966 (NHPA) (54 U.S.C. 300101 et seq.)
- 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)
- AR 200-1, *Environmental Quality: Environmental Protection and Enhancement*
- ORARNG PAM 200-1, *Environmental Quality: Guide to Environmental Compliance*
- Army NEPA Regulation, 32 CFR 651, *Environmental Analysis of Army Actions*
- ARNG NEPA Handbook, *Guidance on Preparing Environmental Documentation for Army National Guard Action in Compliance with the National Environmental Policy Act of 1969* (ARNG 2011)
- Section 438 of the Energy Independence and Security Act of 2007 Description of Proposed Action and Alternatives

SECTION 2: DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

This section describes the alternatives that were considered and their development process. Two alternatives were carried forward for consideration and evaluation in this EA: the Proposed Action Alternative, and the No Action Alternative.

2.2 Proposed Action

This EA evaluates expanded military training operations and associated infrastructure development required over approximately the next 5 years at CUO. Three "Use Areas" have been identified that describe the geographic areas where general types of military training activities and associated facilities would occur (see Figure 1.2). Each of these Use Areas would require some construction to support the military training or associated support activities proposed for that Use Area. Construction efforts would include new purpose-built modern facilities and modification and re-use of existing structures for military training and support activities. In general, the strategy for development of CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, igloo complexes, etc.), where possible to accomplish the required training and support activities, and to reduce the environmental impacts associated with native habitat conversion. The Proposed Action also requires infrastructure improvements that cut across Use Areas. These infrastructure improvements are mostly utilities–related, and would include the potable water system, wastewater treatment system, transportation system, and enhanced firebreak system.

Under the Proposed Action, military training activities at CUO would be expanded to fully support the training requirements of multiple battalions. The CUO would have a capacity to support 620 transient personnel, with surges up to 1,240 transient personnel. The operational capabilities would accommodate company[3]-sized maneuvers, along with live-fire range capability, for individual and collective team qualifications. The support facilities, training areas, ranges, and full-time staff would support the core training and readiness objectives for all ORARNG elements as part of the Combined Arms Training Strategy, along with the TRADOC Programs of Instruction required for the RTI.

Annual throughput of all combined personnel has averaged approximately 22,000 man-days over the last 5 years. Implementation of the Proposed Action anticipates an average annual throughput of Soldier man-days at 40,000 to 50,000, based on increased training exercises by ORARNG units and increased training schedules by the RTI.

Whether analyzing for the maximum occupancy at one time or the annual throughput in man-days, the users would likely cycle through all three of the major Use Areas described in this EA during their stay at CUO. Soldiers and students would be billeted in the Cantonment Use Area, conduct live-fire training and qualification in the Live-Fire Use Area, and conduct mounted and dismounted maneuver training in the Maneuver Use Area. These Use Areas are identified on Figure 1.2.

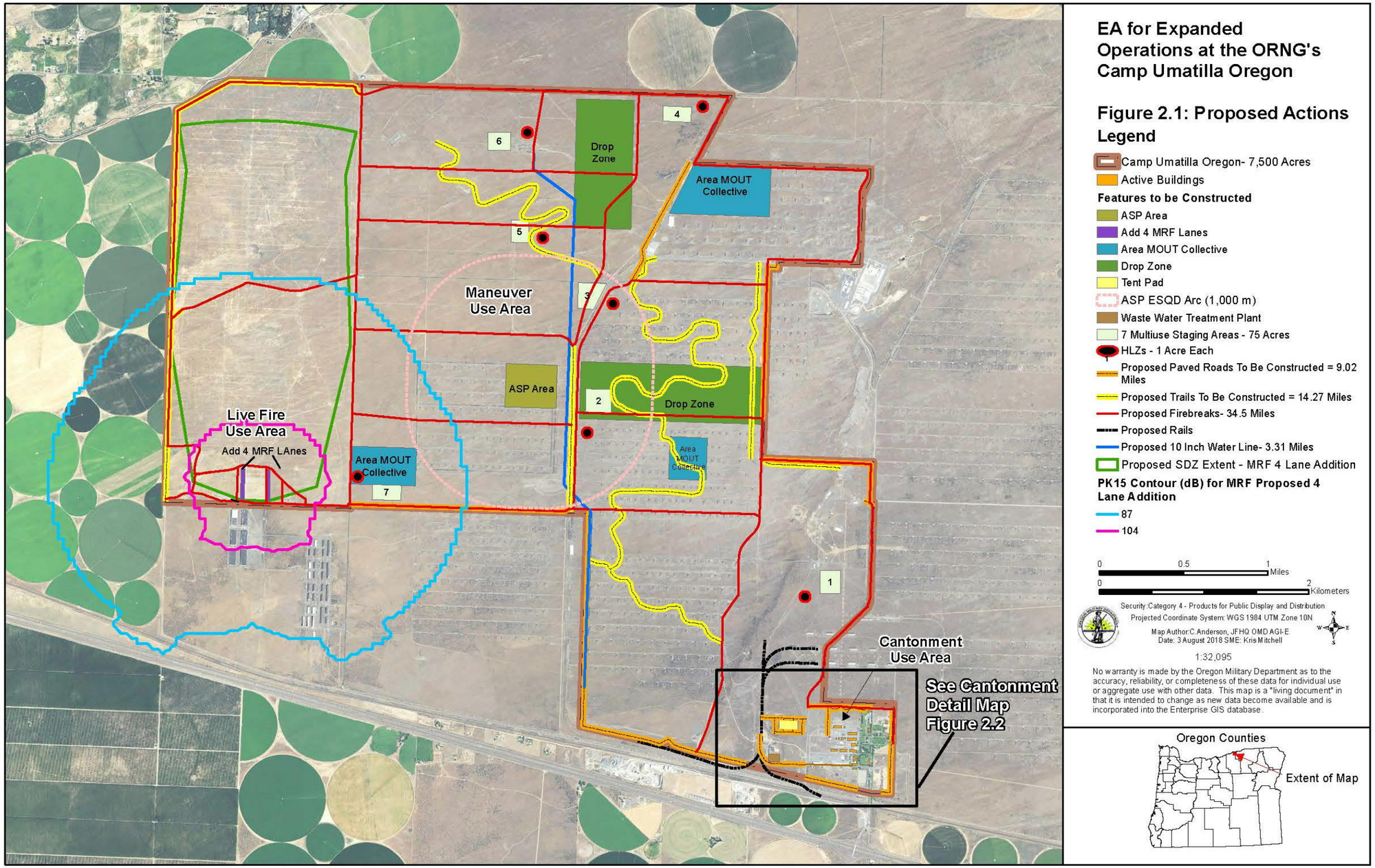
[3] A company typically consists of 3 to 5 platoons; a platoon typically consists of 16 to 40 Soldiers, and is made up of 3 to 4 Squads of 4 to 10 Soldiers each. See "Operational Unit Diagrams" at the following link for more information on the size, types, and leadership structure of U.S. Army Units. https://www.army.mil/info/organization/unitsand commands/oud/.

Infrastructure development, military training activities, and use levels included under the Proposed Action are organized by Use Area, summarized below in Table 2.1, and shown on Figures 2.1 and 2.2. Approximations of total size and acreages of new disturbance for each individual project are estimated. The following subsections provide more detail on activities included in the Proposed Action, by Use Area, and the Best Management Practices (BMPs) that OMD employs as part of its standard operating procedures that would minimize impacts associated with the Proposed Action.

Table 2.1: List of Individual Projects Included in the Proposed Action

Project Description	Total Acres	Acres New Disturbance	Funding Source	Implementation Date
Live Fire Use Area				
Construct and operate up to four additional firing lanes at the Modified Record Fire (MRF) range (NG PAM 415-12)	20	8	SRM	2020
Cantonment Use Area				
Construct and operate a large, gravel tent pad site for a battalion element/multiple companies with adjacent latrine/shower buildings, covered training/mess shelters, and pads for Mobile Containerized Kitchens (NG PAM 415-12)	10	10	SRM/ Troop Labor	2019
Maneuver Use Area				
Construct and operate a large Military Operations on Urbanized Terrain (MOUT) site (urban and/or rural village) (NG PAM 415-12 and RTI POI)	556	100	SRM/ Troop Labor	2018-2022
Construct and operate helicopter landing zones (HLZ) and two parachute drop zones (DZ) for personnel and cargo (NG PAM 415-12)	210	10	G3	2019
Construct and operate an Ammunition Supply Point (ASP) by repurposing 4 to 12 existing Igloos (NG PAM 415-12)	50	10	SRM	2021
Construct and operate new maneuver lanes and a tracked/fighting vehicle maneuver course (non-live fire), including new connector trails, staging areas, and enhanced firebreaks as needed (NG PAM 415-12)	166	116	G3/ Troop Labor/ SRM	2019-2021
Utility and Transportation Projects that cut across Use Areas				
Repair and operate potable Water System (NG PAM 415-12)	8	8	SRM/ UMMC	2018
Repair and operate a Wastewater Collection, Treatment, and Disposal System (NG PAM 415-12 MILCON PN411503)	5	5	Milcon/ UMMC	2018
Construct perimeter roads, fencing, and firebreaks (NG PAM 415-12)	110	110	SRM/ Troop Labor	2019-2022

Note: A total potential new disturbance of approximately 360 acres may result from the Proposed Action, due to 17 acres of overlap of individual actions in the above table.


Drop Zone
Area MOUT Collective
Maneuver Use Area
ASP Area
Drop Zone
Live Fire Use Area
Add 4 MRF LAnes
Area MOUT Collective
Cantonment Use Area
See Cantonment Detail Map Figure 2.2
6
4
5
3
2
7
1
EA for Expanded Operations at the ORNG's Camp Umatilla Oregon
Figure 2.1: Proposed Actions
Legend
Camp Umatilla Oregon- 7,500 Acres
Active Buildings
Features to be Constructed
ASP Area
Add 4 MRF Lanes
Area MOUT Collective
Drop Zone
Tent Pad
ASP ESQD Arc (1,000 m)
Waste Water Treatment Plant
7 Multiuse Staging Areas - 75 Acres
HLZs - 1 Acre Each
Proposed Paved Roads To Be Constructed = 9.02 Miles
Proposed Trails To Be Constructed = 14.27 Miles
Proposed Firebreaks- 34.5 Miles
Proposed Rails
Proposed 10 Inch Water Line- 3.31 Miles
Proposed SDZ Extent - MRF 4 Lane Addition
PK15 Contour (dB) for MRF Proposed 4 Lane Addition
87
104
0 0.5 1 Miles
0 2 Kilometers
Security:Category 4 - Products for Public Display and Distribution
Projected Coordinate System: WGS 1984 UTM Zone 10N
Map Author:C.Anderson, JFHQ OMD AGI-E
Date: 3 August 2018 SME: Kris Mitchell
1:32,095
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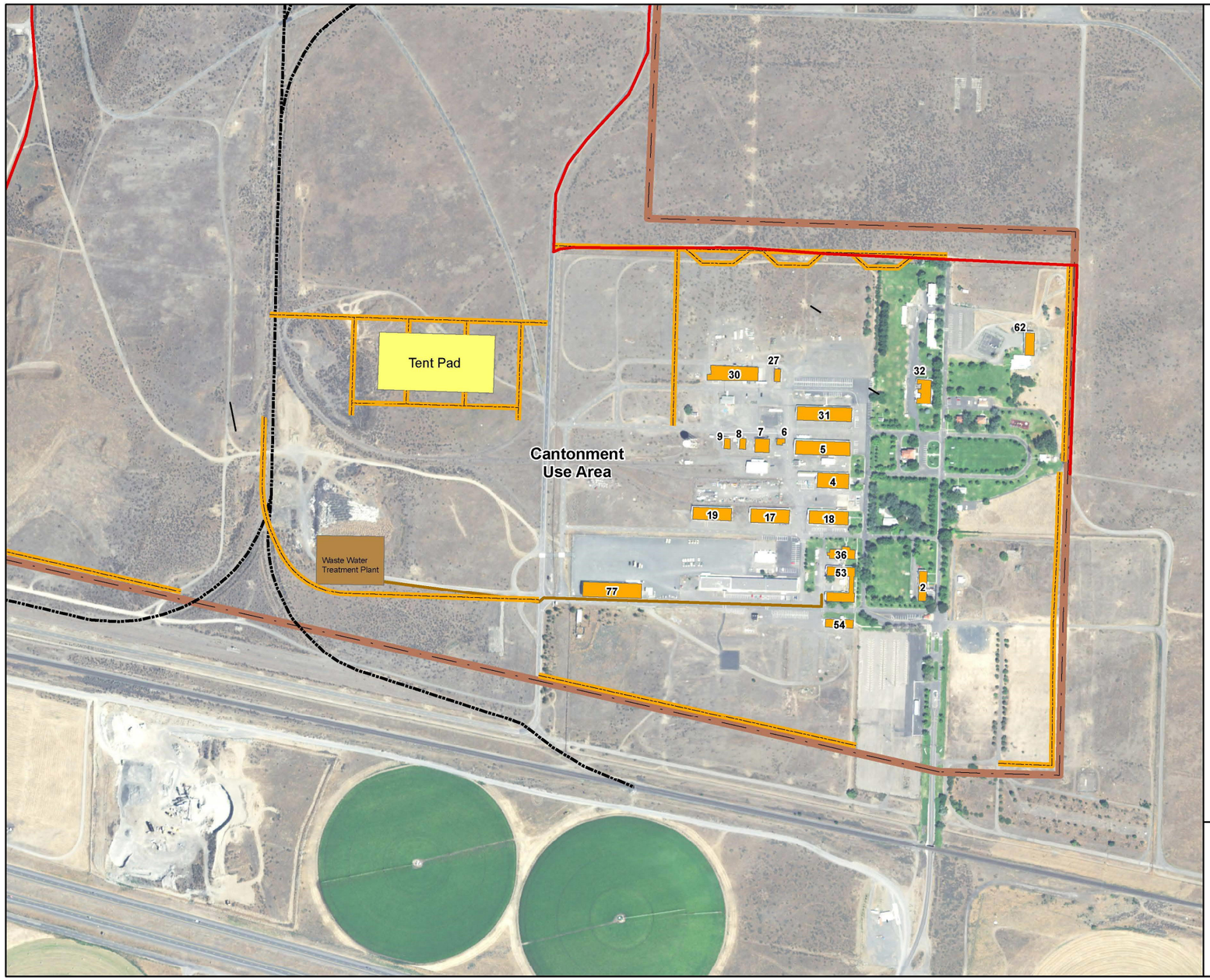
Oregon Counties
Extent of Map



EA for Expanded Operations at the ORNG's Camp Umatilla Oregon

Figure 2.2: Proposed Actions- Cantonment

Legend

- Camp Umatilla Oregon- 7,500 Acres
- Active Buildings

Features to be Constructed

- Tent Pad
- Waste Water Treatment Plant
- Waste Water Line
- Proposed Firebreaks
- Proposed Paved Roads To Be Constructed = 9.02 Miles
- New Proposed Rails

0 0.1 0.2 Miles
0 0.4 Kilometers

Security:Category 4 - Products for Public Display and Distribution
Projected Coordinate System: WGS 1984 UTM Zone 10N
Map Author:C.Anderson, JFHQ OMD AGI-E
Date: 20 April 2018 SME: Kris Mitchell

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Oregon Counties

Extent of Map

2.2.1 Live-Fire Military Training Use Area

The Live-Fire Use Area (Figure 2.1) is along the western side of CUO, with the installation boundary as its northern, western, and southern perimeter, and West Patrol Road to the east.

New activities proposed for the Live-Fire Use Area would be similar to existing ongoing activities as described in Section 1.1. The existing small-arms firing ranges along the southern boundary of the Live-Fire Use Area (oriented north) that would remain include a standard-design 36 firing point (FP) Basic 10- to 25-meter Zero Range, an MRF Range with 10 FP, an Automated Combat Pistol/Military Police Firearms Qualification Course (CPQC) with 10 FP, and a live-fire Grenade Launcher Range (Training Practice chalk rounds only) with 4 FP. The existing small-arms Surface Danger Zone (SDZ)[4] would remain within the property boundary.

The Proposed Action includes adding up to four additional FPs to the MRF range. The four additional FPs would be added to the existing MRF Range in such a way as to keep the SDZ within the property boundary.

2.2.2 Cantonment Use Area

The Cantonment Use Area would consist of the existing UCD cantonment of approximately 170 acres, and an expanded area of approximately 60 acres on the northern and western sides of the existing cantonment. The Cantonment Use Area is the area where classroom training and non-training activities would take place, including administration and operations, housing, dining, and storage. The area is contained by the installation boundary to the north, east, and south, and Rim Road South to the west, as identified on Figure 2.2. The Cantonment Use Area has numerous existing structures that would be retained or modified for use as part of CUO, or demolished and replaced with new construction. The area would provide the typical cantonment-type support services and infrastructure for the training activities occurring throughout CUO.

A Transient Training unit “tent city” is proposed for the cantonment to accommodate additional personnel during large training events, and would include gravel pads for portable showers/latrines, covered training/mess shelters, and pads with hookups for Mobile Containerized Kitchens. Total ground disturbance would include approximately 10 acres.

2.2.3 Military Maneuver Training Use Area

The approximately 5,000-acre Maneuver Use Area (Figure 2.1) would include both mounted and dismounted military maneuver training. Mounted maneuver training includes Soldiers in military vehicles, including both wheeled and tracked vehicles. Military vehicles would include the M1 Abrams, M2/3 Bradley Fighting Vehicles, M113 Armored Personnel Carrier, Family of Medium Tactical Vehicles, Armored Security Vehicle, and High Mobility Multipurpose Wheeled Vehicles currently stationed at CUO, as well as proposed future vehicles such as the Stryker, Mine Resistant Ambush Protected Vehicle, Husky Vehicle-Mounted Mine Detector, and Buffalo Mine-Protected Vehicle. Mounted maneuver would occur on roads and trails only, and no off-road maneuver would be allowed. Dismounted maneuver

[4] The Surface Danger Zone (SDZ) is defined as the ground and airspace designated in the training complex (to include associated safety areas) for vertical and lateral containment of projectiles, fragments, debris, and components resulting from the firing, launching, or detonation of weapon systems, to include explosives and demolitions (DA PAM 385-63 Range Safety).

typically includes squad- to company-sized units moving through the training area on foot. These scenario-based exercises could be force-on-force, and could include use of blank ammunition and Instrumentable Multiple Integrated Laser Engagement System (IMILES) gear. Both mounted and dismounted maneuver training could include use of small Unmanned Aerial System (UASs) such as the hand-launched RQ-11 Raven. There would be overlap of mounted and dismounted maneuver area and scenarios, as well as a number of fixed training facilities that would support both mounted and dismounted training.

Training activities proposed for the Maneuver Use Area could occur during day or night, and would produce noise from vehicle movements and firing individual and crew-served weapons with blank ammunition; however, live-rounds would not be fired in the Maneuver Use Area. Proposed training activities and related infrastructure for the Maneuver Use Area would include the following:

- **MOUT** – MOUT training prepares Soldiers for combat in urban and village environments. Infrastructure activities to support this training could include reuse of existing buildings, new building construction, and building demolition as needed. The type of facilities for urban and village environments are similar, including buildings, building facades, and walled compounds and structures, except urban environment would have a higher building density and road network. The MOUT training areas would be geographically dispersed in the Maneuver Use Area, and would be incorporated into the maneuver trails. The MOUT training area would encompass up to approximately 100 acres of new ground disturbance.
- **Wheeled and Tracked Vehicle Maneuver Trails** – Wheeled and tracked vehicle training would occur on existing secondary roads in the Maneuver Training Use Area. Both wheeled and tracked vehicle training would occur on road or trail only, and no off-road training would be allowed. Where needed, staging areas and segments of new trail construction would be required to connect existing secondary paved roads, which would be allowed to deteriorate over time into gravel maneuver trails. In addition, new trails would be constructed to add some variety to the mostly grid-pattern layout of the existing network. Such training might include simulated Improvised Explosive Device response, force-on-force scenarios, or route clearance training, and would be coupled with MOUT training scenarios and driver's training. Future systems may include some versions of the Stryker. The Stryker is an eight-wheeled rubber-tired combat vehicle that is lighter, smaller, and more readily deployable than current Army combat vehicles of the same capabilities. Maneuver trails and staging areas would include approximately 116 acres of new ground disturbance.
- **Drop Zone (DZ)** – Designation of the two DZs would not include construction activities. The areas would be surveyed and documented to ensure no safety hazards (such as fences or telephone poles) are present before publication of availability for training and use. The unobstructed terrain between the "G" and "J" Block igloo complexes and another area just west of "K" Block each total approximately 200 acres, and would be best suited for use as a DZ. The DZs would support insertion and extraction activities, which train military forces to deliver and extract equipment and personnel using a variety of techniques. These activities encompass parachute, fast rope, rappel, and Soldier extractions. The C-130 and MV-22 aircraft, CH-46, CH-47, and UH-60 helicopters are typically used for equipment and personnel inserts. Insertion and extraction activities at CUO would be fairly infrequent, and centered on parachute dropping of personnel, military equipment, and supplies. Helicopter training operations would remain above 500 feet (152 meters) above ground level (AGL) while outside the boundary of CUO (unless precluded by

weather). All fixed-wing training operations would comply with Federal Aviation Administration (FAA) regulations and altitude requirements. When not in use as a DZ, the areas would be used for dismounted maneuver training.

- **Helicopter Landing Zones (HLZs)** – HLZs could be located in the DZs, on existing paved open areas that occur throughout the Maneuver Use Area, or by constructing new cleared areas of approximately 1 acre each. Additional aviation training associated with HLZs could include training helicopter pilots both day and night with a variety of aviation tasks, including hoisting operations that involve lowering a crew member by winch for Search and Rescue training, sling-load operations that involve the aircraft lifting a heavy load attached to a long-line and suspended beneath the helicopter, and austere landing and take-offs that involve extremely dusty environments. Some Night Vision Goggle/Night Vision Device Training could also be accomplished, although most of this type of training would take place at the nearby NWSTF Boardman. Helicopter training operations would remain above 500 feet (152 meters) AGL while outside the boundary of CUO. HLZ and DZ training combined would include up to approximately 50 flights per year.
- **Ammunition Supply Point (ASP)** – The Maneuver Use Area would include an ASP for receiving, storing, and issuing all ammunition for use at CUO. The ASP would be approximately 50 acres, and would reuse 4 to 12 existing igloos with modifications necessary to bring them up to date. The ASP would include a 1,000-meter explosive safety quantity distance arc that would preclude any new construction or habitable buildings in this area.

2.2.4 Utilities and Infrastructure that Cut Across Use Areas

Construction of new utility infrastructure support systems is a priority over construction of new training center facilities because such systems are the foundation for the Proposed Action. The following systems were originally constructed in the early 1940s, and need some level of repair or replacement.

2.2.4.1 Water System

In the immediate-term, potable water would continue to be supplied to CUO through existing wells and distribution systems. However, the existing system is located, in part, on parcels that did not remain under ORARNG control, and require easements and use agreements between the OMD and various land owners. The Proposed Action includes replacement or construction of a new water supply and distribution system, including additional storage reservoirs for the Cantonment Use Area and training center that would keep the entire potable water system within the boundaries of CUO. The proposed potable water system is shown on Figure 2.3.

2.2.4.2 Wastewater System

The *OMD Camp Umatilla Condition Assessment Report* (Kennedy/Jenks Consultants 2013) identified interim measures to restore full functionality to the wastewater treatment system to support a population of up to 40 full-time personnel, which was estimated to be the need on property reassignment. Measures included repairing or adding additional functional drainfield area, and bringing the small Imhoff tank on-line in place of the large Imhoff tank.

In addition to the interim measures previously discussed, the OMD has prepared the *OMD Camp Umatilla Wastewater System Assessment* (Kennedy/Jenks Consultants 2017) according to Oregon Department of Environmental Quality (DEQ) requirements, which describes the wastewater treatment and discharge method for new construction to support CUO. The proposed wastewater treatment plant consists of a

gravity collection system serving the Cantonment Area and multiple decentralized on-site septic systems across the CUO. Wastewater will be treated in a facultative lagoon with sufficient retention time to accommodate approximately 122 full-time staff, and up to 1,240 transient users. Final facility design would receive DEQ plan approval, and treated wastewater would be discharged in accordance with a DEQ permit.

2.2.4.3 Perimeter Roads, Perimeter Fencing and Firebreaks

Finalization of the CUO boundary, in agreements with adjacent future land users, will leave areas along the western, southern, and eastern sides of the CUO property with no perimeter/patrol road or fencing. New road or trail segments and fencing would be constructed to restore continuity of the perimeter road and security fence lost with the transfer of property parcels. Existing primary paved roads would be maintained as they are. In total, approximately 10 miles of new perimeter roads and fencing would be constructed. Firebreak measures, such as the clearing or control of vegetation in approximately 16-foot-wide strips, would be implemented along approximately 40 miles of roads and trails to help reduce the spread of wildland fires. Total ground disturbance related to construction of new perimeter roads, perimeter fencing, and firebreaks across all Use Areas would include approximately 110 acres. Proposed road and trail improvements are shown on Figure 2.4.

Transportation from home station (armories) or other locations to CUO and back are not analyzed in this EA, because all Army convoys comply with the Defense Transportation Agency DTR 4500.9-R *Defense Transportation Regulations Part III, Mobility* (specifically, Appendix F-Military Movement on Public Roads; DoD 2016).

2.2.5 Best Management Practices

As standard operating procedure, OMD implements several management plans and BMPs that minimize environmental impacts. These BMPs would be implemented as part of the Proposed Action, and are summarized in Section 4.13.

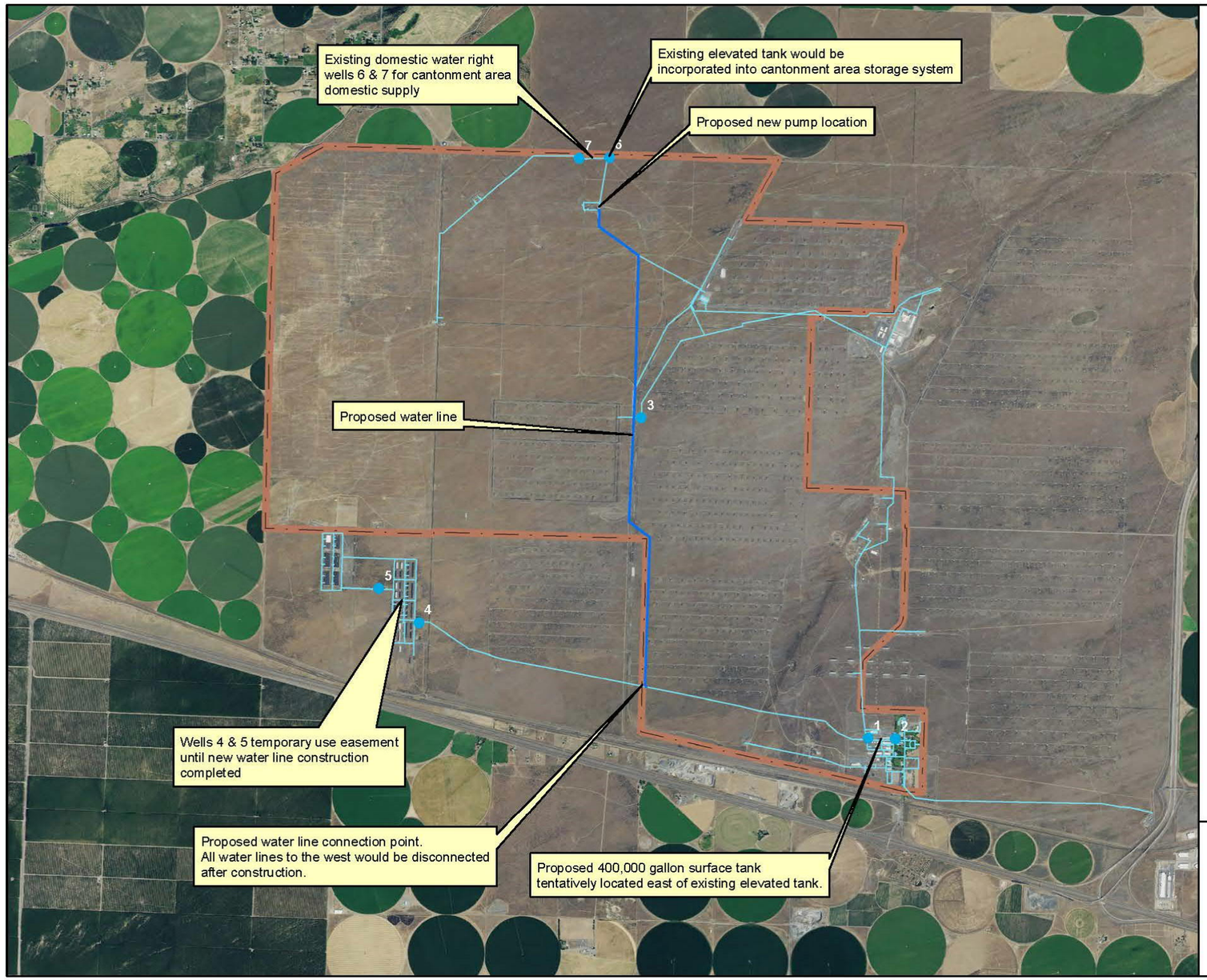
2.2.5.1 Hazardous Material, Waste, and Spill Management Plan (HMWSMP)

The HMWSMP prescribes responsibilities, policies, and procedures for storing and managing hazardous materials, accumulating and managing wastes, and responding to spills of hazardous materials and wastes in the ORARNG. The HMWSMP was completed in accordance with AR 200-1 to ensure ORARNG compliance with applicable federal, state, and local environmental laws and regulations.

2.2.5.2 Integrated Natural Resource Management Plan (INRMP)

In accordance with the requirements of the Sikes Act, as amended, the ORARNG and OMD would prepare an INRMP for CUO. The INRMP would include management actions that would focus on sustaining natural resource conditions to provide natural environmental conditions for military training activities. Under the Sikes Act and DoD direction, an INRMP is required to provide for:

- No net loss in the capability of military installation lands to support the military mission of the installation;
- Fish and wildlife management, land management, weed and exotic species management, forest management, and fish- and wildlife-oriented recreation;
- Fish and wildlife habitat enhancement or modifications;



EA for Expanded Operations at the ORNG's Camp Umatilla Oregon

Figure 2.3: Proposed Water Supply System

Legend

- Camp Umatilla Oregon- 7,500 Acres
- Water Well
- Proposed Water Line- 3.34 Miles
- Existing Water Lines

0 0.5 1 Miles

0 0.5 1 1.5 2 Kilometers

Security:Category 4 - Products for Public Display and Distribution

Projected Coordinate System: WGS 1984 UTM Zone 10N

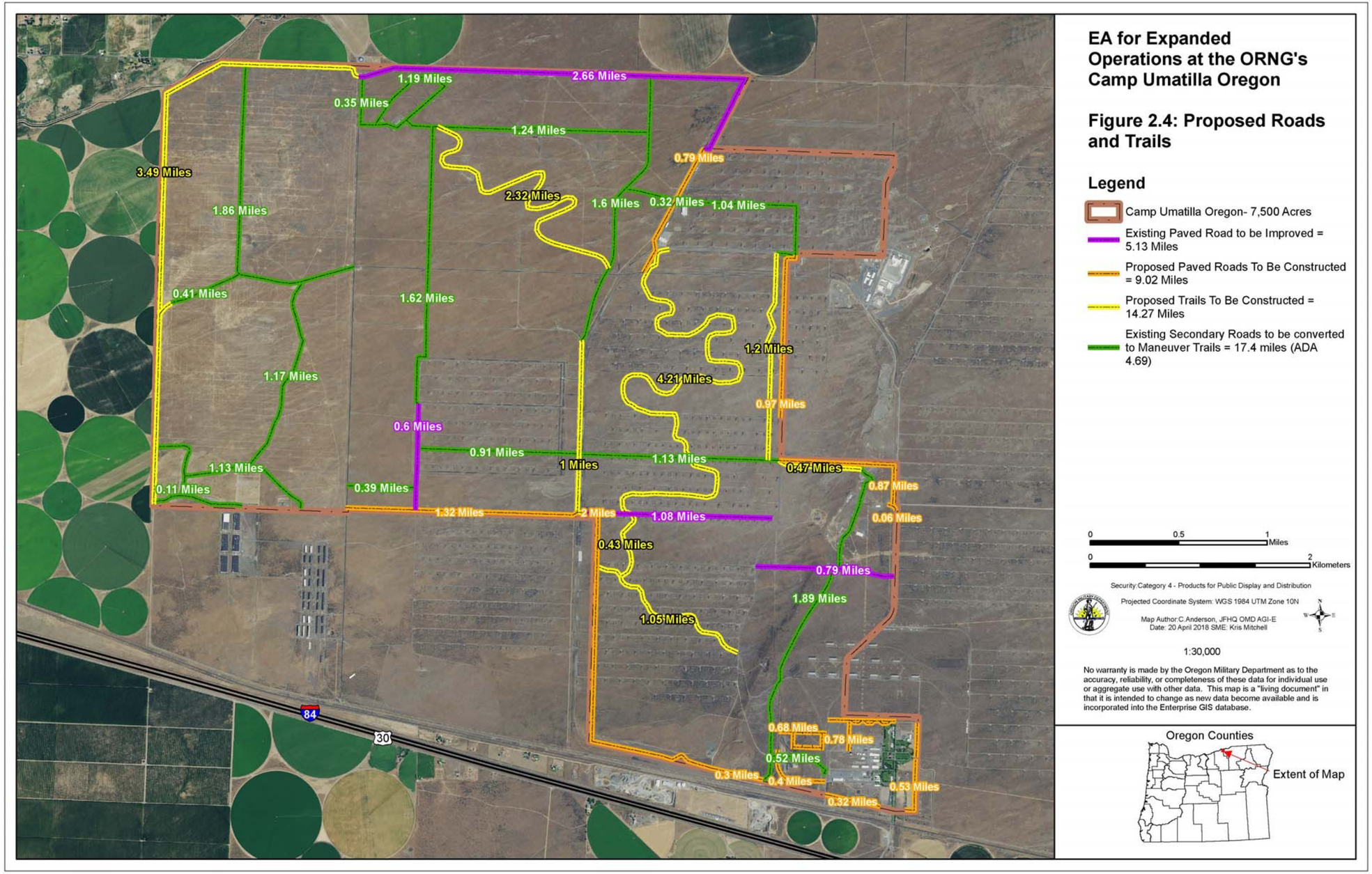
Map Author:C.Anderson, JFHQ OMD AGI-E
Date: 20 April 2018 SME: Kris Mitchell

1:40,000

No warranty is made by the Oregon Military Department as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document" in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database.

Oregon Counties

Extent of Map


1.19 Miles
2.66 Miles
0.35 Miles
1.24 Miles
0.79 Miles
3.49 Miles
2.32 Miles
1.6 Miles
0.32 Miles
1.04 Miles
1.86 Miles
0.41 Miles
1.62 Miles
1.2 Miles
1.17 Miles
4.21 Miles
0.97 Miles
0.6 Miles
0.91 Miles
1 Miles
1.13 Miles
0.47 Miles
1.13 Miles
0.11 Miles
0.39 Miles
0.87 Miles
1.32 Miles
2 Miles
1.08 Miles
0.06 Miles
0.43 Miles
0.79 Miles
1.89 Miles
1.05 Miles
84
30
0.68 Miles
0.78 Miles
0.52 Miles
0.3 Miles
0.4 Miles
0.53 Miles
0.32 Miles
EA for Expanded Operations at the ORNG's Camp Umatilla Oregon
Figure 2.4: Proposed Roads and Trails
Legend
Camp Umatilla Oregon- 7,500 Acres
Existing Paved Road to be Improved = 5.13 Miles
Proposed Paved Roads To Be Constructed = 9.02 Miles
Proposed Trails To Be Constructed = 14.27 Miles
Existing Secondary Roads to be converted to Maneuver Trails = 17.4 miles (ADA 4.69)
0 0.5 1 Miles
0 2 Kilometers
Security:Category 4 - Products for Public Display and Distribution
Projected Coordinate System: WGS 1984 UTM Zone 10N
Map Author:C.Anderson, JFHQ OMD AGI-E
Date: 20 April 2018 SME: Kris Mitchell
1:30,000
No warranty is made by the Oregon Military Department as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document" in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database.
Oregon Counties
Extent of Map

- Wetland protection, enhancement, and restoration where necessary for support of fish and wildlife;
- Integration of and consistency among the various activities conducted under the plan with other appropriate installation plans;
- Establishment of specific natural resource management objectives and time frames for proposed action;
- Sustained use by the public of natural resources to the extent such use is not inconsistent with the needs of fish and wildlife resources management;
- Public access to the military installation, appropriate for the public's sustained use of natural resources, subject to requirements necessary to ensure safety and military security;
- Enforcement of applicable natural resource laws and regulations; and
- Such other activities as the Chief of the NGB determines appropriate.

2.2.5.3 Integrated Training Area Management (ITAM) Program

The ITAM Program is a management program that integrates Army training and other mission requirements for land use and sound natural resource management on maneuver lands. Program activities could include management actions such as marking cultural or environmentally sensitive areas for avoidance, and actions to prevent or repair damage resulting from vehicle maneuver training.

2.2.5.4 Integrated Cultural Resource Management Plan (ICRMP)

In accordance with Army requirements, the ORARNG and OMD would revise the existing statewide ICRMP to include CUO. The ICRMP includes the following goals:

- Ensure compliance with federal preservation laws.
- Consult with appropriate stakeholders and federally recognized Tribes.
- Locate, evaluate, and protect archaeological, historical, and sacred sites.
- Contribute to the regional archaeological and historical body of knowledge.
- Employ efficient techniques for the management of cultural resources.

2.2.5.5 Integrated Wildland Fire Management Plan (IWFMP)

The IWFMP would include the objectives listed below. The IWFMP is currently in the process of being developed.

- Maintain or improve the quality of lands represented in the installations of ORARNG.
- Allow military operations and training to occur at the tempo required to maintain a high level of combat readiness.
- Prioritize installations, and locations within installations, for funding and implementation of fire management improvements.
- Establish a series of firebreaks and/or fuel breaks at high fire risk installations/areas to reduce the probability of a fire moving into high-value areas or off installation. Establish monitoring protocols and minimum specifications for these breaks.
- When possible, control the timing of ignitions so that fires which occur do so when there is a high probability of controlling the fire and protecting all valued resources.
- Communicate within the fire management hierarchy to improve practices and policies.

- Communicate and educate other departments to facilitate a reduction in fire starts.
- Update interagency agreements as necessary to ensure prompt and complete cooperation during wildfire incidents both on ORARNG lands and on those of other agreeing agencies.
- Establish fire management qualifications for all firefighters and fire managers, and ensure all personnel assigned to those positions are trained to a level appropriate for their expected duties.

2.2.5.6 Spill Prevention, Control, and Countermeasures (SPCC) Plan

An SPCC Plan would be completed for CUO. The SPCC Plan identifies potential spill sites and provides a framework for ensuring that the CUO has the resources, structures, and equipment in place to prevent, control, and respond to oil or hazardous substance spills. The SPCC Plan would be completed in accordance with the Oil Pollution Prevention regulations at 40 CFR 112 and AR 200-1. The SPCC Plan is reviewed annually to determine if possible changes in the physical structures or operational procedures have occurred, or if more effective prevention and control technologies are available.

2.2.5.7 State Operational Noise Management Plan (SONMP)

The SONMP provides a strategy for noise management at ORANRG facilities. Elements of the SONMP include education about noise and Army noise metrics; complaint management; and when necessary, noise abatement procedures (ORARNG 2010). OMD would revise the Statewide Noise Plan as funding becomes available.

2.2.5.8 Construction BMPs

Construction BMPs would be implemented to control dust, avoid and minimize erosion and sediment migration, avoid the take of migratory birds during nesting season, and prevent release of toxic or hazardous chemicals to the environment. BMPs could include dust abatement, Regulated Building Materials surveys and abatement, mulching, storm sewer inlet protection, and water run-on and run-off controls.

2.3 Alternatives Considered

This section describes the alternatives that were evaluated and the selection criteria that were used to select the Preferred Alternative in the ORARNG's effort to consider a range of reasonable alternatives.

2.3.1 Alternative Development–Screening Criteria

CEQ implementing regulations provide guidance on the consideration of alternatives in an EIS or EA. These regulations require the decision-maker to consider the environmental effects of a proposed action, and a range of alternatives to a proposed action (40 CFR §1502.14). The range of alternatives includes reasonable alternatives (including a No Action Alternative), which must be rigorously and objectively explored, as well as other alternatives that are eliminated from detailed study. Reasonable alternatives include those that are practical or feasible from a technical, temporal, and economic standpoint, and support the underlying purpose of and need for the proposed action.

Alternatives considered in this EA were developed by the ORARNG after careful assessment by subject-matter experts, including units and commands that use the ranges, range management professionals, Planning staff, and Environmental staff. The team developed criteria to assess whether a possible alternative meets the underlying purpose of and need for the Proposed Action, and is practical or

feasible from a technical and economic standpoint. Any alternative considered for further analysis must meet the following criteria.

- **Meets purpose and need** – must correct the deficiencies identified in Section 1.3.
- **Economically feasible** – must be an alternative that meets the purpose and need in an economically feasible way. The ORARNG would not likely receive sufficient funding at one time to complete construction of all the facilities required for an expanded Training Center. Development would need to proceed in a phased approach as funding is gradually received from a number of different sources, including both federal and state.
- **Controllable variables** – must reduce the number of variables that are outside ORARNG control to be successful. For example, alternatives that require Congressional action would not be in ORARNG's control.
- **Safety** – must implement training, including live-fire weapons training, in a safe manner that is in compliance with Army and regulatory requirements. In addition, must implement site construction and training activities in consideration of existing clean-up areas, Land Use Controls (LUCs), and Recognized Environmental Conditions as identified in the Environmental Condition of Property (ECOP).
- **Minimize adverse impacts to the environment** – construction and training activities should be sited and conducted to minimize adverse environmental impacts where possible, including the amount of habitat converted from native to developed.

Table 2.2 below lists each of the alternatives—those carried forward for detailed analysis and those not carried forward—and describes how they each met or did not meet the purpose and need of each individual selection criterion described above.

Table 2.2: Summary of Alternatives Considered

Alternatives	Meets Purpose and Need	Economically Feasible	Control of Variables	Safety	Minimize Environmental Impacts
Proposed Action	Yes	Yes	Yes	Yes	Yes
No Action	No	Yes	No	Yes	Yes
Camp Rilea	No	No	No	No	Unknown
Camp Adair	No	No	No	No	Unknown
Biak Leased Lands	No	Yes	No	No	Unknown
NWSTF Boardman	Yes	Yes	No	Yes	No
Private Lands	Yes	No	No	Yes	Unknown
Federal Ld Withdrawal	Yes	Yes	No	Yes	Unknown
Oregon DSL	Yes	No	No	Yes	Unknown
Simulations Training	No	Yes	Yes	Yes	Yes
Rearrange Use Areas	Yes	No	Yes	No	No

2.3.2 Evaluated Alternatives

2.3.2.1 Proposed Action (Preferred Alternative)

The Proposed Action is the expanded military training activities at CUO and infrastructure development required over the next 5 years. The Proposed Action is described in detail in Section 2.2 above.

The Proposed Action was designed by ORARNG staff to meet the purpose and need by accomplishing the required military training, while attempting to minimize environmental impacts associated with native habitat conversion by reusing and repurposing existing disturbed areas (buildings, roads, igloo complexes, etc.), where possible. This alternative is the only one that meets all criteria.

2.3.2.2 No Action

In accordance with CEQ regulations (40 CFR §1502.14[d]), analysis of the No Action Alternative is required. The No Action Alternative provides a baseline against which the effects of the Proposed Action and all other alternatives can be compared. The No Action Alternative analyzed in this EA involves continuing military training activities at CUO at regular and historic levels, including typical incremental improvements and fluctuations in training cadence and intensity that would normally occur. The potential impacts of the No Action Alternative are compared to the potential impacts of the Proposed Action. Although the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, this alternative was retained to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under the CEQ Regulations (40 CFR §1502.14). The No Action Alternative reflects the status quo and serves as a benchmark against which the effects of the Proposed Action can be evaluated. The No Action Alternative is best described in the existing conditions sections (Section 1.1.2 and Section 3.1.2), and fundamentally includes the following continued ORARNG activities in the three main Use Areas.

- Live-Fire Military Training Use Area – Continue use of the existing live-fire ranges as described in Section 3.1.2.
- Cantonment Use Area – Continue use of the existing licensed buildings and structures, including continued routine maintenance for the same basic functions and activities described in Section 3.1.2.2.
- Military Maneuver Training Use Area –Continue existing training activities described in Section 3.1.2.3.

2.3.3 Alternatives Eliminated from Further Consideration

The ORARNG evaluated a full range of alternatives using the screening criteria outlined in Section 2.3.1 to identify reasonable alternatives that would be carried forward for analysis in this EA. Pursuant to 40 CFR §1502.14(a), the ORARNG eliminated from further analysis the alternatives described in the following section because they did not meet the purpose of and need for the Proposed Action, or were not practical or feasible from a technical or economic standpoint. The following alternatives were considered, but not carried forward for detailed analysis, because they were not found to be reasonable through the screening process.

2.3.3.1 Implementing the Proposed Action at Locations Other Than Camp Umatilla Oregon

Developing an expanded Training Center at one or more locations other than CUO is outside the scope of this EA, and therefore eliminated from detailed study. However, it is worth noting that the ORARNG has

conducted a number of internal studies and prepared planning documents in the past, related to both the BRAC action to close the former UCD, and the NWSTF Boardman EIS, to identify other lands that would provide the functionality of an expanded training site. Because of the dual nature of the state National Guard system, federal funds can be used to construct new facilities, but the state is required to provide the land suitable for construction, at the state's expense (National Guard Regulation 415-5, Section 7-6(c)(3)). Acquisition of 7,000 acres of maneuver land is beyond the State of Oregon's capacity. All of these study efforts have concluded that acquisition of federal, state, or private lands other than the CUO is not feasible.

2.3.3.1.1 Camp Rilea

Camp Rilea Oregon (CRO) is a 1,800-acre ORARNG training site on the west coast between the cities of Warrenton to the north and Seaside to the south. CRO is surrounded on three sides by residential housing, and on the west by the Pacific Ocean. CRO is too small to provide additional maneuver training, and the State of Oregon is not able to fund the purchase of 7,000 acres of coastal residential real estate adjacent to CRO for conversion to maneuver training.

2.3.3.1.2 Camp Adair

Similar to CRO, Camp Adair is a small, 527-acre training site in the Willamette Valley near Independence, Oregon that is also surrounded by rural residential and farm lands. Camp Adair is too small to provide additional maneuver training, and any effort to acquire 7,000 acres of maneuver lands adjacent to Camp Adair would be prohibitively expensive.

2.3.3.1.3 Biak Training Center (BTC)

BTC is on Bureau of Land Management (BLM) lands under long-term lease to the ORARNG, and is situated in the central portion of the state near Redmond, Oregon. The ORARNG does not have exclusive use of these lands, but rather shares use with the general public and grazing lessors. Military maneuver training at BTC is constrained for safety reasons, predominantly due to the public presence on the maneuver trails and public recreational shooting near units training. Acquisition of an additional 7,000 acres of public lands adjacent to BTC would be outside the control of the ORARNG (would be BLM's decision based on their Resource Area Management Plans), and would be less than optimal space for military maneuver training, because it is constrained by safety issues.

2.3.3.1.4 Navy Weapons Systems Training Facility Boardman

NWSTF Boardman is a U.S. Navy–owned property south of Boardman, Oregon; approximately 15 miles west of CUO. The ORARNG has a license and Host-Tenant Agreement that will allow construction of several live-fire ranges on the Navy's property at Boardman. However, the option of 7,000 acres of maneuver training area is not available due to the presence of an Oregon-listed endangered species Washington Ground Squirrel, and U.S. Navy commitments to maintain this ecologically valuable piece of Shrub-Steppe habitat. Acquisition of 7,000 acres of Navy property at NWSTF Boardman for maneuver training would be outside the control of the ORARNG, and could have potential environmental impacts.

2.3.3.1.5 Private Lands

In a 2010 internal study of potential private land acquisition to support the NWSTF Boardman EIS, the ORARNG evaluated 19 parcels of property suggested by The Nature Conservancy that appeared the most feasible for military training ranges. In all cases, after more detailed analysis, the ORARNG found

that the parcels would not be feasible due to several reasons. All 19 parcels were made up of multiple owners that would all have to agree to sell; each contained state or county roads or other utility rights-of-way that would have to be vacated; each would have to be rezoned; and all were located more than 30 miles from existing ORARNG support facilities. The ORARNG determined that acquisition of private property is not feasible, because it would be too costly; would require decisions outside the control of the ORARNG; and would require costly and time-consuming processes to vacate public roads and rezone.

2.3.3.1.6 Withdrawal of Federal Lands

The Engle Act of 1958 prevents the U.S. military from withdrawing more than 5,000 acres of existing federal lands from public use without the express act of Congress. Therefore, withdrawing 7,000 acres of existing federal lands would require an act of Congress, and is outside the control of the ORARNG to complete.

2.3.3.1.7 Oregon Department of State Lands

ODSL land holdings in the State of Oregon are used to generate funds for the public school system. An attempt to convert 7,000 acres from revenue-generating status to military maneuver training would be outside the control of the ORARNG, and would have a negative impact on school funding.

2.3.3.2 Simulated Training

Military training includes extensive use of computer-simulated virtual training environments, and involves command and control exercises without operational forces (constructive training). These training methods have substantial value in achieving limited training objectives. Computer technologies provide excellent tools for implementing a successful, integrated training program, while reducing the risk and expense typically associated with live military training. However, virtual and constructive training are an adjunct to, not a substitute for, live training, including live-fire training. Unlike live training, simulated training does not provide the requisite level of realism necessary to attain combat readiness, and cannot replicate the high-stress environment encountered during combat operations. Current simulation technology does not permit training with the degree of fidelity required to maintain proficiency. Basic training can take place using simulators; however, beyond basic levels, simulation is of limited utility because the simulator cannot match the dynamic nature of the environment. Specifically, coordinated unit-level activities require multiple crews to interact in a variety of environments that cannot be simulated. Moreover, it is a training imperative that crews actually use the weapons and equipment they will be called on to operate.

This alternative—substitution of simulation for live training—fails to meet the purpose of and need for the Proposed Action, and was therefore eliminated from detailed study.

2.3.3.3 Rearrange Three Major Use Areas

ORARNG staff analyzed the possibility of rearranging the three major Use Areas. Any rearrangement of these Use Areas outside of the Proposed Action arrangement described above would require extensive replication of existing and serviceable facilities in the Live-Fire Use Area and the Cantonment Use Area that would be prohibitively expensive, would not lend itself to gradual buildout, and would have a greater potential for adverse impact to the environment, for little or no benefit. For this reason, the alternative of rearranging the three major Use Areas was eliminated from detailed study.

2.3.4 Alternative Impact Comparison Matrix

This EA evaluates the potential direct, indirect, and cumulative environmental, cultural, socioeconomic, and physical effects of the No Action and Proposed Action alternatives. A comparison of the environmental consequences of these alternatives is provided in Table 2.3 below.

Table 2.3: Comparison of Environmental Impacts of Each Alternative

Resource	Alternatives	
	No Action	**Proposed Action**
Land Use	**No Impact.** No new installation infrastructure and no change to use type or levels.	**Less than significant.** No conflict with overall authorized land use. Site activities would not change, but would be expanded in scope. Long-term positive impact would occur through development of the CUO consistent with existing land use and zoning.
Air Quality	**No Impact.** Training and operations would continue under current conditions at current locations and levels; no change to pollutant emissions.	**Less than significant.** Short-term, less-than-significant, adverse impacts due to the potential for dust generation and air emissions from construction activities. Long-term, less-than-significant, adverse impacts from emissions associated with increased equipment and vehicle use and increased fugitive dust during training operations.
Noise	**No Impact.** Training and operations would continue under current conditions at current locations and levels; no change to local noise environment.	**Less than significant.** Short-term, less-than-significant adverse impacts due to construction noise. Long-term, less-than-significant adverse impacts due to increased noise generation from increased training activities that would be performed consistent with the Statewide Operational Noise Management Plan (SONMP) and existing noise-related Right-of-Way, and would not impact sensitive land uses.
Geology, Topography, and Soils	**Less than significant.** No short-term impacts would occur. Long-term, less-than-significant, adverse impacts due to soil compaction from continued training activities.	**Less than significant.** Short-term, less-than-significant adverse impact through vegetation removal, ground disturbance, and potential compaction during construction. Long-term, less-than-significant, adverse impacts through loss of soil function resulting from creation of impervious surfaces. Proposed ground disturbance in identified areas of severe soil hazards would be conducted using erosion control best management practices (BMPs).
Water Resources	**Less than significant.** No short-term impacts would occur. Long-term, less-than-significant, adverse impacts due to soil erosion during training operations and continued water usage at current levels.	**Less than significant.** Short-term, less-than-significant adverse impacts due to the potential for release of toxic or hazardous materials during construction, which would be completed in accordance with permit requirements. Long-term, less–than-significant adverse impacts due to increased water usage that would remain within allocated water rights. Contamination to groundwater from operations, including the proposed wastewater treatment plant, would be unlikely to occur due to implementation of BMPs.

Table 2.3: Comparison of Environmental Impacts of Each Alternative

Resource	Alternatives	
	No Action	**Proposed Action**
Biological (Vegetation, Fish and Wildlife, and Wildland Fire)	**Less than significant.** No short-term impacts would occur. Long-term, less-than-significant, adverse impacts due to trampling and degradation of non-native vegetation during training activities and impacts to species due to continued human presence in areas previously disturbed by current training and operational activities. Long-term, less-than-significant adverse impacts would occur due to lack of firebreaks at CUO; however, an Integrated Wildland Fire Management Plan would be created for the site.	**Less than significant.** Short-term, less-than-significant, adverse impacts due to vegetation removal and disturbance, habitat loss and degradation during construction, and potential for more frequent fire starts. Long-term, less-than-significant adverse impacts due to vegetation removal and disturbance during operations and training that would occur primarily in areas dominated by non-native and invasive species, and due to habitat conversion, noise, and/or human presence from training and operational activities to be conducted in accordance with the Integrated Natural Resource Management Plan (INRMP). Impacts would be reduced by implementation of exotic/invasive species reduction goals established in the INRMP. Long-term, less-than-significant adverse impact due increased fire risk from increased training; however, offset by incorporation of BMPs, including firebreaks and creation of the Integrated Wildland Fire Management Plan.
Cultural Resources	**Less than significant.** Short-term impacts would not occur. Long-term, less-than-significant adverse impacts due to continued training and operations activities that could potentially result in occasional cultural resource discoveries and required building maintenance/upkeep that would be performed in existing management plan.	**Mitigated to less than significant**. Short-term, less-than-significant adverse impacts due to the potential for cultural resource discovery during construction. Long-term, significant adverse impacts due to impacts to 563 National Register of Historic Places (NRHP)-eligible buildings and structures associated with the UCD Historic District; an NRHP-eligible wagon road; and a potentially eligible property of traditional religious and cultural significance identified by the Confederated Tribes of the Umatilla Indian Reservation. Impacts would be reduced to less-than-significant levels with implementation of mitigation measures discussed in Section 4 and the 2018 Programmatic Agreement.
Socioeconomics	**No impact.** Economic activity associated with current uses of Camp Umatilla Oregon (CUO) would continue, and use levels of CUO would not change.	**Less than significant.** Short-term positive impact due to increased economic activity during construction. Long-term positive impact due to increased long-term employment, income, and population levels and corresponding purchases of goods and services.
Environmental Justice	**No impact.** Activity and use levels would remain the same; no impacts to environmental justice populations.	**No impact.** No disproportionate adverse environmental, economic, or health-specific impact to minority or low-income populations. No disproportionate environmental or health risks to children.

Table 2.3: Comparison of Environmental Impacts of Each Alternative

Resource	Alternatives	
	No Action	**Proposed Action**
Infrastructure	**Less than significant.** Minor improvements to water and wastewater systems to accommodate CUO use levels would result in short- and long-term positive impacts due to improvements to the potable water system and wastewater system to accommodate existing uses.	**Less than significant.** Short- and long term positive impacts due to improvements of existing infrastructure and construction of additional on-site utility infrastructure with sufficient capacity to accommodate increased activity levels.
Hazardous and Toxic Materials/ Wastes	**Less than significant.** Long-term positive impacts due to management of Regulated Building Material (RBM) and hazardous wastes remaining at the site.	**Less than significant.** Short- and long-term beneficial impacts would occur due to abatement of existing RBM and management of hazardous materials during operations.

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SECTION 3: AFFECTED ENVIRONMENT

This section describes the existing environmental and developed conditions of the CUO study area. The CUO study area is defined as the 7,500-acre area that was retained by the Army and leased to the OMD for ORARNG training purposes in December 2017, shown on Figure 1.2.

3.1 Location Description

3.1.1 Environmental Setting

The CUO study area is in the Pleistocene Lake Basin Level IV ecoregion (Thorson et al. 2003), which covers approximately 1,407 square miles in eastern Oregon. The Pleistocene Lake Basin is a sub-region of the Columbia Plateau Level III ecoregion, which includes portions of Oregon and Washington, with small areas extending over the Idaho state border and into British Columbia. The Pleistocene Lake Basin ecoregion is defined by a nearly level to undulating plain shaped by Pleistocene lakes and floodwaters from glacial lakes Missoula and Columbia (Thorson et al. 2003). The topography of this ecoregion slopes to the Columbia River. Elevations on CUO property range from 400 to 677 feet above mean sea level (Pumphrey 2002).

The climate is arid, with significant variation between cold winters (26 degrees Fahrenheit (ºF) low, 41ºF high) and hot summers (52ºF low, 86ºF high). The ecoregion receives between 7 and 10 inches of precipitation per year (Thorson et al. 2003), much of that in the form of snow. The dry climate is largely due to the rain shadow caused by the Cascade and Coast mountain ranges west of the CUO study area.

3.1.2 Existing Site Activities and Facilities

This section describes the existing site activities and facilities that occur in CUO. Existing training activities are organized in three different categories: live-fire weapons training and qualification, mounted and dismounted maneuver training, and classroom and simulations training. There are approximately 20 full-time ORARNG Range operation and training staff who regularly work at CUO. Over the last 5 years, ORARNG training has averaged approximately 22,000 man-days of training per year.

3.1.2.1 Live-Fire Weapons Training and Qualification

Live-fire weapons training occurs in the existing Life-Fire Use Area in the southwestern corner of the property along Range Road, with the direction of fire oriented to the north. The former Ammunition Disposal Area (ADA) that encompasses approximately 1,750 acres to the north of the live-fire ranges serves as the SDZ for all existing live-fire ranges per AR 385-63. The following ranges with support buildings and structures (identified in Table 3.1 below) are included in this complex and are currently used by the ORARNG.

- **MRF Range** – The MRF Range is an Army standard range that allows Soldiers to complete annual Army individual qualification requirements for his/her primary individual weapon (M16/M4). The range consists of 10 lanes of fire with a number of electronically controlled pneumatically actuated pop-up targets out to a maximum distance of 300 meters. The range provides digital scoring on Soldier performance, and encompasses approximately 20 acres.
- **CPQC** – The CPQC is an Army standard range that allows Soldiers to complete annual Army individual qualification requirements for side arms (typically M9). This range consists of 10 lanes of fire with a number of electronically controlled pneumatically actuated pop-up and swing-away

targets out to a maximum distance of 25 meters. The range provides digital scoring on Soldier performance, and encompasses approximately 4 acres.

- **M203 Practice Range** – The M203 Practice Range supports the M203 40 millimeter (mm) grenade launcher. The M203 is typically an accessory mounted on a Soldier's primary individual weapon. This range consists of four lanes of fire out to a maximum distance of 300 meters and includes stationary targets. Only Training Practice chalk rounds are used on this range; no explosive or dud-producing live ammunition is used. The practice rounds fire from the M203 like normal ammunition, but do not explode on impact with the target; instead, the plastic casing breaks open, releasing orange chalk powder on the target. This range does not provide digital feedback, and encompasses approximately 6 acres.
- **Basic 10-Meter/25 Meter Firing Range (Zero Range)** – The Zero Range consists of 36 lanes of fire out to a maximum distance of 25 meters. The range allows Soldiers' familiarization training on the operation of the M249 Squad Automatic Weapon (SAW) and M4/M16 individual weapons. The targets are stationary, and there is no digital feedback. The M249 SAW and M4/M16 fire 5.56-mm ammunition. No 7.62-mm or larger weapons are allowed on this range because the SDZ would extend off CUO, which is not permitted. This range encompasses approximately 3 acres.

Buildings and structures that support these ranges are listed in the Table 3.1.

Table 3.1: Existing Buildings and Structures Supporting Live-Fire Activities

Building Number	Building Name	Area	Date Constructed
RGSP2	Range Support Facility – Modified Record Fire (MRF)	105 square feet (sf)	2009
RGSP3	Range Support Facility	105 sf	2009
NGS01	Range Briefing Structure	4,080 sf	2011
NGH05	Ammunition Breakdown Building – Zero Range	168 sf	2011
NGH02	Ammunition Breakdown Building – MRF Range	168 sf	2011
TBD	Impact Area Non-Dudded	1,743 acres	Unknown
RANG5	Basic 10M – 25M Firing Range (Zero)	3 acres	2011
RANG2	MRF Range	20 acres	2009
RANG3	Automated Combat Pistol/Military Police Firearms Qualification Course (CPQC)	4 acres	2009
RANG4	M203 Practice Range (Grenade Launcher Range)	6 acres	2011
OBST5	Observation Tower – Zero Range	200 sf	2011
OBST2	Observation Tower – MRF	100 sf	2009
OBST3	Observation Tower – CPQC	100 sf	2009

3.1.2.2 Administrative, Classroom, and Support (Cantonment)

The ORARNG military training includes the following buildings and structures in the Cantonment Use Area. The basic functional activities that they support include administrative, classroom, storage, billeting, dining, physical fitness, and supporting parking compound areas. Figure 2.2 shows the locations of the buildings currently included, which are also listed in Table 3.2 below.

Table 3.2: Active Cantonment Buildings

Building Number	Building Name	Area (square feet)	Date Constructed
Building 2	Fire Station	10,842	1941
Building 4	Machine Shop	21,994	1942
Building 5	Vehicle Maintenance Shop	13,469	1942
Building 6	Fuel POL Building	410	1942
Building 7	Carpenter Shop	4,300	1942
Building 8	Pest Control Building	1,581	1942
Building 9	Housing Warehouse	1,567	1942
Building 17	General Purpose Warehouse	13,591	1942
Building 18	Regional Training Institute (RTI) Administrative Storage	5,530	1942
Building 19	Inert Storage Warehouse	12,120	1942
Building 27	Weapons Cleaning Station	1,800	1988
Building 30	Simulator Building	3,056	1942
Building 31	RTI Administrative Storage Building	18,960	1942
Building 32	Office	9,094	1942
Building 36	Transient Dining Facility Building	5,767	1943
Building 53	Enlisted Barracks Transient Building	23,332	1941
Building 54	Treaty Building	5,521	1941
Building 62	RTI Physical Fitness Center Building	10,097	1993
Building 77	Storage Shed Installation	16,950	1975

3.1.2.3 Maneuver Training

Military training currently occurs in the maneuver area and includes both mounted (wheeled or tracked vehicle maneuver) and dismounted maneuver (individual and groups of Soldiers on foot). Maneuver training activities currently include the following:

- Tank Commanders Proficiency Course (TCPC) – an approximately 3.5-mile training course in a 340-acre parcel for M1 Abrams Tanks and M2/M3 Bradley Fighting Vehicles that allows the commander and crews to practice working together as a team while traversing the driving course.
- Helicopter Operations – landings and take-offs of CH-47 Chinook, HH-60 Blackhawks, and UH-72 Lakota to practice loading and unloading Soldiers and supplies, and conducting medical evacuations. Helicopters remain above 500 feet AGL when outside of the CUO boundary. Helicopter operation at CUO is infrequent, and occurs fewer than ten times per year on average.
- Dismounted Maneuver Training – involves various training scenarios, including dry-fire (blanks–no projectiles fired) exercises and use of role players; and can involve multiple Military Services. Typically, small units of military personnel move across the landscape on foot undetected conducting reconnaissance missions or coordinating air strikes (simulated). Dismounted maneuver training can include use of a small hand-launched remote control aircraft with video capability, such as the RQ-11 Raven UAS.

- Land Navigation Course – involves Soldiers walking from station to station using compass, map, and pace counts to progress through the course. The total area includes approximately 860 acres.
- Ad Hoc MOUT Site Training – occurs in various vacant and abandoned buildings that are periodically used for small-unit urban assault training exercises. These exercises do not include live-fire training, but may include opposing force scenarios and blanks used with IMILES-like laser systems. MOUT training can include use of the RQ-11 Raven UAS.
- Bivouac Training – includes Tactical Operations Center and Field Training Exercises using tactical tents such as Army-issued Deployable Rapid Assembly Shelters and Base-X shelter systems. Field conditions simulate tactical scenarios and involve overnight stays.

3.2 Land Use

The CUO study area is currently authorized as a military facility under the jurisdiction of the United States Army, and was being managed according to the 2005 BRAC land use realignment process until December 2017, when the BRAC transfer was completed. Under the 2012 National Defense Authorization Act, the 7,500 acres of the former UCD were required to be retained by the Army for use by Reserve Components. Current land uses include administrative and training, consistent with zoning overlays by both Morrow and Umatilla Counties. A detailed description of current site use and authorized activities is included in Section 3.1.2 and shown on Figures 1.2 and 1.3. Access is restricted, and no public use of the land occurs at the site.

Areas in the former UCD that are outside the CUO study area are zoned by Umatilla County as light industrial and wildlife habitat land use. Morrow County has also designated the Morrow County portion of the former UCD as the Umatilla Depot Military Zone, which allows for outright military uses of this area (Morrow County 2014). The land surrounding the former UCD is predominantly privately owned agricultural land, with some areas zoned as light industrial and rural residential, and a small area zoned as agribusiness (ORNG 2015a). A noise emission right-of-way has been designated by the U.S. Army Corps of Engineers (USACE), and will remain in effect while the property to the south of the small arms ranges remains under BRAC control. The noise emission right-of-way will convert to a deed restriction in perpetuity when the balance of the property is transferred from BRAC to subsequent owners. Existing land uses adjacent to the CUO study area are shown on Figure 3.2.

3.3 Air Quality

The CAA (42 U.S.C. §7410) provides the principal framework for national, state, and local efforts to protect air quality. Under the CAA, the United States Environmental Protection Agency (EPA) is required to establish and maintain National Ambient Air Quality Standards (NAAQS) for criteria pollutants, including ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, particulate matter equal to or less than 10 microns in diameter and 2.5 microns in diameter, and lead. NAAQS represent maximum levels of background pollution that are considered safe, with an adequate margin of safety, to protect public health and welfare. Geographic areas that do not meet or have not consistently met NAAQS are designated as 1) nonattainment areas that consistently fail to meet NAAQS; or 2) maintenance areas, which had a history of previously failing to meet NAAQS but now meet NAAQS. The UCD is not in a designated nonattainment area, maintenance area, or designated air quality district (DEQ 2015a).

On a state level, the DEQ maintains a State of Oregon CAA Implementation Plan under Oregon Administrative Rule (OAR) 340-200-0040, and establishes ambient air quality standards for the state under OAR 340-202-0050. Fugitive emission requirements are defined under OAR 340-208-0210.

Air quality at a given location is affected by both anthropogenic sources, including stationary sources (e.g., industrial facilities) and mobile sources (e.g., mobile vehicles), and naturally occurring sources (e.g., windblown dust). Factors contributing to the air quality at a given location include the quantity and type of pollutants emitted locally and regionally, and the dispersion rates of pollutants in the region. Primary environmental setting factors affecting pollutant dispersion are wind speed and prevailing direction, atmospheric stability, temperature, the presence or absence of inversions, and land topography.

3.3.1 Existing Air Pollutant Emissions in the CUO Study Area

Current ORARNG activities in the CUO study area that generate air emissions include the following:

- Maneuver training (Section 3.1.2.3), including vehicle training and helicopter operations. These activities contribute to mobile sources of emissions and generate dust.
- Heating using propane boilers. Pollutant emissions from the propane boilers were calculated as 3.8 tons per year of carbon monoxide, 5.0 tons per year of nitrogen oxides, 1.0 ton per year of volatile organic compounds, and 0.5 ton per year of particulate matter.
- Vehicle emissions from personnel traveling to and from the ORARNG training enclave.
- Emissions from vehicles and equipment used for short-term construction projects.

A query of the EPA's Integrated Compliance Information System for Air (ICIS-Air) database was conducted to determine if any permitted facilities are located at or immediately adjacent to the CUO study area. The ICIS-Air database includes facilities permitted through federal, state, local, and tribal regulatory agencies. The results of the query indicate that there are no operating facilities at or immediately adjacent to the CUO study area. The former UCD operated a permitted Hazardous Waste Treatment and Disposal system in the past; however, the system is listed as "Permanently Closed," and associated air emissions are no longer being generated.

Per the ICIS-Air database, existing pollutant emissions sources in the vicinity of CUO are listed below. All are reported to be in compliance with permit requirements (EPA 2016):

- Hermiston Generating Company, at 78145 Westland Road in Hermiston, Oregon, approximately 2.4 miles east of the former UCD. The Hermiston Generating Company facility is a fossil fuel electric power generating plant.
- Northwest Pipeline Corporation Plymouth Plant on Christie Road in Plymouth, Washington, approximately 4.6 miles north of the UCD. The Northwest Pipe facility is a natural gas transmission line.
- Price-Less Gas, at 711 6th Street in Umatilla, Oregon, approximately 6.5 miles northeast of the UCD. The Price-Less Gas facility is a measuring and dispensing pump manufacturing facility.
- Conagra Foods Lamb Weston, Inc., at 750 NE Columbia Avenue in Boardman, Oregon, approximately 7.1 miles west of the UCD. The Conagra facility is a frozen specialty food manufacturing facility.

3.3.1.1 Regional and Local Air Quality

The Oregon DEQ operates the ambient air quality monitoring network for the entire state, with the exception of Lane County. The closest air quality monitoring station to the CUO study area is at the Hermiston Municipal Airport. The most recent available air quality monitoring data summary from the Hermiston station indicates the local air quality index was considered "Good" for 132 days out of a total 153 days monitored. Air quality on 11 days was considered "Moderate," with no days considered unhealthy (DEQ 2014). Air quality monitoring data from the Hermiston station indicates the CUO study area is in attainment for all criteria pollutants. The UCD is not in a designated nonattainment area, maintenance area, or designated air quality district (DEQ 2015a).

3.3.2 Sensitive Receptors

No sensitive receptors associated with air quality are in or immediately adjacent to the CUO study area. The nearest sensitive receptor to the CUO study area is the Irrigon Elementary School, approximately 1.5 miles from the northern boundary of the UCD. The locations of sensitive receptors relative to the CUO study area are shown on Figure 3.1.

3.4 Noise

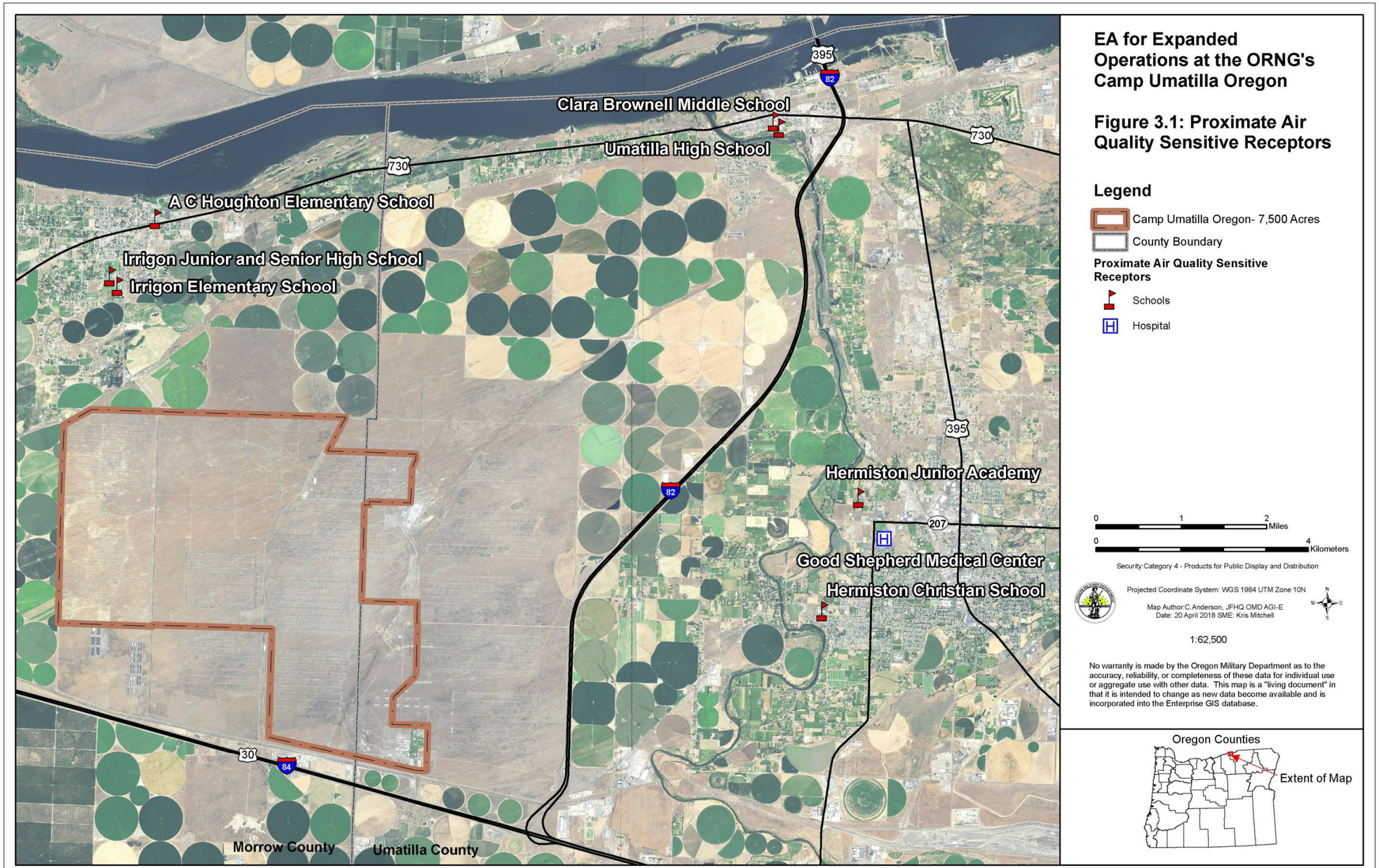
Noise is generally defined as unwanted sound. It may be any sound that is undesirable because it interferes with communications or other human activities, is intense enough to cause hearing damage, or is otherwise annoying. In general, the military noise environment consists of three types of noise: 1) transportation noise from aircraft and vehicle activities; 2) high-amplitude noise from armor and artillery firing and demolition operations; and 3) noise from firing at small-arms ranges.

3.4.1 Noise Level Assessment

Noise may be intermittent or continuous, steady or impulsive. Human response to noise is extremely diverse and varies according to the type of noise source, the sensitivity and expectations of the receptor, the time of day, and the distance between the source and the receptor. The decibel (dB) is the accepted unit of measurement for noise level. The A-scale (dBA) is an adjusted dB that corresponds to the range of normal hearing.

Noise levels are primarily described as the day-night level (DNL). The DNL is the time-weighted energy average sound level over a 24-hour period, with a 10-dB penalty added to the nighttime levels. This nighttime adjustment accounts for the increased sensitivity to nighttime noise levels. The DNL is an accepted unit for quantifying human annoyance to general environmental noise, and is used to evaluate noise levels at noise-sensitive receptor locations. The annual average DNL is used to assess noise levels for most general activities.

Noise from transportation sources such as vehicles and aircraft, and from continuous sources such as generators, is assessed using the A-weighted DNL (ADNL). The ADNL significantly reduces the measured pressure level for low-frequency sounds, while slightly increasing the measured pressure level for some high-frequency sounds.


Clara Brownell Middle School
Umatilla High School
A C Houghton Elementary School
Irrigon Junior and Senior High School
Irrigon Elementary School
Hermiston Junior Academy
Good Shepherd Medical Center
Hermiston Christian School
Morrow County
Umatilla County
395
82
730
207
30
84
EA for Expanded Operations at the ORNG's Camp Umatilla Oregon
Figure 3.1: Proximate Air Quality Sensitive Receptors
Legend
Camp Umatilla Oregon- 7,500 Acres
County Boundary
Proximate Air Quality Sensitive Receptors
Schools
Hospital
0 1 2 Miles
0 4 Kilometers
Security:Category 4 - Products for Public Display and Distribution
Projected Coordinate System: WGS 1984 UTM Zone 10N
Map Author:C.Anderson, JFHQ OMD AGI-E
Date: 20 April 2018 SME: Kris Mitchell
1:62,500
No warranty is made by the Oregon Military Department as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document" in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database.
Oregon Counties
Extent of Map

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Impulse noise resulting from artillery fire and explosives demolition activities is primarily assessed in terms of the C-weighted DNL (CDNL). The CDNL is often used to characterize high-energy blast noise and other low-frequency sounds capable of inducing vibrations in buildings or other structures. The C-weighted scale does not significantly reduce the measured pressure level for low-frequency components of a sound. Single-event noise data, including PK 15(met), may be used to assess effects of noise from test and training ranges (U.S. Army 2007). The metric PK 15(met) is the calculated peak noise level, without frequency weighting, expected to be exceeded by 15 percent of all events that might occur. Noise from small-arms ranges is currently assessed using the PK 15(met) or A-weighted sound exposure level.

3.4.2 ORARNG Statewide Operational Noise Management Plan

The SONMP provides a strategy for noise management at CUO and other ORARNG facilities. Elements of the SONMP include education about noise and Army noise metrics; complaint management; and when necessary, noise abatement procedures (ORARNG 2010).

The noise impact on the community surrounding the CUO study area is translated into noise zones. Two noise zones (Zone III and Zone II) are considered incompatible with potentially sensitive land uses such as schools, hospitals, residences, and churches. Areas outside these two zones are considered compatible with sensitive land uses. The Zone III and Zone II definitions, locations, and land use recommendations are described in Table 3.3. No noise-sensitive receptors are located in Zone III and Zone II at CUO. A map of existing noise zones and sensitive receptors is included as Figure 3.2. As shown on Figure 3.2, there are several rural residential areas in the vicinity; however, none are in noise Zone III or II.

Table 3.3: Noise Zones

Noise Zone and Decibel Levels	Definition	Location within ORARNG Training Enclave	Land Use
Zone III • **Transportation (ADNL) >75** • **Small Arms (PK15) >104** • **Impulsive (CDNL) >70**	Not recommended with noise-sensitive land uses	Entirely contained in the ORARNG training enclave	No non-recommended land uses in Zone III
Zone II • **Transportation (ADNL) 65 to 75** • **Small Arms (PK15) 87 to 104** • **Impulsive (CDNL) 62 to 70**	Normally not recommended with noise-sensitive land uses	Extends 900 meters beyond the ORARNG training enclave due west into an agricultural area	No non-recommended land uses in Zone II

3.5 Geology, Topography, and Soils

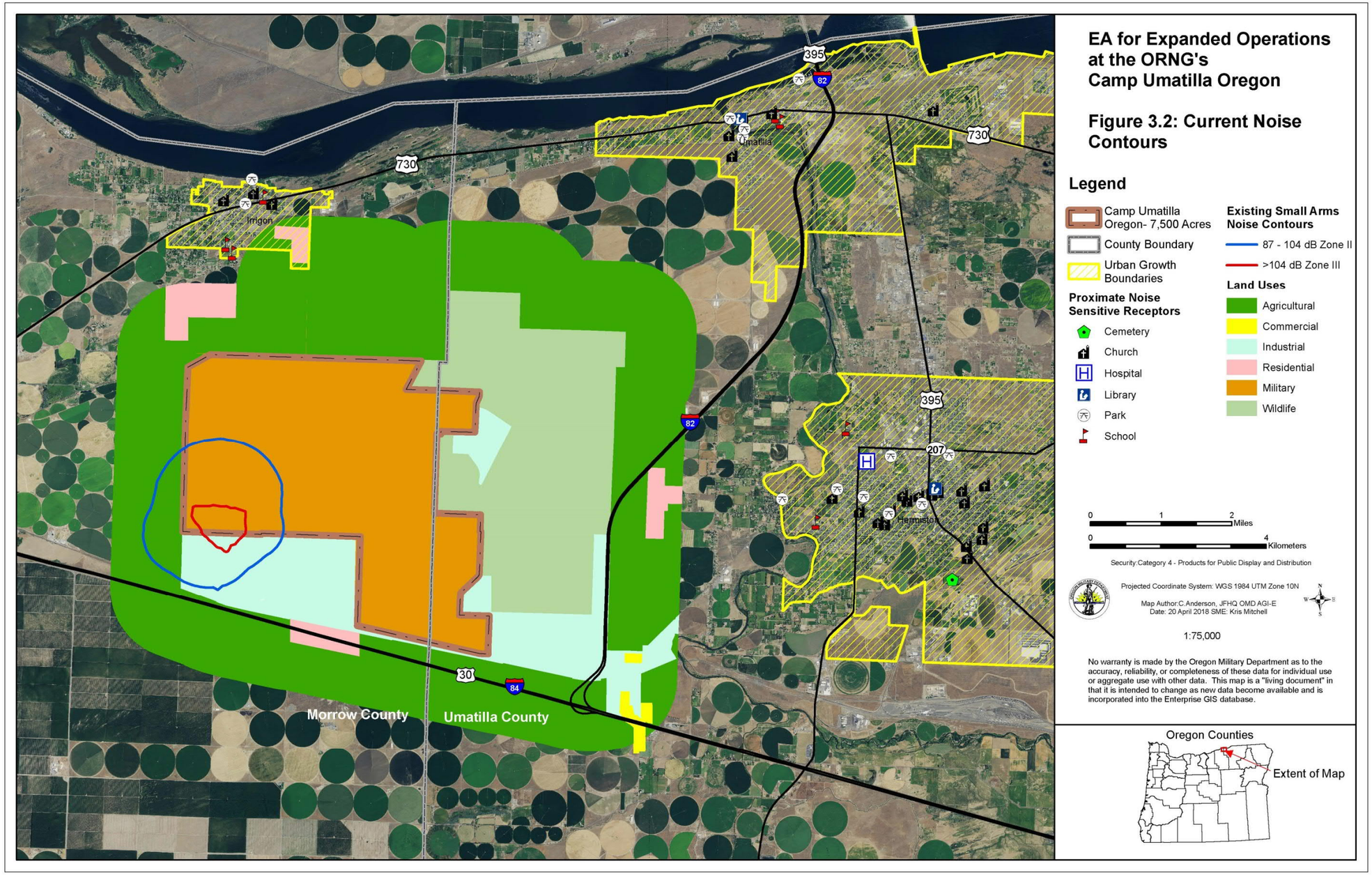
The CUO study area is in the Pleistocene Lake Basin Level IV ecoregion (Thorson et al. 2003), which covers approximately 1,407 square miles in eastern Oregon. The Pleistocene Lake Basin ecoregion is defined by a nearly level to undulating plain shaped by Pleistocene lakes and floodwaters from glacial lakes Missoula and Columbia (Thorson et al. 2003). The topography of this ecoregion slopes to the Columbia River. Elevations on the CUO property range from 400 to 677 feet above mean sea level (Pumphrey 2002).

The site is primarily flat to low rolling topography, with two distinct topographical features that characterize the surface of the UCD: the parallel, lacustrine-deposited dune lines; and Coyote Coulee. The dune lines are oriented along a northeast-southwest axis and have been shaped by strong southwest winds. One to several feet of silt-like material has been deposited over the original gravel surface of the area. Coyote Coulee is a valley oriented along a northeast axis in the east half of the CUO study area. The Coulee directs local winds northward and upward, resulting in localized areas of wind erosion along the toe of the escarpment at the eastern edge of the valley (Pumphrey 2002). Exposed areas in the CUO study area are highly susceptible to wind erosion, including the areas around ammunition igloos, unimproved roads, and Coyote Coulee (Pumphrey 2002). The surficial soil is underlain by as much as 200 feet of Pleistocene alluvial deposits known as Ordnance Gravels, which are composed of permeable silts, sands, and gravels, with some cobbles to the west of Coyote Coulee (AECOM 2014).

Soils in the CUO study area consist of sandy loam and coarse sand developed primarily from the alluvial deposits. The soils have been modified by wind action. Two soil map units, Quincy fine sand and Quincy loamy fine sand, cover more than 80 percent of the project area. These soils are both deep, excessively drained soils (NRCS 2016). The remainder of the site is covered by similar soil types that are well to excessively drained, with the exception of the Coyote Coulee area. The predominant soil type in that area has a low infiltration rate due to a hard duripan below the surface. These soils together cover approximately 2 percent of the CUO study area (NRCS 2016). Soil mapping units in the CUO study area are listed in Table 3.4, below, and shown on Figure 3.3. As shown in the table, the majority of the soils in the CUO study area have either a slight or moderate erosion hazard. Severe erosion hazards exist at Coyote Coulee (for both on- and off–road, and near the very northwestern corner of the site for roads). These severe erosion hazard areas constitute approximately 1.2 percent of the CUO study area. Generally, soils are suitable for construction. However, the eastern third of the CUO study area is limited for shallow excavations, primarily due to potential unstable excavation walls (NRCS 2016).

The Quincy fine sand (74B) and Quincy loamy fine sand (76B) soil units are designated as hydric soils by the Natural Resources Conservation Service (NRCS), indicating these soils are sufficiently wet in the upper part to develop anaerobic conditions during the growing season (NRCS 2016). These two units compose approximately 4.9 percent of the CUO Study Area.

Much of the project area was disturbed during construction and operation of the Depot. Nearly all of those disturbed areas have stabilized, and native vegetation communities have become re-established, although non-native species are present as well. Under existing conditions, there are numerous buildings, ranges, parking areas, and roads that have previously disturbed soils and microtopography through vegetation removal, surface leveling and grading, soil compaction, and covering soils limiting their productivity. Existing buildings, training areas, open storage, and parking facilities cover approximately


EA for Expanded Operations at the ORNG's Camp Umatilla Oregon
Figure 3.2: Current Noise Contours
Legend
Camp Umatilla Oregon- 7,500 Acres
County Boundary
Urban Growth Boundaries
Proximate Noise Sensitive Receptors
Cemetery
Church
Hospital
Library
Park
School
Existing Small Arms Noise Contours
87 - 104 dB Zone II
>104 dB Zone III
Land Uses
Agricultural
Commercial
Industrial
Residential
Military
Wildlife
0 1 2 Miles
0 4 Kilometers
Security:Category 4 - Products for Public Display and Distribution
Projected Coordinate System: WGS 1984 UTM Zone 10N
Map Author:C.Anderson, JFHQ OMD AGI-E
Date: 20 April 2018 SME: Kris Mitchell
1:75,000
No warranty is made by the Oregon Military Department as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document" in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database.
Oregon Counties
Extent of Map
Irrigon
Umatilla
Hermiston
Morrow County
Umatilla County
730
395
82
207
30
84

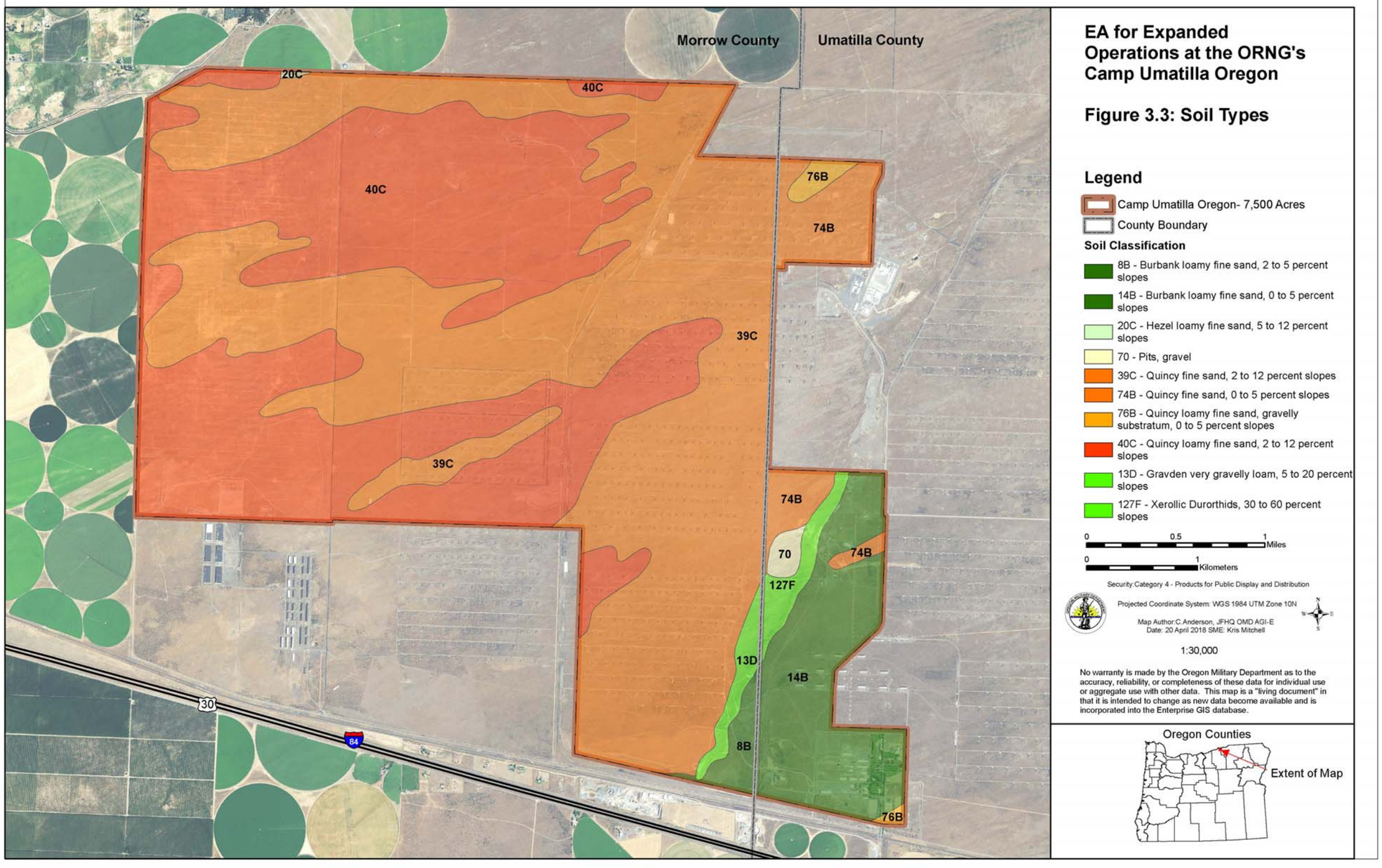

Morrow County
Umatilla County
20C
40C
40C
76B
74B
39C
39C
74B
70
74B
127F
13D
14B
8B
76B
30
84
EA for Expanded Operations at the ORNG's Camp Umatilla Oregon
Figure 3.3: Soil Types
Legend
Camp Umatilla Oregon- 7,500 Acres
County Boundary
Soil Classification
8B - Burbank loamy fine sand, 2 to 5 percent slopes
14B - Burbank loamy fine sand, 0 to 5 percent slopes
20C - Hezel loamy fine sand, 5 to 12 percent slopes
70 - Pits, gravel
39C - Quincy fine sand, 2 to 12 percent slopes
74B - Quincy fine sand, 0 to 5 percent slopes
76B - Quincy loamy fine sand, gravelly substratum, 0 to 5 percent slopes
40C - Quincy loamy fine sand, 2 to 12 percent slopes
13D - Gravden very gravelly loam, 5 to 20 percent slopes
127F - Xerollic Durorthids, 30 to 60 percent slopes
0 0.5 1 Miles
0 1 Kilometers
Security:Category 4 - Products for Public Display and Distribution
Projected Coordinate System: WGS 1984 UTM Zone 10N
Map Author:C.Anderson, JFHQ OMD AGI-E
Date: 20 April 2018 SME: Kris Mitchell
1:30,000
No warranty is made by the Oregon Military Department as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document" in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database.
Oregon Counties
Extent of Map

Table 3.4. Soil Mapping Units in the CUO Study Area

Soil Mapping Unit Symbol	Soil Mapping Unit Name	Erosion Hazard (Road / Trail)[1]	NRCS Designated Hydric Soil[2]	USDA Prime Farmland[3]	Erosion Hazard (Off-Road/Off-Trail)[4]	Percent of CUO Study Area
8B	Burbank loamy fine sand, 2 to 5 percent slopes	Slight	No	No	Slight	1.8
13D	Gravden very gravelly loam, 5 to 20 percent slopes	Moderate	No	No	Slight	0.9
20C	Hezel loamy fine sand, 5 to 12 percent slopes	Severe	No	No	Slight	0.1
39C	Quincy fine sand, 2 to 12 percent slopes	Moderate	No	No	Slight	46.2
40C	Quincy loamy fine sand, 2 to 12 percent slopes	Moderate	No	No	Slight	37.3
14B	Burbank loamy fine sand, 0 to 5 percent slopes	Slight	No	No	Slight	7.3
70	Pits, gravel	Not Rated	No	No	Not Rated	0.4
74B	Quincy fine sand, 0 to 5 percent slopes	Slight	Yes	No	Slight	4.4
76B	Quincy loamy fine sand, gravelly substratum, 0 to 5 percent slopes	Moderate	Yes	No	Slight	0.5
127F	Xerollic Durorthids, 30 to 60 percent slopes	Severe	No	No	Severe	1.1

Source: NRCS 2016
Notes:
1) Erosion hazards on roads and trails are defined as:
Slight = Little or no erosion is likely on unsurfaced roads and trails.
Moderate = Some erosion is likely on unsurfaced roads and trail, the roads or trails may require occasional maintenance, and simple erosion-control measures are needed.
Severe = Substantial erosion is expected on unsurfaced roads and trails, the roads or trails require frequent maintenance, and costly erosion-control measures are needed.
2) The NRCS designates the soil mapping unit as a hydric soil (NRCS 2016)
3) Soil map unit is designated in the *Prime Farmland List for Oregon* (USDA 2015)
4) Erosion hazards on off-road and off-trail areas are defined as:
Slight = Erosion is unlikely under ordinary climatic conditions.
Moderate = Some erosion is likely and erosion-control measures may be needed.
Severe = Erosion is very likely and erosion-control measures, including revegetation of bare areas, are advised
CUO = Camp Umatilla Oregon
NRCS = Natural Resources Conservation Service
USDA = U.S. Department of Agriculture

35 acres of soils under existing conditions. There are also approximately 91.5 miles of existing paved roads, equating to approximately 180 acres of impervious surface, throughout the CUO study area.

The nearest active fault line is approximately 35 miles away (DOGAMI 2016). The bottom of the Coyote Coulee valley is identified as having a high likelihood for landslides, probably due to the steeper topography on either side (DOGAMI 2016).

3.6 Water Resources

Water resources include surface water bodies, groundwater, and wetland and floodplain areas at or in the vicinity of the CUO study area. Each of these resources is discussed in the following sections.

3.6.1 Surface Water

There are no surface water bodies in CUO: the Columbia River is approximately 3.3 miles north of CUO; and the Umatilla River, including several diverted irrigation canals, is approximately 6 miles to the east. Average annual precipitation is 8.85 inches, 60 percent of which occurs between November and March (AMEC 2012). Stormwater runoff is minimal at CUO because of the small amount of precipitation the area receives and the abundance of permeable soils; most precipitation infiltrates on-site and does not discharge off-site, although precipitation in the Administrative Area drains into the stormwater management system. Stormwater runoff from the balance of the cantonment area is allowed to percolate into the ground. The remainder of CUO lacks well-defined drainage patterns. The minimal runoff generated throughout CUO generally flows into the numerous shallow depressions found in the flat and gently rolling topography throughout CUO. Coyote Coulee is the only existing well-defined drainage system at CUO outside of the cantonment area, because much of the precipitation percolates downward to the extensive subsurface groundwater system, where it eventually flows in a northwesterly direction toward the Columbia River. There are several small depressions in CUO, primarily along the floor of Coyote Coulee, that collect water from winter rains, and dry out during the summer (Cleland et al. 1987).

3.6.2 Groundwater

Groundwater occurs beneath the CUO study area in a series of relatively deep, confined basalt aquifers and in a highly productive permeable unconfined aquifer to the south of the CUO study area (extending off-site). The unconfined aquifer consists of the alluvial deposits and the weathered surface of the Elephant Mountain Member basalt, and is overlain by approximately 20 to 125 feet of unsaturated alluvial sand and gravel. Depth to groundwater ranges from 60 to 100 feet below ground surface. Three municipal water systems—Hermiston, Umatilla, and Irrigon—draw from groundwater within a 4-mile radius of the CUO study area.

In 1990, DEQ declared the Lower Umatilla Basin (LUB) Groundwater Management Area (GWMA) be established due to elevated levels of nitrate-nitrogen concentrations (DEQ 2016). The federal safe drinking water standard is 10 milligrams per liter (mg/L), and the trigger level that resulted in establishment of the GWMA under Oregon law is 7 mg/L. Five primary sources of nitrate-nitrogen were identified, one of which was the explosives washout lagoons at the former UCD. The LUB GWMA Action Plan was finalized in December 1997, but the most recent summary report indicates levels of up to 64 mg/L, and demonstrates that the area-wide trend is still increasing levels of nitrate-nitrogen (DEQ 2012). The U.S. Army is involved in implementation of the Action Plan, and has a goal of a downward nitrate trend from the UCD washout lagoons, which is being met as of the most recent Evaluation of the Action Plan (DEQ 2013). Five wells installed around the capped UCD landfill are monitored as part of the

GWMA. Ongoing pump-and-treat activities are occurring that are expected to be protective of human health and the environment on completion, but require prohibition of groundwater use in the interim.

Beginning in the 1970s, the Oregon Water Resources Department (OWRD) established four Ground Water Critical Areas and one Classified Ground Water Area in the L due to the decline in water levels of the aquifer from irrigation diversions. The CUO study area is in the Ordnance Gravel Critical Groundwater Area. Currently, water levels in the critical area are fairly stable. However, water use under permit remains high, and there is a slow, steady increase in exempt uses that do not require permits (such as domestic use, stock-watering, and limited commercial or industrial applications). More recharge or less water use is needed to correct current water-level trends (OWRD 2003), which establishes significant restrictions on accessing groundwater resources in the area. More information on water supply for CUO is provided in Section 3.11.

3.6.3 Wetlands and Floodplains

There is one small freshwater emergent wetland mapped by the National Wetland Inventory along the western boundary of the CUO study area in the Live-Fire Use Area (USFWS 2016a). This wetland is likely due to irrigation runoff occurring immediately west of the CUO study area, and is approximately 0.4 acre, according to 2014 aerial imagery. There are no identified riparian areas in the CUO study area (USFWS 2016a). Vegetation surveys conducted in 2014 identified a small area with wetland vegetation in the CUO study area, which appeared to be associated with artificial water sources. At the far northwestern corner of CUO, a single large sprinkler resulted in a strand of wetland vegetation approximately 0.1 acre in size (Brown and Meinke 2016). There are no mapped 100-year floodplains in the CUO study area (FEMA 2007).

3.7 Biological Resources

Biological resources include vegetation, fish, and wildlife. Each of these resources is discussed in the following sections.

3.7.1 Vegetation

Vegetation in the CUO study area has been subject to extensive historical disturbance. Assessment of historical photos from 1941 indicates that much of the installation was bladed during construction to clear brush to minimize wildfire potential (AECOM 2014). Significant portions of the former UCD were disturbed during major construction of the early 1940s; however, vegetation at the site (both invasive species and native vegetation) has reestablished naturally. Road clearing and construction activities have occurred throughout the CUO study area, and much of the vegetation has been fragmented and subject to disturbance. Vegetation in the Live-Fire Use Area and the northwestern portion of the CUO study area has experienced less disturbance and fragmentation than other areas of the CUO study area, and therefore has the highest degree of intact native vegetation.

Fire history in the former UCD and CUO study area is not well documented. Most range fires on the former UCD or its boundaries have been contained to less than 500 acres, although recent fires along the western and northern boundary have been substantially larger, in the range of 1,000 acres, with the 2016 fire being approximately 2,500 acres (OMD Wildland Fire Services 2016). Because of the recently established fire records at the former UCD, there is very little data to establish frequency, character, or intensity of fires in the CUO study area. Between June 2001 and August 2009, there have been approximately 39 documented wildland fires either on the former UCD or threatening its boundaries

(OMD Wildland Fire Services 2016). A dramatic increase was noted between 2007 and 2009, with 18 of those fires occurring in that timeframe. From July 2011 to May 2016, there have been an additional 13 documented wildland fires in the CUO boundary (Jeff Mach, Oregon Military Department, personal communication August 15, 2016). The majority of fires were human–caused, and isolated to the railroad tracks or roadsides with the intervention of the then Umatilla Chemical Depot Fire Department (OMD Wildland Fire Services 2016). During the fire season, thunderstorms (with dry lightning) occur, which increases the chance of igniting large fires. Fires typically move from west to east.

Fuels in the CUO study area are classified as Grass Group Fuel Model 1 (OMD Wildland Fire Services 2016). Cheatgrass (*Bromus tectorum*) is the prominent fuel on CUO. This fuel is continuous, grows quickly, and dries out in late spring. Antelope bitterbrush (*Purshia tridentata*) and sagebrush (*Artemisia tridentata*) grow throughout CUO. Several areas of the bitterbrush are dead and dry. The cheatgrass is the main carrier of fire into the shrub class of fuels on the camp (OMD Wildland Fire Services 2016). Flame length without wind and terrain features can be from 6 inches to 2 feet. Once shrubs are involved, the flame length can significantly increase with flame lengths in excess of 4 feet (OMD Wildland Fire Services 2016).

Vegetation communities in the CUO study area are predominantly cheatgrass-dominated grasslands interspersed with native perennial grasslands and areas of sagebrush and antelope bitterbrush shrublands. A total of 106 plant taxa was encountered in the CUO study area during floristic surveys of the site in 2014 (Appendix B; Brown and Meinke 2016). Approximately 69 percent of the plant species encountered during these surveys were native, and 31 percent were exotic. Sandberg's bluegrass (*Poa secunda*) is the most abundant native species; hairy false goldenaster (*Heterotheca villosa* ssp. *villosa*) and lanceleaf scurfpea (*Amsinckia lycopsoides*) are also abundant. Antelope bitterbrush is still abundant at the site despite a massive die-off of this species that occurred in recent years, likely due to fungal pathogens, although very few mature adults of this species are still alive (Brown and Meinke 2016). Dominant invasive or non-native species in the CUO study area are cheatgrass, tall tumblemustard (*Sissymbrium altissimum*), Russian thistle (*Salsola iberica*), rush skeletonweed (*Chondrilla juncea*), and yellow salsify (*Tragopogon dubius*) (Brown and Meinke 2016).

The following four dominant plant associations, listed in order of abundance, occur in the CUO study area (Brown and Meinke 2016):

- **Scurf pea and cheatgrass grassland** – Occurs in large and small patches throughout the area. Scurf pea and cheatgrass are the dominant species; a very low diversity of other grass and forb species occurs in this community type.
- **False goldenaster and cheatgrass grassland** – Found predominantly in the southern half of the CUO study area. Dominated by cheatgrass with false goldenaster and other invasive annual forbs.
- **Mixed antelope bitterbrush and rabbitbrush (*Ericameria nauseosa* ssp. *speciosa* and *Chrysothamnus viscidiflorus* var. *viscidiflorus*) shrubland** – Occurs in relatively large, discontinuous swaths across the area. Most of the adult antelope bitterbrush shrubs are dead, but there is some establishment of younger plants. This community also supports patches of native and non-native perennial grasses.

- **Mixed rabbitbrush shrubland** – Occurs in the northwestern corner of the camp and has a relatively high level of native plant diversity and abundance. Dominant shrubs are rubber rabbitbrush and yellow rabbitbrush, with other native shrubs, forbs, and grasses being common.

Five additional minor vegetation communities were identified during surveys of the site in 2014 and 2015. Figure 3.4 shows the distribution of all vegetation communities in the CUO study area. Ornamental landscape trees are found in the cantonment area. Landscape trees in this area provide vegetative structural diversity and wildlife habitat. Twenty-four different landscape tree species were identified during surveys in 2015, one of which (black cottonwood [*Populus nigra*]) is a native species (Brown and Meinke 2016).

3.7.1.1 Special-Status Plants

The U.S. Fish and Wildlife Service (USFWS) administers the ESA of 1973, as amended. This law provides federal protection for species designated as endangered or threatened. No ESA-listed plants or state-listed threatened or endangered plants have been identified during surveys of the CUO study area (Brown and Meinke 2016) or are reported to potentially occur in the CUO study area (USFWS 2016b).

Occurrences of three plant species listed as rare by the State of Oregon (although not threatened or endangered) were found in the CUO study area (Brown and Meinke 2016): Columbia milkvetch (*Astragalus columbianus*), The Dalles milkvetch (*Astragalus sclerocarpus*), and rush skeleton plant (*Lygodesmia juncea*). Columbia milkvetch has a State Rank of 4, indicating that it is apparently secure across its full range, but that there is cause for concern for its populations in Oregon. This species is also on the Oregon Biodiversity Information Center (ORBIC) List 4, which indicates that it is not currently threatened or endangered, but that it may be either very rare and secure, or declining but still too common to be considered for higher conservation status (ORBIC 2013). The Dalles milkvetch and rush skeleton plant do not have a State Rank, but are on ORBIC List 3, indicating that more information is needed to accurately determine if these species are threatened or endangered in Oregon (ORBIC 2013). The milkvetch species have been mapped mostly in the eastern half of the CUO study area in areas among the igloos. Several hundred individuals of each species have been found in the CUO study area (Brown and Meinke 2016).

3.7.1.2 Noxious Weeds

Past disturbance and human use of the Depot has contributed to the presence of non-native, invasive weed species, including noxious weeds, throughout the CUO study area. Six Oregon-listed noxious weed species have been documented in the CUO study area during surveys in 2015: diffuse knapweed (*Centaurea diffusa*), rush skeletonweed (*Chondrilla juncea*), Canada thistle (*Cirsium arvense*), Scotch thistle (*Onopordum acanthium*), milk thistle (*Silybum marianum*), and tree of heaven (*Ailanthus altissima*). All of these species are Oregon Department of Agriculture B-rated noxious weed species, which indicates they are of economic importance, regionally abundant, and with limited distribution in some counties (ODA 2016). Treatment of B-rated noxious weeds is recommended by Oregon Department of Agriculture, but is not mandatory. Additionally, Morrow County lists rush skeletonweed and Scotch thistle as A-list noxious weeds, and Canada thistle and diffuse knapweed as B-list noxious weeds. Umatilla County designates rush skeletonweed as an A-list noxious weed and Canada thistle, diffuse knapweed, and Scotch thistle as B-list noxious weeds. Cereal rye (*Secale cereale*), another species at the site, is listed as a B-list noxious weed by both counties. County ordinances mandate that landowners treat county-listed A-list noxious weeds.

Populations of noxious weeds in the CUO study area are currently treated with herbicides when they are detected, following prescriptions in the ORARNG Integrated Pest Management Plan (ORARNG 2018).

Locations of infestations of these species have not been tracked over time, although infestations have generally been found along roadways and other disturbed areas (USFWS 2007). Tree of heaven is found in the cantonment area, and was likely intentionally planted at the site. It was not clear at the time of the 2015 surveys if this species actually poses a threat of colonizing adjacent ecological systems (Brown and Meinke 2016).

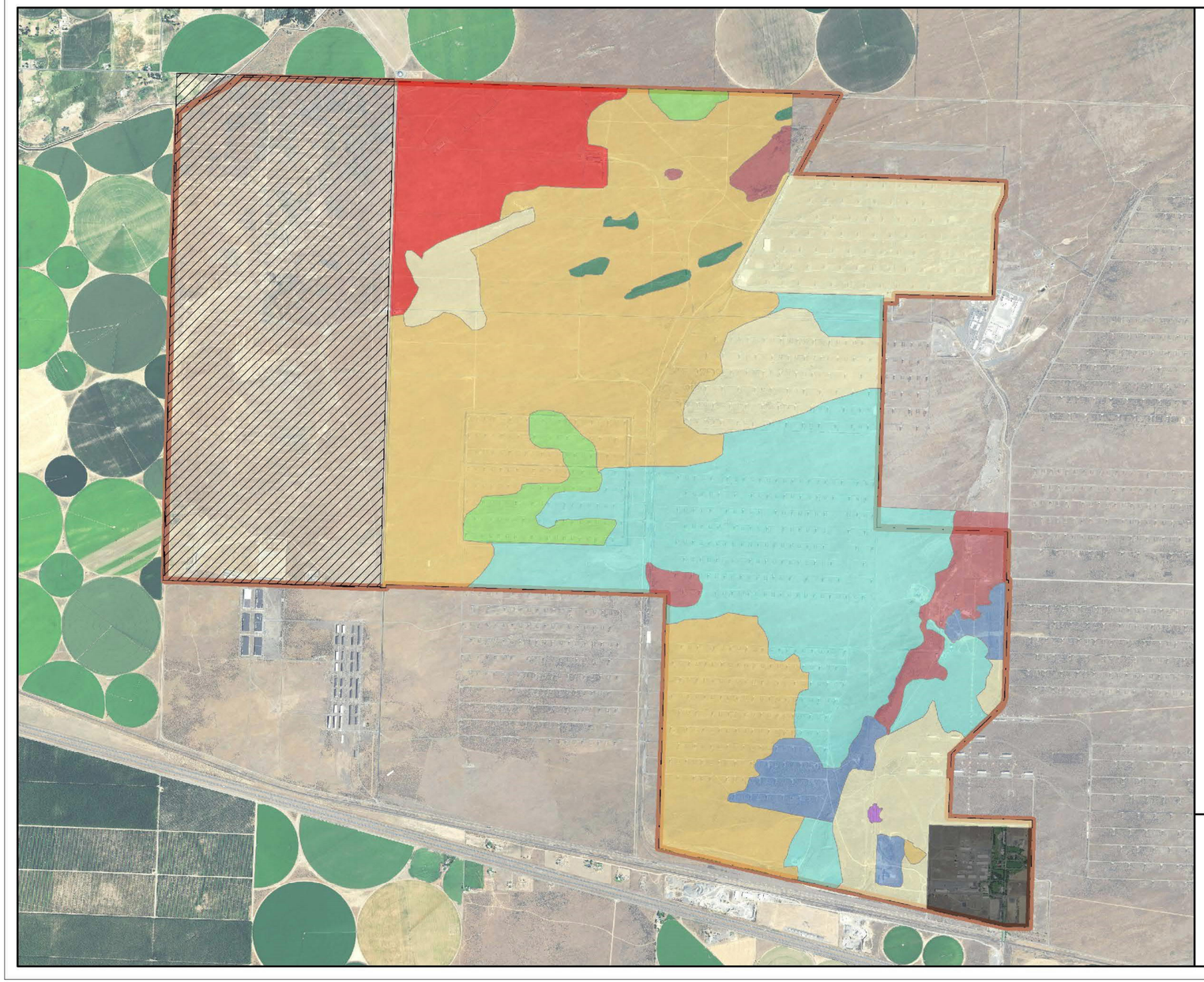
3.7.2 Fish and Wildlife

3.7.2.1 Special-Status Wildlife

No ESA-listed animals have been identified during surveys of the CUO study area (Tetra Tech 2002; USFWS 2007; Mach 2016a). The Washington ground squirrel (*Urocitellus washingtoni*), an Oregon Department of Fish and Wildlife (ODFW)-listed endangered species, has the potential to occur in the CUO study area (USFWS 2016b). The Washington ground squirrel has not been documented as occurring at the site during surveys (Tetra Tech 2002; USFWS 2007; Mach 2016a); therefore, this species will not be analyzed further. The Gray wolf (*Canis lupus*) is also reported as having the potential to occur in the CUO study area (USFWS 2016b); however, gray wolves have never been observed at the site (Mach 2016a). Additionally, the isolated nature of the habitat in this area, the high human use of the ORARNG training enclave and surrounding lands, and lack of adequate prey base make it extremely unlikely that gray wolves would occur in the CUO study area; therefore, this species will not be analyzed further. Bull trout (*Salvelinus confluentus*) is also reported by the USFWS IPaC database as having the potential to be impacted by actions on CUO (USFWS 2016a); however, no surface water conveyance occurs at the site, so impact to this species would not occur, and this species will not be analyzed further.

Several non-ESA-listed special-status wildlife species (one reptile, one mammal, and 66 bird species) have been documented in the CUO study area and immediate area, and several other special-status wildlife species have the potential to occur in the CUO study area. A complete list of these species is presented in Table 3.5. Many of these species are ODFW-listed sensitive species, with either a “vulnerable” or “critical” designation. Several are also ORBIC-listed species, Birds of Conservation Concern (BCC) for USFWS Bird Conservation Region (BCR) 9 (Great Basin), and/or DoD Mission Sensitive (M-S) species. Sensitive wildlife species have been identified throughout the CUO study area during surveys of the UCD, and are listed on Table 3.5 (Tetra Tech 2002; USFWS 2007; Mach 2016a). Raptors and other birds have been observed roosting in ornamental landscape trees in the cantonment area.

Since 2008, the Army and OMD, with the assistance of the USFWS and the Global Owl Project, have been implementing conservation measures at the former UCD for western burrowing owl (*Athene cunicularia hypugaea*), an Oregon Sensitive-Critical and DoD M-S species. The Depot’s natural resources manager noticed in 2007 that this species was experiencing a scarcity of available burrows, likely as a result of predator control actions targeting coyotes (*Canis latrans*) and American badgers (*Taxidea taxus*). Nesting surveys, initiated by the Army and continued by OMD, have been performed at the site since 2008, and 189 artificial burrows have been installed at the former UCD as of 2016. A total of 662 fledglings has been produced by owls nesting on the UCD between 2009 and 2014. In 2016, 66 pairs of burrowing owls nested on the former UCD. The Army, in cooperation with United States and Canada federal, state, and provincial wildlife agencies, has given some fledgling owls to the Burrowing Owl Conservation Society of British Columbia for use in their captive breeding and reintroduction program. The former UCD is the most important and concentrated western burrowing owl propagation center in the Columbia Plateau region (Mach 2016b).



EA for Expanded Operations at the ORNG's Camp Umatilla Oregon

Figure 3.4: Vegetation Communities

*Data Depicted is from the Draft Report "A Partial Floristic Survey of Umatilla Chemical Depot:2014-2015" by the Oregon Department of Agriculture Native Plant Conservation Program, prepared by Jordan Brown and Robert Meinke.

Legend

- Camp Umatilla, Oregon- 7,500 Acres

Vegetation Class

- Cantonment Area
- Big sagebrush shrubland
- Bitterbrush native forb shrubland
- Bitterbrush non-native forb shrubland
- Crested wheatgrass grassland
- False goldenaster grassland
- Mixed bitterbrush and rabbitbrush shrubland
- Mixed rabbitbrush shrubland
- Scurf pea grassland
- Thickspike wheatgrass sand dunes
- ADA - Area Not Inventoried

Projected Coordinate System: WGS 1984 UTM Zone 10N

Map Author:C.Anderson, JFHQ OMD:AGI-E
Date: 20 April 2018 SME: Kris Mitchell

N W E S

No warranty is made by the Oregon Military Department as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document" in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database.

Oregon Counties

Extent of Map

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Table 3.5: Special-Status Wildlife Species that Occur or have Potential to Occur in the CUO Study Area

Common Name	Federal Status[1]	State Status[1]	Global (G) and State (S) Rank[2]	Other Status[1,3,4]	Occurrence[5,6,7]
Northern sagebrush lizard (*Sceloporus graciosus graciosus)*	Species of Concern	Sensitive-Vulnerable	G5T5; S5	ORBIC List 4	Present
Black-tailed jackrabbit (*Lepus californicus)*	None	Sensitive-Vulnerable	G5; S4	ORBIC List 4	Present
Long-legged myotis (*Myotis volans)*	Species of Concern	Sensitive-Vulnerable	G4G5; S3	ORBIC List 4	Potential
Pallid bat (*Antrozous pallidus)*	Species of Concern	Sensitive-Vulnerable	G4; S2	ORBIC List 2	Potential
Townsend's big-eared bat (*Corynorhinus townsendii)*	Species of Concern	Sensitive-Critical	G4; S2	ORBIC List 2	Potential
White-tailed Jackrabbit (*Lepus townsendii)*	None	Sensitive-Vulnerable	G5; S4	ORBIC List 3	Potential
Bald eagle (*Haliaeetus leucocephalus)*	None	Sensitive-Vulnerable	G5; S4B,S4N	Bald and Golden Eagle Protection Act; BCC Region 9; ORBIC List 4; MBTA	Potential; not confirmed, but may be transient visitors to the area [7]
Bobolink (*Dolichonyx oryzivorus)*	None	Sensitive-Vulnerable	G5; S2B	ORBIC List 2; MBTA	Present
Brewer's sparrow (*Spizella breweri)*	None	None	G5; S4B	BCC Region 9; MBTA; DoD M-S Species	Present
Common nighthawk (*Chordeiles minor)*	None	None	G5; S5B	ORBIC List 4; MBTA; DoD M-S Species	Present
Ferruginous hawk (*Buteo regalis)*	None	Sensitive-Vulnerable	G4; S3B	BCC Region 9; MBTA	Present
Golden eagle (*Aquila chrysaetos)*	None	None	G5; S3S4	Bald and Golden Eagle Protection Act; ONHIC List 4; BCC Region 9; MBTA	Present
Grasshopper sparrow (*Ammodramus savannarum)*	None	Sensitive-Vulnerable	G5; S2B	MBTA; DoD M-S Species	Present
Lewis' woodpecker (*Melanerpes lewis)*	None	Sensitive-Critical	G4; S2S3B	BCC Region 9; MBTA; DoD M-S Species	Present
Loggerhead shrike (*Lanius ludovicianus)*	None	Sensitive-Vulnerable	G4; S3B,S2N	BCC Region 9; MBTA; DoD M-S Species	Present
Long-billed curlew (*Numenius americanus)*	None	Sensitive-Vulnerable	G5; S3B	BCC Region 9; MBTA; DoD M-S Species	Present

Table 3.5: Special-Status Wildlife Species that Occur or have Potential to Occur in the CUO Study Area

Common Name	Federal Status[1]	State Status[1]	Global (G) and State (S) Rank[2]	Other Status[1,3,4]	Occurrence[5,6,7]
Merlin (*Falco columbarius)*	None	None	G5; SHB	ORBIC List 2; MBTA	Present
Peregrine falcon (*Falco peregrinus)*	None	Sensitive-Vulnerable	G4; S1	BCC Region 9; MBTA	Potential; not confirmed, but may be transient visitors to the area [7]
Prairie falcon (*Falco mexicanus)*	None	None	G5; S4	MBTA; DoD M-S Species	Present
Sage sparrow (*Amphispiza belli)*	None	Sensitive-Critical	G4; S?	BCC Region 9; MBTA	Present
Sage thrasher (*Oreoscoptes montanus*)	None	None	G4; S4B	BCC Region 9; MBTA	Present
Swainson's hawk (*Buteo swainsoni)*	None	Sensitive-Vulnerable	G5; S3B	MBTA	Present
Tricolored blackbird (*Agelaius tricolor)*	None	None	G3G4; S2B	BCC Region 9; MBTA	Potential; not confirmed[7]
Western burrowing owl (*Athene cunicularia hypugaea)*	None	Sensitive-Critical	G4T4; S3B	MBTA; DoD M-S Species	Present
Western meadowlark (*Sturnella neglecta)*	None	Sensitive-Critical	G5; S4	ORBIC List 4; MBTA	Present

Sources: [1] ORBIC 2013; [2] NatureServe 2015; [3] USFWS 2013; [4] USFWS 2008; [5] USFWS 2007; [6] Mach 2016a; [7] Blake 2013; [8] TetraTech 2002

Notes:

Global and State Rank codes (NatureServe 2015): G4: Apparently Secure; G5: Secure; S?: Unranked; S1: Critically Imperiled; S2: Imperiled; S3: Vulnerable; S4: Apparently Secure; S5: Secure; SH: Possibly Extirpated; N: Non-breeding population in state; B: Breeding population in state

MBTA: Indicates birds protected under the Migratory Bird Treaty Act (80 FR 80594; USFWS 2015).

DoD M-S Species: Indicates birds on the DoD Partners in Flight Program list. These are species that occur on DoD lands and are at risk of becoming listed as threatened or endangered under the federal Endangered Species Act if current population trends continue. The purpose of this list is to help DoD resource managers better prioritize monitoring and management efforts on those species (and their habitats) having the highest potential to impact the military mission should they become federally listed. A secondary focus is on those species with significant conservation concern on DoD lands.

BCC Region 9: Indicates birds of conservation concern identified by the USFWS for Region 9 (USFWS 2008).

ORBIC List 1: Contains taxa that are threatened with extinction or presumed to be extinct throughout their entire range. These are the taxa most at risk and should be the highest priority for conservation action.

ORBIC List 2: Contains species threatened with extirpation or presumed to be extirpated from the State of Oregon. These are often peripheral or disjunct species that are of concern when considering species diversity within Oregon's borders. They can be very significant when protecting the genetic diversity of a taxon. ORBIC regards extreme rarity as a significant threat and has included species that are very rare in Oregon on this list.

ORBIC List 3: Contains species for which more information is needed before status can be determined, but which may be threatened or endangered in Oregon or throughout their range. Many taxa on this list may eventually be determined to belong on List 1 or List 2, so it is important that they be looked for, and that the few known occurrences be protected.

ORBIC List 4: Contains species that are of conservation concern but are not currently threatened or endangered. This includes taxa that are very rare but are currently secure, as well as taxa that are declining in numbers or habitat but are still too common to be proposed as threatened or endangered. Although these taxa may not currently need the same active management attention as threatened or endangered taxa, they do require continued monitoring.

3.7.2.2 Migratory Birds

The majority of the bird species found at the site are protected under the MBTA (16 U.S.C. 703-712). Currently, land in the CUO study area is managed in accordance with a Memorandum of Understanding (MOU) between the DoD and the USFWS addressing the conservation of migratory birds on DoD properties (DoD and USFWS 2006). The current INRMP provides conservation measures to protect migratory birds, including raptors, from impacts due to transmission lines and demolition activities. The list of migratory birds known to occur at the site (including some species that are also special-status species) is provided in Table 3.6.

Table 3.6: Migratory Bird Species that Occur at the CUO

Common Name	Scientific Name
American crow	*Corvus brachyrhynchos*
American goldfinch	*Carduelis tristis*
American kestrel	*Falco sparverius*
American pipit	*Anthus rubescens*
American robin	*Turdus migratorius*
Bank swallow	*Riparia riparia*
Barn owl	*Tyto alba*
Barn swallow	*Hirundo rustica*
Black phoebe	*Sayonaris nigricans*
Black-billed magpie	*Pica pica*
Bobolink	*Dolichonyx oryzivorus*
Brewer's blackbird	*Euphagus cyanocephalus*
Brewer’s sparrow	*Spizella breweri*
Brown-headed cowbird	*Molothrus ater*
Bullock’s oriole	*Icterus bullockii*
California gull	*Larus californicus*
Chipping sparrow	*Spizella passerina*
Cliff swallow	*Petrochelidon pyrrhonota*
Common nighthawk	*Chordeiles minor*
Common poorwill	*Phalaenoptilus nuttallii*
Common raven	*Corvus corax*
Cooper's hawk	*Accipiter cooperii*
Dark-eyed junco	*Junco hyemalis*
Ferruginous hawk	*Buteo regalis*
Golden eagle	*Aquila chrysaetos*
Grasshopper sparrow	*Ammodramus savannarum*
Great blue heron	*Ardea herodias*
Great horned owl	*Bubo virginianus*
Horned lark	*Eremophila alpestris*

Table 3.6: Migratory Bird Species that Occur at the CUO

Common Name	Scientific Name
House finch	*Carpodacus mexicanus*
Kildeer	*Charadrius vociferus*
Lark sparrow	*Chondestes grammacus*
Lewis' woodpecker	*Melanerpes lewis*
Loggerhead shrike	*Lanius ludovincianus*
Long-billed curlew	*Numenius americanus*
Mallard	*Anas platyrhynchos*
Merlin	*Falco columbarius*
Mourning dove	*Zenaida macroura marginella*
Northern flicker	*Colaptes auratus*
Northern harrier	*Circus cyaneus*
Prairie falcon	*Falco mexicanus*
Red-tailed hawk	*Buteo jamaicensis*
Red-winged blackbird	*Agelaius phoeniceus*
Ring-billed gull	*Larus delawarensis*
Rough-legged hawk	*Buteo lagopus*
Ruby-crowned kinglet	*Regulus calendula*
Sage sparrow	*Amphispiza belli*
Sage thrasher	*Oreoscoptes montanus*
Savannah sparrow	*Passerculus sandwichensis*
Say's phoebe	*Sayornis saya*
Short-eared owl	*Asio flammeus*
Spotted towhee	*Pipilo maculatus*
Swainson's hawk	*Buteo swainsoni*
Tree swallow	*Tachycineta bicolor*
Vesper sparrow	*Pooecetes gramineus*
Violet-green swallow	*Tachycineta thalassina*
Western burrowing owl	*Athene cunicularia hypugea*
Western kingbird	*Tyrannus verticalis*
Western meadowlark	*Sturnella neglecta*
Western screech-owl	*Megascops kennicottii*
Western wood-pewee	*Contopus sordidulus*
White-crowned sparrow	*Zonotrichia leucophrys*
Yellow-headed blackbird	*Xanthocephalus xanthocephalus*

Notes: List includes some species that are also special-status species for other reasons.
Sources: USFWS 2013; Mach 2016a; Blake 2013; Tetra Tech 2002

The MBTA prohibits the taking, killing, or possessing of migratory birds or the parts, nests, or eggs of such birds, unless permitted by regulation. Per 50 CFR §21.15, *Authorization of Take Incidental to Military Readiness Activities*, the Armed Forces must give appropriate consideration to protecting migratory birds when planning and executing military readiness activities. However, implementing those protections must not diminish the effectiveness of the military readiness activities. The OMD must confer and cooperate with the USFWS to develop and implement appropriate conservation measures for actions that, as determined through the NEPA process, may result in a significant adverse effect on a population of migratory bird species. Potential effects on migratory bird species identified due to conservation concerns are evaluated in Section 4.7.1.2.2.

EO 13186 requires each federal agency to develop an MOU with the USFWS that promotes the conservation of migratory birds. Effective in September 2014, the MOU between DoD and USFWS outlines a collaborative approach to promote the conservation of migratory bird populations. The NEPA process is used to assess the direct and indirect impacts of a proposed action on migratory birds, and their habitat, in a project area. Responsibilities of the DoD under this MOU include the following:

- Follow all migratory bird permitting requirements for non-military readiness activities.
- Incorporate comprehensive migratory bird management objectives in the preparation of DoD planning documents (including INRMPs).
- Incorporate conservation measures in regional or state bird conservation plans.
- Allow the USFWS to access DoD lands if needed and as consistent with imperatives of safety and security.
- Analyze impacts of proposed actions on migratory birds through the planning process, and include the USFWS in impact assessment and the development of avoidance or minimization measures.
- Manage DoD lands and non-military readiness activities in a manner that supports migratory bird conservation.
- Develop and implement new and/or existing inventory and monitoring programs to evaluate the effectiveness of conservation measures to minimize or mitigate take of migratory birds.
- Reduce the potential for bird/window collisions by considering new building locations and orientations with respect to migratory bird habitat areas, and through the use of other techniques, such as reducing the amount of reflective glass on buildings.

3.7.2.3 General Wildlife

No comprehensive planning-level surveys for non-sensitive vertebrate species have been conducted at the former UCD or the CUO study area, although several wildlife species are known to occur in the area. Observations of non-sensitive vertebrate species have been made during surveys for breeding birds in 2013 (Blake 2013), surveys for threatened and endangered species in 2002 (Tetra Tech 2002), and general surveys in 1993 (USACE 1993). A list of wildlife species observed in the CUO study area is presented in Table 3.7.

Table 3.7: General Wildlife Species Present in the CUO Study Area

Common Name	Scientific Name
Amphibians	
Great Basin spadefoot toad	*Scaphiopus intermontanus*
Reptiles	
Bull snake	*Pituophis catenifer sayi*
Great Basin gopher snake	*Pituophis catenifer deserticola*
Northern pacific rattlesnake	*Crotalus viridis oreganus*
Western yellow-bellied racer	*Coluber constrictor mormon*
Birds	
California quail	*Callipepla californica*
Eurasian collared dove	*Streptopelia decaocto*
European starling	*Sturnus vulgaris*
Gray partridge	*Perdix perdix*
House sparrow	*Passer domesticus*
Ring-necked pheasant	*Phasianus colchicus*
Rock pigeon	*Columba livia*
Mammals	
American badger	*Taxidea taxus*
Bushy-tailed woodrat, packrat	*Neotoma cinerea*
Coyote	*Canis latrans*
Deer mouse	*Peromyscus maniculatus*
Field mouse	*Peromyscus spp.*
Great Basin pocket mouse	*Perognathus parvus*
House mouse	*Mus musculus*
Long-tailed weasel, bridled weasel, big stoat	*Mustela frenata*
North American porcupine	*Erethizon dorsatum*
Northern pocket gopher	*Thomomys talpoides*
Nuttall's cottontail rabbit, mountain cottontail rabbit	*Sylvilagus nuttallii*
Ord's kangaroo rat	*Dipodomys ordii*
Pronghorn antelope	*Antilocapra americana*
Western harvest mouse	*Reithrodontomys megalotis*

Sources: Mach 2016a; Blake 2013; TetraTech 2002

The former UCD hosted a captive herd of pronghorn antelope (*Antilocapra americana*) between 1969 and 2014 as part of an ODFW breeding and translocation program (Mach 2016b). Predator control efforts on the former UCD between 1970 and 1980 in support of the pronghorn antelope program resulted in a reduction of coyotes and American badgers (Mach 2016b). The antelope herd was removed from the former UCD by ODFW in 2013 (Mach 2016b).

3.8 Cultural Resources

Cultural resources consist of locations of human activity, occupation, or use identified through field inventory, historic documentation, or oral evidence. The term encompasses historic properties as defined by the National Register of Historic Places (NRHP), including archaeological and architectural properties, as well as sites or places of traditional cultural or religious importance to Native American Tribes or other social or cultural groups. This section begins with an overview of the general cultural setting of the UCD, and then describes the existing cultural resources in the COU study area.

3.8.1 Cultural Setting

Although archaeological sites in the Columbia Plateau indicate that humans have inhabited the area for at least 10,000 years, most regional studies have focused on the resource-rich river systems, resulting in an incomplete understanding of the prehistory of the UCD. Prehistoric human populations in the areas surrounding the UCD were closely associated with areas near the more bountiful riverine resources, using the upland plateau areas for hunting and gathering efforts as a seasonal supplement to riverine resources. Because the UCD site is situated away from the naturally occurring water sources of the Columbia and Umatilla Rivers, little evidence of prehistoric human activity has been documented at the UCD (Pumphrey 2002:3-30).

The occupants of the UCD and surrounding area were the Sahaptin-speaking Umatilla Indians. Traditionally, the Umatilla practiced a riverine fishing economy, supplemented by hunting and gathering following a semi-nomadic seasonal round. Use of UCD lands during the ethnohistoric period was likely restricted to subsistence activities such as hunting and gathering. Winter villages were situated in a core territory along the lower courses of the Umatilla River to about present-day Alderdale. The Umatilla exploited a much wider subsistence range, however, which included the Blue and Wallowa Mountains, the Grande Ronde and Wallowa Valleys, the John Day River, and other areas to the south and west of their homeland. Typically, this wider subsistence range was shared with neighboring tribes such as the Cayuse, Walla Walla, Nez Perce, and Palouse (Cleland et al. 1987:1-7).

The Umatilla used other habitation and resource exploitation sites near the UCD, including areas near the present locales of Mottinger, Hermiston, Echo, Alderdale, Arlington, Roosevelt, Blalock, Boulder, Castle Rock, Rock Creek, Thanksgiving Island, and Blalock Island. To the southeast, the Umatilla shared a number of subsistence sites with the Nez Perce, Walla Walla, and Palouse along the Grand Ronde and Wallowa Rivers. To the west, they shared similar areas with the Tenino (Warm Springs), Cayuse, and other Columbia River groups along the John Day and Deschutes Rivers (Cleland et al. 1987:2-25).

The migration of Euro-Americans into Oregon caused conflicts with the region's indigenous groups (Pumphrey 2002). In 1855, Washington territorial governor Isaac Stevens and Oregon Territory Superintendent of Indian Affairs Joel Palmer entered into a treaty with representatives of the Cayuse, Walla Walla, and Umatilla Tribes, who agreed to move to the Umatilla Reservation east of Pendleton, approximately 40 miles from the UCD. The CTUIR was officially allotted in 1885.

Settlement of the UCD area prior to military activity was limited by the dry climate, soil conditions, and lack of nearby natural water features. Visible wagon trail remnants on UCD property, including the circa (ca.) 1860 Old Emigrant Wagon Road and the 1875 GLO Wagon Road Umatilla Cutoff, represent pioneer transient activity in the area. However, homesteading and settler migration patterns have left little impact on the natural environment compared to military activity (Pumphrey 2002).

From the 1860s to the 1880s, cattle ranching dominated the region between The Dalles and the Umatilla River. During the latter two decades of the nineteenth century, sheep, ranch cattle, and wheat replaced open-range cattle in the area. These changes led to the construction of the Oregon-Washington Railroad and Navigation Company Railroad and the massive influx of settlers accompanying the availability of cheap transportation (Cleland et al. 1987:2-51). The main line of the Union Pacific Railroad, the Coyote or Messner-Hinkle cutoff, was constructed ca. 1915 along what would become the southern boundary of the UCD (Pumphrey 2002:3-12).

In 1940, the U.S. prepared for war, and the government obtained the UCD parcel for a new ammunition and supply depot (Dodd n.d.:231; Umatilla Army Depot n.d.:3). The UCD met several criteria for the siting of new military installations, because the parcel was a safe distance from the coast, yet close enough to northwestern military posts, ports, and rail lines to facilitate shipment of supplies (Hightower 1984:15; Kuranda et al. 2009:3-4). An important aspect of the UCD was its railroad infrastructure, which facilitated the loading and unloading of munitions. The internal rail network of approximately 50 miles of railroad track connected to the Union Pacific Railroad (Chance 2010:8; Hightower 1984:15).

The military operation employed approximately 7,000 workers during peak construction. The Umatilla Ordnance Depot was dedicated on October 14, 1941, and charged with the mission of storage and processing of vehicles, storage, and issue of lend-lease, quartermaster supplies, ammunition, small arms, and components (U.S. Department of the Army 1982:2). Following America's entrance into WWII, the Depot was vital in the support of the Armed Forces, providing storage of quartermaster materials and ammunition for Seattle General Depot (DARCOM 1981:1).

At the conclusion of WWII, large stocks of ammunition were sent to Umatilla Ordnance Depot for renovation, maintenance and storage, or demilitarization and scrap metal salvaging (Umatilla Army Depot n.d.:3; U.S. Department of the Army 1982:2). Activity increased again during the Korean War in the early 1950s. Ammunition was shipped by barge, arriving at Irrigon, and transported to the Depot (Macnab 1975:288; Umatilla Army Depot n.d.:3). As a safety precaution, the Depot obtained approximately 4,000 acres of adjoining land between 1957 and 1960 to serve as a safety buffer. In 1962, the facility was renamed Umatilla Army Chemical Depot, and was given the mission of receiving, storing, issuing, and maintaining toxic munitions (U.S. Department of the Army 1982:2). The Depot sent munitions shipments to Vietnam from 1965 until 1973. The facility was then renamed Umatilla Depot Activity (UMDA), with the mission to operate a reserve storage activity. With each increase in activity at the Depot during significant military buildup, the surrounding area benefitted. Many members of the CTUIR were employed at the facility. Additionally, agricultural communities, such as Hermiston, Irrigon, and Umatilla, prospered with the influx of workers (Macnab 1975:249).

The UCD had over 1,500 buildings and structures, most of which were built between 1941 and the end of WWII. These included administration, maintenance, and housing facilities, ammunition storage igloos, and warehouses (Chance 2010:13). Past activities at the depot included materials storage, ammunition demolition, maintenance, ammunition renovation, waste disposal, and firing range operations. Ammunition demolition began in 1945; and in 1947, an ammunition renovation complex was added, with two ammunition maintenance buildings added in 1955 and 1958. Chemical agents, missiles, and missile fuel were stored at the Depot until the early 1960s (Chance 2010:13). In 1988, the Commission on Base Closures recommended the Depot for realignment, and under BRAC, the storage of conventional ordnance was moved or destroyed. The realigned mission was the destruction of stored chemical munitions, completed in 2012 (Chance 2010:14).

3.8.2 Identification of Historic Properties

For this EA, efforts to identify historic properties included a desktop review of archival materials, including confidentially maintained data on file at the State Historic Preservation Office (SHPO), aerial photographs, documents provided by OMD, and historical maps. Historic properties were also identified as a result of the PA consultation. A total of 670 acres of the CUO have been surveyed for archaeological resources (some according to older standards) and 3,075 acres are previously disturbed and would not warrant archaeological survey. A total of 4,211 acres remain to be surveyed or re-surveyed prior to ground-disturbing actions (PA 2018).

Numerous cultural resource surveys have been conducted within the CUO study area (Cooper and Scott 2016; Stegner et. al. 2015; Boreson 1996; Celmer 1996; Cleland et al. 1987; Hightower 1984; Rice, Brunner, and Cooke 1984). These investigations have resulted in the identification of one archaeological site, one linear resource, one historic district, and one property of traditional religious and cultural significance (PTRCS) within the CUO study area (Table 3.8).

Table 3.8: Previously Identified Cultural Resources within the CUO Study Area

Resource No.	Site Class	Site Type	National Register of Historic Places Status	Attributes	Report No.
N/A	Historic	District	Eligible	UCD Historic District (includes HAER No. 5 – Headquarters Building and Fire House)	(Hightower 1984; SHPO 1998; Pumphrey 2002)
35UM489	Historic	Site	Not Eligible	UCD Cantonment Military Site	27314 (Stegner et al. 2015)
35UM497	Historic	Linear	Eligible	1875 GLO Wagon Road Umatilla Cutoff	15401A-C (Boreson 1996) 28313 (Cooper and Scott 2016)
N/A	Multi	PTRCS	Potentially Eligible	Coyote Coulee (Geographic Feature that Crosses the CUO)	Engum 2016

Archaeological site 35UM489, the UCD Cantonment Site, consists of a diffuse scatter of military-related historic archaeological features and artifacts affiliated with the WWII and Cold-War-era development of the UCD. This approximate 200-acre site was recommended as not eligible for the NRHP (Stegner et al. 2015), and OMD and SHPO concurred with these findings.

The ca. 1875 Umatilla Cutoff wagon road (site 35UM49) crosses the southern portion of the CUO study area. This site was determined eligible for the NRHP by the USACE with concurrence received from the SHPO by correspondence dated August 18, 2016 (PA 2017).

Above-ground or architectural resources within the CUO study area include hundreds of military-affiliated structures and features which are summarized as part of the UCD Historic District. The BRAC and USACE previously evaluated 1,516 buildings and structures that were once part of the Umatilla Chemical Depot and determined that 1,217 of them are eligible for inclusion in the NRHP as contributing properties to an historic district under criterion A for their association with the WWII-era ammunition storage and Cold War-era Chemical Weapons work. This determination received concurrence from the Oregon SHPO by correspondence dated May 25, 2016. A total of 563 buildings and structures of the 1,217 that are National Register eligible are inside the boundaries of CUO and may be adversely effected as part of the CUO Expansion and Development Project (PA 2017).

Although the entire CUO study area has not been previously surveyed for archaeological resources, based on the results of the literature review and previous archaeological investigations in the region, the uplands lacking a water source like those that comprise the study area generally have low potential for precontact archaeological sites (Pumphrey 2002:3-42). Historic sites associated with the ca. 1875 wagon road could be encountered, as could evidence for transient use, such as trash dumps or railroad-related sites. WWII and Cold War-era military land use is expected to obscure potentially older archaeological features or sites, and the probability of encountering intact, significant resources appears to be low for much of the UCD due to past soil disturbances up to depths of 3 to 6 feet or greater (Pumphrey 2002:3-42). For BRAC lands leaving federal ownership at UCD, an intensive cultural resources investigation was recently conducted on 3,350 acres adjacent to the CUO (AMEC 2016). The investigation identified two NRHP-eligible historic wagon roads (35UM497 and 35UM498), 33 historic isolates, 2 historic sites, and 2 precontact isolated finds (lithic flakes) as a result of pedestrian surveys and excavation of over 2,500 shovel test probes, illustrating types of resources, low density of resources, and military-related disturbances that can be expected within the CUO study area.

The CTUIR Cultural Resources Protection Program conducted a traditional use investigation of the former UCD (Engum 2016). Fourteen native place names were identified as historic properties of religious and cultural significance to the CTUIR and are adjacent to the CUO study area, including permanent village locations, fishing camps, and legendary sites. One historic property of religious and cultural significance to the CTUIR was in the CUO study area, which is now known by the English language name of Coyote Coulee. Coyote Coulee traverses the CUO study area and is a traditionally used travel route, hunting location, and plant-gathering area that was used seasonally by the CTUIR.

Since the 1980s, the CUO study area has been governed by cultural resource management plans (Cleland et al 1987; Pumphrey 2002). In 2013, the Department of the Army prepared the *Programmatic Agreement among the Department of the Army, State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding the Closure and Transfer of Select Parcels of Umatilla Chemical Depot, Oregon* (U.S. Army et al. 2013). The implementation of the required stipulations in the programmatic agreement focused mainly on the property not remaining under federal control as CUO, and is ongoing.

In 2018, the ARNG-I&E, on behalf of NGB, and ORARNG signed a *Programmatic Agreement among the National Guard Bureau, the Oregon Army National Guard, the Oregon State Historic Preservation Office, and The Advisory Council on Historic Preservation for the Camp Umatilla Oregon Expansion, Development, and Operations Project*. The stipulations of the Programmatic Agreement (PA) address the cultural resources discussed in this EA, and are described in Section 4.8.3.

3.9 Socioeconomics

The area of analysis for socioeconomic conditions associated with actions in the CUO study area is Umatilla and Morrow Counties in Oregon. This section describes the existing socioeconomic characteristics, including demographics, employment, and income in the analysis area.

3.9.1 Population Demographics

Population in the two-county region in 2014 was 87,862 people. Population in the two-county region increased by 7.7 percent from 2000 to 2014, which represents a lower rate of increase than the national average of 11.6 percent during that time period. The majority of people in the two-county area identify as white (non-Hispanic or non-Latino; 67.5 percent) or Hispanic or Latino (25.9 percent). The remaining

6.6 percent of people are Black/African American (0.6 percent), Asian (0.7 percent), American Indian (1.7 percent), Native Hawaiian or other Pacific Islander (0.1 percent), other race (0.1 percent), or two or more races (3.4 percent; U.S. Department of Commerce 2015a).

3.9.2 Regional Employment

There were 46,240 full- and part-time jobs in the analysis area in 2014. The number of jobs for each industry in the analysis area is shown in Table 3.9. Of this total, 234 jobs (0.5 percent) were associated with the military (U.S. Department of Commerce 2015b). Labor earnings from military employment account for 0.3 percent of total labor earnings in the two-county analysis area.

Table 3.9: Employment and Labor Earnings by Industry in Morrow and Umatilla Counties in 2014 (2015 dollars)

	Number of Jobs	Percent of Total Jobs	Labor Earnings (in Thousands of Dollars)	Percent of Total Labor Earnings
Total	**46,240**	--	**$2,125,800**	--
Non-services related	**13,302**	**29.2%**	**639,656**	**30.1%**
Farm	4,553	10.0%	221,450	10.4%
Forestry, fishing, and agricultural services	1,655	3.6%	58,759	2.8%
Mining (including fossil fuels)	130	0.3%	1,669	0.1%
Construction	1,829	4.0%	103,676	4.9%
Manufacturing	5,135	11.3%	254,103	12.0%
Services related	**24,481**	**53.8%**	**965,193**	**45.4%**
Utilities	351	0.8%	48,088	2.3%
Wholesale trade	1,069	2.3%	59,974	2.8%
Retail trade	4,279	9.4%	120,211	5.7%
Transportation and warehousing	3,113	6.8%	193,667	9.1%
Information	320	0.7%	19,133	0.9%
Finance and insurance	1,106	2.4%	36,384	1.7%
Real estate and rental and leasing	1,192	2.6%	14,312	0.7%
Professional and technical services	1,168	2.6%	59,727	2.8%
Management of companies and enterprises	160	0.4%	17,182	0.8%
Administrative and waste services	1,685	3.7%	82,240	3.9%
Educational services	306	0.7%	6,935	0.3%
Health care and social assistance	4,391	9.6%	176,927	8.3%
Arts, entertainment, and recreation	523	1.1%	4,628	0.2%
Accommodation and food services	2,666	5.9%	53,619	2.5%
Other services, except public administration	2,152	4.7%	73,131	3.4%
Government	**7,753**	**17.0%**	**495,776**	**23.3%**
Federal	571	1.3%	55,345	2.6%
State and Local	6,948	15.3%	433,051	20.4%
Military	234	0.5%	7,380	0.3%

Source: U.S. Department of Commerce 2015b

3.9.3 Regional Housing

There were 4,442 housing units in Morrow County and 29,667 housing units in Umatilla County in 2014. The availability of housing units in Morrow and Umatilla counties has remained relatively constant in the timeframe between 2005 and 2014, with 10 units built in Morrow County and 125 units built in Umatilla County during this time. There was an 89.8 percent occupancy rate for housing units in the two-county area in 2014 (U.S. Department of Commerce 2015a).

The city of Hermiston is reported to have sufficient land within its urban growth boundary to meet commercial and housing needs for the next 20 years. The city of Umatilla is also reported to have enough land within its urban growth boundary to meet commercial and housing needs for the next 20 years; however, Umatilla has planned for an increase in housing and commercial demand due to the deconstruction of the UCD incinerator (ORNG 2015b). The city of Irrigon intends to petition the state for an expansion of the urban growth boundary to accommodate anticipated need for residential, commercial, and industrial infrastructure.

3.10 Environmental Justice

EO 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires federal agencies to identify and address as appropriate disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations, and to provide opportunity for participation in the public involvement process. Federal actions should be conducted in a manner that does not exclude communities from participation in, deny communities the benefits of, or subject communities to discrimination under such actions, because of their race, color, or national origin.

Overall, populations in the two-county area are poorer than the national average. In Morrow County, 19.3 percent of people and 15.5 percent of families are living below the poverty line. In Umatilla County, 17.1 percent of people and 13.2 percent of families are living below the poverty line. Both of these counties have poverty levels higher than the national average (15.6 percent of individuals, and 11.5 percent of families living below the poverty line).

Approximately 33 percent of residents in the two-county area are of Hispanic or Latino, Black/African American, Asian, American Indian, Native Hawaiian or other Pacific Islander, other race, or two or more races (U.S. Department of Commerce 2015a). The two-county area has a higher percentage of residents that are Hispanic or Latino (25.9 percent) and American Indian (1.7 percent) than the national averages for these races (16.9 and 0.7 percent, respectively). The two-county area has a lower percentage of residents that are Black/African American (0.6 percent) and Asian (0.7 percent) than the national average (12.2 percent and 4.9 percent, respectively).

The average percentage of households that receive at least a portion of their income from food stamps or the Supplemental Nutrition Assistance Program in the two-county area is 22.4 percent, which is higher than the national average of 13.0 percent. The average percentage of residents older than 25 in the two-county area with a high school education is 82.5 percent, which is slightly less than the national average of 86.3 percent. Monthly cost of rent exceeds 30 percent of household income for 28.4 percent of households in the two-county area (U.S. Department of Commerce 2015a).

3.11 Infrastructure

The following section describes the existing infrastructure in the CUO study area. These systems currently support the existing ORARNG enclave, although they are not included under the existing license, and are managed by the Caretaker contract.

3.11.1 Potable Water System

Water is supplied throughout the CUO study area via an on-site water system consisting of wells, pipelines, and storage reservoirs. Chlorination at the well head is the only treatment required and provided in the system. The water system is divided into two parts—one serving the northwestern and northern-central portion of CUO study area (North System), and the second serving the southwestern (warehouse) area and the cantonment area (South System). The igloo areas are not served by the water system (Kennedy/Jenks Consultants 2014).

The North System provides water for fire protection, domestic use, and industrial use, and includes Wells 3, 6 and 7, one elevated storage reservoir, and booster pump stations. Well 3 is permitted for only 10 gallons per minute (gpm) for fire protection and is not currently in use. Well 6 is active and provides water; Well 7 is out of service due to an electrical issue, but is believed to be productive. Wells 3, 6, and 7 are within the CUO boundary. The South System provides water for fire protection, irrigation, and domestic use, and includes four Wells 1, 2, 4, and 5, and two elevated reservoirs. Wells 1 and 2 in the South System no longer produce water, but could be repairable. Wells 4 and 5 do produce water, but are outside of the CUO boundary.

ORARNG received reassignment for all the water rights on Wells 2 and 3, half of the fire protection water right on Well 1, and all of the domestic use water right for Well 6. Currently, there are water rights for 224 gpm for domestic uses that are in production at CUO. The reassignment documents are included in Appendix E. The remaining 3,231-gpm water rights will be conveyed by deed from the Army to the CDA. Table 3.10 summarizes the water status for the wells.

Table 3.10: Water Well Status

Well	Reported Pumping Capacity (gpm[1])	Water Right Capacity (gpm[1])	Allowed Use	Status of Well
1	--	153	Irrigation for 27 acres	Not currently in use, casing is bent.
		898	Fire Protection[2]	
2	--	350	Domestic	Not currently in use, pump needs to be replaced.
3	10	10	Fire Protection[2]	Low production, well not currently in use.
4	400	498	Fire Protection[2]	Capacity of well is insufficient to supply the full rate authorized by the water right. The well is outside of the CUO boundary.
5	800	498	Fire Protection[2]	The well is outside of the CUO boundary.
6	550	224	Domestic	Capacity of well is sufficient, but not currently in use.
7	500	1,014	Manufacturing and Fire Protection[2]	Well is not operating due to an electrical issue. A water right transfer has been complete.
		772	Fire Protection[2]	

[1]gpm = gallons per minute
[2]A water right is not required for fire protection.
Source: Kennedy/Jenks Consultants 2014; Table ES.3

3.11.2 Wastewater System

The wastewater system was installed in the 1940s, and consists of a concrete control box, two concrete Imhoff tanks (a small tank and a large tank), a drying pond, and two concrete conveyance pipes. Sewage from the administrative area is collected and carried to a treatment facility approximately 5,000 feet west; the cantonment area is the only area served with a piped sanitary sewer system. Currently, the control box diverts flow from the collection system to the small Imhoff tank because the large Imhoff tank leaks and is not operational. The small Imhoff tank has an average overflow rate of 800 gallons per square foot per day, and provides a total liquid capacity of approximately 52,800 gallons per day (gpd). Flows for existing usage are approximately 740 gpd (Kennedy/Jenks Consultants 2013). The Imhoff tanks treat wastewater through settling, sedimentation, and anaerobic digestion. A drying pond between the two Imhoff tanks receives discharge from the Imhoff tanks; the discharge dries and is then taken to a landfill for disposal.

Individual septic tanks and drain fields provide for treatment of domestic sewage at locations other than the cantonment area. Most of these decentralized septic tanks and drain fields were not constructed to modern standards, and will require replacement or abandonment (Kennedy/Jenks Consultants 2016). Six of the decentralized systems are operational and will remain in service (Kennedy/Jenks Consultants 2016). The stormwater management pipes in the Administrative Area, which are co-located with the wastewater system, may need to be repaired simultaneously.

A conditions assessment performed by Kennedy/Jenks Consultants in 2013, and a subsequent evaluation by the USACE, identified the existing wastewater facilities to be in poor condition and unsuitable for continued extended service (Kennedy/Jenks Consultants 2017).

3.11.3 Electrical System

Electrical power is supplied to the CUO study area on overhead lines by the Umatilla Electric Cooperative (UEC). The service is provided at 12,470 volts, three-phase, four-wire, 60 hertz. The CUO substation is east of the main entrance, where the CUO electrical system is fed on overhead lines mounted on wooden poles along roads similar to a rural electrical system. The lines have existed since the original UCD construction, and the poles are in substandard condition (Dana Engineering 2014).

3.11.4 Communication System

Telephone service enters the CUO study area at the southeastern corner of the property. Services are a combination of overhead and underground lines going to locations throughout the CUO study area. Most of the system is underground, serving the administration and main outlying buildings. Remote areas have special mine-type units mounted on posts, or provisions for portable telephones (Dana Engineering 2016).

3.11.5 Heating, Ventilation, and Cooling System

There is no centralized heating plant in the CUO study area. Buildings are heated by individual propane heating systems with propane storage tanks adjacent to each structure. Some of the larger buildings have multiple propane storage tanks. Wall- and window-mounted air-conditioners are electrically powered.

3.11.6 Transportation Network

An existing internal paved roadway network traverses the former UCD, with connections to local access roads at the northwestern and southeastern corners of the facility (see Figure 2.4). A perimeter road currently encircles the former UCD property. However, on completion of the land conveyances, the perimeter road and fence would become disjointed, and the 7,500-acre CUO study area would not have a complete and contiguous perimeter patrol road. Within the CUO boundary, there are roads providing circulation routes in the cantonment, warehouse, and igloo complexes. The condition of the existing paved asphalt roadways varies from very good to deteriorating. Some existing roads were tested to handle varying load weights of heavy trucks and military equipment from 9,000 to 12,000 pounds. The CUO study area is accessed via two main interstates: I-84 and I-82. Annual average daily traffic on I-84 and I-82 in this area is 14,400 and 18,800, respectively (ODOT 2014).

Existing rail lines at the former UCD were installed in the early 1940s, with track of a standard design for that time period. From the boundary spur line, the former UCD was served by a looped rail system, essentially adjacent to the former munitions storage blocks. A dead-end rail line serves the warehouse area in the southwestern corner of CUO study area; however, the line serving the warehouse is now severed from the main line. In total, the CUO study area has about 50 miles of track.

3.12 Hazardous and Toxic Materials/Wastes

A hazardous material is any item or agent that has the potential to cause harm to humans, animals, or the environment either individually or through interaction with other factors. Hazardous materials are defined as substances with strong physical properties, such as ignitability, corrosivity, reactivity, or toxicity that may cause an increase in mortality or illness, or pose a substantial threat to human health or the environment. Hazardous wastes are defined as any solid, liquid, contained gaseous, or semisolid waste, or any combination of wastes, that pose a substantial present or potential hazard to human health or the environment.

Numerous federal, state, and local laws regulate the storage, handling, disposal, and transportation of hazardous and toxic materials and wastes (HTMW). At the federal level, these include the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §6901–6992k), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 U.S.C. §9601 et seq.), Toxic Substances Control Act (TSCA), and Department of Transportation and Occupational Safety and Health Administration laws. The primary purpose of these laws is to protect public health and the environment. At a state level, hazardous wastes and materials are regulated by the DEQ (Oregon Revised Statute Chapters 465 and 466), Oregon Department of Transportation, the Oregon State Fire Marshal, and the Oregon Occupational Safety and Health Administration.

CUO is regulated as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste under RCRA. Hazardous materials management at CUO is conducted in accordance with ORARNG PAM 200-1, *Environmental Quality: Guide to Environmental Compliance* (ORARNG 2012), and ORARNG Regulation 420-47, *Installations: Hazardous Material, Waste, and Spill Management Plan* (ORARNG 2009). These guidelines and regulation describe management practices to control the procurement, use, and storage of hazardous materials to prevent pollution from being generated, minimize hazards of chemical use to the health of employees and the environment, and provide waste minimization.

An SPCC Plan and an Installation Spill Contingency (ISC) Plan were developed by the Army Chemical Materials Activity (CMA), and are maintained by BRAC for the UCD. The SPCC and ISC Plans identify potential oil and hazardous spill sites at the facility, and establish procedures and resources to respond to and clean up spills. Following property reassignment, the OMD is developing a SPCC Plan to cover their operations.

3.12.1 Environmental Condition of Property / Environmental Baseline Survey

There are several contaminated areas in the cantonment area, as well as other sites across the CUO study area. The contamination results from various chemicals commonly found on installations such as the UCD when adequate environmental controls were not in place. Remediation efforts are currently under way, as described in Section 3.12.2 below.

An ECOP/Environmental Baseline Survey (EBS) Report was completed for a proposed CUO parcel of the former UCD in 2012 (AMEC 2012). The ECOP/EBS identified several existing recognized environmental conditions and environmental liabilities associated with past Army operations and use of the property. Areas in the CUO study area were classified in accordance with the ARNG's ECOP Standard Operating Procedure dated March 14, 2007, as follows:

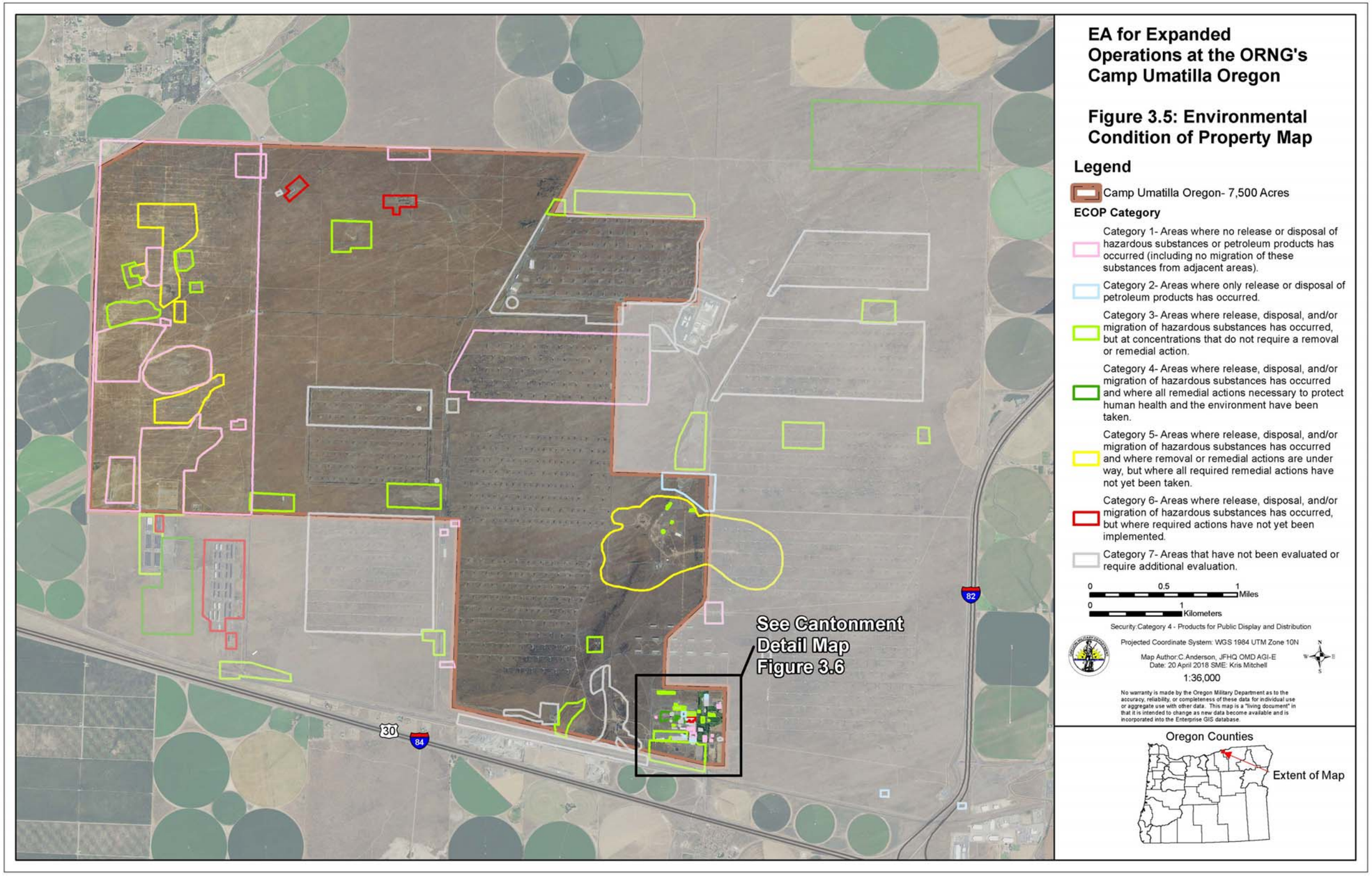
- **Category 1** – Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).
- **Category 2** – Areas where only release or disposal of petroleum products has occurred.
- **Category 3** – Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.
- **Category 4** – Areas where release, disposal, and/or migration of hazardous substances has occurred and where all remedial actions necessary to protect human health and the environment have been taken.
- **Category 5** – Areas where release, disposal, and/or migration of hazardous substances has occurred and where removal or remedial actions are under way, but where all required remedial actions have not yet been taken.
- **Category 6** – Areas where release, disposal, and/or migration of hazardous substances has occurred, but where required actions have not yet been implemented.
- **Category 7** – Areas that have not been evaluated, or require additional evaluation.

Areas identified in the ECOP are shown on Figures 3.5 and 3.6. Areas requiring completion of environmental restoration are described in Section 3.12.2.

Additional findings of the ECOP/EBS related to hazardous wastes are described below.

3.12.1.1 Asbestos-Containing Materials (ACM)

During the site reconnaissance conducted as part of the ECOP/EBS, suspect ACM was observed in many of the existing buildings and structures. Immediate mitigation was determined to be required for building materials that were no longer intact due to weatherization and lack of maintenance. Future mitigation, including building-specific surveys, was recommended for construction and demolition activities that would later be performed at the buildings.


EA for Expanded Operations at the ORNG's Camp Umatilla Oregon
Figure 3.5: Environmental Condition of Property Map
Legend
Camp Umatilla Oregon- 7,500 Acres
ECOP Category
Category 1- Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).
Category 2- Areas where only release or disposal of petroleum products has occurred.
Category 3- Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.
Category 4- Areas where release, disposal, and/or migration of hazardous substances has occurred and where all remedial actions necessary to protect human health and the environment have been taken.
Category 5- Areas where release, disposal, and/or migration of hazardous substances has occurred and where removal or remedial actions are under way, but where all required remedial actions have not yet been taken.
Category 6- Areas where release, disposal, and/or migration of hazardous substances has occurred, but where required actions have not yet been implemented.
Category 7- Areas that have not been evaluated or require additional evaluation.
0 0.5 1 Miles
0 1 Kilometers
Security:Category 4 - Products for Public Display and Distribution
Projected Coordinate System: WGS 1984 UTM Zone 10N
Map Author:C.Anderson, JFHQ OMD AGI-E
Date: 20 April 2018 SME: Kris Mitchell
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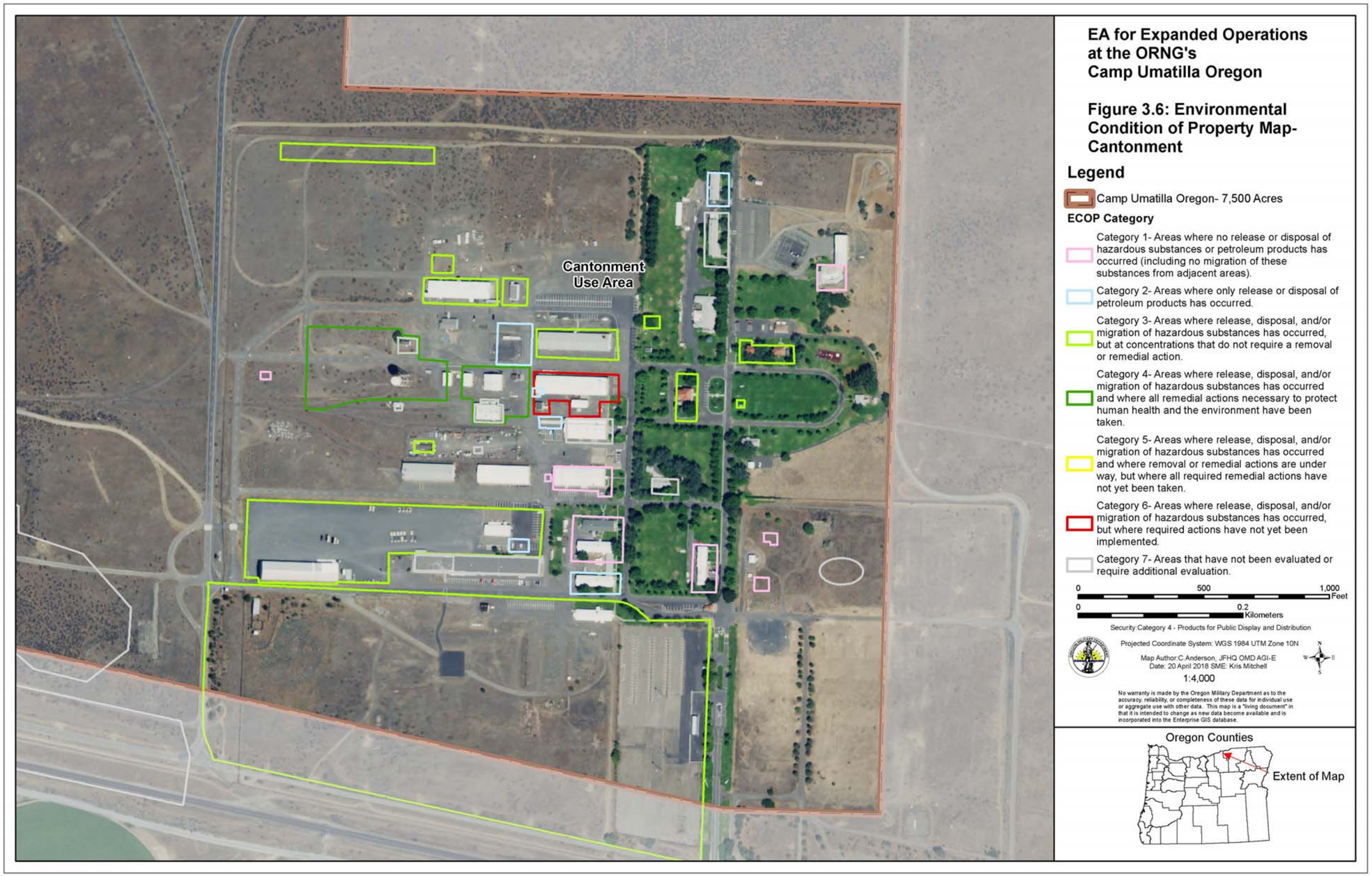
No warranty is made by the Oregon Military Department as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document" in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database.
Oregon Counties
Extent of Map
See Cantonment Detail Map Figure 3.6
30
84
82


Cantonment
Use Area
EA for Expanded Operations
at the ORNG's
Camp Umatilla Oregon
Figure 3.6: Environmental
Condition of Property Map-
Cantonment
Legend
Camp Umatilla Oregon- 7,500 Acres
ECOP Category
Category 1- Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).
Category 2- Areas where only release or disposal of petroleum products has occurred.
Category 3- Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.
Category 4- Areas where release, disposal, and/or migration of hazardous substances has occurred and where all remedial actions necessary to protect human health and the environment have been taken.
Category 5- Areas where release, disposal, and/or migration of hazardous substances has occurred and where removal or remedial actions are under way, but where all required remedial actions have not yet been taken.
Category 6- Areas where release, disposal, and/or migration of hazardous substances has occurred, but where required actions have not yet been implemented.
Category 7- Areas that have not been evaluated or require additional evaluation.
0 500 1,000 Feet
0 0.2 Kilometers
Security:Category 4 - Products for Public Display and Distribution
Projected Coordinate System: WGS 1984 UTM Zone 10N
Map Author:C.Anderson, JFHQ OMD AGI-E
Date: 20 April 2018 SME: Kris Mitchell
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Oregon Counties
Extent of Map

3.12.1.2 Federal Facilities Agreement

The proposed CUO parcel of the former UCD is subject to a Federal Facilities Agreement (FFA), titled *Umatilla Army Depot (Lagoons)*, signed in 1989 by the Army, EPA, and DEQ. The FFA indicates the Army and all subsequent property owners are bound to cleanup requirements for nine designated cleanup locations, identified as operable units (OUs). The number of OUs was reduced to eight in a series of Records of Decision (RODs) in the mid-1990s, which established cleanup goals and remediation strategies for each of the OUs. Six of the eight OUs are within the boundaries of the CUO study area. The Army, EPA, and DEQ have agreed that remedial actions at four of the OUs are protective of human health and environment, and No Further Action (NFA) is required at these four OUs. The agreement is documented in the *Memorandum of Agreement between the National Guard Bureau and The U.S. Army BRAC Division* (U.S. Army 2016). Two of the OUs remain in the process of cleanup: the ADA in the northwestern portion of the CUO study area; and Explosives Washout Lagoon–Groundwater in the southeastern portion of the CUO study area. The former UCD is included on the EPA National Priorities List under Superfund Site ID 1000546.

3.12.1.3 Miscellaneous Sites OU

The Miscellaneous Sites OU includes 32 separate locations throughout the former UCD, where past environmental investigations have identified potential contamination from historical operations. Remediation in the form of soil removal occurred at three of the 32 locations. According to a joint ROD between the EPA and the Army, subsurface soil and groundwater investigations indicated no need for further cleanup at the remaining 29 locations (AMEC 2012).

3.12.1.4 Petroleum Underground Storage Tanks (USTs)

Several investigations to identify historical locations of petroleum USTs, UST sampling investigations, and UST removals have taken place since the 1980s. However, there is a potential that petroleum USTs may exist in areas that were not previously identified or were not documented.

3.12.1.5 Gravel Borrow Pits

Approximately 10 to 12 gravel borrow pits were observed throughout the CUO study area. Disposal of construction demolition debris, metal, tires, and wood was observed in all former borrow pits. Former borrow pits also could have been used for disposal of other materials. Most gravel borrow pits were identified as Study Sites in previous investigations. The Army, EPA, and DEQ have determined that no environmental work is required at the gravel borrow pits (U.S. Army 2016). However, gravel pits used for the disposal of construction and other debris with NFAs from the DEQ should be revisited to determine if proper closure protocols have been followed. A gravel borrow pit in J-Block was not identified as a previous Study Site, and was observed to contain construction debris.

3.12.1.6 Igloo Blocks

Approximately 427 igloos are in the CUO study area. Igloos may have lead-containing paint and asbestos tar surfacing at the interface between the rooftops and vegetation. Igloos were not included in lead paint surveys formerly conducted at the UCD.

3.12.1.7 Septic Systems

Although most current and former septic systems have been identified, not all former septic systems may have been documented or properly investigated. As an example, foundations and a possible septic leach field were observed in Area III during the ECOP/EBS site reconnaissance (AMEC 2012).

3.12.1.8 Transformers

Comprehensive sampling, removal, and replacement surveys for transformers were completed in 1989 and 1993. During the field reconnaissance, out-of-service transformers were observed at several locations in the CUO study area. Materials associated with former transformers, such as electrical lines, insulators, metal transformer platforms, and utility poles were observed at several locations. In November 2017, the 74 transformers were removed and transported off-site for disposal by BRAC (U.S. Army 2017).

3.12.1.9 Hazardous Building Materials

The following hazardous building materials have been observed or documented:

- Suspect ACM was observed in many of the existing buildings and structures.
- Paint containing detectable concentrations of lead is present in many buildings and structures.
- Radon concentrations above 4.0 picocuries per liter are present in Buildings 1, 5, and 415.
- Regulated materials potentially classified as universal hazardous wastes, including mercury-containing fluorescent light tubes, high-intensity discharge lighting and thermostats, chlorofluorocarbons-containing air conditioners, and polychlorinated biphenyl (PCB)-containing light ballasts were observed in buildings.
- PCB bulk-waste products may be present in caulking, door frames, and masonry materials in many buildings constructed or renovated prior to 1978.

3.12.1.10 Drywells and Underground Injection Controls (UICs)

UCD installation maps depicted several existing drywells and catch basins that are not connected to a storm sewer system. Because the Cantonment Area is the only area in the CUO study area connected to a storm sewer system, catch basins outside of the existing Cantonment Area are likely connected to drywells. Roof drains on buildings in the existing Cantonment Area discharge precipitation directly to the ground surface. Roof drains and dry wells qualify as UICs per DEQ regulation 340-044-0005(24).

3.12.2 Current Remedial Actions

A Memorandum of Agreement was signed on August 2, 2016, between the NGB and BRAC for the Real Property Assignment and Transfer of Responsibility for Real Property Located on the Former Umatilla Chemical Depot, Umatilla and Morrow Counties, Oregon. Per the 1989 FFA, the FFA OUs and UCD Solid Waste Management Units (SWMUs) will achieve compliance in accordance with CERCLA. The SWMUs also will meet applicable corrective action requirements under RCRA. The UCD Hazardous Waste Management Units will achieve compliance in accordance with the state hazardous waste management permit (RCRA permit).

Sixty-nine Army Environmental Database-Restoration (AEDB-R) sites are on the portion of the property conveyed to the NGB as CUO. Sixty-seven of the AEDB-R sites have achieved Response Complete status. Two of the remaining sites require completion of environmental restoration pursuant to the FFA and RCRA permit, and are described below.

3.12.2.1 Umatilla Army Depot (UMAD)-024 South Lagoon (Site 4)

UMAD-024 consists of a groundwater plume near and extending across the eastern edge of CUO. Site UMAD-024 is subject to the ROD for Umatilla Depot Activity Explosives Washout Lagoons Groundwater Operable Unit, dated June 7, 1994. A Focused Feasibility Study was completed in 2011 to evaluate the

addition of bioremediation when the plume size is sufficiently reduced. The Focused Feasibility Study received concurrence from EPA Region 10, and the DEQ and is currently being updated; a ROD Amendment may be issued to modify or amend the selected remedy.

3.12.2.2 Umatilla Army Depot (UMAD)-148 ADA Unexploded Ordnance (UXO) Clearance

UMAD-148 is comprised of an approximately 1,750-acre area in the northeastern section of the UCD. UMAD-148 is subject to the ROD for Umatilla Depot Activity Ammunition Demolition Activity Area Operable Unit, dated June 10, 1994, and amended by the Explanation of Significant Differences for Umatilla Chemical Depot Ammunition Demolition Activity Area Operable Unit, Site 19E/F, dated June 27, 2002. A portion of UMAD-148 is currently under contract for cleanup, with an expected completion in 3 years.

3.12.3 Land Use Controls

In accordance with AR 200-1, *Environmental Quality: Environmental Protection and Enhancement*, the ORARNG has completed an inventory and map of locations at CUO requiring LUCs. LUCs may consist of institutional or engineering controls used to prevent unacceptable exposures to contamination left in place at the completion of removal or remedial actions. Examples of common institutional controls are restrictions on groundwater use or prohibition of use as a daycare. Examples of common engineering controls are fences to prevent unauthorized entry or caps over contaminated soils.

Thirty locations at CUO are designated as requiring LUCs; these locations are shown on Figure 3-7. Development restrictions associated with the LUC locations will be integrated in the future master plan for CUO. The OMD is currently working with the DEQ to establish an MOU (or other administrative instrument) for maintaining the LUCs established by regulators following RCRA and CERCLA closure of remediation sites.

3.12.4 U.S. Army Chemical Materials Activity Permits

UCD was a RCRA-permitted waste treatment and storage facility. The following permits are the responsibility of the Army, and may continue to remain in effect after real property assignment to, and conveyance of, CUO to NGB:

- **TSCA Permit for K Block Igloos** – The U.S. Army and EPA are currently in the final stages of closing this permit.
- **RCRA Permits** – Umatilla Chemical Depot Permit No. OR6 213 820 917 authorizes the storage of hazardous waste. Umatilla Chemical Disposal Facility Permit No. ORQ 000 009 431-01, issued to the CMA, authorizes the construction and operation of a Treatment, Storage, and Disposal Facility to incinerate chemical agents. CMA is solely responsible for managing termination of the RCRA permits. The DEQ, with oversight by EPA Region 10, and the CMA are negotiating appropriate mechanisms for implementing LUCs required by the RCRA permits.

3.12.5 Hazardous Materials Generation and Storage

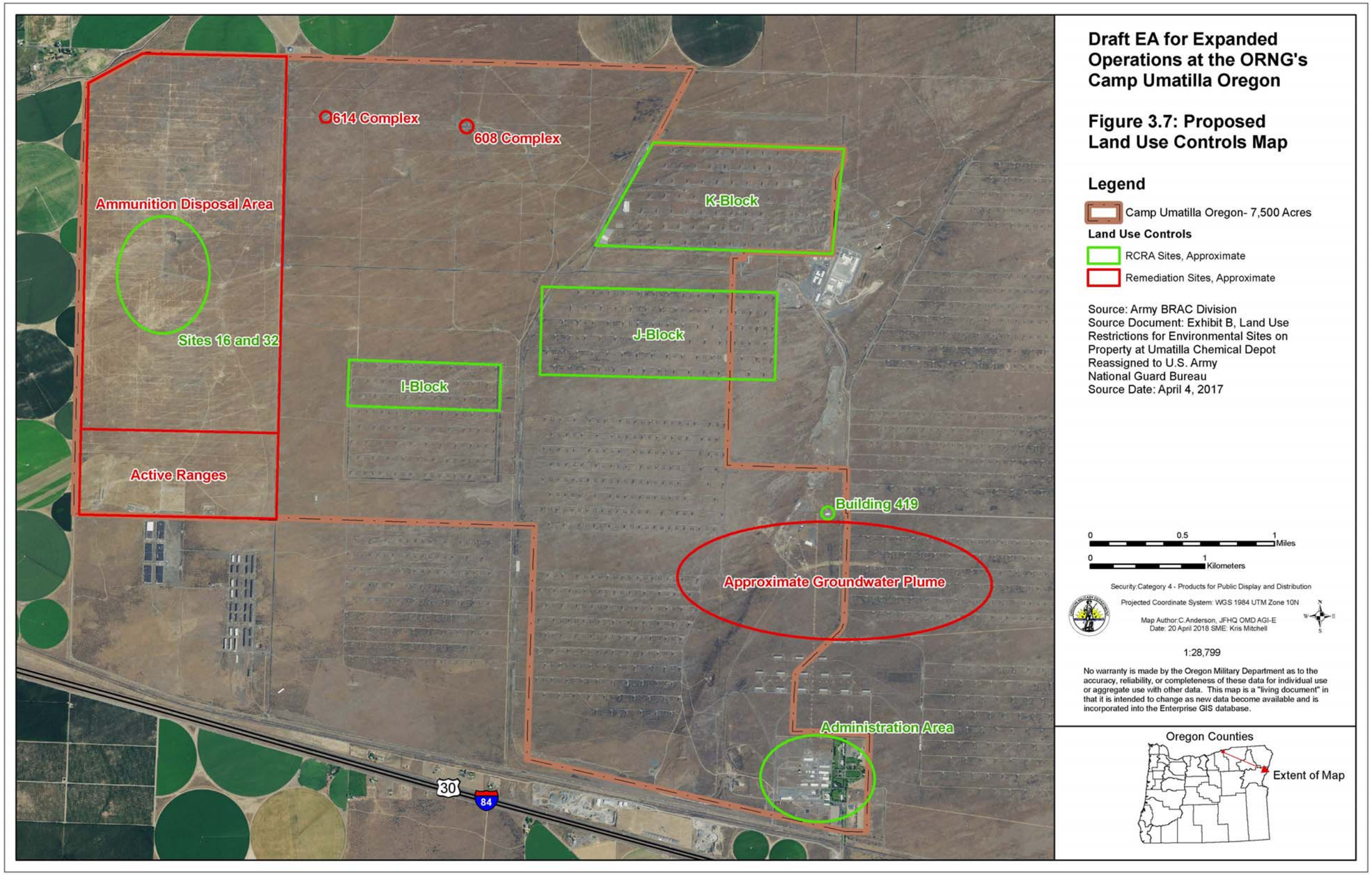
Lead is used at CUO in the form of ammunition for live-fire range training. Approximately 548.9 pounds of lead were released in 2015. Expended lead is managed in accordance with applicable federal, state, and local requirements and DoD, Army, and ORARNG requirements for management of hazardous waste.

Limited quantities of hazardous materials and hazardous waste are stored at CUO. The ORARNG is subject to Section 302 of the Emergency Planning and Community Right-to-Know Act regarding Extremely Hazardous Substances. Reportable quantities of hazardous substances are stored at CUO, including de-icing fluid, jet fuel, oxygen, acetylene, chlorine, propane, and sodium chloride (Oregon State Fire Marshal 2015). Hazardous substances are managed in accordance with ORARNG PAM 200-1 and ORARNG Regulation 420-47 to maintain a current inventory of all hazardous materials on hand and/or used in operations, to protect human health and environmental quality, and perform regular inspections of stored hazardous materials.

According to the 2012 ECOP/EBS Report, the following USTs and Aboveground Storage Tanks (ASTs) are in the CUO study area:

- Five USTs, including two regulated and DEQ-permitted USTs and three unregulated USTs.
- Sixteen ASTs used to store propane, fuel, and used oil. The ASTs are managed in accordance with the SPCC Plan and applicable regulations. The ASTs range in size from 275 gallons to 15,000 gallons.

As described in the SPCC and ISC Plans, no ASTs or other aboveground storage units with the potential to spill are located near any waterbodies, drainage pathways, or sensitive environmental areas (ORNG 2011).


614 Complex
608 Complex
Ammunition Disposal Area
K-Block
Sites 16 and 32
J-Block
I-Block
Active Ranges
Building 419
Approximate Groundwater Plume
Administration Area
30
84
Draft EA for Expanded Operations at the ORNG's Camp Umatilla Oregon
Figure 3.7: Proposed Land Use Controls Map
Legend
Camp Umatilla Oregon- 7,500 Acres
Land Use Controls
RCRA Sites, Approximate
Remediation Sites, Approximate
Source: Army BRAC Division
Source Document: Exhibit B, Land Use Restrictions for Environmental Sites on Property at Umatilla Chemical Depot Reassigned to U.S. Army National Guard Bureau
Source Date: April 4, 2017
0 0.5 1 Miles
0 1 Kilometers
Security:Category 4 - Products for Public Display and Distribution
Projected Coordinate System: WGS 1984 UTM Zone 10N
Map Author:C.Anderson, JFHQ OMD AGI-E
Date: 20 April 2018 SME: Kris Mitchell
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No warranty is made by the Oregon Military Department as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. This map is a "living document" in that it is intended to change as new data become available and is incorporated into the Enterprise GIS database.
Oregon Counties
Extent of Map

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SECTION 4: ENVIRONMENTAL CONSEQUENCES

4.1 Introduction

Chapter 4 describes the potential impacts that could occur to the natural and human environment as a result of the Proposed Action and No Action alternatives. For each resource, significance thresholds are defined.

The impact analysis assumes that under the Proposed Action, projects would be constructed as funding becomes available over the next 5 years. In general, the strategy for development of CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, igloo complexes, etc.), where possible, to accomplish the required training, and to reduce the environmental impacts associated with native habitat conversion. During the first few years of the Proposed Action, most improvements that would occur would be associated with the renovation of existing buildings and infrastructure improvements, with the majority of construction activity occurring within the next 5 years, as summarized in the bullets below. Construction projects are planned to occur as shown in Table 2.1. Three construction projects would occur over a range of 3 to 5 years, as follows:

- Construction of the MOUT in the Maneuver Use Area would occur over a 5-year period, with approximately 110 acres constructed per year.
- Construction of the new maneuver lanes and vehicle maneuver course in the Maneuver Use Area would occur over a 3-year period, with approximately 60 acres disturbed per year.
- Construction of perimeter roads, fencing, and firebreaks throughout the CUO would occur over a 3-year period, with approximately 40 acres constructed per year.

4.2 Land Use

For this analysis, changes in land use that would result in **inconsistencies with zoning, external planning documents, or planning goals** are considered significant impacts to land use.

4.2.1 Effects of the Proposed Action

No short-term impacts to land use would occur due to construction activities. **Long-term, positive impacts** would result from development and operation of the CUO.

4.2.1.1 Construction Activities

There would be **no short-term impacts** to land use.

4.2.1.2 Site Operations

CUO would continue to be authorized as a military facility under the Proposed Action. Although activities would be expanded in scope, there would be no conflict with the overall authorized land use for the area, because land uses would continue to be administrative and training, and therefore be consistent with existing land use and zoning in and adjacent to the CUO. Land use in CUO would be guided by the *ORNG Umatilla Training Center Site Development Plan* (2016). Long-term positive impacts on land use would occur due to development of the CUO consistent with existing land use and zoning rules.

4.2.1.3 Impact Summary

As described above, significant impacts related to land use include changes in land use that would result in inconsistencies in zoning, external planning documents, and planning goals. The Proposed Action would result in long-term positive impacts because:

- There would be no short-term, construction-related impacts to land use; and
- Proposed development would be consistent with existing land use and zoning rules in and adjacent to CUO.

4.2.2 Effects of the No Action Alternative

Under the No Action Alternative, the 7,500 acres of CUO would still be used by OMD for training purposes. However, no additional infrastructure would be built, and use levels would remain the same as existing conditions. There would be **no impacts** to land use associated with this alternative.

4.2.3 Mitigation Measures

No mitigation measures are necessary to reduce any adverse environmental impacts to below significant levels.

4.3 Air Quality

For this analysis, impacts that would result in **exceedance of one or more NAAQS** are considered to be significant.

4.3.1 Effects of the Proposed Action

The Proposed Action would result in short-term effects to air quality from construction activities and long-term, operational effects associated with CUO site operations. **Short-term, less than significant, adverse impacts** would occur due to the potential for dust generation and air emissions from construction activities. **Long-term, less than significant adverse impacts to air quality would occur** due to emissions associated with increased equipment and vehicle use and increased fugitive dust during training operations.

4.3.1.1 Construction Activities

Under the Proposed Action, short-term, less-than-significant adverse impacts to air quality are expected to consist of temporary emissions and generation of dust through construction of new buildings, facilities, and outdoor training areas. During construction activities, dust would be managed in accordance with state and local regulations and BMPs. Fugitive dust emissions would be mitigated in accordance with the State of Oregon CAA Implementation Plan under OAR 340-200-0040, and Requirements for Fugitive Emissions under OAR 340-204-0210. Typical BMPs include providing temporary designated driving surfaces consisting of graveled and/or paved surfaces, and wetting unimproved driving areas with water or tackifiers to suppress dust. Measures to minimize dust generated during construction would be coordinated with sediment transport control measures as part of the DEQ National Pollutant Discharge Elimination System (NPDES) construction stormwater permit requirements. Air monitoring is not expected to be required. No sensitive receptors are in the immediate vicinity of proposed construction or training areas.

4.3.1.2 Site Operations

Under the Proposed Action, long-term, less-than-significant adverse impacts to air quality are expected to occur due to increased vehicle emissions and generation of dust from expansion of vehicle, helicopter, and heavy equipment training and transportation-related activities, including driving and parking of privately owned and military-owned vehicles. The Proposed Action is expected to result in an additional 30 vehicles at CUO on each training day. Greenhouse gas and vehicle emissions are expected to increase slightly from these increased training operations, but not exceed air quality standards.

4.3.1.3 Impact Summary

As described above, significant impacts to air quality are considered to be impacts that would result in exceedances of one or more NAAQS. The Proposed Action would result in less-than-significant adverse impacts to air quality because:

- Short-term construction emissions would be managed in accordance with state and local regulations;
- Short-term generation of dust during construction activities would be managed in accordance with erosion and sediment transport BMPs;
- CUO is not in a nonattainment area; therefore, proposed facilities would not generate emissions above applicable DEQ limits; and
- Identified regional air pollutant emission facilities are all in compliance with permits.

4.3.2 Effects of the No Action Alternative

Under the No Action Alternative, pollutant emissions would be limited to current levels associated with training activities, vehicle use, and operation of propane boilers for heating. There would be **no impacts** to air quality associated with this alternative.

4.3.3 Mitigation Measures

No mitigation measures are necessary to reduce any adverse environmental impacts to below significant levels.

4.4 Noise

For this analysis, impacts that result in **incompatibility with local land uses per the SONMP and AR 200-1, Chapter 7**, are considered to be significant.

4.4.1 Effects of the Proposed Action

Under the Proposed Action, **short-term, less-than-significant adverse** impacts to the local noise environment would occur. Direct impacts would include short-term increases in noise levels as a result of construction activities. **Long-term, less-than-significant adverse impacts** would occur due to increases in noise levels from new training areas and increased levels of training activity.

4.4.1.1 Construction Activities

Noise-generating sources during construction activities would be associated primarily with standard construction equipment. Given the distance between proposed construction sites and sensitive receptors,

coupled with the temporary duration of these activities conducted during normal business hours, construction noise impacts are considered less than significant.

Construction activities generate noise by their very nature, and the associated noise levels are highly variable, depending on the type, number, and operating schedules of equipment. Construction projects under this alternative would be performed in stages, each having its own combination of equipment and noise characteristics and magnitudes. Construction activities would include mobilization, site preparation, excavation, foundation placement, utility development, and heavy equipment movement. The most prevalent noise source at construction sites is the internal combustion engine. General construction equipment using engines includes, but is not limited to, heavy, medium, and light equipment such as excavators; roller compactors; front-end loaders; bulldozers; graders; backhoes; dump trucks; water trucks; concrete trucks; pump trucks; utility trucks; cranes; sheet pile drivers; man lifts; forklifts; and lube, oil, and fuel trucks.

Peak noise levels vary at a given location based on line of sight, topography, vegetation, and atmospheric conditions. In addition, peak noise levels would be variable and intermittent because each piece of equipment is only operated when needed. However, peak construction noise levels would be considerably higher than existing noise levels. Relatively high peak noise levels in the range of 93 to 108 dBA would occur on the active construction site, decreasing with distance from the construction areas. Table 4.1 presents peak noise levels that could be expected from a range of construction equipment during proposed construction activities.

Combined peak noise levels, or worst-case noise levels when several loud pieces of equipment are used in a small area at the same time, are expected to occur rarely, if ever, during the project. Under these circumstances, peak noise levels could exceed 90 dBA within 200 feet of the construction area, depending on equipment being used. The worst-case noise levels as described above are detailed in Table 4.1.

Although noise levels would be high in the immediate area, the intermittent nature of peak construction noise levels would not create the steady noise level conditions for an extended duration that could lead to hearing damage. Construction workers would follow standard federal Occupational Safety and Health Administration requirements to prevent hearing damage.

Areas that would be most affected by noise from construction include those closest to the construction footprint. Land uses surrounding CUO are primarily agricultural, although there are a few areas of rural residential land use nearby at distances as close as approximately 0.5 mile to the south and northwest of CUO. The OMD would incorporate several BMPs to limit noise impacts during construction, as listed in below:

- Limit, to the extent possible, construction and associated heavy truck traffic between 9 p.m. to 7 a.m. This measure would reduce noise impacts during sensitive nighttime hours.
- Locate stationary equipment as far away from sensitive receivers as possible.
- Select material transportation routes as far away from sensitive receivers as possible.
- Shut down noise-generating heavy equipment when it is not needed.
- Maintain noisy equipment per manufacturer's recommendations.
- Encourage construction personnel to operate equipment in the quietest manner practicable (e.g., speed restrictions, retarder brake restrictions, engine speed restrictions).

Table 4.1: Peak Noise Levels Expected from Typical Construction Equipment

Source	Peak Noise Level (dBA, attenuated)							
	Distance from Source (feet)							
	0	50	100	200	400	1,000	1,700	2,500
Heavy Truck	95	84 to 89	78 to 93	72 to 77	66 to 71	58 to 63	54 to 59	50 to 55
Dump Truck	108	88	82	76	70	62	58	54
Concrete Mixer	108	85	79	73	67	59	55	51
Jack-hammer	108	88	82	76	70	62	58	54
Scraper	93	80 to 89	74 to 82	68 to 77	60 to 71	54 to 63	50 to 59	46 to 55
Bulldozer	107	87 to 102	81 to 96	75 to 90	69 to 84	61 to 76	57 to 72	53 to 68
Generator	96	76	70	64	58	50	46	42
Crane	104	75 to 88	69 to 82	63 to 76	55 to 70	49 to 62	45 to 48	41 to 54
Loader	104	73 to 86	67 to 80	61 to 74	55 to 68	47 to 60	43 to 56	39 to 52
Grader	108	88 to 91	82 to 85	76 to 79	70 to 73	62 to 65	58 to 61	54 to 57
Pile driver	105	95	89	83	77	69	65	61
Forklift	100	95	89	83	77	69	65	61

Worst-Case Combined Peak Noise Level (Bulldozer, Jackhammer, Scraper)					
	Distance from Source (feet)				
Combined Peak Noise Level	**50**	**100**	**200**	**0.25 Mile**	**0.5 Mile**
	103	97	91	74	68

Source: Tipler 1976

Additional short-term noise impacts could occur from workers commuting and material transport. Area traffic volumes and noise levels would increase slightly as construction employees commute to and from work at the project areas, and delivery and service vehicles (including trucks of various sizes) transit to and from the site. Because trucks are present during most phases of construction, and leave and enter the site via local thoroughfares, truck noises tend to impact more people over a wider area. People living in the residential areas near CUO would experience short-term increases in traffic noise during daytime hours. However, additional construction traffic to and from CUO would primarily occur on I-84, where large truck traffic at high speeds is common; therefore, increases in noise from project construction traffic would not constitute a substantial increase over existing conditions. These short-term, intermittent effects are not considered significant because they would not result in noise levels that are incompatible with local land uses.

4.4.1.2 Site Operations

Long-term, less-than-significant adverse impacts would result from continued and expanded training activities described in Section 2.2. Noise-generating activity would include training vehicles, helicopters, and live fire activities. Typically, training activities would be conducted during daytime hours.

Short-term noise impacts could occur from military vehicles training on CUO. Similar to the description of construction-related vehicles above, military vehicles used in military training would increase noise levels slightly. Although trucks are present during many phases of military training, CUO is surrounded primarily by agricultural activities, and exposure to nearby residences would be minimal. People living in the residential areas near CUO could experience short-term increases in traffic noise during daytime hours from the arrival and departure of military vehicles at CUO. However, additional military traffic to and from CUO would primarily occur on I-84, where large truck traffic at high speeds is common; therefore, increases in noise from military vehicle traffic would not constitute a substantial increase over existing conditions. These short-term, intermittent effects are not considered significant because they would not result in noise levels that are incompatible with local land uses.

Helicopter operations would remain above FAA-approved 500 feet AGL when outside the boundary of CUO, and would follow flight paths that avoid residential areas and other sensitive noise receptors, according to the Army's "Fly Neighborly" program. The average number of annual flights would range from 12 to 24, with a possible maximum of 50. Based on the 2010 SONMP, the low number of flights would not warrant additional noise modeling; however, the proposed helicopter activities at CUO would be included in the SONMP update, currently scheduled for 2019.

The proposed expanded live fire activities and additional firing lanes at CUO would not result in appreciable changes to the existing Noise Zone II and III contours shown on Figure 2.1, versus Figure 3.2. There are no sensitive receptors or sensitive land uses that intersect Noise Zones II or III—either existing or proposed. The noise emission right-of-way to the south of the small arms ranges is in effect while the adjacent property remains under BRAC control. After BRAC transfer of the adjacent property, the noise emission right-of-way will convert to a deed restriction in perpetuity.

4.4.1.3 Impact Summary

As described above, significant impacts related to noise are considered to be impacts that would result in incompatibility with local land uses per the SONMP and AR 200-1, Chapter 14. The Proposed Action would result in short- and long-term, less-than-significant adverse impacts related to noise because:

- Noise would be managed consistent with the updated SONMP, planned for revision in 2019. In the interim, the OMD would continue to manage noise consistent with the current SONMP for CUO to ensure noise associated with military training operations is compatible with surrounding land uses.
- Noise would be managed in accordance with AR 200-1 Chapter 14 to minimize disturbance to humans to the extent practicable.

4.4.2 Effects of the No Action Alternative

Implementation of the No Action Alternative would have **no impact** on the current local noise environment. Training and operations at CUO would continue under current conditions at current locations and levels.

4.4.3 Mitigation Measures

No mitigation measures are necessary to reduce any adverse environmental impacts to below significant levels.

4.5 Geology, Topography, and Soils

For this analysis, significant impacts to geology, topography, and soils are considered to be impacts that would result in a substantial increase in **soil erosion off-site, change in site topography that results in substantial change to runoff patterns, or disturbance in areas of severe soil hazards**.

4.5.1 Effects of the Proposed Action

The Proposed Action would have **short-term, less-than-significant adverse impacts** to soils from construction activities, and **long-term, less–than-significant adverse impacts** associated with operational site activities and infrastructure.

4.5.1.1 Construction Activities

Short-term, less-than-significant adverse impacts would occur due to clearing, grading, and excavation activities associated with construction. Disturbed and exposed soils from these construction activities could promote wind- and water-induced erosion. The OMD would obtain and comply with NPDES construction stormwater permits that would include BMPs to reduce erosion and sediment-laden stormwater runoff from discharging off-site. BMPs would likely include dust abatement, mulching, inlet protection, and run-on and run-off controls. Implementing these BMPs would avoid substantial soil erosion off-site.

4.5.1.2 Site Operations

In the Cantonment Use Area, long-term impacts to soils would be primarily associated with the creation of impervious surfaces associated with buildings and roads. The Cantonment Use Area would increase in size from 170 acres to approximately 231 acres, and impervious surfaces would increase to a total of approximately 46 acres. This would limit the infiltration of stormwater into soils, and increase stormwater runoff from the site. Due to the relatively low rainfall in the area and stormwater management measures that would be implemented, these impacts would not result in substantial changes in runoff patterns. Section 4.6 provides more information on impacts associated with stormwater runoff.

In the Maneuver Use Area, long-term impacts to soils would primarily result from construction of new impervious surfaces. New impervious surface would be created as part of new HLZs. However, existing secondary paved roads in the Maneuver Use Area would be allowed to deteriorate into gravel roads, resulting in a net reduction of total impervious surfaces under the Proposed Action (total of 63.9 acres of impervious surface in the Maneuver Use Area; as compared to 154.5 acres of impervious surface under the No Action alternative).

New infrastructure that would be constructed across Use Areas that could impact soils would include improvements to the potable water and wastewater systems, and road and trail construction and improvements. Impacts from the potable water system and wastewater system would include mixing of soil layers, and some additional impervious surface from storage tanks. The Proposed Action would improve 5.13 miles of existing paved roads, construct 9.02 miles of new paved roads, construct 14.27 miles of new trails, and convert 17.4 miles of existing secondary roads to maneuver trails (Figure 2.4). New roads would result in new impervious surface, which could result in loss of soil function. Deterioration of secondary paved roads in the Maneuver Use Area would increase acres of pervious surfaces, but would not return the soils of these areas to pre-disturbance conditions. Construction of new trails would result in vegetation loss, soil compaction, and increased potential for erosion. In addition, there would be 34.5 miles of firebreaks or fuel breaks that would result in an additional 66.9 acres of vegetation removal or reduction, which could lead to an increased potential for soil erosion in those areas.

As discussed above, the Proposed Action would result in short- and long-term impacts to soils. As discussed in Section 3.5, erosion hazards in CUO are primarily slight for non-road uses, and slight to moderate for trail and road use, indicating that roads may require occasional maintenance. No improvements are planned at the Coyote Coulee feature, where erosion hazards are severe. However, there is one location near the northwestern boundary with severe erosion hazards (soil mapping unit 20C) that could be crossed by a new trail. OMD would include additional erosion controls during and after construction, as necessary, to minimize erosion in that area. Therefore, there would be no substantial increase in soil erosion off-site with the incorporation of erosion and sediment control BMPs. Additionally, under the Proposed Action, several buildings would be demolished and the area re-vegetated. However, the majority of buildings demolished would be re-constructed, and there would still be an increase in the amount of non-vegetated surface within the CUO boundary.

4.5.1.3 Impact Summary

As described above, significant impacts to geology, topography, and soils are considered to be impacts that would result in a substantial increase in soil erosion off-site, change in site topography that results in substantial change to runoff patterns, or disturbance in areas of severe soil hazards. Short- and long-term, less-than-significant adverse impacts are not considered significant because:

- Soil erosion would be minimized through construction and operational BMPs as described in Section 2.2.7;
- Runoff patterns would not change; and
- Construction and operational erosion control BMPs would be implemented near the northwestern boundary of CUO, where a road would be constructed in an area of severe erosion hazards.

4.5.2 Effects of the No Action Alternative

Under the No Action Alternative, impacts to soils would be similar to existing conditions. The 7,500-acre CUO would still be used by ORARNG as a training facility; however, no new facilities would be constructed. Therefore, there would be no construction-related erosion impacts under the No Action Alternative. **Long-term, less-than-significant adverse impacts** would result from ongoing mounted and dismounted training activities that contribute to soil erosion. However, there would be no increase in impervious surface, and no grading that would alter drainage patterns in CUO. Therefore, there would be no substantial increase in soil erosion off-site, change in site topography that results in substantial change to runoff patterns, or disturbance in areas of severe soil hazards under the No Action Alternative. Significant impact thresholds identified for geology, topography, and soils would not be met.

4.5.3 Mitigation Measures

No mitigation measures are necessary to reduce any adverse environmental impacts to below significant levels.

4.6 Water Resources

For this analysis, significant impacts to water resources are considered to be impacts that would **violate water quality standards, result in hydro-modification to receiving waterbodies, result in a substantial increase in water consumption rates from wells over and above existing allocated water rights, contaminate groundwater affecting drinking water wells, or result in a permanent net loss of wetlands and riparian areas or their ecosystem functions**.

4.6.1 Effects of the Proposed Action

The Proposed Action would result in **short-term, less-than-significant adverse impacts** from construction activities, and **long-term, less-than-significant adverse impacts** from operational impacts associated with site activities and infrastructure. As detailed below, the Proposed Action would not result in impacts that would meet or exceed the defined significance thresholds; therefore, short- and long-term adverse impacts to water resources would be less than significant.

4.6.1.1 Surface Water

Impacts to surface water resources include both short-term impacts associated with construction activities and long-term impacts associated with site operations.

4.6.1.1.1 Construction Activities

Short-term, less-than-significant adverse impacts would occur due to clearing, grading, and excavation activities associated with construction that could result in erosion and an increase the sediment-load of stormwater runoff discharging off-site. These impacts are expected to be minimal because the majority of stormwater runoff would be infiltrated on-site due to the high permeability of on-site soils. Additionally, the OMD would comply with NPDES construction stormwater requirements that include measures and BMPs to reduce erosion and sediment-laden stormwater runoff from discharging off-site. BMPs would likely include dust abatement, mulching, inlet protection, and run-on and run-off controls. Implementing these BMPs would avoid substantial soil erosion off-site and minimize the discharge of sediment-laden stormwater.

4.6.1.1.2 Site Operations

Long-term, less-than-significant adverse impacts would result due to new impervious surfaces, change or increase in pollution-generating activities, and permanent vegetation removal. Construction of new impervious surface would affect the amount of stormwater runoff that would be generated on-site, although the planned deterioration of existing secondary paved roads in the Maneuver Use Area would result in a decrease in the total area of impervious surfaces under the Proposed Action. Throughout the CUO, with the exception of the Cantonment Use Area, stormwater runoff would continue to infiltrate into the ground due to the low annual precipitation, high infiltration rates of soils, and the large amount of land that would continue to be pervious and maintain capacity to infiltrate precipitation falling on CUO. The 14.27 miles of new trails and 66.9 acres of firebreaks would increase potential for erosion. Where these impacts would occur in areas of moderate or high erosion hazard, OMD would monitor roads for erosion, and implement BMPs as necessary.

In the Cantonment Use Area, the amount of stormwater generated from the site would increase under the Proposed Action. The Cantonment Use Area would expand from 170 acres under existing conditions to 231 acres, increasing the total impervious surface under the Proposed Action to 46 acres in this use area. This would increase the amount of stormwater generated on the site; however, stormwater would infiltrate into the ground prior to reaching surface waters. The increase in full-time staff and frequency and size of training activities would also result in more pollutants, such as oil, grease, sediment, and metals from the increased use of vehicles in the Cantonment Use Area. However, the OMD would comply with Section 438 of the Energy Independence and Security Act (EISA) of 2007, which requires any federal facility with a proposed disturbance area greater than 5,000 square feet to maintain or restore the pre-development hydrology of the property to the maximum extent technically feasible with respect to temperature, flow rate, runoff volume, and duration of flow. Due to favorable infiltration capacity in and adjacent to the site, additional stormwater management facilities above and beyond a standard curb-and-gutter collection system may not be required to meet the intent of the EISA of 2007.

4.6.1.2 Groundwater

Impacts to groundwater include both short-term, less-than-significant adverse impacts associated with construction activities, and long-term, less-than-significant adverse impacts associated with site operations.

4.6.1.2.1 Construction Activities

Short-term, less-than-significant, adverse impacts could result during construction due to the potential for a release of toxic or hazardous materials to the environment that could impact water quality. As discussed previously, the OMD would comply with NPDES construction stormwater requirements during construction that include pollution prevention and control measures, with proper storage and containment of hazardous materials and proper fueling techniques. With the implementation of these measures, and because depth to groundwater is approximately 60 feet or more (OWRD 2003), contamination of groundwater as a result of toxic or hazardous chemicals used during construction is not anticipated.

4.6.1.2.2 Site Operations

Long-term, less-than-significant adverse impacts would occur as a result of the construction of new impervious surfaces (primarily associated with the Cantonment Use Area), but would not affect groundwater recharge, because the overwhelming majority of the site would remain pervious, with high infiltration capacity.

The wastewater treatment system has potential to discharge contaminants into the ground, which could impact groundwater. As discussed in Section 4.11.1.2, the wastewater system would be constructed in accordance with a Water Pollution Control Facility (WPCF) permit from DEQ, and treated wastewater would be discharge in accordance with the WPCF permit to avoid contamination of groundwater and surface water quality. Improvements to the wastewater treatment system would be designed in accordance with the LUB GWMA Action Plan to avoid releases of nitrate-nitrogen. Remedial activities associated with the capped landfill and the five GWMA monitoring wells in the northeastern portion of CUO would not be disrupted by the Proposed Action. No impacts would occur to the levels of nitrate-nitrogen as a result of the Proposed Action.

Increased use of water from groundwater wells could result in further decline of the aquifer in the OWRD Ordnance Critical Ground Water Area, and cause long-term impacts to groundwater levels. However, water consumption at CUO would not exceed allocated water rights.

4.6.1.3 Wetlands

As discussed in Section 3.6.3, three potential wetlands have been identified in the CUO boundary. These potential wetlands are all likely a result of unnatural water sources. Regardless, if new development associated with the Proposed Action is planned near one of these potential wetlands, a wetland delineation would be conducted, and appropriate avoidance or mitigation would be performed if necessary so that there would be no net loss of wetlands or their functions as a result of the Proposed Action.

4.6.1.4 Impact Summary

As described above, significant impacts to water resources are considered to be impacts that would violate water quality standards, result in hydro-modification to receiving waterbodies, result in a substantial increase in water consumption rates from wells over and above existing allocated water rights, contaminate groundwater affecting drinking water wells, or result in a permanent net loss of wetlands and riparian areas or their ecosystem functions. The Proposed Action would result in short- and long-term, less-than-significant, adverse impacts that are not considered significant because:

- Site runoff would not reach surface waters, and therefore not violate water quality standards or result in hydro-modification of receiving waters;
- Water consumption at CUO would be within allocated water rights;
- Groundwater would not be contaminated due to depth to groundwater and BMPs implemented by OMD; and
- No development would occur in wetlands; therefore, there would be no loss of wetland area or function.

4.6.2 Effects of the No Action Alternative

Under the No Action Alternative, impacts to water resources would be similar to existing conditions. The 7,500-acre area would still be used by the ORARNG as a training facility; however, no new facilities would be constructed. Therefore, there would be no construction-related impacts to water resources under the No Action Alternative. Activities that contribute to vegetation trampling and removal would occur from mounted and dismounted training activities at the same level and frequency as existing conditions. There would be no new impervious surfaces and no grading that would alter drainage patterns in CUO. Therefore, there would be no substantial increase in soil erosion off-site, change in site topography that

results in substantial change to runoff patterns, or resulting increase in pollution or flow rates or volumes to receiving waterbodies. There would be no new impervious surfaces; therefore, there would not be an increase in stormwater runoff or decrease in groundwater recharge as a result of the No Action Alternative. Ongoing activities would continue to be performed in accordance with the DEQ LUC GWMA Action Plan to reduce nitrate-nitrogen in groundwater, and the OWRD Ordnance Gravel Critical Groundwater Area to address water level declines, and no additional water rights would be granted. There would be no impacts to wetlands as a result of the No Action Alternative. The significant impact thresholds identified for water resources as described above would not be reached as a result of the No Action Alternative. Therefore, the No Action Alternative would have **short- and long-term, less-than-significant adverse** impacts to surface water, groundwater, and wetlands.

4.6.3 Mitigation Measures

No mitigation measures are necessary to reduce any adverse environmental impacts to below significant levels.

4.7 Biological Resources

Biological resources included in this analysis are vegetation, and fish and wildlife, including special-status or protected species. Significance criteria are described for each biological resource in the following sections.

4.7.1 Effects of the Proposed Action

Effects of the Proposed Action to biological resources include **short-term, less-than-significant adverse impacts** associated with construction, and **long-term, less-than-significant adverse impacts** associated with site operations.

No short-term impacts would occur. An Integrated Wildland Fire Management Plan would be developed based on the specific details of the Proposed Action that would incorporate BMPs, including the implementation of firebreaks, to minimize the risk of wildland fire and to control the spread of fires anticipated with new project activities. Although the risk of fire may increase due to additional training activities, implementation of the Integrated Wildland Fire Management Plan is expected to result in **long-term positive impacts**.

4.7.1.1 Vegetation

For this analysis, significant impacts to vegetation are considered to be impacts that would result in **"take" of ESA-listed threatened or endangered species, removal of special-status (Oregon state-listed) plant populations, or a substantial increased potential for infestation or spread of noxious weeds**. The Proposed Action would have short-term impacts to vegetation from construction activities and long-term, operational impacts associated with training activities and infrastructure. Because the disturbance would occur primarily in vegetation communities that are already dominated by non-native and invasive species, and because there would be no impacts to ESA-listed or Oregon state-listed plant species, impacts to vegetation would be less than significant.

4.7.1.1.1 Vegetation Communities

Impacts of construction and training activities on vegetation communities would be of a higher intensity in areas where vegetation is relatively intact and where native species predominate, such as in the Live-Fire Use Area and the northwestern corner of the Maneuver Use Area. Construction impacts on vegetation in

areas where vegetation is already highly fragmented and disturbed, such as in the Cantonment Use Area, would be of a lower intensity.

4.7.1.1.2 Construction Activities

Short-term impacts to vegetation would occur as a result of site excavation, grading, and equipment operations during project construction, which would result in vegetation removal, increased dust deposition, and potential for the introduction and spread of noxious weeds. These impacts could also lead to potential changes to the composition and type of vegetation communities in CUO. The OMD would comply with NPDES construction stormwater requirements, which would include measures to minimize effects associated with construction-related vegetation removal. Localized, long-term effects to vegetation also would occur at locations where new facilities are constructed, and the existing vegetation is removed and replaced by buildings, roads, trails, and various types of proposed training and support facilities.

Construction equipment and activities would introduce additional ignition sources to CUO. Contractors would be briefed about fire danger prior to initiating work, and necessary precautions would be taken according to current fire danger levels.

Table 4.2 shows a comparison of vegetation acreages to potential disturbance resulting from the Proposed Action. As indicated in Section 3.7.1, vegetation in the CUO study area has been subject to extensive historical disturbance. Existing disturbance was approximated using the footprint of roads, buildings, and parking lots, and likely underestimates the actual value.

Table 4.2: Approximate Vegetation Disturbance Acreage by Class

Vegetation Class	Total Vegetation Class Area	Class Area remaining after Existing Disturbance	Proposed Action Disturbance	New Disturbance (Proposed minus Existing)
Cantonment Area[1]	153.9	92.5	5.9	5.5
Big sagebrush shrubland	3.1	3.0	0	0
Bitterbrush native forb shrubland	206.3	194.1	5.3	4.5
Bitterbrush non-native forb shrubland	171.6	165.2	9.1	8.9
Crested wheatgrass grassland	169.4	160.0	1.6	0.7
False goldenaster grassland	1,387.0	1,339.3	148.7	137.3
Mixed bitterbrush and rabbitbrush shrubland	1,044.6	980.1	21.9	14.9
Mixed rabbitbrush shrubland	454.6	434.4	17.4	11.9
Scurf pea grassland	2,137.0	2,065.0	102.2	87.8
Thickspike wheatgrass sand dunes	33.9	32.8	5.6	5.4
Not inventoried (Ammunition Disposal Area)[2]	1,744.0	1,687.0	42.5	32.3
Total Acreage	**7,505.4**	**7,153.4**	**360.2**	**309.1**

Notes:
1) The vegetation survey, dated 2014, used a smaller Cantonment Use Area boundary than the current boundary.
2) The Ammunition Disposal Area, including the Live-Fire Use Area, has not been inventoried for vegetation communities.

4.7.1.1.3 Site Operations

Impacts to vegetation communities would occur from the operation of CUO under the Proposed Action. The acreage of vegetation removal is discussed in Section 4.5. Vehicle and foot traffic in vegetated areas causes trampling and crushing of individual plants; and over time, these actions can result in degradation of plant communities. Vehicle and foot traffic in vegetated areas would be predominantly associated with training activities. Increased potential for wildland fire (Section 4.13) is likely to impact vegetation communities, potentially resulting in further loss of shrub and forb components, and increases in invasive annual grass species.

In the Live-Fire Use Area, disturbance associated with the Proposed Action would be limited to the 8 acres associated with adding four firing lanes to the MRF range. This area is vegetated, but it falls within the "Not Inventoried" area indicated in Table 4.2. These ranges will be adjacent to the existing range, where some erosion has occurred. In the Cantonment Use Area, approximately 46 acres of the 231-acre area would be impervious surfaces devoid of vegetation. However, this area is heavily developed and altered under existing conditions so that impacts to vegetation would be limited to 5.9 acres (Table 4.2). In the 5,000-acre Maneuver Use Area, 240 acres of new disturbance would be included under the Proposed Action. On approximately 110 of the 240 acres, impacts would primarily be associated with foot traffic from Soldiers as they travel across the area performing dismounted training activities, which would result in vegetation trampling and crushing, but not complete removal. The impacts to vegetation would be similar to dismounted maneuver activities conducted elsewhere throughout the 5,000-acre Maneuver Use Area. On the remaining 130 acres of new disturbance, vegetation removal would be permanent, resulting from construction of the ASP, new maneuver lanes, and the tracked/fighting vehicle maneuver course.

Throughout the CUO, there would be approximately 71 acres of permanent vegetation removal associated with construction and improvement of roads, trails, and firebreaks. In addition to new facilities, the Proposed Action would include demolition of many existing facilities, some of which would be revegetated. However, there would still be an overall net increase in the amount of non-vegetated surface in CUO.

An INRMP for the 7,500-acre CUO would be developed, and would include management directives and avoidance and/or minimization measures to protect vegetation (including rare plants) from impacts due to operation and maintenance activities, as well as to control the introduction and spread of noxious weeds in CUO.

There would be an increased potential for human-caused fires to be ignited by the increase in live-fire and other military training activities under the Proposed Action. Additionally, under the Proposed Action, there would be additional infrastructure that could be damaged or destroyed, and personnel that could be put at risk in the event of a fire. Potential for naturally caused wildland fires would remain the same as current conditions under the Proposed Action.

A draft Integrated Wildland Fire Management Plan has been prepared for CUO (OMD 2016a). This plan would be revised and would be used to manage wildland fire through prevention and suppression activities. The plan would include implementation of firebreaks to disrupt the travel of wildland fire through CUO. A detachment of three full-time OMD fire personnel would be stationed at CUO, and would be expanded to 9 to 12 personnel during fire season. Fire prevention and control BMPs that would likely be incorporated into the Integrated Wildland Fire Management Plan include the following:

- Develop a risk management review process and fire response coordination for proposed training events (would include standard operating procedures for when live-fire or pyrotechnics are planned).
- Employ prescribed burning, where appropriate and if conducted in a manner that does not promote colonization by exotic, invasive plants afterwards.
- Construct a fuel break network (potentially 16-foot strips plowed, mowed, or burned along some existing roads).
- Construct small, hardened or pre-burned areas designed for pyrotechnics use (e.g., open-topped 55-gallon drum emplaced in the ground surrounded by 10 feet or more of gravel).
- Provide 5-gallon water fire extinguishers to training units to be immediately available in case of fire.
- Provide awareness briefing to all incoming units.
- Review/revise hot work permitting process.
- Develop and maintain mutual aid agreements with other fire departments in the region.
- Provide additional fire equipment (brush trucks, water tender) as needed.
- Provide additional fire personnel as needed (including full-time and/or seasonal).

Implementation of these BMPs is expected to result in **long-term positive impacts** under the Proposed Action.

4.7.1.1.4 Special-Status Plants

No ESA-listed threatened, endangered, or candidate plant species or Oregon state-listed threatened or endangered plant species exist in CUO. Several thousand individuals of three Oregon rare plants (Columbia milkvetch, The Dalles milkvetch, and rush skeleton plant) are found throughout the CUO study area, and could be subject to disturbance due to construction and training activities. Impacts to individuals of these species are likely to occur with implementation of project activities; notably, the vehicle and foot traffic associated with site operations.

4.7.1.1.5 Noxious Weeds

Seeds of noxious and invasive weed species can be transported on vehicle tires and undercarriages, as well as on clothing and footwear of personnel traveling through an area. Additionally, noxious weeds and invasive species can more easily invade areas where the soil has been disturbed (i.e., through construction or heavy equipment use) due to associated changes in soil composition and chemistry. Therefore, it is likely that introduction and spread of noxious weeds would occur at the site as a result of construction activities and increased vehicular and foot traffic on roads and for training activities, particularly in the Maneuver Use Area. OMD would implement weed prevention and control measures in accordance with the updated INRMP and Integrated Pest Management Plan (IPMP), which may include biological, mechanical, and chemical control methods. Through the implementation of BMPs defined in the INRMP and IPMP, there would not be a substantial increased potential for infestation or spread of noxious weeds.

4.7.1.1.6 Impact Summary

As described above, significant impacts to vegetation are considered to be impacts that would result in "take" of ESA-listed threatened or endangered species, removal of special-status (Oregon state-listed) plant populations, or a substantial increased potential for infestation or spread of noxious weeds. Short- and long-term, less-than-significant adverse impacts would occur to vegetation. The Proposed Action would not result in significant impacts to vegetation because:

- There would be no impacts to ESA-listed or Oregon state-listed plant species;
- Disturbance would occur primarily in vegetation communities that are already dominated by non-native and invasive species; and
- OMD would implement weed prevention and control BMPs in accordance with the updated INRMP and IPMP; therefore, there would not be a substantial increased potential for infestation or spread of noxious weeds.

As described above, significant impacts to wildland fire are defined as impacts that would result in a substantial increased risk to public safety due to increased fire risk. The Proposed Action would result in **long-term positive impacts** to wildland fire because:

- Construction contractors would be briefed on the risk of wildland fire prior to initiating work; and
- CUO would be managed in accordance with an Integrated Wildland Fire Management Plan, which would include measures to prevent and minimize the risk of wildland fire and control the spread of fires (e.g., implementation of firebreaks, detachment of full-time fire personnel).

4.7.1.2 Fish and Wildlife

For this analysis, significant impacts to fish and wildlife species are considered to be impacts that would result in **incidental take of special-status wildlife species, substantial habitat loss and degradation due to construction activities and noise and/or human presence due to construction and training activities, or significant adverse impacts to migratory birds during construction and maintenance activities or site operations**. The Proposed Action would have **short-term, less-than-significant, adverse impacts** from construction activities, and **long-term, less-than-significant, adverse** operational impacts associated with vegetation removal and increased development at CUO.

4.7.1.2.1 Wildlife and Special-Status Species

Construction Activities

Short-term impacts to wildlife species would occur from the use of heavy machinery, vegetation clearing, and increased noise and human activities. Wildlife would be expected to vacate the immediate areas during construction, although some individuals of the less-mobile species (i.e., small mammals and reptiles) could be crushed or injured. Use of heavy machinery during clearing and construction activities can result in mortality to individual animals or crushing of nests or burrow sites. Human presence during construction at the site has the potential to disturb and displace wildlife species.

Site Operations

Construction of facilities under the Proposed Action would result in long-term removal of vegetation communities as described in Section 4.7.1.1.1. Removal of vegetation could eliminate habitat for wildlife

species and result in displacement of individuals from an area. The introduction and spread of non-native plant species, including noxious weeds, due to ground disturbance from construction can degrade habitat for wildlife species. Degradation of habitat may eventually lead to displacement of wildlife species from an area. Human presence during training activities at the site has the potential to disturb and displace wildlife species. However, because the majority of wildlife habitats in CUO are currently highly fragmented and disturbed (i.e., dominated by non-native and invasive plant species; lack of shrub overstory components), and because wildlife in the area is likely habituated to human presence and noise associated with training activities, impacts to wildlife are likely to be minimal.

In the Live-Fire Use Area, impacts to vegetation could occur in the fire lanes, but would be limited to the area where weapons would be fired. Vegetation in the Live-Fire Use Area is a mix of native and non-native vegetation communities, and is relatively intact. Human use of this area under existing conditions has been relatively frequent, with loud noises occurring frequently due to firearms use. Therefore, wildlife in these areas may be desensitized to these types of effects.

The Cantonment Use Area would be expanded from 170 acres to 231 acres, and approximately 46 acres would be developed to be impervious, resulting in some loss of wildlife habitat in this area. In the Cantonment Use Area, development is already high, vegetation is predominantly non-native, and human presence is common. Therefore, wildlife use of this area is considered to be less frequent than the rest of CUO, and impacts to wildlife species in this area due to construction are likely to be minimal. The potential removal of landscape trees in this area could impact bird species that roost or nest in these trees; however, trees are common in the Cantonment Use Area, and loss of habitat due to the removal of select trees is anticipated to be minimal and is likely to be offset by planting new trees. Direct impacts to bird species can be avoided by restricting the timing of tree removal activities to outside the nesting season (April through August).

As mentioned above, in the Maneuver Use Area, vegetation trampling could occur from MOUT training and activity associated with the designated DZ, impacting up to 110 acres of new disturbance in addition to current operations (Table 2.1). These impacts would primarily be associated with foot traffic resulting in disturbance, but not complete removal, of vegetation. Other improvements in the Maneuver Use Area, such as the ASP, the new maneuver lanes, and the tracked/fighting vehicle maneuver course, would result in approximately 126 acres of new disturbance (Table 2.1). New impervious surfaces would be constructed in some locations, which would require vegetation removal. Existing secondary paved roads would be allowed to deteriorate into gravel roads, but would not be revegetated. Vegetation in this area is a mix of native and non-native vegetation communities, and human presence in this area has been relatively infrequent. Several wildlife species, including special-status wildlife (Appendix B), have been recorded in this area. Training activities in this area also have the potential to impact wildlife species due to human presence, noise, and vehicle movement.

An INRMP would be developed for the 7,500-acre CUO, and would include management directives and avoidance and/or minimization measures to protect special-status species from impacts due to operation and maintenance activities. Wildlife in CUO would be managed according to the revised INRMP and other DoD natural resource management guidance, objectives, and regulations, including those published in 50 CFR §21 and the 2002 DoD *Partners in Flight Strategic Plan* (DoD 2002), which presents overall objectives for the management of migratory bird species and their habitats on DoD lands.

Because the majority of the vegetation communities in the Maneuver Use Area are highly fragmented and disturbed (i.e., dominated by non-native and invasive plant species; lack of shrub overstory components), and because wildlife in the area is likely habituated to human presence and noise associated with training activities, impacts to wildlife, including special-status wildlife, are likely to be minimal and less than significant.

4.7.1.2.2 Migratory Birds

4.7.1.2.2.1 Construction and Maintenance Activities

Construction and operations activities described for wildlife and special-status species in Section 4.7.1 would be anticipated to have direct impacts on migratory birds. To minimize impacts, management measures for migratory birds would be conducted in accordance with 50 CFR §21 (Migratory Bird Permits). Ground-disturbing activities would be planned to avoid ground-nesting bird habitat as much as practicable. Ground-disturbing activities would be initiated prior to or after the nesting season (April through August) to prevent incidental take of ground-nesting birds. Artificial burrowing owl burrows would be moved to new locations, away from the planned disturbance, before or after nesting season. If necessary, vegetation removal from the construction site would occur before the nesting season to render the habitat unsuitable for nesting migratory birds and other special-status bird species, thereby avoiding the potential for the unintentional take of birds as much as possible.

4.7.1.2.2.2 Site Operations (Military Readiness Activities)

Incidental take of migratory birds during military readiness activities is authorized under 50 CFR 21.15 as long as significant adverse effects on a population are avoided. Readiness activities, such as range use and maneuver training, at CUO have the potential to injure or kill migratory birds. However, it is anticipated that any birds capable of flying would not be injured or killed during military readiness activities, including training. However, nests with eggs or chicks could be unintentionally disturbed, destroyed, or abandoned during these activities, although it is anticipated that these impacts would be rare. Nesting activity may decrease in CUO due to increased disturbance and noise. However, it is anticipated that birds would habituate to the military readiness activities over time, and that nesting would continue to occur in the area.

Project impacts on BCC species in the context of their populations in USFWS BCR 9 are used in this analysis as an indicator of project impacts on all migratory birds. Seven migratory bird species known to occur in CUO are also USFWS BCC for Region 9. These species are Brewer's sparrow (*Spizella breweri*), ferruginous hawk (*Buteo regalis*), golden eagle (*Aquila chrysaetos)*, Lewis' woodpecker (*Melanerpes lewis*), loggerhead shrike (*Lanius ludovicianus*), sage sparrow (*Amphispiza belli*), and sage thrasher (*Oreoscoptes montanus*). Additionally, this analysis considers impacts to burrowing owl and long-billed curlew (*Numenius americanus*), two regionally important species that are known to nest at the CUO, to be indicative of impacts to all ground-nesting migratory bird species. All of these species are confirmed as occurring in the project area, and breeding of loggerhead shrike, long-billed curlew, and burrowing owl has been confirmed in grasslands at CUO (Blake 2013). Table 4.3 summarizes species occurrence at the site and population estimates for the Oregon and Washington areas of BCR 9.

Table 4.3: Migratory Bird Species Occurrence and Breeding Status at CUO

Common Name	Occurrence and Breeding Status at the Site[1]	Population estimate in BCR 9 (Oregon and Washington)[2]
Brewer's sparrow	Possible breeder in shrublands and grasslands.	1,470,000
Ferruginous hawk	Breeding not confirmed.	3,170
Golden eagle	Breeding not confirmed.	5,300
Lewis' woodpecker	Breeding not confirmed.	19,600
Loggerhead shrike	Breeding confirmed on grassland areas; possible in shrubland areas.	94,000
Long-billed curlew	Breeding confirmed in grassland areas.	15,823[3]
Sage sparrow	Breeding not confirmed.	320,000
Sage thrasher	Breeding possible in grassland areas.	880,000
Western burrowing owl	Breeding confirmed in grassland areas.	8,600

Sources:
[1] Blake 2013
[2] Based on North American Breeding Bird Survey Data obtained from the Partners in Flight Landbird Population Estimates Database (Partners in Flight 2013).
[3] This area is outside or on the periphery of species' typical breeding range. Population numbers are extrapolated based on the area of each region, and long-billed curlew data presented in Jones et al. (2008) for BCR 9.

Significant adverse effects to populations of migratory birds in the BCR in Oregon and Washington due to military readiness activities at the CUO are not likely to occur, because of the anticipated rarity of direct impacts on migratory birds and the large size of populations for most of these species in the BCR.

The Proposed Action would have less-than-significant impacts on migratory birds, given the size of the areas to be impacted, the fact that the habitat to be impacted is generally composed of non-native plant species, the abundance of migratory birds of conservation concern in the greater region, implementation of mitigation measures, and the low likelihood of incidental take during readiness exercises.

4.7.1.2.3 Impact Summary

As described above, significant impacts to vegetation resources are considered to be impacts that would result in "take" of ESA-listed threatened or endangered species, removal of special-status (Oregon state-listed) plant populations, or a substantial increased potential for infestation or spread of noxious weeds. Short- and long-term, less-than-significant adverse impacts would occur to vegetation resources. The Proposed Action would not result in significant impacts to vegetation resources because:

- Disturbance would occur primarily in vegetation communities that are already dominated by non-native and invasive species;
- Vegetation would be managed under a CUO INRMP and IPMP that would include management directives and avoidance and/or minimization measures to protect special-status species from impacts due to operation and maintenance activities.
- There would be no impacts to ESA-listed plant species; and
- There would be no impacts to Oregon state-listed plant species.

As described above, significant impacts to wildlife resources are considered to be impacts that would result in "take" of ESA-listed threatened or endangered species, or "take" of migratory birds outside of military readiness activities. Short- and long-term, less-than-significant adverse impacts would occur to wildlife resources. The Proposed Action would not result in significant impacts to wildlife resources because:

- Disturbance would occur primarily in habitats that are already degraded (i.e., dominated by non-native and invasive plant species, loss of shrub component);
- Wildlife would be managed under a CUO INRMP that would include management directives and avoidance and/or minimization measures to protect special-status species from impacts due to operation and maintenance activities.
- There would be no impacts to ESA-listed wildlife species;
- "Take" of migratory bird species would not occur outside of incidental, rare impacts due to military readiness activities; and
- "Take" of migratory bird species during construction would be prevented with scheduling restrictions and hazing prior to construction as needed.

4.7.2 Effects of the No Action Alternative

No short-term impacts would occur under the No Action Alternative. Effects of the No Action Alternative to biological resources include **long-term, less-than-significant, adverse impacts** to vegetation, fish, and wildlife resources.

4.7.2.1 Vegetation

Under the No Action Alternative, impacts to vegetation would be similar to existing conditions as described in Section 3.7.1. The 7,500-acre area would still be used by the ORARNG as a training facility; however, no new facilities would be constructed, and use levels would remain the same. Therefore, there would be no construction-related impacts to vegetation under the No Action Alternative. Activities that contribute to vegetation trampling, crushing, and removal would continue to occur from mounted and dismounted training activities. Under the No Action Alternative, the activity type and use level would be the same as existing conditions. Therefore, it is unlikely that special-status plant population would be removed or that there would be a substantial increase in noxious weed infestations under the No Action Alternative. Under the No Action Alternative, noxious weeds would continue to be managed consistent with state and county requirements, and according to the INRMP to be developed by the ORARNG. CUO would continue to follow all management prescriptions in the 2011 DoD Instruction *Natural Resources Conservation Program* (DoD 2011).

Management of wildland fire would be conducted in accordance with an Integrated Wildland Fire Management Plan. Under the No Action Alternative, ignition sources would be similar to existing conditions; however, fuel breaks would not be constructed under the No Action Alternative. Because ignition sources would be similar to existing conditions, and an Integrated Wildland Fire Management Plan would be developed, the No Action Alternative would not result in a substantial increased risk to public safety due to increased fire risk. Long-term adverse impacts would be less than significant.

4.7.2.2 Fish and Wildlife

There would be no construction-related impacts to fish and wildlife under the No Action Alternative, and operational impacts would be similar to existing conditions. Activities would continue that contribute to vegetation trampling, crushing, and removal from mounted and dismounted training activities. Incidental, although rare, direct impacts to migratory birds would continue due to military readiness activities, although these impacts would not significantly affect migratory bird populations in BCR 9. Because the activity type and use level would not change under the No Action Alternative, compared with existing conditions, the extent and intensity of damage to wildlife habitat from site activities would not change. The introduction and spread of noxious weeds, degradation of wildlife habitat, noise associated with training activities, and human presence would continue to impact wildlife species as a result of current training activities and travel through the site. CUO would continue to follow prescriptions in the INRMP and other DoD natural resource management guidance, objectives, and regulations, including those published in the 2002 DoD Partners in Flight Strategic Plan (DoD 2002) and 50 CFR §21. The No Action Alternative would not likely result in "take" of ESA-listed threatened or endangered species or migratory birds (outside of incidental, rare impacts during military readiness activities) or substantial decrease in wildlife habitat; therefore, long-term adverse impacts would be less than significant.

4.7.3 Mitigation Measures

No mitigation measures are necessary to reduce any adverse environmental impacts to below significant levels.

4.8 Cultural Resources

For this analysis, significant impacts to cultural resources are considered to be impacts that would result in **a loss of integrity as required for NRHP eligibility, unless mitigated to less than significant through completion of the Section 106 process under the NHPA**. Less–than-significant impacts would result in no detectable changes in integrity, and medium impacts would result in measureable impacts to integrity, but impacts that are not sufficient to affect NRHP eligibility.

4.8.1 Effects of the Proposed Action

Long-term, significant adverse impacts could occur due to the Proposed Action; however, these effects would be mitigated to **less than significant**. Cultural resources that have been determined eligible or are potentially eligible/unevaluated for the NRHP exist in the CUO, and are subject to project effects. These include a segment of wagon road (35UM497), 563 buildings and structures of the UCD Historic District that fall within the CUO, and the Coyote Coulee PTRCS identified by the CTUIR (Table 4.4).

A portion of the linear ca. 1875 Umatilla Cutoff wagon road (35UM497) alignment falls along the southern boundary, and was determined NRHP-eligible by BRAC, in consultation with the Oregon SHPO, as a pioneer transportation route. Effects to the NRHP-eligible site may include modification, or partial or complete obliteration, as a result of the CUO project and military training in the area.

A total of 563 buildings and structures that were once part of the Umatilla Chemical Depot is inside the boundaries of CUO, and may either be modified or demolished as part of the CUO Expansion and Development Project (PA 2017). These were determined by BRAC, in consultation with the Oregon

SHPO, to be NRHP-eligible as contributing properties to the UCD Historic District under criterion A for their association with the WWII-era ammunition storage and Cold War-era Chemical Weapons work.

The CTUIR identified one PTRCS in the CUO study area. Project effects to the Coyote Coulee PTRCS could include potential adverse effects due to minimization of access to the area by tribal members. These impacts would be resolved through implementation of the PA. Pursuant to the PA, ORARNG has agreed to limit off-road vehicular traffic or new construction in the PTRCS site. ORARNG will consult with the CTUIR to develop a protocol allowing tribal member access during certain times of the year to carry out cultural practices.

Effects of the Proposed Action would be significant (or adverse) to the NRHP-eligible historic properties listed in Table 4.4. The project would demolish or alter aspects of these resources that make them eligible for the NRHP. Consistent with 36 CFR 800, ORARNG consulted with SHPO, the Advisory Council of Historic Preservation (ACHP), and federally recognized Tribes on the Proposed Action to develop a PA. The PA was drafted to resolve adverse effects from the Proposed Action. For the purposes of NEPA, the mitigation measures outlined in the PA (Appendix C) and in Section 4.8.3 would reduce impacts to a less-than-significant level.

Table 4.4: Historic Properties in the CUO Study Area and Mitigation Measures

Resource No.	Site Class	Site Type	National Register of Historic Places Status	Attributes	PA Stipulation
N/A	Historic	District	Eligible	UCD Historic District (563 buildings and structures)	-Designate a representative historic district -Develop a historic district manual
35UM497	Historic	Linear	Eligible	1875 GLO Wagon Road Umatilla Cutoff	-Photographic inventory and site form update - Light Intensity Distance and Ranging study
N/A	Multi	PTRCS	Potentially Eligible	Coyote Coulee (Geographic Feature that Crosses the CUO)	-Limit traffic and construction -Allow tribal member access

Tribal consultation was initiated with the CTUIR, Confederated Tribes of the Warm Springs Reservation of Oregon, and the Legislative Commission on Indian Services by letter dated August 12, 2016. The CTUIR chose to consult; however, they did not choose to be a signatory to the PA. ORARNG staff met with CTUIR staff at the Tribal headquarters on four separate occasions; October 2016, April 2017, May 2017, and July 2017.

In addition to these documented resources, as yet unidentified archaeological sites and isolated finds would also be expected to be impacted by the Proposed Action. A total of 4,211 acres remain to be surveyed or re-surveyed prior to ground-disturbing activities. However, based on prior cultural surveys of 640 acres in the CUO and on survey and subsurface testing across 3,500 acres of adjacent UCD land, site density of non-surveyed lands in the CUO would be expected to be low, and include isolated historic and prehistoric artifacts or small sites, with the majority historic in affiliation and disturbed by prior military use (e.g., Cooper and Scott 2016; Stegner et al. 2015). Inadvertent discoveries of cultural resources or

human skeletal remains, although not known to be present, could also occur as a result of ground-disturbing activities. Such discoveries would be addressed according to Standard Operating Procedures included in the ORARNG state-wide ICRMP, which would be revised to include CUO.

4.8.2 Effects of the No Action Alternative

Under the No Action Alternative, impacts to cultural resources would be similar to existing conditions, as described in Section 3.8.2. The 7,500-acre area would still be used by the ORARNG/OMD as a training facility; however, no new facilities would be constructed, and use levels would remain the same. Therefore, there would be no construction-related impacts to cultural resources under the No Action Alternative. Continued military training activities could minimally impact as-yet unidentified archaeological sites and isolated finds, and continued use may contribute to inadvertent discoveries. Most NRHP-eligible buildings and structures in the CUO would be maintained as they are currently for the foreseeable future in accordance with the existing ICRMP (Pumphrey 2002); therefore, buildings and structures in the historic district would not be adversely affected by the No Action Alternative. Under the No Action Alternative, cultural resources would continue to be managed consistent with federal and state requirements and according to the 2013 PA and ICRMP developed for Department of the Army (Pumphrey 2002). In addition, tribal consultation would continue to occur as outlined in the ICRMP procedures. Impacts to cultural resources under the No Action Alternative would be **long-term, less-than-significant, and adverse**.

4.8.3 Mitigation Measures

Mitigation of adverse effects is provided in the PA (2018) (Table 4.4). Because of the impacts to significant cultural resources, the CUO Expansion and Development Project would be required to:

- Designate a representative historic district in a 15.5-acre area in the central cantonment and an 8-acre area of igloos, and maintain this historic district for the foreseeable future, maintaining the integrity of those historic buildings and structures. Those buildings and structures outside the designated historic district may be demolished, modified, or otherwise altered without further consultation.
- Develop a historic district management manual for the newly designated representative district.
- Protect the PTRCS site identified by the CTUIR as though it is eligible for the NRHP by limiting off-road vehicular traffic or new construction in the PTRCS site, and by consulting with the CTUIR to develop a protocol allowing tribal member access during certain times of the year to carry out cultural practices.
- Complete additional archaeological surveys in previously undisturbed areas prior to any CUO Expansion and Development ground-disturbing actions in that area.
- Photo-document the wagon road (35UM497) and update the site form. Complete a Light Intensity Distance and Ranging study to better document its track across the CUO.

The ACHP, Oregon SHPO, NGB, and ORARNG executed a PA in 2018. The project would also adhere to the existing ICRMP and inadvertent discovery protocol already in place for the facility until such time as the ORARNG's statewide ICRMP can be updated to include CUO.

4.9 Socioeconomics

For this analysis, significant impacts to socioeconomics are considered to be impacts that would result in a **substantial net loss of sales volume, employment, income, and population** due to proposed activities.

4.9.1 Effects of the Proposed Action

Effects of the Proposed Action include short-term effects associated with construction activities and long-term effects associated with site operations. As described below, because the Proposed Action would not result in a substantial net loss of sales volume, employment, income, and population due to proposed activities, **short- and long-term positive impacts** to socioeconomics would occur.

4.9.1.1 Construction Activities

Implementation of the Proposed Action would require a construction work force of an anticipated 20 to 60 full-time employees at any one time. Construction workers would likely be a mix of local work forces and seasonal relocated workers from the greater northwest Region (Oregon, Washington, Idaho, and northern Montana). Housing pressures due to the short-term increase in demand from the construction workforce are likely to be minimal. Economic activity associated with increases in local and non-local employment and spending in the two-county region during the short-term construction timeframe would provide short-term benefits to the local economy. However, beneficial socioeconomic impacts during construction would likely be negligible on a regional scale.

4.9.1.2 Site Operations

CUO currently averages a throughput of all combined personnel of approximately 22,000 man-days a year, and implementation of the Proposed Action would increase average man-days to between 40,000 and 50,000 a year. The number of full-time training site staff is anticipated to be 40 individuals at the outset of operations, increasing to a maximum of 122 individuals at the height of operations. The number of transient personnel is anticipated to be 476 at the outset, with surges of up to 1,240 individuals. An increase in the number of full-time employed personnel, transient personnel, and man-days at CUO would have a beneficial effect on the local economy due to a possible increase in spending by military personnel employed and temporarily present for training at CUO, as well as an increase in the tax base of the area. These impacts, while beneficial, would be negligible at the county level. The increased number of full-time employees would live in the surrounding two-county area; however, the impacts on local housing availability are anticipated to be minimal in context of the already-anticipated growth occurring in these areas. Therefore, there would be no long-term effects to housing associated with operations under this alternative.

4.9.1.3 Impact Summary

As described above, significant impacts to socioeconomics are considered to be impacts that would result in a substantial net loss of sales volume, employment, income, and population due to proposed activities. There would be short- and long-term positive impacts due to increased economic activity associated with construction and operation activities. The Proposed Action would not result in adverse socioeconomic impacts because:

- Housing pressures due to temporary increase in construction workforce would be minimal;

- Economic activity associated with increases in local and non-local employment and spending in the two-county region during the short-term construction timeframe would likely be regionally negligible; and
- There would be no long-term effects to local spending, tax base, or housing due to anticipated increase in operations personnel at CUO.

4.9.2 Effects of the No Action Alternative

Under the No Action Alternative, existing employment levels and Soldier man-days would continue, and extensive additional construction would not be anticipated. Economic activity associated with current uses of CUO would continue. Therefore, the No Action Alternative would have **no impact** to socioeconomics.

4.9.3 Mitigation Measures

No mitigation measures are necessary to reduce any adverse environmental impacts to below significant levels.

4.10 Environmental Justice

For this analysis, significant impacts to environmental justice are considered to be impacts that would **disproportionately impact minorities, low-income groups or individuals, or children**.

4.10.1 Effects of the Proposed Action

No significant adverse impacts to air quality, noise, hazardous materials, water resources, or socioeconomics have been identified as a result of the Proposed Action. Therefore, the Proposed Action would not cause disproportionately adverse environmental, economic, or health impacts specific to any minorities, low-income groups or individuals, or children at CUO or in Morrow or Umatilla Counties. **No impact** under this alternative.

4.10.1.1 Impact Summary

The Proposed Action would not result in significant short- or long-term adverse impacts to minority or low-income populations because:

- No significant adverse impacts to air quality, noise, hazardous materials, water resources, or socioeconomics have been identified as a result of the Proposed Action, and therefore, there would be no disproportionate impacts on minorities, low-income groups or individuals, or children.

4.10.2 Effects of the No Action Alternative

As described in previous sections of this chapter, impacts associated with the No Action Alternative would be similar to existing conditions. Therefore, there would be no disproportionately adverse effects on minority or low-income populations, and **no impact** would occur under this alternative.

4.10.3 Mitigation Measures

No mitigation measures are necessary to reduce any adverse environmental impacts to below significant levels.

4.11 Infrastructure

For this analysis, significant impacts to infrastructure are assumed to occur if there is **insufficient local capacity to accommodate the alternative under evaluation**. As described below, impacts to infrastructure would be **long-term and positive**.

4.11.1 Effects of the Proposed Action

For this analysis, potential effects to the potable water system, wastewater system, electrical system, and transportation network were analyzed. The Proposed Action includes upgrades to each of these systems, not necessarily due to a lack of capacity, but rather due to age and condition of each system. These upgrades would result in a **long-term positive impact.**

4.11.1.1 Potable Water System

Effects of the Proposed Action on the potable water system include short-term effects associated with construction activities and long-term effects associated with site operations.

4.11.1.1.1 Construction Activities

Under the Proposed Action, there would be short-term increases in water demand as construction activities occur. Construction-related water demand would occur as shown in the implementation schedule in Table 2.1. Water needed for construction would primarily be sourced from groundwater wells at CUO. Water use levels and type would be consistent with the Army's allocated water rights.

4.11.1.1.2 Site Operations

Under the Proposed Action, water demand would increase as a result of increased site operations and use of CUO. It is estimated that the maximum daily water demand under the Proposed Action would be 604 gpm, and the peak hour demand would be 905 gpm on full build-out of the Proposed Action (Kennedy/Jenks Consultants 2014).

For the first several years of the Proposed Action, potable water would continue to be supplied to CUO through existing wells and distribution systems. This would require a temporary easement for the use of Wells 4 and 5. The Proposed Action would construct a new water line and pump that would convey water from Wells 6 and 7 south, and connect to an existing water line near the southern boundary of CUO; and then to the Cantonment Use Area, where the majority of water usage would occur. An existing elevated tank near Well 6 would be used for water storage for CUO, and a new 400,000-gallon surface tank would be constructed in the Cantonment Use Area. New distribution lines would also be constructed in the Cantonment Use Area. Existing water rights provide sufficient water supply to satisfy the water demand under the Proposed Action (Kennedy/Jenks Consultants 2014).

4.11.1.2 Wastewater System

Effects of the Proposed Action on the wastewater system include short-term effects associated with construction activities and long-term effects associated with site operations.

4.11.1.2.1 Construction Activities

Temporary sanitation facilities would be used to handle additional sanitary waste generated during construction activities. The existing wastewater system would be kept online until the new wastewater

system is constructed; therefore, there would be no construction-related impacts to the wastewater system.

4.11.1.2.2 Site Operations

There would be an estimated wastewater flow of 55 gallons per capita per day (gpcpd) for full-time staff and 35 gpcpd for transient personnel, resulting in an estimated maximum wastewater generation of up to 6,710 gpd for full-time staff and 21,700 gpd for transient staff at average occupancy, and 43,400 gpd for transient staff at maximum occupancy (Kennedy/Jenks Consultants 2016). For the first several years of the Proposed Action, the small Imhoff tank would continue to be used to manage wastewater generated from the Cantonment Use Area. Repairs to the tank and drain field have been completed to handle the anticipated short-term capacity of 2,480 gpd. Because the existing wastewater facility was determined to be unsuitable for continued extended service (Kennedy/Jenks 2017), a new wastewater facility would be constructed. The new facility would use a denitrification process for treating wastewater generated from the Cantonment Use Area. Portable toilets would be brought in as necessary to accommodate additional sanitation needs during high-capacity training events. The wastewater system would be designed and constructed to handle the maximum flow expected at CUO. The OMD would obtain a WPCF permit for the wastewater facility from DEQ, and treated wastewater would be discharge in accordance with the permit.

The OMD has adopted a Net Zero goal with respect to water consumption at CUO. To meet this goal, the new wastewater treatment facility would convey treated effluent to a recycled water application, such as irrigation, vehicle wash water, and non-potable plumbing fixtures when possible (Kennedy Jenks 2017).

4.11.1.3 Electrical System

Effects of the Proposed Action on the electrical system include short-term effects associated with construction activities and long-term effects associated with site operations.

4.11.1.3.1 Construction Activities

Additional power would be required during construction for operation of construction equipment. Power required for construction beyond what is available at CUO would be supplied by construction contractors so that CUO would maintain sufficient capacity to operate while construction activities are taking place.

4.11.1.3.2 Site Operations

The primary power feed would be from the southern UEC substation, the UEC Chemical Substation, or UEC's Irrigon distribution system, near the northeastern corner of the CUO boundary. All three potential power feeds have the capacity to supply the full power need without adversely impacting local power needs. Long-term, the existing electrical system would require upgrades from its current substandard condition to provide system redundancy to maximize power availability and provide sufficient power to meet the projected need (Dana Engineering, Inc. 2014).

4.11.1.4 Communication System

Under the Proposed Action, the communication system would be maintained in working order at all times during construction and operation of the site. There would be no impacts to communications systems under the Proposed Action.

4.11.1.5 Transportation Network

Effects of the Proposed Action on the transportation network include **short-term impacts** associated with construction activities and **long-term positive impacts** associated with site operations.

4.11.1.5.1 Construction Activities

A short-term increase in traffic associated with construction of the Proposed Action would occur, including delivery of construction materials and equipment, and construction workers traveling to and from the work site. These increases in traffic would occur intermittently over the course of the next 5 years as construction projects occur. These intermittent construction-related traffic increases would not exceed the capacity of the transportation network that serves CUO.

4.11.1.5.2 Site Operations

Under the Proposed Action, use of vehicles and the transportation network would increase, including vehicle and equipment movement in CUO, as well as Soldiers and staff traveling to and from CUO. This additional traffic is not expected to generate a substantial amount of new trips in the area (Kittelson and Associates, Inc. 2014a). I-84 and I-82 provide access to CUO; both of these interstates have high capacity and would not be affected by the additional traffic expected to be generated as a result of the Proposed Action. Within the CUO boundary, a perimeter road would be constructed in areas where one currently does not exist to improve site security. There would be approximately 5 miles of new roads and 17.8 miles of new trails throughout CUO under the Proposed Action. These new and upgraded transportation systems would accommodate the increased number of personnel and training activities that would result under the Proposed Action. Transportation of all Army convoys from home station (armories) or other locations to CUO and back would comply with the Defense Transportation Agency DTR 4500.9-R Defense Transportation Regulations Part III, Mobility (specifically, Appendix F-Military Movement on Public Roads; DOD 2016).

4.11.1.5.3 Impact Summary

As described above, significant impacts to infrastructure are assumed to occur if there is insufficient capacity to accommodate the alternative under evaluation. The Proposed Action would result in **short- and long-term positive** impacts to infrastructure because:

- Proposed expansion of the existing potable water system would provide sufficient capacity for the anticipated long-term water demand;
- Existing wastewater facilities would manage anticipated short-term increases in capacity; the proposed new wastewater facility would be designed and constructed to handle maximum anticipated flow at CUO, and be constructed under IAW federal, state, and local regulations;
- Initial power feed would be relocated using power from UEC; in the long-term, the existing electrical system capacity would be upgraded in phases to provide system redundancy;
- There would be no impacts to the existing communication system; and
- Construction- and operations-related traffic increases would not exceed the capacity of the transportation network currently serving CUO; new and upgraded roads and trails throughout CUO would accommodate increased number of personnel and training activities resulting from the Proposed Action.

4.11.2 Effects of the No Action Alternative

Under the No Action Alternative, there would be no major expansion of regular military training activities; therefore, impacts would be **less than significant**. Improvements would be made to the potable water system and wastewater system to accommodate existing uses at CUO.

4.11.3 Mitigation Measures

No mitigation measures are necessary to reduce any adverse environmental impacts to below significant levels.

4.12 Hazardous and Toxic Materials/Wastes

For this analysis, impacts that result in a **substantial increase in the generation of HTMW, exposure of persons to HTMW, or presence of HTMW in the environment, or that place restrictions on property use in or adjacent to the project area due to HTMW are considered significant**.

4.12.1 Effects of the Proposed Action

Under the Proposed Action, **less-than-significant** short-term and long-term impacts related to HTMW would occur. Implementation of the Proposed Action would not substantially affect the ORARNG's hazardous materials storage and handling procedures, hazardous waste disposal processes, or spill prevention practices.

4.12.1.1 Construction Activities

Anticipated increases in generation of HTMW during construction would result from additional vehicle and equipment use, construction/renovation of training facilities, and infrastructure improvements. These activities would result in increased use of operating fluids and maintenance materials. However, spill prevention and response practices would be followed during construction as part of NPDES construction stormwater permitting requirements to avoid and minimize release of hazardous and non-hazardous materials to the environment during construction. During construction activities, hazardous building materials and waste identified in the ECOP/EBS Report (AMEC 2012) would be surveyed and abated/remediated. These materials currently pose a potential risk to human receptors and the environment; therefore, the Proposed Action would result in long-term beneficial impacts due to the removal of the hazardous building materials and universal waste.

CUO has and is currently undergoing remediation and clean-up activities in response to past site uses as a chemical depot. Those remediation activities are not associated with the Proposed Action analyzed in this EA.

4.12.1.2 Site Operations

Long-term impacts associated with training activities at CUO would produce increases in handling, storage, use, transportation, and disposal of HTMW. The largest generation of hazardous waste would result from the increased firing of ammunition, which could result in elevated lead levels in the Live-Fire Use Area.

The ORARNG is a RCRA CESQG for CUO and submits an annual Toxics Release Inventory and Oregon State Fire Marshal Hazardous Substance Information System report for reportable quantities of hazardous materials stored or used at CUO. The storage and management of HTMW would continue to

be performed in accordance with the ORARNG's HMWSMP, and SPCC and ISC Plans, which would be updated to include the expanded activities under the Proposed Action. These management plans provide BMPs to prevent or minimize the migration of contaminants from HTMW areas. The OMD would also implement sustainable-range BMPs to maintain and improve the environmental condition of the operational ranges. BMPs commonly focus on measures to maintain vegetation on range floors and post-target impact areas to reduce soil erosion.

Long-term beneficial impacts would result from management of ACM, including abatement, in existing buildings where ACM was previously identified (AMEC 2012). ACM would be managed in accordance with federal and state regulations to prevent human health exposure during demolition and construction activities. Pre-construction ACM surveys would be conducted prior to disturbance. Identified ACM would be abated prior to demolition and disposed of properly to avoid potential release to the environment.

Therefore, impacts associated with the generation, transport, use, and storage of hazardous materials and wastes are expected to be **less than significant**.

4.12.1.3 Impact Summary

As described above, significant impacts related to HTMW are considered to be impacts that would result in a substantial increase in the generation of HTMW, exposure of persons to HTMW, or presence of HTMW in the environment; or that place restrictions on property use in or adjacent to the project area due to HTMW. The Proposed Action would result in **less–than-significant** impacts related to HTMW because:

- The amount of HTMW generated or stored at CUO would not be significantly increased;
- HTMW would be managed in accordance with federal, state, and local requirements, including ORARNG requirements, to avoid exposure of persons to HTMW or release of HTMW to the environment;
- The Proposed Action would not result in restrictions on property use due to HTMW; and
- Existing HTMW in buildings would be abated as part of the Proposed Action.

4.12.2 Effects of the No Action Alternative

Implementation of the No Action Alternative would have no effects with respect to HTMW used or generated at CUO. HTMW, universal waste, and/or ACM abatement/mitigation would occur as needed. Impacts would be **less than significant**.

4.12.3 Mitigation Measures

No mitigation measures are necessary to reduce any adverse environmental impacts to below significant levels.

4.13 Mitigation Measures

Mitigation measures are project-specific and unique to the specific action under evaluation. For the Proposed Action, mitigation measures are required for adverse effects to cultural resources. These mitigation measures are described in Section 4.8, Table 4.4, and are the subject of the PA found in Appendix C.

ORARNG routinely implements BMPs as standard "business practices" for any project, including compliance with regulatory requirements (e.g., NPDES permitting requirements) and the requirements of environmental management plans (e.g., timing construction to avoid sensitive species from the INRMP, limiting noise-producing activities from the SONMP). These BMPs would be implemented as part of the Proposed Action to minimize environmental impacts, and are described Section 2.2.5 and in the following management plans.

- Hazardous Material, Waste, and Spill Management Plan

The HMWSMP prescribes responsibilities, policies, and procedures for storing and managing hazardous materials, accumulating and managing wastes, and responding to spills of hazardous materials and wastes in the ORARNG. The HMWSMP was completed in accordance with AR 200-1 to ensure ORARNG compliance with applicable federal, state, and local environmental laws and regulations.

- Integrated Natural Resource Management Plan

In accordance with the requirements of the Sikes Act, as amended, the ORARNG and OMD would prepare an INRMP for CUO. The INRMP would include management actions that would focus on sustaining natural resource conditions to provide natural environmental conditions for military training activities.

- Integrated Training Area Management Program

The ITAM Program is a management program that integrates Army training and other mission requirements for land use and sound natural resource management on maneuver lands. Program activities could include management actions such as marking cultural or environmentally sensitive areas for avoidance, and actions to prevent or repair damage resulting from vehicle maneuver training.

- Integrated Cultural Resource Management Plan

In accordance with Army requirements, the ORARNG and OMD would revise the existing state-wide ICRMP to include CUO. The ICRMP would be completed in accordance with AR 200-1 and ARNG Guidance to ensure ORARNG compliance with applicable federal and state cultural resources management laws.

- Integrated Wildland Fire Management Plan

The IWFMP is currently in the process of being developed. The IWFMP would describe policies and actions to reduce fire ignitions, the potential for fire to spread, and fire response times; and outline other relevant fire prevention and response strategies.

- Spill Prevention, Control, and Countermeasures Plan

An SPCC Plan would be completed for CUO. The SPCC Plan identifies potential spill sites, and provides a framework for ensuring that the CUO has the resources, structures, and equipment in place to prevent, control, and respond to oil or hazardous substance spills. The SPCC Plan would be completed in accordance with the Oil Pollution Prevention regulations at 40 CFR 112 and AR 200-1. The SPCC Plan is reviewed annually to determine if possible changes in the physical structures or operational procedures have occurred, or if more effective prevention and control technologies are available.

- State Operational Noise Management Plan

The SONMP provides a strategy for noise management at ORANRG facilities. Elements of the SONMP include education about noise and Army noise metrics; complaint management; and when necessary, noise abatement procedures (ORARNG 2010). OMD would revise the Statewide Noise Plan as funding becomes available.

- Construction BMPs

Construction BMPs would be implemented to control dust, avoid and minimize erosion and sediment migration, avoid the take of migratory birds during nesting season, and prevent release of toxic or hazardous chemicals to the environment. BMPs could include dust abatement, Regulated Building Materials surveys and abatement, mulching, storm sewer inlet protection, and water run-on and run-off controls.

4.14 Cumulative Effects

4.14.1 Introduction

This section discusses the relevant anticipated cumulative effects of the Proposed Action on those resources affected when considering other actions in the area. The CEQ defines cumulative effects as the "impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions." Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. A cumulative impact results from the additive effect of all projects in a common geographical area.

Because of the number of past, present, and reasonably foreseeable future actions on CUO, cumulative effects are the most difficult to analyze. NEPA requires the analysis of cumulative environmental effects of a Proposed Action on resources that may often be manifested only at the cumulative level, such as traffic congestion, air quality, noise, biological resources, cultural resources, socioeconomic conditions, and utility system capacities. The primary factor that has influenced the CUO study area is the former UCD, which—as described in Chapters 1, 2, and 3—has resulted in extensive disturbance of soils, vegetation, and habitat, as well as environmental contamination, throughout many areas of the CUO. Agricultural land uses surround much of the former UCD to the extent that native vegetation and habitat are generally lacking in the immediate vicinity of CUO. Wildland fires have also influenced the landscape, resulting in the proliferation of cheatgrass and decline of sagebrush in the former UCD.

Past, present, and reasonably foreseeable actions in the immediate vicinity of CUO include the following.

- **BRAC Land Use Realignment Process**

As discussed in Chapter 1, the Army closed the UCD as an active military installation on August 1, 2012, and is proceeding with disposal of the property through a variety of land conveyances consistent with the requirements of the 2005 BRAC process. Approximately 7,500 acres of the property were transferred to ORARNG. The remaining 9,555 acres will be transferred to a number of local government entities to be developed for commercial and industrial uses, with approximately 5,700 acres to be conserved as wildlife habitat. The CDA estimated that full redevelopment of the former UCD would generate approximately 4,249 new positions for the region, $285 million in direct and indirect payroll benefits, and $3.6 million in property taxes to support community services. However, these beneficial economic impacts could take decades to be realized (CDA 2016).

- **Additional CUO Improvements**

Several activities that were considered for inclusion with the Proposed Action of this EA were removed because they are not currently validated or funded projects; however, they may still occur in the reasonably foreseeable future. These actions are as follows.

- Construct permanent field latrine facilities at live-fire range complex.
- Construct a Light Demolition Range (within existing range SDZ area).
- Construct TCPC in the SDZ area for Heavy (off-road) maneuver.
- Construct Unit Training Equipment Site.
- Construct Centralized Vehicle Wash Facility (with soaking capability).
- Construct 400-person dining facility.
- Construct a multi-story RTI "schoolhouse" consisting of the RTI Headquarters/administrative area, educational or general instruction building area, and student/cadre barracks.
- Construct two Enlisted Barracks (2 story, 168 person each).
- Construct multi-story Readiness Center of approximately 28,000 to 44,000 square feet with privately owned vehicle parking.
- Construct Centralized Heat Plant (biomass) or replace individual building heat sources.
- Demolish unneeded buildings and structures.
- Construct a Leadership Reaction Course.
- Construct a Structural Collapse Venue Site with nearby staging area.
- Designate Engineer Medium-/Heavy-Equipment Training Area.
- Construct multi-use sports field with running track.
- Construct two tactical training bases: one improved and the other unimproved.
- Designate one aviation Forward Area Refueling Point site.
- Continue use of existing Land Navigation Course.
- Construct a Chemical, Biological, Radiological, Nuclear, and Explosive Training Chamber; either as a new building, or possibly by re-using an existing igloo.
- Construct 60-foot rappel tower to support Air Assault School training.
- Construct Confidence Course.
- Construct range operations and range maintenance facilities.
- Repair or construct road or railroad facilities for OMD military equipment, arriving or departing CUO via either road or rail, and storage of equipment.
- Construct a solar energy array to provide clean energy for use by CUO.
- Repair/replace Electrical System as needed.
- Repair/replace Telecommunication System as needed.
- Repair/replace Rail Network.

- **Interchange Plans**

To support the reuse and redevelopment of the former UCD and the associated changes to traffic and access, interchange improvements have been identified for three highway interchanges near the former UCD:

- I-82 and Lamb Road: Improvements would enhance roadway connectivity in the former UCD site that would provide public roadway connections between the I-84/Army Depot Access Road and I-82/Lamb Road interchanges (Kittelson and Associates 2014b).

- I-84/Army Depot Access Road: Improvements would enhance roadway connectivity in the former UCD site that would provide public roadway connections between the I-84/Army Depot Access Road and I-82/Lamb Road interchanges (Kittelson and Associates 2014a).
- I-84/Paterson Road: Improvements would enhance roadway connectivity in the former UCD site that would provide public roadway connections between the I-84/Paterson Ferry Road, I-84/Army Depot Access Road, and I-82/Lamb Road interchanges (Kittelson and Associates 2014c).

- **Boardman to Hemingway (B2H) Transmission Project**

The B2H project proposes to construct and operate a new 500-kilovolt electrical transmission line that would run from Boardman, Oregon, to the Hemingway substation near Melba, Idaho. The project is proposed by Idaho Power, PacifiCorp, and the Bonneville Power Administration; and would provide additional capacity for exchanging energy between the Pacific Northwest and the Intermountain West. The BLM is currently analyzing public comments received on the Draft EIS, and preparing for the Final EIS. Idaho Power estimates that the in-service date for the B2H project would be in 2022 or later (B2H 2016). The B2H project is approximately 5.5 miles due west of CUO at its closest point.

- **Naval Weapons System Training Facility Boardman**

The U.S. Navy, in cooperation with the NGB and the ORARNG, is proposing several actions to ensure that critical training and testing requirements are met, and NWSTF Boardman continues serving as a vital training resource. NWSTF Boardman is approximately 6 miles southwest of CUO at its closest point. These actions include the following (U.S. Navy 2016):

- Maintain baseline training and testing activities at current levels.
- Increase certain training activities from current levels to support the Navy and ORARNG requirements.
- Develop appropriate ranges and facilities, as necessary, to support training requirements.
- Accommodate mission requirements associated with force structure changes and introduction of new weapons systems for training.
- Implement range enhancements.

- **Road Maintenance and Repairs**

There are no projects currently listed on the Oregon Department of Transportation or county websites for roadway repairs that would overlap in time or geography with the Proposed Action (ODOT 2016). However, it is likely that minor road construction and repair projects may occur during the 10-year timeframe of this EA in the vicinity of CUO.

- **Lost Valley Ranch (formerly Willow Creek Dairy)**

Lost Valley Ranch (formerly Willow Creek Dairy) is a concentrated animal feeding operation (CAFO), defined by the U.S. Department of Agriculture (USDA) as an animal feeding operation that has over 1,000 animals confined for more than 45 days per year. Lost Valley Ranch began operations in spring of 2017. Lost Valley Ranch is approved to house 30,000 animals, with 16,500 animals expected to be housed during the first year of operation. The size of the herd would be increased over the course of 3 years, until the maximum is reached (DEQ 2018). This dairy would be the second large-scale CAFO in Eastern Oregon, and would generate an estimated 187 million gallons of liquid manure per year. The purchase of the approximately 7,000 acres of land needed for the dairy included the transfer of water

rights, and the dairy is anticipated to use 325 million gallons of water per year (Loew 2016). The proposed Willow Creek Dairy is approximately 5.5 miles southwest of CUO in Boardman, Oregon.

In March 2017, Lost Creek Ranch received an approved NPDES permit through the ODA and DEQ that specifies surface and groundwater protection measures required during operations. Protection measures include prohibition of discharge to surface water, containment of waste in a lined detention feature, and installation of 11 groundwater wells to establish a long-term groundwater monitoring program. The protection measures were designed to lead to improvements in the Lower Umatilla Ground Water Management Area aquifer over time, and will be measured through the ongoing groundwater monitoring program (DEQ 2018). The ODA and DEQ determined that the proper implementation of the protective measures specified in the permit would result in no cumulative impact on water quality.

The ODA and DEQ coordinated with the OWRD during the permit approval process to ensure the amount of water necessary for operation of the Lost Creek Ranch facility is legally available. Groundwater use was determined to remain consistent with pre-operation levels because Lost Valley Ranch was transferring existing surface water rights to another landowner in exchange for groundwater rights. Lost Valley Ranch has an agreement to purchase drinking and process water from the Port of Morrow if additional water is needed.

Air quality was not addressed during the ODA and DEQ permit review process; however, the DEQ determined the protective measures and BMPs specified in the Lost Valley Ranch's operational plan would mitigate air emissions from dairy operations (DEQ 2018).

4.14.2 Cumulative Effects within the Area

Overall, CUO is in an area that is predominantly agricultural/grazing. The two-county area experienced population growth of 7.7 percent from 2000-2014, representing a lower growth rate than the national average of 11.6 percent. The 2008 economic downturn slowed growth in the area; however, growth has continued steadily, but slowly, over the last decade.

This slow, steady growth has increased traffic congestion, air quality impacts, and other environmental effects, placing some increased demands on services, utilities, and infrastructure; and consuming former open-space areas with new development. Development of former open space has resulted in associated natural and cultural resources impacts, and the conversion of prime and unique farmlands.

4.14.3 Cumulative Effects of the Proposed Action

The Preferred Action Alternative would result in the impacts identified throughout **Section 5**. These include potential less-than-significant adverse impacts to land use, air quality, the noise environment, soils, water resources, biological resources, socioeconomic, infrastructure, and HTMW. These impacts would be further reduced through implementation of standard ORARNG BMPs, as identified throughout **Section 5**. Potential significant cultural resources impacts are identified, but are mitigable to less-than-significant levels; mitigation measures are summarized in **Section 4.8.3**. No adverse impacts to environmental justice are anticipated.

Implementation of the Preferred Action Alternative is not expected to cumulatively significantly adversely impact any technical area discussed in this EA. Cumulative net positive impacts to the local socioeconomic environment and infrastructure could be realized. The Proposed Action would not noticeably contribute to the ongoing regional decline in natural or cultural resources, because impacts to

such resources would be mitigated to acceptable levels, or standard BMPs would be used to reduce impacts. In terms of air quality and traffic, the Proposed Action would not significantly cumulatively increase regional impacts; the action primarily involves staff and activities currently present in the area, and would relocate operational traffic (and associated air emissions) to different locations in the area; full-time staffing increases would be negligible to the region. The Preferred Action Alternative would maintain or enhance the local socioeconomic environment through providing short-term construction jobs and long-term benefits through increased training use of the site, with consequent increases in local spending.

Although positive cumulative impacts to the socioeconomic environment are anticipated, the Proposed Action would likely produce localized, less-than-significant adverse impacts to the human environment through less-than-significant potential increases in local area traffic (i.e., during training events), associated air quality emissions, and noise. As noted above, this does not represent a regional cumulative impact.

Under the No Action Alternative, the ORARNG would not construct the Proposed Action and would continue with operations as currently conducted across CUO. The CUO would remain as is under current conditions, and continue to operate under current, effective environmental management plans. Under the No Action Alternative, less-than-significant short- and long-term cumulative impacts would be anticipated; however, short- and long-term positive impacts to the socioeconomic environment from new construction jobs or increased training use benefits would not be realized.

4.14.4 Inter-relationship of Cumulative Effects

The environment on and surrounding CUO is slowly changing due to ongoing development, producing environmental effects. The ORARNG's Preferred Action Alternative is to expand operations at CUO, including several infrastructure development projects; this would produce environmental effects. In the surrounding area and region, a need for land to accommodate the area's increasing population and economic development, including additional agricultural and industrial uses, businesses, homes, and related services and infrastructure, would produce environmental effects. These two factors are interrelated in two ways:

> (1) One of the missions of the ORARNG is to service the emergency needs of the people of the State of Oregon. Land and facilities are necessary to accommodate training so that the ORARNG can service the community effectively (as well as the entire country, in terms of National defense). Therefore, the growth of the region, Oregon, and the Nation as a whole drives the need for this training and support capability; and
>
> (2) Both factors produce pressures on the environment in the region.

Interrelated cumulative impacts place demands on the local area, planning organizations, and the military's natural resource management, cultural resource management, and public works personnel. Through sound, integrated, long-range planning on both sides of the proverbial fence, these impacts are minimized. The BRAC and Local Reuse Authority processes, working closely with the ORARNG, have developed an overall vision for the former UCD property and surrounding region. This vision, including recent investments in infrastructure, public amenities, and other planning elements, has enabled CUO and the surrounding area to grow in a planned and measured way, absorbing the pressures of new development. The Oregon SHPO and the CTUIR, working closely with the ORARNG, have assisted in the

environmentally sensitive development of this Preferred Action Alternative to ensure environmental impacts are minimized.

No significant adverse cumulative impacts to the environment, induced by changes under the Preferred Action Alternative, are anticipated in the region. Close coordination between the ORARNG and local planning and regulatory authorities would serve to minimize any potential future land use conflicts. Implementation of land use and resource management plans would serve to control the extent of environmental impacts, and proper planning would ensure that future socioeconomic conditions maintain or improve the quality of life for area residents. Implementation of effective environmental management plans and programs would minimize or eliminate any potential cumulative degradation of the natural ecosystem.

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SECTION 5: COMPARISON OF ALTERNATIVE AND CONCLUSIONS

5.1 Comparison of the Environmental Consequences of the Alternative

Table 5.1 compares the potential impacts that could occur under the Proposed Action and No Action alternatives, by resource.

Table 5.1: Comparison of Environmental Impacts of Each Alternative

Resource	Alternatives	
	No Action	**Proposed Action**
Land Use	**No Impact.** No new installation infrastructure and no change to use type or levels.	**Less than significant.** No conflict with overall authorized land use. Site activities would not change, but would be expanded in scope. Long-term positive impact would occur through development of the CUO consistent with existing land use and zoning.
Air Quality	**No Impact.** Training and operations would continue under current conditions at current locations and levels; no change to pollutant emissions.	**Less than significant.** Short-term, less-than-significant, adverse impacts due to the potential for dust generation and air emissions from construction activities. Long-term, less–than-significant, adverse impacts from emissions associated with increased equipment and vehicle use and increased fugitive dust during training operations.
Noise	**No Impact.** Training and operations would continue under current conditions at current locations and levels; no change to local noise environment.	**Less than significant.** Short-term, less-than-significant adverse impacts due to construction noise. Long-term, less-than-significant adverse impacts due to increased noise generation from increased training activities that would be performed consistent with the Statewide Operational Noise Management Plan (SONMP) and existing noise-related Right-of-Way, and would not impact sensitive land uses.
Geology, Topography, and Soils	**Less than significant.** No short-term impacts would occur. Long-term, less–than-significant, adverse impacts due to soil compaction from continued training activities.	**Less than significant.** Short-term, less-than-significant adverse impact through vegetation removal, ground disturbance, and potential compaction during construction. Long-term, less-than-significant, adverse impacts through loss of soil function resulting from creation of impervious surfaces. Proposed ground disturbance in identified areas of severe soil hazards would be conducted using erosion control best management practices (BMPs).

Table 5.1: Comparison of Environmental Impacts of Each Alternative

Resource	Alternatives	
	No Action	**Proposed Action**
Water Resources	**Less than significant.** No short-term impacts would occur. Long-term, less–than-significant, adverse impacts due to soil erosion during training operations and continued water usage at current levels.	**Less than significant.** Short-term, less-than-significant adverse impacts due to the potential for release of toxic or hazardous materials during construction, which would be completed in accordance with permit requirements. Long-term, less-than-significant adverse impacts due to increased water usage that would remain within allocated water rights. Contamination to groundwater from operations, including the proposed wastewater treatment plant, would be unlikely to occur due to implementation of BMPs.
Biological (Vegetation, Fish and Wildlife, and Wildland Fire)	**Less than significant.** No short-term impacts would occur. Long-term, less-than-significant, adverse impacts due to trampling and degradation of non-native vegetation during training activities and impacts to species due to continued human presence in areas previously disturbed by current training and operational activities. Long-term, less-than-significant adverse impacts would occur due to lack of firebreaks at CUO; however, an Integrated Wildland Fire Management Plan would be created for the site.	**Less than significant.** Short-term, less-than-significant, adverse impacts due to vegetation removal and disturbance, habitat loss and degradation during construction, and potential for more frequent fire starts. Long-term, less–than-significant adverse impacts due to vegetation removal and disturbance during operations and training that would occur primarily in areas dominated by non-native and invasive species, and due to habitat conversion, noise, and/or human presence from training and operational activities to be conducted in accordance with the Integrated Natural Resource Management Plan (INRMP). Impacts would be reduced by implementation of exotic/invasive species reduction goals established in the INRMP. Long-term, less-than-significant adverse impact due increased fire risk from increased training; however, offset by incorporation of BMPs, including firebreaks and creation of the Integrated Wildland Fire Management Plan.
Cultural Resources	**Less than significant.** Short-term impacts would not occur. Long-term, less–than-significant adverse impacts due to continued training and operations activities that could potentially result in occasional cultural resource discoveries and required building maintenance/upkeep that would be performed in existing management plan.	**Mitigated to less than Significant**. Short-term, less-than-significant adverse impacts due to the potential for cultural resource discovery during construction. Long-term, significant adverse impacts due to impacts to 563 National Register of Historic Places (NRHP)-eligible buildings and structures associated with the UCD Historic District; an NRHP-eligible wagon road; and a potentially eligible property of traditional religious and cultural significance identified by the Confederated Tribes of the Umatilla Indian Reservation. Impacts would be reduced to less-than-significant levels with implementation of mitigation measures discussed in Section 4 and the 2018 Programmatic Agreement.

Table 5.1: Comparison of Environmental Impacts of Each Alternative

Resource	Alternatives	
	No Action	Proposed Action
Socioeconomics	**No impact.** Economic activity associated with current uses of Camp Umatilla Oregon (CUO) would continue and use levels of CUO would not change.	**Less than significant.** Short-term positive impact due to increased economic activity during construction. Long-term positive impact due to increased long-term employment, income, and population levels and corresponding purchases of goods and services.
Environmental Justice	**No impact.** Activity and use levels would remain the same; no impacts to environmental justice populations.	**No impact.** No disproportionate adverse environmental, economic, or health-specific impact to minority or low-income populations. No disproportionate environmental or health risks to children.
Infrastructure	**Less than significant.** Minor improvements to water and wastewater systems to accommodate CUO use levels would result in short- and long-term positive impacts due to improvements to the potable water system and wastewater system to accommodate existing uses.	**Less than significant.** Short- and long-term positive impacts due to improvements of existing infrastructure and construction of additional on-site utility infrastructure with sufficient capacity to accommodate increased activity levels.
Hazardous and Toxic Materials/ Wastes	**Less than significant.** Long-term positive impacts due to management of Regulated Building Material (RBM) and hazardous wastes remaining at the site.	**Less than significant.** Short- and long-term beneficial impacts would occur due to abatement of existing RBM and management of hazardous materials during operations.

5.2 Conclusions

The scope of this EA includes analysis of the current military training activities (No Action) and those proposed increased military training activities and related infrastructure development projects over the next 5 years (Proposed Action). As described in Sections 4.2 through 4.14 and summarized in Table 5.1, neither the Proposed Action nor the No Action alternatives is expected to result in significant impacts. Implementation of the Proposed Action Alternative, provided that BMPs and mitigation measures specified in this EA are implemented, would incur impacts that are within acceptable levels and best fulfill the purpose of and need for the Proposed Action, allowing the ORARNG to accomplish its mission while minimizing potential impacts to the local and regional natural, cultural, and socioeconomic environment. This EA's analysis determines, therefore, that an EIS is unnecessary for implementation of the Proposed Action Alternative, and that a FNSI is appropriate. The Proposed Action Alternative was determined by the ORARNG to provide the best combination of land and resources to sustain quality military training, and to maintain and improve the units' readiness postures. The No Action Alternative was not found to satisfy the purpose of and need for the project. This alternative would limit the capability of the ORARNG to carry out its assigned mission. Therefore, this EA recommends implementation of the Proposed Action Alternative.

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SECTION 7: GLOSSARY

100-year Flood – A flood event of such magnitude that it occurs, on average, every 100 years; this equates to a 1 percent chance of its occurring in a given year.

Aesthetics – Pertaining to the quality of human perception of natural beauty.

Ambient – The environment as it exists around people, plants, and structures.

Ambient Air Quality Standards – Those standards established according to the CAA to protect health and welfare (AR 200-1).

Aquifer – An underground geological formation containing usable amounts of groundwater that can supply wells and springs.

Attainment Area – Region that meets the NAAQS for a criteria pollutant under the CAA.

Berm – Earthen berm placed at the end of a firing range to stop the travel of fired projectiles.

Bedrock – The solid rock that underlies all soil, sand, clay, gravel and loose material on the earth's surface.

Best Management Practices (BMPs) – Methods, measures, or practices to prevent or reduce the contributions of pollutants to U.S. waters. BMPs may be imposed in addition to, or in the absence of, effluent limitations, standards, or prohibitions (AR 200-1).

Commercial Land Use – land use that includes private and public businesses (retail, wholesale, etc.), institutions (schools, churches, etc.), health services (hospitals, clinics, etc.), and military buildings and installations.

Compaction – The packing of soil together into a firmer, denser mass, generally caused by the pressure of great weight.

Company – A military unit that is the next smaller unit of a battalion; the most basic administrative and tactical unit (approximately 50 to 200 persons, depending on the type of unit).

Contaminants – Any physical, chemical, biological or radiological substances that have an adverse effect on air, water or soil.

Council on Environmental Quality (CEQ) – An executive office of the President composed of three members appointed by the President, subject to approval by the senate. Each member shall be exceptionally qualified to analyze and interpret environmental trends; to appraise programs and activities of the federal government. Members are to be conscious of and responsive to the scientific, economic, social, aesthetic, and cultural needs of the nation, and to formulate and recommend national policies to promote the improvement of the quality of the environment.

Criteria Pollutants – The CAA of 1970 required the EPA to set air quality standards for common and widespread pollutants to protect human health and welfare. There are six "criteria pollutants": ozone (O_3), carbon monoxide (CO), sulfur dioxide (SO_2), lead (Pb), nitrogen dioxide (NO_2), and particulate matter.

Cultural Resources – Cultural resources are historic properties as defined by the NHPA, cultural items as defined by the Native American Graves Protection and Repatriation Act, archaeological resources as defined by the Archaeological Resources Protection Act, sacred sites as defined by EO 13007 to which access is afforded under the American Indian Religious Freedom Act, and collections and associated records as defined by 36 CFR §79.

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

dBA – "A-weighted" non-impulse noise measurement in decibels, weighted to match human hearing frequency response.

Decibel (dB) – A unit of measurement of sound pressure level.

Emission – A release of a pollutant.

Endangered Species – Any species that is in danger of extinction throughout all or a significant portion of its range.

Environmental Assessment (EA) – An EA is a publication that provides sufficient evidence and analysis to show whether a proposed system would adversely affect the environment or be environmentally controversial.

Erosion – The wearing away of the land surface by detachment and movement of soil and rock fragments through the action of moving water and other geological agents.

Farmland – Cropland, pastures, meadows, and planted woodland.

Floodplain – The relatively flat area or lowlands adjoining a river, stream, ocean, lake, or other body of water that is susceptible to being inundated by floodwaters.

FNSI – Finding of No Significant Impact, a NEPA document.

Fugitive Dust – Particles light enough to be suspended in air that are not caught in a capture or filtering system. For this document, this refers to particles put in the air by moving vehicles and air movement over disturbed soils at construction sites.

Geology – Science that deals with the physical history of the earth, the rocks of which it is composed, and physical changes in the earth.

Groundwater – Water found below the ground surface. Groundwater may be geologic in origin and as pristine as it was when it was entrapped by the surrounding rock or it may be subject to daily or seasonal effects depending on the local hydrologic cycle. Groundwater may be pumped from wells and used for drinking water, irrigation, and other purposes. It is recharged by precipitation or irrigation water soaking

into the ground. Thus, any contaminant in precipitation or irrigation water may be carried into groundwater.

Hazardous Substance – Hazardous materials are defined within several laws and regulations to have certain meanings. For this document, a hazardous material is any one of the following:

- Any substance designated pursuant to section 311 (b)(2) (A) of the Clean Water Act.
- Any element, compound, mixture, solution or substance designated pursuant to Section 102 of CERCLA.
- Any hazardous as defined under the RCRA.
- Any toxic pollutant listed under TSCA.
- Any hazardous air pollutant listed under Section 112 of CAA.
- Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of TSCA.

The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in a above, or 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). A list of hazardous substances is found in 40 CFR §302.4.

Hazardous Waste – A solid waste, which when improperly treated, stored, transported, or disposed of poses a substantial hazard to human health or the environment. Hazardous wastes are identified in 40 CFR §261.3 or applicable foreign law, rule, or regulation (see also solid waste).

Hazardous Waste Storage – As defined in 40 CFR §260.10, ". . . the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere".

Hydric Soil – A soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic (oxygen-lacking) conditions that favor the growth and regeneration of hydrophytic vegetation. A wetland indicator.

Inactive Duty Training – Authorized training performed by a member of a Reserve component not on active duty or active duty for training and consisting of regularly scheduled unit training assemblies, additional training assemblies, periods of appropriate duty or equivalent training, and any special additional duties authorized for Reserve component personnel by the Secretary concerned, and performed by them in connection with the prescribed activities of the organization in which they are assigned with or without pay. Does not include work or study associated with correspondence courses.

Indirect Impact – An indirect impact is caused by a Proposed Action, but occurs later in time or farther removed in distance, but is still reasonably foreseeable. Indirect impacts may include induced changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural and social systems. For example, referring to the possible direct impacts described above, the clearing of trees for new development may have an indirect impact on area wildlife by decreasing available habitat.

Industrial Land Use – Land uses of a relatively higher intensity that are generally not compatible with residential development. Examples include light and heavy manufacturing, mining, and chemical refining.

Listed Species – Any plant or animal designated as a state or federal threatened, endangered, special concern, or candidate species.

Man-days – Soldiers on site per day. Example: 50 Soldiers on site for training for a 2-day weekend is 100 man-days.

Mitigation – Measures taken to reduce adverse impacts on the environment.

Mobile Sources – Vehicles, aircraft, watercraft, construction equipment, and other equipment that use internal combustion engines for energy sources.

Monitoring – A process of inspecting and recording the progress of mitigation measures implemented.

National Ambient Air Quality Standards (NAAQS) – Nationwide standards set up by the EPA for widespread air pollutants, as required by Section 109 of the CAA. Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone (O_3), particulate matter, and sulfur dioxide (SO_2).

National Environmental Policy Act (NEPA) – U.S. statute that requires all federal agencies to consider the potential effects of Proposed Actions on the human and natural environment.

Nonattainment Area – An area that has been designated by the EPA or the appropriate state air quality agency as exceeding one or more national or state ambient air quality standards.

Particulates or Particulate Matter – Fine liquid or solid particles such as dust, smoke, mist, fumes or smog found in air.

Physiographic Region – A portion of the Earth's surface with a basically common topography and common morphology.

Pollutant – A substance introduced into the environment that adversely affects the usefulness of a resource.

Potable Water – Water that is suitable for drinking.

Prime Farmland – A special category of highly productive cropland that is recognized and described by the U.S. Department of Agriculture's Soil Conservation Service (now the Natural Resources Conservation Service [NRCS]) and receives special protection under the Surface Mining Law.

Remediation – A long-term action that reduces or eliminates a threat to the environment.

Riparian Areas – Areas adjacent to rivers and streams that have a high density, diversity, and productivity of plant and animal species relative to nearby uplands.

Sedimentation – Deposition of eroded material in an alternate location by dispersing agents such as water or wind.

Sensitive Receptors – Include, but are not limited to, asthmatics, children, and the elderly, as well as specific facilities, such as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, and childcare centers.

Short Term Impacts – Direct or indirect impacts resulting from an action in the near term. In this context, short-term does not refer to any rigid time period and is determined on a case-by-case basis in terms of the environmental consequences of the Proposed Action.

Significant Impact – According to 40 CFR §1508.27, "significance" as used in NEPA requires consideration of both context and intensity.

- Context. The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the Proposed Action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.
- Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

Soil – The mixture of altered mineral and organic material at the earth's surface that supports plant life.

Solid Waste – Any discarded material that is not excluded by section 261.4(a) or that is not excluded by variance granted under sections 260.30 and 260.3 1.

Surficial Aquifer – Comprises all the rocks and sediments from land surface downward to the top of the intermediate confining unit containing usable amounts of groundwater, which can supply wells and springs.

Threatened Species – Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Topography – The relief features or surface configuration of an area.

Toxic Material/Waste – A harmful substance that includes elements, compounds, mixtures, and materials of complex composition.

Wetlands – Areas that are regularly saturated by surface or groundwater and, thus, are characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Examples include swamps, bogs, fens, marshes and estuaries.

Wildlife Habitat – Set of living communities in which a wildlife population lives.

Zone II – Noise within this zone is not recommended for noise-sensitive land uses.

Zone III – Noise within this zone is normally not recommended with noise-sensitive land uses.

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SECTION 8: LIST OF PREPARERS

Name	Role	Degree	Years of Experience
Oregon Military Department			
LTC Russell Gibson	Executive Officer, Oregon Training Command	M.M.A.S. Masters of Military Art and Science	29
MAJ Sung Ji	Operations Officer, Oregon Training Command		
Dan Cleveland	Wildland Fire Program Manager		
Amanda Haney	Environmental Program Manager	B.S. Geology	14
Jeff Mach	Natural Resources Manager	B.S Wildlife Management	39
Jim Arnold	Restoration and Water Quality Manager	B.A. Physical Geography	28
Jennifer Losson	Hazardous Waste Manager	B.S. Business Management	24
Kris Mitchell	OMD Project Manager; NEPA and Cultural Resource Manager	M.A. Historic Preservation	22
Carl Anderson	GIS Specialist	M.S. Geography	10
AECOM (Consultant Team)			
Emily Newell	Project Manager, NEPA analysis and oversight, EA Author (Soils, Water Resources, Infrastructure, and Wildland Fire)	B.S. Civil/Environmental Engineering	10
Brian Boose	Senior Technical Review	B.S. Biological Sciences and Ecology	27
Danni Kline	Technical Editor of the EA	B.S. Botany Technical Editing Certificate	17 6
Maya Taylor	Preparation of EA sections (Air Quality, Noise, HTMW)	B.S. Environmental Science	12
Jan Reed	Preparation of EA sections (Land Use, Biology, Socioeconomics, Environmental Justice)	B.A. Environmental Studies M.S. Ecology	11

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SECTION 9: AGENCIES AND INDIVIDUALS CONSULTED

Boardman Rural Fire Protection District
Marc Rogelstad, Fire Chief
300 Southwest Wilson Lane
Boardman, OR 97818

City of Boardman
Karen Pettigrew, City Manager
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P.O. Box 229
Boardman, OR 97818

City of Hermiston
Byron Smith, City Manager
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Hermiston, OR 97838

City of Irrigon
Aaron Palmquist, City Manager
180 NE 2nd Street
Irrigon, OR 97844

City of Umatilla
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Umatilla, OR 97882

Columbia Development Authority
Mr. Greg Smith, Executive Director
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Boardman, OR 97818

Confederated Tribes of the Umatilla Indian Reservation
Chairman Gary Burke
46411 Timine Way
Pendleton, OR 97801

Confederated Tribes of the Warm Springs Reservation of Oregon
Chairperson Eugene Austin Greene, Jr.
1233 Veterans Street
Warm Springs, OR 97761

Oregon Department of Environmental Quality
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811 SW Sixth Avenue
Portland, OR 97204

Oregon Department of Fish and Wildlife
Mr. Curt Melcher, Interim Director
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Oregon State Historic Preservation Office
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Oregon Water Resources Department
Tom Byler, Director
725 Summer St. NE, Suite A
Salem, OR 97301

State of Oregon
Legislative Commission on Indian Services
Ms. Karen Quigley, Executive Director
900 Court St NE, Room 167
Salem, OR 97301

Umatilla County Commission
The Honorable George Murdock
216 SE Fourth Street
Pendleton, OR 97801

Umatilla County Courthouse
Ms. Tamra Mabott, Planning Director
216 SE Fourth Street
Pendleton, OR 97801

Umatilla Rural Fire Protection District
Mike Roxbury, Chief
621 Sixth Street
P.O. Box 456
Umatilla, OR 97882

Hermiston Fire & Emergency Services Scott Stanton, Fire Chief 320 South 1st Street Hermiston, OR 97838	U.S. Department of the Interior U.S. Fish and Wildlife Service Mr. Gary Miller, Field Supervisor 3502 Highway 30 La Grande, OR 97850
Morrow County Carla McLane, Planning Director P.O. Box 40 Irrigon, OR 97844	U.S. Environmental Protection Agency Mr. Dennis McLerran, Region X Administrator 1200 Sixth Avenue, Suite 900 Seattle, WA 98101
Morrow County Court The Honorable Terry Tallman P.O. Box 788 Heppner, OR 97836	U.S. Navy Mr. Jerry Sodano, PACFLT RSSC 3730 North Charles Porter Avenue Oak Harbor, WA 98278

APPENDIX A:

SCOPING LETTERS

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MORROW COUNTY

PLANNING DEPARTMENT

P. O. Box 40 • Irrigon, Oregon 97844
(541) 922-4624 or (541) 676-9061 x 5503
FAX: (541) 922-3472

August 29, 2016

Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
1776 Militia Way
Post Office Box 14350
Salem, Oregon 97309-5047

RE: Environmental Assessment for the expansion of military training operations and related infrastructure development at Camp Umatilla Oregon

Dear Mr. Mitchell:

Morrow County appreciates receiving Notice from Roy Swafford dated August 12, 2016, of the upcoming National Environmental Policy Act (NEPA) activities. After reviewing the letter the County Court asked me to request, on their behalf, Cooperating Agency status for Morrow County during the drafting of the Environmental Assessment (EA). As the County Planning Director I will take the lead role for the County and would request you add Carla McLane, Planning Director, to your contact list.

In the letter dated August 12 it identifies "Opportunity for Involvement," but does not offer or define Cooperating Agency status or opportunities. It also indicates that the Oregon Military Department is currently preparing the draft Environmental Assessment, but does not reference that the necessary Scoping has taken place. It would be appreciated if you could provide guidance to the Oregon Military Department process for conducting an EA under the NEPA for Morrow County to better understand how, without Scoping, you are able to move directly to a draft EA.

Morrow County has gained extensive experience with the NEPA process and is currently acting or has recently acted as a Cooperating Agency with three other federal actions - the Boardman-to-Hemingway transmission line (BLM), the suspended Cascade Crossing transmission line (USFS), and the now completed Carty Lateral gas pipeline (FERC). Additionally we have been working with the Navy on actions, now complete, for enhanced uses proposed at the Boardman Bombing Range which was done to also benefit the Oregon Army National Guard. We have an understanding of what it means to take on this role and the impacts it can have.

We look forward to working with you and others on this process. Should you have any questions concerning this letter or our request for Cooperator Agency status please contact me at: 205 NE Third Street, P.O. Box 40, Irrigon, Oregon, 97844, 541-922-4624, cmclane@co.morrow.or.us.

Thank you for your consideration of this request.

Cordially,

Carla McLane
Planning Director

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

City of Boardman
Karen Pettigrew, City Manager
200 City Center Circle
P.O. Box 229
Boardman, OR 97818

Dear Ms. Pettigrew:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

Background
The former UCD was a nearly 20,000-acre munitions and chemical agent storage and maintenance facility owned by the Army. The Army closed the UCD as an active military installation on August 1, 2012 and is proceeding with disposal of the property through a variety of land conveyances consistent with the requirements of the 2005 Base Realignment and Closure (BRAC) land use realignment process. The ORNG has maintained an enclave within the UCD property since the early 1980s to support various military training activities of ORNG Soldiers. The training enclave currently includes 2,100 acres of property and several buildings licensed from the Army to the ORNG. The approved BRAC disposal plan calls for approximately 6,700 acres to be turned over to a number of local government entities to be developed for commercial and industrial uses. Approximately 5,500 acres located on the eastern side of the former UCD would be conserved as wildlife habitat. The Army would retain the balance of the installation, approximately 7,500 acres, as the CUO to be used as an expanded training area for the ORNG. The NEPA analysis for the BRAC real estate transfer of the original UCD is currently being addressed by the Army in a separate EA.

Purpose and Need
The purpose of the Proposed Action is to maximize the training opportunities available on the 7,500-acre CUO in an economically-feasible way in order to support the core training and readiness objectives for all ORNG elements as part of the Combined Arms Training Strategy, along with the US Army Training and Doctrine Programs of Instruction required for the Regional Training Institute.

The need for the Proposed Action stems from the State of Oregon's lack of in-state training installations necessary to provide ORNG Soldiers with adequate training opportunities. The need for the Proposed Action has been validated by the National Guard Bureau Training Support Systems Division.

Scope of the Environmental Assessment

The EA will evaluate potential impacts from two alternatives: the Proposed Action and the No Action Alternative as summarized below. The EA assumes that the BRAC real estate transfer of 7,500 acres to the ORNG will occur. The EA will analyze potential impacts that could result from the two alternatives within the following resource categories:

- Land Use
- Air Quality
- Noise
- Geology, Topology and Soils
- Water Resources
- Biological Resources
- Cultural Resources
- Socioeconomics
- Environmental Justice
- Infrastructure
- Hazardous Materials and Waste
- Wildland Fire

Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500-acre area retained for ORNG training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of the CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, and transportation system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at the CUO under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

Under the No Action Alternative, the 7,500-CUO would still be retained for ORNG training activities. However, no infrastructure improvement projects would occur and use levels would remain the same or similar to existing conditions.

Opportunity for Involvement

OMD is currently preparing the Draft EA. Following National Guard Bureau NEPA guidelines, no formal public comment period for the Draft EA is planned. However, once the Final EA is completed, and if a Finding of No Significant Impact (FNSI) is determined to be appropriate based upon the analysis presented, a notification will be sent to concerned agencies, organizations, and the interested public stating that the Final EA and Draft FNSI are available for review. Public and stakeholder comments would be considered prior to a decision and the issuance of a final FNSI. If significant effects on the quality of the human and natural environment are identified and cannot be mitigated to a level below significance, the OMD will re-evaluate project feasibility and may initiate preparation of an Environmental Impact Statement (EIS), which would afford further opportunities to participate in the environmental review process. If you have questions or concerns, or would like additional information on the CUO Project or on the NEPA process, please contact Kris Mitchell at the e-mail address listed below.

Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Boardman Rural Fire Protection District
Marc Rogelstad, Fire Chief
300 Southwest Wilson Lane
Boardman, OR 97818

Dear Chief Rogelstad:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

Background
The former UCD was a nearly 20,000-acre munitions and chemical agent storage and maintenance facility owned by the Army. The Army closed the UCD as an active military installation on August 1, 2012 and is proceeding with disposal of the property through a variety of land conveyances consistent with the requirements of the 2005 Base Realignment and Closure (BRAC) land use realignment process. The ORNG has maintained an enclave within the UCD property since the early 1980s to support various military training activities of ORNG Soldiers. The training enclave currently includes 2,100 acres of property and several buildings licensed from the Army to the ORNG. The approved BRAC disposal plan calls for approximately 6,700 acres to be turned over to a number of local government entities to be developed for commercial and industrial uses. Approximately 5,500 acres located on the eastern side of the former UCD would be conserved as wildlife habitat. The Army would retain the balance of the installation, approximately 7,500 acres, as the CUO to be used as an expanded training area for the ORNG. The NEPA analysis for the BRAC real estate transfer of the original UCD is currently being addressed by the Army in a separate EA.

Purpose and Need
The purpose of the Proposed Action is to maximize the training opportunities available on the 7,500-acre CUO in an economically-feasible way in order to support the core training and readiness objectives for all ORNG elements as part of the Combined Arms Training Strategy, along with the US Army Training and Doctrine Programs of Instruction required for the Regional Training Institute.

The need for the Proposed Action stems from the State of Oregon's lack of in-state training installations necessary to provide ORNG Soldiers with adequate training opportunities. The need for the Proposed Action has been validated by the National Guard Bureau Training Support Systems Division.

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The EA will evaluate potential impacts from two alternatives: the Proposed Action and the No Action Alternative as summarized below. The EA assumes that the BRAC real estate transfer of 7,500 acres to the ORNG will occur. The EA will analyze potential impacts that could result from the two alternatives within the following resource categories:

- Land Use
- Air Quality
- Noise
- Geology, Topology and Soils
- Water Resources
- Biological Resources
- Cultural Resources
- Socioeconomics
- Environmental Justice
- Infrastructure
- Hazardous Materials and Waste
- Wildland Fire

Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500-acre area retained for ORNG training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of the CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, and transportation system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at the CUO under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

Under the No Action Alternative, the 7,500-CUO would still be retained for ORNG training activities. However, no infrastructure improvement projects would occur and use levels would remain the same or similar to existing conditions.

Opportunity for Involvement
OMD is currently preparing the Draft EA. Following National Guard Bureau NEPA guidelines, no formal public comment period for the Draft EA is planned. However, once the Final EA is completed, and if a Finding of No Significant Impact (FNSI) is determined to be appropriate based upon the analysis presented, a notification will be sent to concerned agencies, organizations, and the interested public stating that the Final EA and Draft FNSI are available for review. Public and stakeholder comments would be considered prior to a decision and the issuance of a final FNSI. If significant effects on the quality of the human and natural environment are identified and cannot be mitigated to a level below significance, the OMD will re-evaluate project feasibility and may initiate preparation of an Environmental Impact Statement (EIS), which would afford further opportunities to participate in the environmental review process. If you have questions or concerns, or would like additional information on the CUO Project or on the NEPA process, please contact Kris Mitchell at the e-mail address listed below.

Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Columbia Development Authority
Mr. Greg Smith, Executive Director
Two Marine Drive, Suite 102
Boardman, OR 97818

Dear Mr. Smith:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

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Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500-acre area retained for ORNG training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of the CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, and transportation system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at the CUO under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

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Opportunity for Involvement

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Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Oregon Department of Environmental Quality
Mr. Pete Shepherd, Office of the Director
811 Southwest Sixth Avenue
Portland, OR 97204

Dear Mr. Shepherd:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

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Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500-acre area retained for ORNG training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of the CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, and transportation system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at the CUO under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

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Opportunity for Involvement
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Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

cc:
Ms. Lissa Druback, Department of Environmental Quality Eastern Region,
ER Solid Waste Manager

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

U.S. Environmental Protection Agency
Mr. Dennis McLerran, Region X Administrator
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Dear Mr. McLerran:

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Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

cc:
Mr. Harry Craig, EPA Region X Hanford Project Office,
Remedial Project Manager

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

City of Hermiston
Byron Smith, City Manager
180 Northeast 2nd Street
Hermiston, OR 97838

Dear Mr. Smith:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

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MAJ (Ret)
Director of Installations

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1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Hermiston Fire & Emergency Services
Scott Stanton, Fire Chief
320 South 1st Street
Hermiston, OR 97838

Dear Chief Stanton:

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Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

City of Irrigon
Aaron Palmquist, City Manager
180 Northeast 2nd Street
Irrigon, OR 97844

Dear Mr. Palmquist:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

Background
The former UCD was a nearly 20,000-acre munitions and chemical agent storage and maintenance facility owned by the Army. The Army closed the UCD as an active military installation on August 1, 2012 and is proceeding with disposal of the property through a variety of land conveyances consistent with the requirements of the 2005 Base Realignment and Closure (BRAC) land use realignment process. The ORNG has maintained an enclave within the UCD property since the early 1980s to support various military training activities of ORNG Soldiers. The training enclave currently includes 2,100 acres of property and several buildings licensed from the Army to the ORNG. The approved BRAC disposal plan calls for approximately 6,700 acres to be turned over to a number of local government entities to be developed for commercial and industrial uses. Approximately 5,500 acres located on the eastern side of the former UCD would be conserved as wildlife habitat. The Army would retain the balance of the installation, approximately 7,500 acres, as the CUO to be used as an expanded training area for the ORNG. The NEPA analysis for the BRAC real estate transfer of the original UCD is currently being addressed by the Army in a separate EA.

Purpose and Need
The purpose of the Proposed Action is to maximize the training opportunities available on the 7,500-acre CUO in an economically-feasible way in order to support the core training and readiness objectives for all ORNG elements as part of the Combined Arms Training Strategy, along with the US Army Training and Doctrine Programs of Instruction required for the Regional Training Institute.

The need for the Proposed Action stems from the State of Oregon's lack of in-state training installations necessary to provide ORNG Soldiers with adequate training opportunities. The need for the Proposed Action has been validated by the National Guard Bureau Training Support Systems Division.

Scope of the Environmental Assessment

The EA will evaluate potential impacts from two alternatives: the Proposed Action and the No Action Alternative as summarized below. The EA assumes that the BRAC real estate transfer of 7,500 acres to the ORNG will occur. The EA will analyze potential impacts that could result from the two alternatives within the following resource categories:

- Land Use
- Air Quality
- Noise
- Geology, Topology and Soils
- Water Resources
- Biological Resources
- Cultural Resources
- Socioeconomics
- Environmental Justice
- Infrastructure
- Hazardous Materials and Waste
- Wildland Fire

Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500-acre area retained for ORNG training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of the CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, and transportation system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at the CUO under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

Under the No Action Alternative, the 7,500-CUO would still be retained for ORNG training activities. However, no infrastructure improvement projects would occur and use levels would remain the same or similar to existing conditions.

Opportunity for Involvement

OMD is currently preparing the Draft EA. Following National Guard Bureau NEPA guidelines, no formal public comment period for the Draft EA is planned. However, once the Final EA is completed, and if a Finding of No Significant Impact (FNSI) is determined to be appropriate based upon the analysis presented, a notification will be sent to concerned agencies, organizations, and the interested public stating that the Final EA and Draft FNSI are available for review. Public and stakeholder comments would be considered prior to a decision and the issuance of a final FNSI. If significant effects on the quality of the human and natural environment are identified and cannot be mitigated to a level below significance, the OMD will re-evaluate project feasibility and may initiate preparation of an Environmental Impact Statement (EIS), which would afford further opportunities to participate in the environmental review process. If you have questions or concerns, or would like additional information on the CUO Project or on the NEPA process, please contact Kris Mitchell at the e-mail address listed below.

Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

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ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

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P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

State of Oregon
Legislative Commission on Indian Services
Ms. Karen Quigley, Executive Director
900 Court St NE, Room 167
Salem, OR 97301

Dear Director Quigley:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

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Purpose and Need
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- Hazardous Materials and Waste
- Wildland Fire

Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500-acre area retained for ORNG training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of the CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, and transportation system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at the CUO under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

Under the No Action Alternative, the 7,500-CUO would still be retained for ORNG training activities. However, no infrastructure improvement projects would occur and use levels would remain the same or similar to existing conditions.

Opportunity for Involvement

OMD is currently preparing the Draft EA. Following National Guard Bureau NEPA guidelines, no formal public comment period for the Draft EA is planned. However, once the Final EA is completed, and if a Finding of No Significant Impact (FNSI) is determined to be appropriate based upon the analysis presented, a notification will be sent to concerned agencies, organizations, and the interested public stating that the Final EA and Draft FNSI are available for review. Public and stakeholder comments would be considered prior to a decision and the issuance of a final FNSI. If significant effects on the quality of the human and natural environment are identified and cannot be mitigated to a level below significance, the OMD will re-evaluate project feasibility and may initiate preparation of an Environmental Impact Statement (EIS), which would afford further opportunities to participate in the environmental review process. If you have questions or concerns, or would like additional information on the CUO Project or on the NEPA process, please contact Kris Mitchell at the e-mail address listed below.

Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

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ROY. D SWAFFORD
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Director of Installations

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SALEM, OREGON 97309-5047

August 12, 2016

Morrow County
Ms. Carla McLane, Planning Director
P.O. Box 40
Irrigon, OR 97844

Dear Ms. McLane:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

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Summary of the Proposed Action Alternative

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NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

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Director of Installations

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P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Morrow County Court
The Honorable Terry Tallman
P.O. Box 788
Heppner, OR 97836

Dear Chairman Tallman:

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SALEM, OREGON 97309-5047

August 12, 2016

U.S. Navy
Mr. Jerry Sodano, PACFLT RSSC
3730 North Charles Porter Avenue
Oak Harbor, WA 98278

Dear Mr. Sodano:

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Oregon Military Department
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Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

cc:
Ms. Amy Burt, NAVFAC Northwest,
Environmental Planning Supervisor

OREGON MILITARY DEPARTMENT
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1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Oregon Department of Fish & Wildlife
Mr. Curt Melcher, Interim Director
811 Southwest Sixth Avenue
Portland, OR 97204

Dear Director Melcher:

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Under the No Action Alternative, the 7,500-CUO would still be retained for ORNG training activities. However, no infrastructure improvement projects would occur and use levels would remain the same or similar to existing conditions.

Opportunity for Involvement
OMD is currently preparing the Draft EA. Following National Guard Bureau NEPA guidelines, no formal public comment period for the Draft EA is planned. However, once the Final EA is completed, and if a Finding of No Significant Impact (FNSI) is determined to be appropriate based upon the analysis presented, a notification will be sent to concerned agencies, organizations, and the interested public stating that the Final EA and Draft FNSI are available for review. Public and stakeholder comments would be considered prior to a decision and the issuance of a final FNSI. If significant effects on the quality of the human and natural environment are identified and cannot be mitigated to a level below significance, the OMD will re-evaluate project feasibility and may initiate preparation of an Environmental Impact Statement (EIS), which would afford further opportunities to participate in the environmental review process. If you have questions or concerns, or would like additional information on the CUO Project or on the NEPA process, please contact Kris Mitchell at the e-mail address listed below.

Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

cc:
Mr. Steve Cherry, ODFW, Northeast Region, John Day Watershed District,
District Wildlife Biologist

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Oregon Water Resources Department
Mr. Tom Byler, Director
725 Summer St. NE, Suite A
Salem, OR 97301

Dear Director Byler:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

Background
The former UCD was a nearly 20,000-acre munitions and chemical agent storage and maintenance facility owned by the Army. The Army closed the UCD as an active military installation on August 1, 2012 and is proceeding with disposal of the property through a variety of land conveyances consistent with the requirements of the 2005 Base Realignment and Closure (BRAC) land use realignment process. The ORNG has maintained an enclave within the UCD property since the early 1980s to support various military training activities of ORNG Soldiers. The training enclave currently includes 2,100 acres of property and several buildings licensed from the Army to the ORNG. The approved BRAC disposal plan calls for approximately 6,700 acres to be turned over to a number of local government entities to be developed for commercial and industrial uses. Approximately 5,500 acres located on the eastern side of the former UCD would be conserved as wildlife habitat. The Army would retain the balance of the installation, approximately 7,500 acres, as the CUO to be used as an expanded training area for the ORNG. The NEPA analysis for the BRAC real estate transfer of the original UCD is currently being addressed by the Army in a separate EA.

Purpose and Need
The purpose of the Proposed Action is to maximize the training opportunities available on the 7,500-acre CUO in an economically-feasible way in order to support the core training and readiness objectives for all ORNG elements as part of the Combined Arms Training Strategy, along with the US Army Training and Doctrine Programs of Instruction required for the Regional Training Institute.

The need for the Proposed Action stems from the State of Oregon's lack of in-state training installations necessary to provide ORNG Soldiers with adequate training opportunities. The need for the Proposed Action has been validated by the National Guard Bureau Training Support Systems Division.

Scope of the Environmental Assessment

The EA will evaluate potential impacts from two alternatives: the Proposed Action and the No Action Alternative as summarized below. The EA assumes that the BRAC real estate transfer of 7,500 acres to the ORNG will occur. The EA will analyze potential impacts that could result from the two alternatives within the following resource categories:

- Land Use
- Air Quality
- Noise
- Geology, Topology and Soils
- Water Resources
- Biological Resources
- Cultural Resources
- Socioeconomics
- Environmental Justice
- Infrastructure
- Hazardous Materials and Waste
- Wildland Fire

Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500-acre area retained for ORNG training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of the CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, and transportation system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at the CUO under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

Under the No Action Alternative, the 7,500-CUO would still be retained for ORNG training activities. However, no infrastructure improvement projects would occur and use levels would remain the same or similar to existing conditions.

Opportunity for Involvement
OMD is currently preparing the Draft EA. Following National Guard Bureau NEPA guidelines, no formal public comment period for the Draft EA is planned. However, once the Final EA is completed, and if a Finding of No Significant Impact (FNSI) is determined to be appropriate based upon the analysis presented, a notification will be sent to concerned agencies, organizations, and the interested public stating that the Final EA and Draft FNSI are available for review. Public and stakeholder comments would be considered prior to a decision and the issuance of a final FNSI. If significant effects on the quality of the human and natural environment are identified and cannot be mitigated to a level below significance, the OMD will re-evaluate project feasibility and may initiate preparation of an Environmental Impact Statement (EIS), which would afford further opportunities to participate in the environmental review process. If you have questions or concerns, or would like additional information on the CUO Project or on the NEPA process, please contact Kris Mitchell at the e-mail address listed below.

Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

cc:
Ms. Jen Woody, Oregon Water Resources Department
Hydrogeologist, Groundwater Section

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Oregon State Historic Preservation Office
Ms. Chrissy Curran
725 Summer Street NE, Suite C
Salem, OR 97301

Dear Ms. Curran:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

Background
The former UCD was a nearly 20,000-acre munitions and chemical agent storage and maintenance facility owned by the Army. The Army closed the UCD as an active military installation on August 1, 2012 and is proceeding with disposal of the property through a variety of land conveyances consistent with the requirements of the 2005 Base Realignment and Closure (BRAC) land use realignment process. The ORNG has maintained an enclave within the UCD property since the early 1980s to support various military training activities of ORNG Soldiers. The training enclave currently includes 2,100 acres of property and several buildings licensed from the Army to the ORNG. The approved BRAC disposal plan calls for approximately 6,700 acres to be turned over to a number of local government entities to be developed for commercial and industrial uses. Approximately 5,500 acres located on the eastern side of the former UCD would be conserved as wildlife habitat. The Army would retain the balance of the installation, approximately 7,500 acres, as the CUO to be used as an expanded training area for the ORNG. The NEPA analysis for the BRAC real estate transfer of the original UCD is currently being addressed by the Army in a separate EA.

Purpose and Need
The purpose of the Proposed Action is to maximize the training opportunities available on the 7,500-acre CUO in an economically-feasible way in order to support the core training and readiness objectives for all ORNG elements as part of the Combined Arms Training Strategy, along with the US Army Training and Doctrine Programs of Instruction required for the Regional Training Institute.

The need for the Proposed Action stems from the State of Oregon's lack of in-state training installations necessary to provide ORNG Soldiers with adequate training opportunities. The need for the Proposed Action has been validated by the National Guard Bureau Training Support Systems Division.

Scope of the Environmental Assessment

The EA will evaluate potential impacts from two alternatives: the Proposed Action and the No Action Alternative as summarized below. The EA assumes that the BRAC real estate transfer of 7,500 acres to the ORNG will occur. The EA will analyze potential impacts that could result from the two alternatives within the following resource categories:

- Land Use
- Air Quality
- Noise
- Geology, Topology and Soils
- Water Resources
- Biological Resources
- Cultural Resources
- Socioeconomics
- Environmental Justice
- Infrastructure
- Hazardous Materials and Waste
- Wildland Fire

Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500-acre area retained for ORNG training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of the CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, and transportation system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at the CUO under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

Under the No Action Alternative, the 7,500-CUO would still be retained for ORNG training activities. However, no infrastructure improvement projects would occur and use levels would remain the same or similar to existing conditions.

Opportunity for Involvement
OMD is currently preparing the Draft EA. Following National Guard Bureau NEPA guidelines, no formal public comment period for the Draft EA is planned. However, once the Final EA is completed, and if a Finding of No Significant Impact (FNSI) is determined to be appropriate based upon the analysis presented, a notification will be sent to concerned agencies, organizations, and the interested public stating that the Final EA and Draft FNSI are available for review. Public and stakeholder comments would be considered prior to a decision and the issuance of a final FNSI. If significant effects on the quality of the human and natural environment are identified and cannot be mitigated to a level below significance, the OMD will re-evaluate project feasibility and may initiate preparation of an Environmental Impact Statement (EIS), which would afford further opportunities to participate in the environmental review process. If you have questions or concerns, or would like additional information on the CUO Project or on the NEPA process, please contact Kris Mitchell at the e-mail address listed below.

Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

cc:
Dr. Dennis Griffin, Oregon Department of Parks & Recreation,
State Archeologist
Mr. Ian Johnson, Oregon Department of Parks & Recreation,
Associate Deputy State Historic Preservation Officer
Ms. Jessica Gabriel, Oregon Department of Parks & Recreation,
National Register/Review & Compliance/Survey Coordinator

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
OFFICE OF THE ADJUTANT GENERAL
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Confederated Tribes of the Umatilla Indian Reservation
Chairman Gary Burke
46411 Timine Way
Pendleton, OR 97801

Dear Chairman Burke:

The Oregon Military Department is preparing an Environmental Assessment in compliance with the National Environmental Policy Act (NEPA) for the conversion and expansion of an existing 2,100-acre military training enclave into a 7,500-acre training center. This expanded 7,500-acre training center is identified as Camp Umatilla Oregon and is situated within a portion of the former United States Army Umatilla Chemical Depot. Camp Umatilla Oregon is located in portions of both Morrow and Umatilla Counties at the northwest corner of the I-82 and I-84 junction.

Because we recognize the Confederated Tribes of the Warm Springs Reservation of Oregon as a sovereign nation, we would like to begin the government-to-government consultation process with your Tribal leadership and staff to ensure any Tribal concerns regarding significant natural resources, cultural resources, and properties of traditional, customary, religious or cultural importance are addressed.

Background
The former Umatilla Chemical Depot was a nearly 20,000-acre munitions and chemical agent storage and maintenance facility owned by the US Army. The US Army closed the Umatilla Chemical Depot as an active military installation on August 1, 2012. In accordance with requirements of the 2005 Base Realignment and Closure land use realignment process the US Army is proceeding with disposal of the property through land conveyances. The Oregon National Guard has maintained an enclave within the Umatilla Chemical Depot property since the early 1980s in support of various Oregon National Guard Soldier training activities. The training enclave currently includes 2,100 acres of property and several buildings leased from the US Army to the Oregon National Guard. The approved Base Realignment and Closure disposal plan calls for approximately 6,700 acres to be turned over to a number of local government entities to be developed for commercial and industrial uses. Approximately 5,500 acres located on the eastern side of the former Umatilla Chemical Depot would be conserved as wildlife habitat. The US Army would retain a balance of 7,500 acres of the installation as Camp Umatilla Oregon to be used as an expanded training area for the Oregon National Guard. The NEPA analysis for the Base Realignment and Closure real estate transfer of the original Umatilla Chemical Depot is currently being addressed by the US Army in a separate Environmental Assessment.

Purpose and Need
The purpose of the Proposed Action is to maximize the training opportunities available on the 7,500 acre Camp Umatilla Oregon in an economically-feasible way in order to support the core training and readiness objectives for all Oregon National Guard elements as part of the Combined Arms Training Strategy, along with the US Army Training and Doctrine Programs of Instruction required for the Regional Training Institute.

The need for the Proposed Action stems from the State of Oregon's lack of in-state training installations necessary to provide Oregon National Guard Soldiers with adequate training opportunities. The need for the Proposed Action has been validated by the National Guard Bureau Training Support Systems Division.

Scope of the Environmental Assessment

The Environmental Assessment will evaluate potential impacts from two alternatives: the Proposed Action and the No Action Alternative as summarized below. The Environmental Assessment assumes that the Base Realignment and Closure real estate transfer of 7,500 acres to the Oregon National Guard will occur. The Environmental Assessment will analyze potential impacts that could result from the two alternatives within the following resource categories:

- Land Use
- Air Quality
- Noise
- Geology, Topology and Soils
- Water Resources
- Biological Resources
- Cultural Resources
- Socioeconomics
- Environmental Justice
- Infrastructure
- Hazardous Materials and Waste
- Wildland Fire

Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500 acre area retained for Oregon National Guard training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of Camp Umatilla Oregon would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, transportation system and firebreak system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at Camp Umatilla Oregon under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

Under the No Action Alternative, the 7,500 acre Camp Umatilla Oregon would still be retained for Oregon National Guard training activities. However, no infrastructure improvement projects would occur and use levels would remain the same or similar to existing conditions.

Opportunity for Involvement

The Oregon Military Department is currently preparing a Draft Environmental Assessment in accordance with National Guard Bureau NEPA guidelines. No formal public comment period for the Draft Environmental Assessment is planned. However, once the Final Environmental Assessment is complete, and if a Finding of No Significant Impact (FNSI) is determined to be appropriate based upon the analysis presented, a notification will be sent to concerned agencies, organizations, and the interested public stating that the Final Environmental Assessment and Draft FNSI are available for review. Public and stakeholder comments would be considered prior to a decision and the issuance of a final FNSI. If significant effects on the quality of the human or natural environment are identified and cannot be mitigated to a level below significance, the Oregon Military Department will re-evaluate project feasibility and may initiate preparation of an Environmental Impact Statement, which would afford further opportunities to participate in the environmental review process.

However, we are extending an invitation to the Confederated Tribes of the Umatilla Indian Reservation and the Confederated Tribes of the Warm Springs Reservation of Oregon to consult in our NEPA and National Historic Preservation Act processes in a manner or level that you feel is appropriate. We look forward to continuing our meaningful and productive relationship with the Confederated Tribes of the Umatilla Indian Reservation. If you have any information, questions, or concerns, please have your staff contact Kris Mitchell at the e-mail address listed below.

Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

MICHAEL E. STENCEL
Major General
The Adjutant General

cc:
Ms. Teara Farrow Ferman, Cultural Resources Program Manager
Ms. Catherine Dickson, Cultural Resources Program

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
OFFICE OF THE ADJUTANT GENERAL
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Chairperson, Eugene Austin Greene, Jr.
Confederated Tribes of the Warm Springs Reservation of Oregon
1233 Veterans Street
Warm Springs, OR 97761

Dear Chairperson Greene:

The Oregon Military Department is preparing an Environmental Assessment in compliance with the National Environmental Policy Act (NEPA) for the conversion and expansion of an existing 2,100-acre military training enclave into a 7,500-acre training center. This expanded 7,500-acre training center is identified as Camp Umatilla Oregon and is situated within a portion of the former United States Army Umatilla Chemical Depot. Camp Umatilla Oregon is located in portions of both Morrow and Umatilla Counties at the northwest corner of the I-82 and I-84 junction.

Because we recognize the Confederated Tribes of the Warm Springs Reservation of Oregon as a sovereign nation, we would like to begin the government-to-government consultation process with your Tribal leadership and staff to ensure any Tribal concerns regarding significant natural resources, cultural resources, and properties of traditional, customary, religious or cultural importance are addressed.

Background
The former Umatilla Chemical Depot was a nearly 20,000-acre munitions and chemical agent storage and maintenance facility owned by the US Army. The US Army closed the Umatilla Chemical Depot as an active military installation on August 1, 2012. In accordance with requirements of the 2005 Base Realignment and Closure land use realignment process the US Army is proceeding with disposal of the property through land conveyances. The Oregon National Guard has maintained an enclave within the Umatilla Chemical Depot property since the early 1980s in support of various Oregon National Guard Soldier training activities. The training enclave currently includes 2,100 acres of property and several buildings leased from the US Army to the Oregon National Guard. The approved Base Realignment and Closure disposal plan calls for approximately 6,700 acres to be turned over to a number of local government entities to be developed for commercial and industrial uses. Approximately 5,500 acres located on the eastern side of the former Umatilla Chemical Depot would be conserved as wildlife habitat. The US Army would retain a balance of 7,500 acres of the installation as Camp Umatilla Oregon to be used as an expanded training area for the Oregon National Guard. The NEPA analysis for the Base Realignment and Closure real estate transfer of the original Umatilla Chemical Depot is currently being addressed by the US Army in a separate Environmental Assessment.

Purpose and Need
The purpose of the Proposed Action is to maximize the training opportunities available on the 7,500 acre Camp Umatilla Oregon in an economically-feasible way in order to support the core training and readiness objectives for all Oregon National Guard elements as part of the Combined Arms Training Strategy, along with the US Army Training and Doctrine Programs of Instruction required for the Regional Training Institute.

The need for the Proposed Action stems from the State of Oregon's lack of in-state training installations necessary to provide Oregon National Guard Soldiers with adequate training opportunities. The need for the Proposed Action has been validated by the National Guard Bureau Training Support Systems Division

Scope of the Environmental Assessment

The Environmental Assessment will evaluate potential impacts from two alternatives: the Proposed Action and the No Action Alternative as summarized below. The Environmental Assessment assumes that the Base Realignment and Closure real estate transfer of 7,500 acres to the Oregon National Guard will occur. The Environmental Assessment will analyze potential impacts that could result from the two alternatives within the following resource categories:

- Land Use
- Air Quality
- Noise
- Geology, Topology and Soils
- Water Resources
- Biological Resources
- Cultural Resources
- Socioeconomics
- Environmental Justice
- Infrastructure
- Hazardous Materials and Waste
- Wildland Fire

Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500 acre area retained for Oregon National Guard training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of Camp Umatilla Oregon would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, transportation system and firebreak system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at Camp Umatilla Oregon under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

Under the No Action Alternative, the 7,500 acre Camp Umatilla Oregon would still be retained for Oregon National Guard training activities. However, no infrastructure improvement projects would occur and use levels would remain the same or similar to existing conditions.

Opportunity for Involvement
The Oregon Military Department is currently preparing a Draft Environmental Assessment in accordance with National Guard Bureau NEPA guidelines. No formal public comment period for the Draft Environmental Assessment is planned. However, once the Final Environmental Assessment is complete, and if a Finding of No Significant Impact (FNSI) is determined to be appropriate based upon the analysis presented, a notification will be sent to concerned agencies, organizations, and the interested public stating that the Final Environmental Assessment and Draft FNSI are available for review. Public and stakeholder comments would be considered prior to a decision and the issuance of a final FNSI. If significant effects on the quality of the human or natural environment are identified and cannot be mitigated to a level below significance, the Oregon Military Department will re-evaluate project feasibility and may initiate preparation of an Environmental Impact Statement, which would afford further opportunities to participate in the environmental review process.

However, we are extending an invitation to the Confederated Tribes of the Umatilla Indian Reservation and the Confederated Tribes of the Warm Springs Reservation of Oregon to consult in our NEPA and National Historic Preservation Act processes in a manner or level that you feel is appropriate. We look forward to continuing our meaningful and productive relationship with the Confederated Tribes of the Warm Springs Reservation of Oregon. If you have any information, questions, or concerns, please have your staff contact Kris Mitchell at the e-mail address listed below.

Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

MICHAEL E. STENCEL
Major General
The Adjutant General

cc:
Roberta Kirk, THPO Assistant
Kathleen Sloan, PhD Cultural Resources Department

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Umatilla County Courthouse
Ms. Tamra Mabott, Planning Director
216 Southeast Fourth Street
Pendleton, OR 97801

Dear Ms. Mabott:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

Background
The former UCD was a nearly 20,000-acre munitions and chemical agent storage and maintenance facility owned by the Army. The Army closed the UCD as an active military installation on August 1, 2012 and is proceeding with disposal of the property through a variety of land conveyances consistent with the requirements of the 2005 Base Realignment and Closure (BRAC) land use realignment process. The ORNG has maintained an enclave within the UCD property since the early 1980s to support various military training activities of ORNG Soldiers. The training enclave currently includes 2,100 acres of property and several buildings licensed from the Army to the ORNG. The approved BRAC disposal plan calls for approximately 6,700 acres to be turned over to a number of local government entities to be developed for commercial and industrial uses. Approximately 5,500 acres located on the eastern side of the former UCD would be conserved as wildlife habitat. The Army would retain the balance of the installation, approximately 7,500 acres, as the CUO to be used as an expanded training area for the ORNG. The NEPA analysis for the BRAC real estate transfer of the original UCD is currently being addressed by the Army in a separate EA.

Purpose and Need
The purpose of the Proposed Action is to maximize the training opportunities available on the 7,500-acre CUO in an economically-feasible way in order to support the core training and readiness objectives for all ORNG elements as part of the Combined Arms Training Strategy, along with the US Army Training and Doctrine Programs of Instruction required for the Regional Training Institute.

The need for the Proposed Action stems from the State of Oregon's lack of in-state training installations necessary to provide ORNG Soldiers with adequate training opportunities. The need for the Proposed Action has been validated by the National Guard Bureau Training Support Systems Division.

Scope of the Environmental Assessment

The EA will evaluate potential impacts from two alternatives: the Proposed Action and the No Action Alternative as summarized below. The EA assumes that the BRAC real estate transfer of 7,500 acres to the ORNG will occur. The EA will analyze potential impacts that could result from the two alternatives within the following resource categories:

- Land Use
- Air Quality
- Noise
- Geology, Topology and Soils
- Water Resources
- Biological Resources
- Cultural Resources
- Socioeconomics
- Environmental Justice
- Infrastructure
- Hazardous Materials and Waste
- Wildland Fire

Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500-acre area retained for ORNG training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of the CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, and transportation system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at the CUO under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

Under the No Action Alternative, the 7,500-CUO would still be retained for ORNG training activities. However, no infrastructure improvement projects would occur and use levels would remain the same or similar to existing conditions.

Opportunity for Involvement
OMD is currently preparing the Draft EA. Following National Guard Bureau NEPA guidelines, no formal public comment period for the Draft EA is planned. However, once the Final EA is completed, and if a Finding of No Significant Impact (FNSI) is determined to be appropriate based upon the analysis presented, a notification will be sent to concerned agencies, organizations, and the interested public stating that the Final EA and Draft FNSI are available for review. Public and stakeholder comments would be considered prior to a decision and the issuance of a final FNSI. If significant effects on the quality of the human and natural environment are identified and cannot be mitigated to a level below significance, the OMD will re-evaluate project feasibility and may initiate preparation of an Environmental Impact Statement (EIS), which would afford further opportunities to participate in the environmental review process. If you have questions or concerns, or would like additional information on the CUO Project or on the NEPA process, please contact Kris Mitchell at the e-mail address listed below.

Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Umatilla County Commission
The Honorable George Murdock
216 Southeast Fourth Street
Pendleton, OR 97801

Dear Chairman Murdock:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

Background
The former UCD was a nearly 20,000-acre munitions and chemical agent storage and maintenance facility owned by the Army. The Army closed the UCD as an active military installation on August 1, 2012 and is proceeding with disposal of the property through a variety of land conveyances consistent with the requirements of the 2005 Base Realignment and Closure (BRAC) land use realignment process. The ORNG has maintained an enclave within the UCD property since the early 1980s to support various military training activities of ORNG Soldiers. The training enclave currently includes 2,100 acres of property and several buildings licensed from the Army to the ORNG. The approved BRAC disposal plan calls for approximately 6,700 acres to be turned over to a number of local government entities to be developed for commercial and industrial uses. Approximately 5,500 acres located on the eastern side of the former UCD would be conserved as wildlife habitat. The Army would retain the balance of the installation, approximately 7,500 acres, as the CUO to be used as an expanded training area for the ORNG. The NEPA analysis for the BRAC real estate transfer of the original UCD is currently being addressed by the Army in a separate EA.

Purpose and Need
The purpose of the Proposed Action is to maximize the training opportunities available on the 7,500-acre CUO in an economically-feasible way in order to support the core training and readiness objectives for all ORNG elements as part of the Combined Arms Training Strategy, along with the US Army Training and Doctrine Programs of Instruction required for the Regional Training Institute.

The need for the Proposed Action stems from the State of Oregon's lack of in-state training installations necessary to provide ORNG Soldiers with adequate training opportunities. The need for the Proposed Action has been validated by the National Guard Bureau Training Support Systems Division.

Scope of the Environmental Assessment

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- Land Use
- Air Quality
- Noise
- Geology, Topology and Soils
- Water Resources
- Biological Resources
- Cultural Resources
- Socioeconomics
- Environmental Justice
- Infrastructure
- Hazardous Materials and Waste
- Wildland Fire

Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500-acre area retained for ORNG training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of the CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, and transportation system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at the CUO under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

Under the No Action Alternative, the 7,500-CUO would still be retained for ORNG training activities. However, no infrastructure improvement projects would occur and use levels would remain the same or similar to existing conditions.

Opportunity for Involvement

OMD is currently preparing the Draft EA. Following National Guard Bureau NEPA guidelines, no formal public comment period for the Draft EA is planned. However, once the Final EA is completed, and if a Finding of No Significant Impact (FNSI) is determined to be appropriate based upon the analysis presented, a notification will be sent to concerned agencies, organizations, and the interested public stating that the Final EA and Draft FNSI are available for review. Public and stakeholder comments would be considered prior to a decision and the issuance of a final FNSI. If significant effects on the quality of the human and natural environment are identified and cannot be mitigated to a level below significance, the OMD will re-evaluate project feasibility and may initiate preparation of an Environmental Impact Statement (EIS), which would afford further opportunities to participate in the environmental review process. If you have questions or concerns, or would like additional information on the CUO Project or on the NEPA process, please contact Kris Mitchell at the e-mail address listed below.

Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

City of Umatilla
Russell Pelleberg, City Manager
P.O. Box 130
Umatilla, OR 97882

Dear Mr. Pelleberg:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

Background
The former UCD was a nearly 20,000-acre munitions and chemical agent storage and maintenance facility owned by the Army. The Army closed the UCD as an active military installation on August 1, 2012 and is proceeding with disposal of the property through a variety of land conveyances consistent with the requirements of the 2005 Base Realignment and Closure (BRAC) land use realignment process. The ORNG has maintained an enclave within the UCD property since the early 1980s to support various military training activities of ORNG Soldiers. The training enclave currently includes 2,100 acres of property and several buildings licensed from the Army to the ORNG. The approved BRAC disposal plan calls for approximately 6,700 acres to be turned over to a number of local government entities to be developed for commercial and industrial uses. Approximately 5,500 acres located on the eastern side of the former UCD would be conserved as wildlife habitat. The Army would retain the balance of the installation, approximately 7,500 acres, as the CUO to be used as an expanded training area for the ORNG. The NEPA analysis for the BRAC real estate transfer of the original UCD is currently being addressed by the Army in a separate EA.

Purpose and Need
The purpose of the Proposed Action is to maximize the training opportunities available on the 7,500-acre CUO in an economically-feasible way in order to support the core training and readiness objectives for all ORNG elements as part of the Combined Arms Training Strategy, along with the US Army Training and Doctrine Programs of Instruction required for the Regional Training Institute.

The need for the Proposed Action stems from the State of Oregon's lack of in-state training installations necessary to provide ORNG Soldiers with adequate training opportunities. The need for the Proposed Action has been validated by the National Guard Bureau Training Support Systems Division.

Scope of the Environmental Assessment

The EA will evaluate potential impacts from two alternatives: the Proposed Action and the No Action Alternative as summarized below. The EA assumes that the BRAC real estate transfer of 7,500 acres to the ORNG will occur. The EA will analyze potential impacts that could result from the two alternatives within the following resource categories:

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- Noise
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- Water Resources
- Biological Resources
- Cultural Resources
- Socioeconomics
- Environmental Justice
- Infrastructure
- Hazardous Materials and Waste
- Wildland Fire

Summary of the Proposed Action Alternative

Under the Proposed Action, the 7,500-acre area retained for ORNG training would be used for continued and expanded military training activities and associated infrastructure development. Expansion of military training activities and infrastructure would occur over approximately the next 10 years. In general, the strategy for development of the CUO would be to reuse and repurpose existing disturbed areas (buildings, roads, bunker complexes, etc.), where possible, to accomplish the required training and to reduce the environmental impacts associated with native habitat conversion. Although the exact locations of specific proposed activities and development may not be known, "Use Areas" have been identified which describe the geographic areas where general types of military training activities and associated facilities would occur. The Proposed Action also includes infrastructure improvements that would cut across Use Areas. These infrastructure improvements would be primarily utilities-related and would include the potable water system, wastewater treatment system, and transportation system. Implementation of the Proposed Action would approximately double the average annual training use at the site. Training activities that would occur at the CUO under the Proposed Action would be similar to those currently occurring, including live fire and mounted and dismounted maneuver training.

Summary of the No Action Alternative

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Opportunity for Involvement
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Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

Umatilla Rural Fire Protection District
Mike Roxbury, Chief
621 Sixth Street
P.O. Box 456
Umatilla, OR 97882

Dear Chief Roxbury:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

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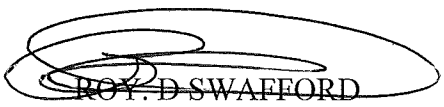
Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,



ROY. D SWAFFORD
MAJ (Ret)
Director of Installations

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

August 12, 2016

U.S. Department of the Interior
U.S. Fish and Wildlife Service
Mr. Gary Miller, Field Supervisor
3502 Highway 30
La Grande, OR 97850

Dear Mr. Miller:

The Oregon Military Department (OMD) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) for the expansion of military training operations and related infrastructure development on an Oregon National Guard (ORNG) training center in northeastern Oregon. This 7,500-acre training center is identified as Camp Umatilla Oregon (CUO), situated within a portion of the former United States Army (Army) Umatilla Chemical Depot (UCD) within portions of both Morrow and Umatilla counties, and located at the northwest corner of the Interstate (I)-82 and I-84 junction.

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Kris Mitchell
NEPA/Cultural Resources Manager
Oregon Military Department
Kris.C.Mitchell.nfg@mail.mil

Sincerely,

ROY D SWAFFORD
MAJ (Ret)
Director of Installations

OREGON MILITARY DEPARTMENT
JOINT FORCE HEADQUARTERS, OREGON NATIONAL GUARD
INSTALLATIONS DIVISION
1776 MILITIA WAY
P.O. BOX 14350
SALEM, OREGON 97309-5047

AGI-ENV

3 August 2018

MEMORANDUM FOR RECORD, ATTN: ORARNG-AGI, 1776 Militia Way SE, Salem, Oregon 97309-5047

SUBJECT: Camp Umatilla Oregon, Environmental Assessment Tribal & SHPO Consultation

1. National Environmental Policy Act (NEPA) analysis for Expanded Operations at the ORARNG's Camp Umatilla Oregon (CUO) is conducted within an Environmental Assessment (EA).

2. National Historic Preservation Act (NHPA) Section 106 consultation with the Oregon SHPO resulted in a finding of Adverse Effect to Historic Properties. To mitigate the adverse effect, a Programmatic Agreement (PA) was executed among ORARNG, NGB, the Oregon SHPO, and the ACHP (Appendix C of the CUO Expanded Operations EA).

3. Government-to-Government Tribal consultation letters were sent 12 August 2016 to the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) and the Confederated Tribes of the Warm Springs Reservation of Oregon to initiate consultation under both NEPA and NHPA.

4. At the request of the CTUIR, ORARNG NEPA and Cultural Resources Manager, and other ORARNG staff members as needed, traveled to the Nixyáawii Governance Center in Pendleton to meet with tribal representatives October 2016, April 2017, and July 2017 to consult on both the EA and the PA. ORARNG also presented to the Tribal Council's Cultural Resources Committee in May 2017.

5. The draft EA was provided to the CTUIR on 29 June 2017, and draft iterations of the PA were shared back and forth with the CTUIR throughout its development to ensure Coyote Coulee, treated as a property of traditional religious and cultural significant, is protected. All concerns were addressed in the PA. ORARNG will continue our working relationship with CTUIR to develop an access protocol and other matters of importance to the tribe.

6. In addition, ORARNG updated all nine federally-recognized Tribes in Oregon (Burns Paiute Tribe; Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians; Confederated Tribes of the Grand Ronde Community of Oregon; Confederated Tribes of Siletz Indians; CTUIR; Confederated Tribes of Warm Springs; Coquille Indian Tribe; Cow Creek Band of Umpqua Tribe of Indians and the Klamath Tribes) and participating state agency representatives on the EA at each regularly scheduled quarterly meeting of the State's Cultural Resources

Cluster Group and each meeting of the Natural Resources Work Group in late 2016, all of 2017, and early 2018. No concerns were raised at any of these meetings.

7. Questions or concerns should be forwarded to the undersigned via e-mail at kris.c.mitchell.nfg@mail.mil

KRIS C. MITCHELL
NEPA and Cultural Resources Manager

AGI-E 18 September 2018

MEMORANDUM FOR RECORD

SUBJECT: Section 7 Endangered Species Act Consultation; Camp Umatilla expanded operations environmental assessment, Morrow and Umatilla Counties, Oregon

1. The undersigned assessed the potential effects to listed and proposed threatened and endangered species and designated and proposed critical habitat from the Oregon Army National Guard's (ORARNG's) proposed expanded training operations on Camp Umatilla, within Morrow and Umatilla Counties, Oregon.

2. The proposed project would include a variety of activities, including facility demolition and construction and military training operations which are described as the proposed action in the environmental assessment (EA). This memorandum evaluates the potential effects to designated and proposed federal threatened and endangered species and critical habitat from the proposed action.

3. Camp Umatilla does not contain any listed or proposed species, does not contain proposed or designated critical habitat for any listed species, and the proposed action would not adversely affect habitat on which any of the species depend. Therefore the Oregon Army National Guard has concluded that the proposed action described in the EA would have no effect on any of the identified threatened or endangered species and would not destroy or adversely modify designated or proposed critical habitat. Any significant changes in the proposed project or action area will require additional Endangered Species Act review for potential effect analysis and determination.

4. On 18 September 2018, I reviewed the federal listings of threatened and endangered species for Morrow and Umatilla Counties, Oregon, which were current as of that date (accessed at http://ecos.fws.gov/ipac/ and http://www.nmfs.noaa.gov/pr/species/esa/fish.htm). The table below summarizes the listed and proposed federal threatened or endangered species which may occur in the counties, the designated and proposed critical habitat for those species in the counties, and the likely effect of the proposed project on those species and critical habitats.

Common Name	Scientific Name	Habitat Present?	Critical Habitat (CH) in Counties?	Determination
Bull trout	*Salvelinus confluentus*	No	Yes (Nearest CH is >3.5 mi N of proposed project)	No effect.
Chinook salmon (Snake River Basin spring/summer-run and fall-run ESUs and Upper Columbia River spring-run ESU)	*Onchorynchus tsawytscha*	No	Yes (Nearest CH is >3.5 mi N of proposed project)	No effect.

Common Name	Scientific Name	Habitat Present?	Critical Habitat (CH) in Counties?	Determination
Sockeye salmon (Snake River Basin ESU)	*Onchorynchus nerka*	No	Yes (Nearest CH is >3.5 mi N of proposed project)	No effect.
Steelhead trout (Middle Columbia River, Snake River basin, and Upper Columbia River DPSes)	*Onchorynchus mykiss*	No	Yes (Nearest CH is >3.5 mi N of proposed project)	No effect.
Yellow-billed cuckoo	*Coccyzus americanus*	No	No	No effect.
Gray wolf	*Canis lupus*	No	No	No effect.

5. The undersigned is the point of contact for this action and can be contacted by email Jeff.Mach.nfg@mail.mil or by telephone at (503) 584-3493/DSN 355-3493.

JEFF MACH
Natural Resources Conservation Manager

APPENDIX B:

VEGETATION AND WILDLIFE SPECIES THAT OCCUR AT CUO

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Special status wildlife species that occur or have potential to occur at the CUO

Common Name	Scientific Name	Federal Status[1]	State Status[1]	Global and State Rank[2]	Other Status[1,3,4]	Occurrence[5,6,7]
Reptiles						
Northern sagebrush lizard	*Sceloporus graciosus graciosus*	Species of Concern	Sensitive- Vulnerable	Global Rank: G5T5; State Rank: S5	ORBIC List 4	Present
Mammals						
Black-tailed jackrabbit	*Lepus californicus*	None	Sensitive- Vulnerable	Global Rank: G5; State Rank: S4	ORBIC List 4	Present
Long-legged myotis	*Myotis volans*	Species of Concern	Sensitive- Vulnerable	Global Rank: G4G5; State Rank: S3	ORBIC List 4	Potential
Pallid bat	*Antrozous pallidus*	Species of Concern	Sensitive- Vulnerable	Global Rank: G4; State Rank: S2	ORBIC List 2	Potential
Townsend's big-eared bat	*Corynorhinus townsendii*	Species of Concern	Sensitive- Critical	Global Rank: G4; State Rank: S2	ORBIC List 2	Potential
Washington ground squirrel	*Urocitellus washingtoni*	Candidate	Endangered	Global Rank: G2; State Rank: S2	ORBIC List 1	Potential
White-tailed Jackrabbit	*Lepus townsendii*	None	Sensitive- Vulnerable	Global Rank: G5; State Rank: S4	ORBIC List 3	Potential
Birds						
Bald eagle	*Haliaeetus leucocephalus*	None	Sensitive- Vulnerable	Global Rank: G5; State Rank: S4B,S4N	Bald and Golden Eagle Protection Act; BCC Region 9; ORBIC List 4; MBTA	Potential; not confirmed, but may be transient visitors to the area [7]
Bobolink	*Dolichonyx oryzivorus*	None	Sensitive- Vulnerable	Global Rank: G5; State Rank: S2B	ORBIC List 2; MBTA	Present
Brewer's sparrow	*Spizella breweri*	None	None	Global Rank: G5; State Rank: S4B	BCC Region 9; MBTA; DoD M-S Species	Present
Common nighthawk	*Chordeiles minor*	None	None	Global Rank: G5; State Rank: S5B	ORBIC List 4; MBTA; DoD M-S Species	Present
Ferruginous hawk	*Buteo regalis*	None	Sensitive- Vulnerable	Global Rank: G4; State Rank: S3B	BCC Region 9; MBTA	Present
Golden eagle	*Aquila chrysaetos*	None	None	Global Rank: G5; State Rank: S3S4	Bald and Golden Eagle Protection Act; ONHIC List 4; BCC Region 9; MBTA	Present
Grasshopper sparrow	*Ammodramus savannarum*	None	Sensitive- Vulnerable	Global Rank: G5; State Rank: S2B	MBTA; DoD M-S Species	Present
Lewis' woodpecker	*Melanerpes lewis*	None	Sensitive- Critical	Global Rank: G4; State Rank: S2S3B	BCC Region 9; MBTA; DoD M-S Species	Present
Loggerhead shrike	*Lanius ludovicianus*	None	Sensitive- Vulnerable	Global Rank: G4; State Rank: S3B,S2N	BCC Region 9; MBTA; DoD M-S Species	Present
Long-billed curlew	*Numenius americanus*	None	Sensitive- Vulnerable	Global Rank: G5; State Rank: S3B	BCC Region 9; MBTA; DoD M-S Species	Present
Merlin	*Falco columbarius*	None	None	Global Rank: G5; State Rank: SHB	ORBIC List 2; MBTA	Present
Peregrine falcon	*Falco peregrinus*	None	Sensitive- Vulnerable	Global Rank: G4; State Rank: S1	BCC Region 9; MBTA	Potential; not confirmed, but may be transient visitors to the area [7]
Prairie falcon	*Falco mexicanus*	None	None	Global Rank: G5; State Rank: S4	MBTA; DoD M-S Species	Present

Special status wildlife species that occur or have potential to occur at the CUO

Sage sparrow	*Amphispiza belli*	None	Sensitive- Critical	Global Rank: G4; State Rank: S?	BCC Region 9; MBTA	Present
Sage thrasher	*Oreoscoptes montanus*	None	None	Global Rank: G4; State Rank: S4B	BCC Region 9; MBTA	Present
Swainson's hawk	*Buteo swainsoni*	None	Sensitive- Vulnerable	Global Rank: G5; State Rank: S3B	MBTA	Present
Tricolored blackbird	*Agelaius tricolor*	None	None	Global Rank: G3G4; State Rank: S2B	BCC Region 9; MBTA	Potential; not confirmed[7]
Western burrowing owl	*Athene cunicularia hypugaea*	None	Sensitive- Critical	Global Rank: G4T4; State Rank: S3B	MBTA; DoD M-S Species	Present
Western meadowlark	*Sturnella neglecta*	None	Sensitive- Critical	Global Rank: G5; State Rank: S4	ORBIC List 4; MBTA	Present

Sources:

[1] ORBIC 2013

[2] NatureServe 2015

[3] USFWS 2013

[4] USFWS 2008

[5] USFWS 2007

[6] Mach 2016

[7] Blake 2013

[8] TetraTech 2002

Notes:

Global and State Rank codes (NatureServe 2015):

G4: Apparently Secure

G5: Secure

S?: Unranked

S1: Critically Imperiled

S2: Imperiled

S3: Vulnerable

S4: Apparently Secure

S5: Secure

SH: Possibly extirpated

N: Non-breeding population in the state

B: Breeding population in the state

MBTA: Indicates birds protected under the Migratory Bird Treaty Act (80 FR 80594; USFWS 2015).

DoD M-S Species: Indicates birds on the DoD Partners in Flight Program list. These species are those that occur on DoD lands and are at risk of becoming listed as threatened or endangered under the federal Endangered Species Act if current populations trends continue. The purpose of this list is to help DoD resource managers better prioritize monitoring and management efforts on those species (and their habitats) having the highest potential to impact the military mission should they become Federally listed. A secondary focus was on those species with significant conservation concern on DoD lands.

BCC Region 9: Indicates birds of conservation concern identified by the USFWS for Region 9 (USFWS 2008).

ORBIC List 1: Contains taxa that are threatened with extinction or presumed to be extinct throughout their entire range. These are the taxa most at risk, and should be the highest priority for conservation action.

ORBIC List 2: Contains species threatened with extirpation or presumed to be extirpated from the state of Oregon. These are often peripheral or disjunct species which are of concern when considering species diversity within Oregon's borders. They can be very significant when protecting the genetic diversity of a taxon. ORBIC regards extreme rarity as a significant threat and has included species which are very rare in Oregon on this list.
ORBIC List 4: Contains species which are of conservation concern but are not currently threatened or endangered. This includes taxa which are very rare but are currently secure, as well as taxa which are declining in numbers or habitat but are still too common to be proposed as threatened or endangered. While these taxa may not currently need the same active management attention as threatened or endangered taxa, they do require continued

Migratory bird species that occur at the CUO

Common Name	Scientific Name
American crow	*Corvus brachyrhynchos*
American goldfinch	*Carduelis tristis*
American kestrel	*Falco sparverius*
American pipit	*Anthus rubescens*
American robin	*Turdus migratorius*
Bank swallow	*Riparia riparia*
Barn owl	*Tyto alba*
Barn swallow	*Hirundo rustica*
Black phoebe	*Sayonaris nigricans*
Black-billed magpie	*Pica pica*
Bobolink	*Dolichonyx oryzivorus*
Brewer's blackbird	*Euphagus cyanocephalus*
Brewer’s sparrow	*Spizella breweri*
Brown-headed cowbird	*Molothrus ater*
Bullock’s oriole	*Icterus bullockii*
California gull	*Larus californicus*
Chipping sparrow	*Spizella passerina*
Cliff swallow	*Petrochelidon pyrrhonota*
Common nighthawk	*Chordeiles minor*
Common poorwill	*Phalaenoptilus nuttallii*
Common raven	*Corvus corax*
Cooper's hawk	*Accipiter cooperii*
Dark-eyed junco	*Junco hyemalis*
Ferruginous hawk	*Buteo regalis*
Golden eagle	*Aquila chrysaetos*
Grasshopper sparrow	*Ammodramus savannarum*
Great blue heron	*Ardea herodias*
Great horned owl	*Bubo virginianus*
Horned lark	*Eremophila alpestris*
House finch	*Carpodacus mexicanus*
Kildeer	*Charadrius vociferus*
Lark sparrow	*Chondestes grammacus*
Lewis’ woodpecker	*Melanerpes lewis*
Loggerhead shrike	*Lanius ludovincianus*
Long-billed curlew	*Numenius americanus*
Mallard	*Anas platyrhynchos*
Merlin	*Falco columbarius*
Mourning dove	*Zenaida macroura marginella*
Northern flicker	*Colaptes auratus*
Northern harrier	*Circus cyaneus*
Prairie falcon	*Falco mexicanus*
Red-tailed hawk	*Buteo jamaicensis*
Red-winged blackbird	*Agelaius phoeniceus*

Migratory bird species that occur at the CUO

Ring-billed gull	*Larus delawarensis*
Rough-legged hawk	*Buteo lagopus*
Ruby-crowned kinglet	*Regulus calendula*
Sage sparrow	*Amphispiza belli*
Sage thrasher	*Oreoscoptes montanus*
Savannah sparrow	*Passerculus sandwichensis*
Say's phoebe	*Sayornis saya*
Short-eared owl	*Asio flammeus*
Spotted towhee	*Pipilo maculatus*
Swainson's hawk	*Buteo swainsoni*
Tree swallow	*Tachycineta bicolor*
Vesper sparrow	*Pooecetes gramineus*
Violet-green swallow	*Tachycineta thalassina*
Western burrowing owl	*Athene cunicularia hypugea*
Western kingbird	*Tyrannus verticalis*
Western meadowlark	*Sturnella neglecta*
Western screech-owl	*Megascops kennicottii*
Western wood-pewee	*Contopus sordidulus*
White-crowned sparrow	*Zonotrichia leucophrys*
Yellow-headed blackbird	*Xanthocephalus xanthocephalus*
Sources: USFWS 2013 Mach 2016 Blake 2013 Tetra Tech 2002	

Wildlife species present in the CUO area (non-special status species).

Common Name	Scientific Name
Amphibians	
Great Basin spadefoot toad	*Scaphiopus intermontanus*
Reptiles	
Bull snake	*Pituophis catenifer sayi*
Great Basin gopher snake	*Pituophis catenifer deserticola*
Northern pacific rattlesnake	*Crotalus viridis oreganus*
Western yellow-bellied racer	*Coluber constrictor mormon*
Birds	
California quail	*Callipepla californica*
Eurasian collared dove	*Streptopelia decaocto*
European starling	*Sturnus vulgaris*
Gray partridge	*Perdix perdix*
House sparrow	*Passer domesticus*
Ring-necked pheasant	*Phasianus colchicus*
Rock pigeon	*Columba livia*
Mammals	
American badger	*Taxidea taxus*
Bushy-tailed woodrat, packrat	*Neotoma cinerea*
Coyote	*Canis latrans*
Deer mouse	*Peromyscus maniculatus*
Field mouse	*Peromyscus* spp.
Great Basin pocket mouse	*Perognathus parvus*
House mouse	*Mus musculus*
Long-tailed weasel, bridled weasel, big stoat	*Mustela frenata*
North American porcupine	*Erethizon dorsatum*
Northern pocket gopher	*Thomomys talpoides*
Nuttall's cottontail rabbit, mountain cottontail rabbit	*Sylvilagus nuttallii*
Ord's kangaroo rat	*Dipodomys ordii*
Pronghorn antelope	*Antilocapra americana*
Western harvest mouse	*Reithrodontomys megalotis*
Sources: Mach 2016 Blake 2013 TetraTech 2002	

All vegetation species that occur at the CUO

Scientific Name	Common name	2000 Abundance	2014 Abundance	Other Status[1,2]
Achillea millifolium	Common yarrow	C	O	---
Achnatherum hymenoides	Indian ricegrass	U	U	---
Agropyron cristatum	Crested wheatgrass	Ar	Ar	---
Agroseris grandiflora	Large-flowered agroseris	X	U	---
Agroseris heterophylla var. *heterophylla*	Annual agroseris	X	O	---
Ailanthus altissima	Tree of heaven	X	U	Oregon Noxious Weed Class B
Ambrosia acanthicarpa	Bur ragweed, flatspine	C	C	---
Amsinckia lycopsoides	Tarweed fiddleneck	X	C	---
Artemesia tridentata	Big sagebrush	Ar	O	---
Asclepias speciosa	Showy milkweed	U	U	---
Astragalus caricinus	Buckwheat milkvetch	X	U	---
Astragalus purshii	Woolypod milkvetch	U	O	---
Astragalus sclerocarpus	Stalked-pod milkvetch, woodypod milkvetch, The Dalles milkvetch	O	U	'Global Rank: G5; State Rank: NR; ORBIC List 3
Astragalus succumbens	Columbia milkvetch	C	O	Global Rank: G4G5; State Rank: S4; ORBIC List 4
Balsamorhiza careyana	Carey's balsamroot	Ar	O	---
Bromus tectorum	Cheatgrass	A	A	---
Calochortus macrocarpus var. *macrocarpus*	Sagebrush mariposa lily	O	O	---
Camissonia contorta	Plains evening primrose	X	U	---
Centaurea diffusa	Diffuse knapweed	Ar	Ar	Oregon Noxious Weed Class B
Chaenactis douglasii var. *douglasii*	False yarrow, Douglas' dustymaiden	O	U	---
Chamaesyce glyptosperma	Ribseed sandmat, corrugate-seeded spurge	C	C	---
Chenopdium album	Lambsquarters	X	U	---
Chondrilla juncea	Rush skeletonweed	Ar	Ar	Oregon Noxious Weed Class B
Chrysothamnus viscidiflorus var. *viscidiflorus*	Green rabbitbrush, yellow rabbitbrush	Ar	Ar	---
Cirsium arvense	Canada thistle	X	U	Oregon Noxious Weed Class B
Crepis atribarba	Slender hawksbeard	U	C	---
Crocidium multicaule	Spring gold, common spring-gold, gold stars	O	U	---

All vegetation species that occur at the CUO

Croton setiger	Dove weed, turkey mullein	O	O	---
Cryptantha circumscissa	Cushion cryptantha	X	O	---
Cryptantha pterocarya	Wingnut cryptantha, winged cryptantha	C	U	---
Cymopterus terebinthinus var. *terebinthinus*	Northern Indian parsnip, turpentine wavewing	C	C	---
Dactylis glomerata	Orchardgrass	X	U	---
Dalea ornata	Western prairie clover, Blue Mountain prairie clover, showy prairie clover	U	U	---
Delphinium nuttallianum	Two-lobe larkspur, upland larkspur	U	O	---
Descurainia nelsonii	Nelson's tansymustard	X	U	---
Descurainia sophia	Herb sophia	X	U	---
Dieteria canescens	Hoary-aster, hoary tansyaster	O	X	---
Draba verna	Spring draba, shadflower, nailwort, whitlow grass, Vernal Whitlow grass, early whitlow grass, spring whitlow grass	C	O	---
Elaegnus angustifolia	Russian olive	X	U	---
Elymus elymoides	Bottlebrush squirreltail	U	O	---
Elymus lanceolatus ssp. *lanceolatus*	Thickspike wheatgrass	C	C	---
Epilobium brachycarpum	Tall annual willowherb, tall fireweed	C	O	---
Eragrostis pectinacea	Tufted lovegrass	X	U	---
Ericameria nauseosa ssp. *speciosa*	Gray rabbitbrush, rubber rabbitbrush	Ar	Ar	---
Erigeron pumilus var. *intermedius*	Shaggy fleabane, shaggy daisy	O	X	---
Erigonium niveum	Snow buckwheat	C	Ar	---
Erigonium vimineum	Wickerstem buckwheat	C	Ar	---
Erodium cicutarium	Redstem stork's bill	C	C	---
Erysimum capitatum var. *capitatum*	Western wallflower	X	U	---
Gilia sinuata	Rosy gilia	X	U	---
Helianthus annuus	Common sunflower	X	U	---
Helianthus petiolaris ssp. *petiolaris*	Prairie sunflower	X	U	---
Hesperostipa comata ssp. *comata*	Needle-and-thread grass	Ar	A	---
Heterotheca villosa	hairy false goldenaster	Ar	Ar	---
Holosteum umbellatum	Jagged chickweed	C	O	---
Idahoa scapigera	Oldstem Idahoan	X	U	---
Lactuca serriola	Prickly lettuce	C	C	---

All vegetation species that occur at the CUO

Ladeania lanceolata	Lanceleaf, yellow scurfpea	Ar	Ar	---
Lagophylla ramosissima	Slender hareleaf, branched hareleaf	C	C	---
Lamium amplexicaule	Henbit deadnettle	X	U	---
Layia glandulosa	Whitedaisy tidytips	X	U	---
Lepidium perfoliatum	Clasping pepperweed	X	U	---
Leymus cinereus	Great Basin wildrye, basin wildrye	X	O	---
Linum perenne	Blue garden flax, perennial flax	X	U	---
Lomatium macrocarpum	Large-fruited lomatium, big-seed bisquitroot	C	C	---
Lygodesmia juncea	Rush-pink, rush skeletonplant	C	C	Global Rank G5; State Rank: NR; ORBIC List 3
Marrubium vulgare	Horehound, white horehound	X	U	---
Medicago sativa	Alfalfa	X	U	---
Melilotus albus	White sweetclover	X	U	---
Mentzelia albicaulis	Whitestem blazingstar	X	O	---
Microsteris gracilis	Slender phlox	X	U	---
Morus alba	White mulberry	X	U	---
Oenthera pallida var. *pallida*	Pale evening primrose, whitestem primrose	C	Ar	---
Onopordum acathium ssp. *acanthium*	Scotch cottonthistle	X	U	Oregon Noxious Weed Class B
Opuntia x columbiana	Starvation pricklypear, Columbia pricklypear, plains pricklypear	C	O	---
Persicaria maculosa	Spotted ladysthumb	X	U	---
Phacelia hastata var. hastata	Whiteleaf phacelia, silverleaf phacelia	O	O	---
Phacelia linearis	Threadleaf phacelia	X	U	---
Phlox longifolia ssp. *longifolia*	Longleaf phlox	O	C	---
Plantago patagonica	Indian wheat, wooly plantain	C	C	---
Plectritis macrocera	Longhorn plectritis, white plectritis	U	U	---
Plypogon monspeliensis	Annual rabbitsfoot grass	X	U	---
Poa bulbosa	Bulbous bluegrass	A	Ar	---
Poa pratensis	Kentucky bluegrass	X	U	---
Poa secunda ssp. *secunda*	Sandberg's bluegrass	A	A	---
Polygonum douglasii ssp. *majus*	Large knotweed	X	U	---
Populus balsamifera ssp. t*richocarpa*	Black cottonwood	X	U	---
Pseudoroegneria spicata	Bluebunch wheatgrass	Ar	U	---
Purshia tridentata	Antelope bitterbrush	Ar	Ar	---
Robinia pseudoacacia	Black locust	X	U	---
Rumex venosus	Winged dock, veiny dock, wild begonia	Ar	O	---
Salix exigua	Narrowleaf willow	X	U	---

Salsola tragus	Russian thistle	C	A	---
Secale cerale	Cereal rye	Ar	O	---
Silybum marianum	Blessed milkthistle	X	U	Oregon Noxious Weed Class B
Sisymbrium altissimum	Tall tumble mustard	Ar	A	---
Sporobolus cryptandrus	Sand dropseed	C	Ar	---
Syringa vulgaris	Common lilac	X	U	---
Taraxacum officinale	Common dandelion	X	U	---
Tragapogon dubius	Yellow salsify, yellow goatsbeard	C	Ar	---
Triteleia grandiflora	Howell's triteleia, largeflower triteleia	O	U	---
Typha latifolia	Broadleaf cattail	X	U	---
Verbascum thapsus	Common mullein	X	U	---
Verbena bracteata	Bigbract verbena	X	U	---
Veronica americana	American seedwell	X	U	---
Veronica anagallis-aquatica	Water speedwell	X	U	---
Vulpia microstachys	Small fescue	X	U	---
Vulpia octoflora	Sixweeks fescue	X	U	---
Yucca filamentosa	Adam's needle	X	U	---

NOTES:

Plant list source: Brown and Meinke 2016

[1] ORBIC 2013

[2] ODA 2016

Local abundance classified as (Brown and Meinke 2016):

A - Abundant and widespread; seen in >20 places on the installation

Ar - Locally abundant, but with restricted distribution on the installation

C - Common, but not a dominant species at any survey site

O - Encountered occasionally throughout the installation

U - Uncommon or rarely encountered on the installation

X - Not encountered

ORBIC List 3 = Taxa for which more information is needed before the status can be determined, but which may be threatened or endangered in Oregon or throughout their range.

ORBIC List 4 = Taxa which are of conservation concern but are not currently threatened or endangered.

Oregon Noxious Weed Class B = Listed by Oregon Department of Agriculture (ODA) as a noxious weed with a rating of "B," meaning that it is a a weed of economic importance which is regionally abundant, but which may have limited distribution in some counties.

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APPENDIX C:

PROGRAMMATIC AGREEMENT

PROGRAMMATIC AGREEMENT
AMONG
THE NATIONAL GUARD BUREAU,
THE OREGON ARMY NATIONAL GUARD,
THE OREGON STATE HISTORIC PRESERVATION OFFICE,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
FOR THE
CAMP UMATILLA OREGON EXPANSION, DEVELOPMENT AND OPERATIONS PROJECT
2018

WHEREAS, the National Guard Bureau (NGB), as a federal agency, is required to comply with the National Historic Preservation Act (NHPA) 54 U.S.C. 300101 et seq., and its implementing regulations, 36 C.F.R. §800, and the NGB, a joint activity of the Department of Defense, provides federal funding and guidance to state Guard organizations such as the Oregon Army National Guard (ORARNG); and

WHEREAS, the Department of the Army (Army) has granted to the ORARNG a real estate license, No. DACA 67-3-17-66, dated 1 December 2017, in 7,500 acres of the former 19,728 acre Umatilla Chemical Depot (as depicted in Appendix A) that is referred to as Camp Umatilla Oregon (CUO); and

WHEREAS, the ORARNG proposes to expand military training operations and associated infrastructure development at CUO. Expanded military training operations would require infrastructure improvements such as new construction of purpose-built modern facilities, modification and reuse of existing buildings and structures, demolition of unneeded buildings and structures, and repair and replacement of transportation and utilities infrastructure. Military training activities at CUO would be expanded to support the training requirements of multiple battalions. Military training and infrastructure development would be accomplished on federal lands using both federal and state funding; and the ORARNG and NGB have determined that this project (i.e., Camp Umatilla Expansion, Development and Operations) constitutes a federal Undertaking as defined by 36 C.F.R. §800.16(y); and

WHEREAS, the ORARNG consulted with the Oregon State Historic Preservation Office (SHPO) pursuant to 36 C.F.R. §800.6(a), *Protection of Historic Properties* and established the Area of Potential Effect (APE) as defined at 36 C.F.R. §800.16(d) (depicted in Appendix A). The historic properties identified within that APE consist of the “Umatilla Chemical Depot Historic District”, an 1874 Wagon Road (35UM497), and a property of traditional religious and cultural significance to the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) known as Coyote Coulee, and determined that the demolition, modifications, new construction and military training required by the CUO Expansion, Development and Operations Project will have an adverse effect on these historic properties; and

WHEREAS, the Army previously identified and evaluated the “Umatilla Chemical Depot Historic District” for eligibility to the National Register of Historic Places (NRHP) at both national and local levels; it consists of 1,516 buildings and structures that once formed the Umatilla Chemical Depot. The Army determined that 1,217 of these buildings and structures are contributing properties and 299 are non-contributing properties to one Historic District that is eligible for inclusion on the NRHP at the national level under Criterion A for its association with World War II-era ammunition storage and Cold War-era Chemical Weapons work. The Army received concurrence with this determination from the Oregon SHPO by correspondence dated May 25, 2016. Appendix B to this PA identifies 563 buildings and structures of the 1,217 contributing properties to the National Register-eligible Umatilla Chemical Depot Historic District that are located inside the APE (the remaining 654 properties are not on ORARNG property and are not subject to this PA) and that the ORARNG will adversely effect as part of the CUO Expansion, Development and Operations Project; and

WHEREAS, 427 buildings and structures of the 563 contributing properties within the APE, marked in Appendix B, are covered under the *Program Comment For World War II and Cold War era (1939-1974) Ammunition Storage Facilities*, approved by the Advisory Council on Historic Preservation (ACHP) and issued on 18 August 2006 to the Department of Defense; and

WHEREAS, a historic wagon road (35UM497) that crosses the southern portion of the APE was identified and determined eligible for inclusion on the NRHP by the Army, with concurrence received from the SHPO by correspondence dated August 18, 2016; and

WHEREAS, in consultation with the ORARNG, the CTUIR have identified a potential property of traditional religious and cultural significance, known as Coyote Coulee, that crosses a portion of the APE and that the ORARNG will treat as eligible for inclusion on the NRHP; and

WHEREAS, 670 acres of the APE have been surveyed for archaeological resources by the Army (some according to older standards), 3,075 acres are previously disturbed and do not warrant archaeological survey, and 4,211 acres remain to be surveyed or re-surveyed prior to ground-disturbing actions (Appendix C); and

WHEREAS, any undertakings as defined at 36 C.F.R. §800.16(y) not included in this PA will be reviewed individually through the standard Section 106 Process as described in 36 C.F.R. §800; and

WHEREAS, the ORARNG notified and offered an opportunity to consult to the federally-recognized Confederated Tribes of the Umatilla Indian Reservation (CTUIR) and the Confederated Tribes of the Warm Springs Reservation and consulted with the CTUIR at their request; and

WHEREAS, the ORARNG has afforded the public an opportunity to comment on the mitigation plan for the Undertaking through public notices posted in the *East Oregonian*, and *Hermiston Herald* on July 03-04, 2018, and public comments were not received; and

WHEREAS, the ORARNG notified the ACHP of the adverse effect determination and invited the ACHP to participate in this consultation per 36 CFR §800.6 (a)(l) in a letter dated February, 16 2017, and the ACHP has chosen to participate in the consultation by letter dated April 5, 2017; and

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

STIPULATIONS

ORARNG shall ensure that the following stipulations are carried out:

I. MITIGATION

A. Designation of Representative Historic District

1. The ORARNG shall designate a 15.5-acre area within the cantonment and an 8-acre area of Igloos as a smaller discontiguous historic district (proposal depicted in Appendix D – Representative Historic District Map) that is representative of the larger World War II and Cold War-era historic district identified by the Army. The ORARNG will maintain the architectural integrity of the historic buildings and structures indefinitely as outlined in the Historic District Management Manual (HDMM) described in Stipulation I.B. Those buildings and structures outside the representative historic district would no longer be subject to the

Section 106 process or Stipulation II and may be demolished, modified, maintained or otherwise altered without further consultation.

B. Develop a Historic District Management Manual (HDMM)

1. The ORARNG shall develop, in consultation with the Oregon SHPO, a maintenance and management manual for the newly designated representative historic district that will outline in more detail the acceptable building and structure modifications and new construction that are allowable to ensure that the historic buildings and structures are viable long-term contributors to the ORARNG's mission and readiness. The HDMM will be completed within four (4) years of execution of this PA and will require Oregon SHPO review and concurrence in order to be finalized and viable. If ORARNG and the Oregon SHPO are unable to reach agreement on a final HDMM, then ORARNG would follow Stipulation III.G. The HDMM will include the following main outline elements for each of the historic properties included within the representative historic district.

    a. Basic Description: A narrative description of the property's history, architecture, design and function.
    b. Identification of Character-Defining Features: Identifying the aspects of the overall property, including those of individual buildings or structures, that define its historic character.
    c. Alterations or Modifications Present: A statement of "current condition," including changes over time that either support or detract from the character-defining aspects.
    d. Goal: The objective for all maintenance and management activities concerning this particular property including allowable additions and modifications; preservation of character-defining features and integrity of setting, feeling, association, design, workmanship, materials, and location.
    e. Approach: a general statement defining the basic approach to meet the goal. As appropriate, this section may include web links or other references to recommended products, materials or reference documents considered useful to the recommended approach.
    f. Exempt Actions: a descriptive list of specific kinds of future actions that would be exempt from additional Section 106 consultation; all other actions would be addressed under Section II, ORARNG Project Review Procedures.
    g. New Construction: a description of guidelines for any new construction within the historic district.
    h. Landscape: a description of landscape management and alteration guidelines.

C. Coyote Coulee Protection and Access.

1. The ORARNG will treat Coyote Coulee as eligible for the National Register as a property of traditional religious and cultural significance to the CTUIR: 1) by limiting off-road vehicular traffic or new construction within previously undisturbed portions of the potential historic property, and 2) by consulting with the CTUIR to develop, within two years of execution of this PA, a written protocol allowing CTUIR tribal member access during certain times of the year to carry out cultural practices.

D. Archaeological Surveys.

1. The ORARNG will complete additional archaeological pedestrian surveys (approximately 4211 acres) in previously undisturbed un-surveyed areas prior to any CUO Expansion,

Development and Operations Project that involves ground-disturbing actions in that area or within five years of execution of this PA (Appendix C – Archaeological Surveys). Survey results and reports will be prepared according to the most current State of Oregon Field and Reporting Guidelines and will allow 30 day review by the Oregon SHPO and the CTUIR prior to any ground disturbing actions in the related area. Testing will not be conducted unless a site is identified.

E. Historic Wagon Road.

1. The ORARNG will photographically document the portion of the 1874 wagon road (35UM497) that is located on CUO and update the existing Oregon Archaeological Site Form as needed. Prior to any ground disturbance of the 1874 wagon road and within five years of execution of this PA, the ORARNG will complete a Light Detection and Ranging (LIDAR) study of the wagon road (35UM497) to better document its exact track across the CUO. The LIDAR study and products will require Oregon SHPO review and concurrence in order to be finalized and viable. The resulting LIDAR bare-earth data set will be offered to National Historic Oregon Trail Interpretive Center Baker City, Oregon and the Columbia Gorge Discovery Center and Museum The Dalles, Oregon. The historic wagon road would no longer be subject to the Section 106 process or Stipulation II and may be demolished, modified, or otherwise impacted without further consultation.

II. ORARNG PROJECT REVIEW PROCEDURES

A. Determine the Undertaking is one not already mitigated under Stipulation I.

1. The ORARNG Cultural Resources Manager (CRM), who meets the qualifications listed in Stipulation III(B), shall determine if a project is an undertaking as defined in 36 CFR § 800.16(y) and whether that project has Potential to Cause Effects (36 CFR § 800.3(a)(1)).

   a. If the CRM determines the proposed project is an undertaking, the CRM will follow the procedures in Stipulation II.B.

   b. If the CRM determines that a project is not an undertaking or has “No Potential to Cause Effects,” ORARNG has no further obligations under Stipulation II of this agreement.

B. Identification of Historic Properties

1. The CRM shall, in consultation with the SHPO, define and document a site-specific APE appropriate for the scope and scale of the undertaking, considering direct, indirect, and cumulative effects.

2. The CRM shall, in consultation with the SHPO, determine if cultural resource surveys are required for all or a portion of the site specific APE using the following parameters:

   a. The APE encompasses an undisturbed area without any previous cultural resource surveys.

   b. Determines if previous surveys are inadequate.

3. If cultural resource surveys are required, the ORARNG shall follow the Section 106 compliance process at 36 CFR § 800.4(b), *Identify historic properties,* and will proceed to Stipulation II(B)4.

4. If cultural resource surveys have been completed and include identified but unevaluated cultural resources in the APE, the ORARNG shall follow the compliance process at 36 CFR § 800.4(c), *Evaluate historic significance,* and will proceed to Stipulation II(B)5 or II(B)6.

5. If the site-specific APE is outside of the Representative Historic District and surveys have identified all Historic Properties in the APE, as defined by 36 CFR § 800.16(l)(2), the CRM determines one of the following:

    a. "No Historic Properties Affected". The CRM shall document this determination for inclusion in the Annual Report (Stipulation III.C), and ORARNG has no further obligations under Stipulation II of this agreement.

    b. "Historic Properties Affected". The CRM will follow Stipulation II.C.

6. When the site-specific APE is within the Representative Historic District

    a. If an undertaking will not affect the exterior of a contributing property in the Historic District or the integrity of the District overall, the undertaking is confined to a non-contributing building, or the undertaking adheres to the guidelines of the HDMM (Stipulation I.B), the CRM shall determine "No Historic Properties Affected." The CRM shall document that finding in the Annual Report (Stipulation III.C). ORARNG has no further obligations under Stipulation II of this agreement.

    b. If an undertaking has the potential to affect the exterior of any individual property contributing to the Historic District and does not adhere to the guidelines of the HDMM (Stipulation I.B.), the CRM shall determine "Historic Properties Affected" and will follow Stipulation II.C.

C. Assessment of Effects

1. ORARNG shall provide documentation to the SHPO using *Oregon Reporting Guidelines* (2011) consisting of: 1) a detailed description of the proposed undertaking and determination of effect; 2) images of the affected contributing property; and, 3) a planview map of the project location. SHPO shall have thirty (30) calendar days to review documentation and provide a response.

2. ORARNG shall give the CTUIR and interested parties an opportunity to review and comment on proposed undertakings. The CTUIR and interested parties shall have at least thirty (30) calendar days to review documentation and provide a response. ORARNG will make every reasonable effort to address objections within thirty (30) calendar days.

3. If, with concurrence from SHPO, the CRM determines that the undertaking will result in No Adverse Effect, then the CRM shall document the finding in the Annual Report (Stipulation III.C). ORARNG has no further obligations under Stipulation II of this agreement.

4. If ORARNG and SHPO are unable to reach concurrence on a No Adverse Effect, then ORARNG will follow the procedures found in 36 CFR § 800.5(c).

5. If, with concurrence from SHPO, the CRM makes a determination of Historic Properties Adversely Affected (36 CFR § 800.5(d)(2)), ORARNG shall follow Stipulation II(D).

D. Resolution of Adverse Effects

1. The ORARNG shall follow the Section 106 process at 36 CFR § 800.6(b)(1) and (c). The ACHP will not participate in resolving adverse effects unless specifically requested by a consulting party or otherwise choosing to participate. The public will be notified of an adverse effect as stipulated in 36 CFR § 800.6(a)(4).

2. ORARNG shall review and resolve any substantive comments by consulting parties. ORARNG shall consult with the SHPO and other signatories to resolve any objections. ORARNG will make every reasonable effort to resolve comments within thirty (30) calendar days. Project actions which are not the subject of the objections may proceed while the consultation is conducted.

III. ADMINSTRATIVE STIPULATIONS

A. Definition of signatories.

1. For the purposes of this PA the term "signatories to this PA" means the ACHP, NGB, ORARNG and the Oregon SHPO, each of which has authority under 36 C.F.R. §800.6(c)(1) to execute, amend, or terminate the PA.

B. Professional supervision.

1. The ORARNG shall ensure that all activities regarding archaeological or historic preservation related fieldwork, research and reporting that are carried out pursuant to this PA are carried out by or under the direct supervision of a person or persons meeting the *Secretary of the Interior's Professional Qualifications Standards for Archaeology and Historic Preservation* (36 C.F.R. Part 61).

C. Annual Report.

1. ORARNG will submit an annual report to the Oregon SHPO, NGB, and CTUIR not later than December 31 following the previous federal fiscal year. The annual report will follow the outline found in Appendix E – Annual Report Template, and will list the actions that have been taken under this PA during the previous fiscal year. The ORARNG will be available for a follow-up meeting to discuss in greater detail if requested by the Oregon SHPO.

D. Duration.

1. This PA will expire if the timeframes in Section 1 Mitigation are not met, and all parties are unable to agree to an amendment extending the PA as outlined in Section J. This PA shall expire in ten (10) years from the date of its execution. At such time, and prior to work continuing on the undertaking, ORARNG shall: (a) amend the PA as outlined in Section J, (b) execute a Memorandum of Agreement (MOA) pursuant to 36 C.F.R. § 800.6, or (c)

request, take into account, and respond to the comments of the ACHP under 36 C.F.R. § 800.7. Prior to such time, ORARNG may consult with the other signatories to reconsider the terms of the PA and amend it in accordance with Stipulation K below. ORARNG shall notify the signatories and CTUIR, as appropriate, as to the course of action it will pursue.

E. Post-Review Discoveries.

1. In the event that archaeological materials are discovered during construction activities, the ORARNG will stop work in the area of the discovery and follow procedures established under 36 C.F.R. §800.13(b)(3).

F. Inadvertent Discovery of Human Remains.

1. If human remains or other unidentified cultural items, as defined in the Native American Graves Protection and Repatriation Act, 25 USC §3001 et seq., (NAGPRA), are discovered, work in the vicinity of the discovery will immediately cease and the remains or other cultural items will be safeguarded in place. The ORARNG will ensure compliance with NAGPRA consistent with 43 CFR § 10.4, Inadvertent Discoveries and will contact CTUIR and SHPO. The ORARNG will include this requirement in any permit, work order, or contract issued for work at Camp Umatilla.

G. Dispute Resolution.

1. Should any signatory to this PA object at any time to any actions proposed or the manner in which the terms of this PA are implemented, ORARNG shall consult with such party to resolve the objection. If ORARNG determines that such objection by a signatory of this PA cannot be resolved, ORARNG will:

    a. Forward all documentation relevant to the dispute, including the ORARNG's proposed resolution, to NGB. Once NGB has reviewed the dispute, NGB will forward the information to the ACHP. The ACHP shall provide NGB and ORARNG with its advice on the resolution of the objection within 30 days of receiving adequate documentation of the dispute. Prior to reaching a final decision on the dispute, ORARNG shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories, or consulting parties and provide them with a copy of this written response. ORARNG will then proceed according to its final decision.

    b. If the ACHP does not provide its advice regarding the dispute within the 30 day time period, ORARNG and NGB may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, ORARNG, in cooperation with NGB, shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and consulting parties, and provide them and the ACHP with a copy of such written response.

    c. ORARNG's responsibilities to carry out all other actions subject to the terms of this PA that are not the subject of the dispute remain unchanged.

H. Anti-Deficiency Act compliance.

1. All requirements set forth in this PA requiring expenditure of Army funds are expressly subject to the availability of appropriations and the requirements of the Anti-Deficiency Act (31 U.S.C. Section 1341). No obligation undertaken by the Army under the terms of this PA

shall require or be interpreted to require a commitment to expend funds not appropriated for a particular purpose.

I. Review.

1. The SHPO, CTUIR, and NGB, will review this PA each year upon receipt of the ORARNG's Annual Report described in III. C. 1 above. ORARNG will be available for a meeting after each Annual Report is submitted to discuss in greater detail, if requested by SHPO or CTUIR. Every five (5) years from the date of its execution, the SHPO and ORARNG will conduct a mandatory face-to-face meeting to assess the PA's effectiveness, the usefulness of the Annual Reports, and to identify any PA amendments that might be required.

J. Amendments.

1. This PA may be amended when such an amendment is agreed to in writing by all signatories and reviewed by CTUIR. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

K. Termination.

1. If any signatory to this PA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Stipulation K above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the PA upon written notification to the other signatories and CTUIR.
2. Once this PA is terminated, the ORARNG shall comply with the standard Section 106 process as outlined in 36 CFR § 800.3 through 800.7.

EXECUTION of this PA by the ORARNG, NGB, Oregon SHPO and the ACHP and implementation of its terms evidences that ORARNG and NGB have taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

PROGRAMMATIC AGREEMENT
AMONG
THE NATIONAL GUARD BUREAU,
THE OREGON ARMY NATIONAL GUARD,
THE OREGON STATE HISTORIC PRESERVATION OFFICE,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
FOR THE
CAMP UMATILLA OREGON EXPANSION, DEVELOPMENT AND OPERATIONS PROJECT
2018

Signature Page

NATIONAL GUARD BUREAU

Date: 21 Aug 2018

William M. Myer
Colonel, US Army
Deputy Chief of Staff, Installations &
Environment
Army National Guard

PROGRAMMATIC AGREEMENT
AMONG
THE NATIONAL GUARD BUREAU,
THE OREGON ARMY NATIONAL GUARD,
THE OREGON STATE HISTORIC PRESERVATION OFFICE,
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FOR THE
CAMP UMATILLA OREGON EXPANSION, DEVELOPMENT AND OPERATIONS PROJECT
2018

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OREGON ARMY NATIONAL GUARD

Michael E. Stencel Date: 23 Aug 18

MICHAEL E. STENCEL
Major General
The Adjutant General

PROGRAMMATIC AGREEMENT
AMONG
THE NATIONAL GUARD BUREAU,
THE OREGON ARMY NATIONAL GUARD,
THE OREGON STATE HISTORIC PRESERVATION OFFICE,
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THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
FOR THE
CAMP UMATILLA OREGON EXPANSION, DEVELOPMENT AND OPERATIONS PROJECT
2018

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OREGON STATE HISTORIC PRESERVATION OFFICE

Christine Curran Date: 8.27.18

CHRISTINE CURRAN
Oregon Deputy State Historic Preservation Officer

PROGRAMMATIC AGREEMENT
AMONG
THE NATIONAL GUARD BUREAU,
THE OREGON ARMY NATIONAL GUARD,
THE OREGON STATE HISTORIC PRESERVATION OFFICE,
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CAMP UMATILLA OREGON EXPANSION, DEVELOPMENT AND OPERATIONS PROJECT
2018

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ADVISORY COUNCIL ON HISTORIC PRESERVATION

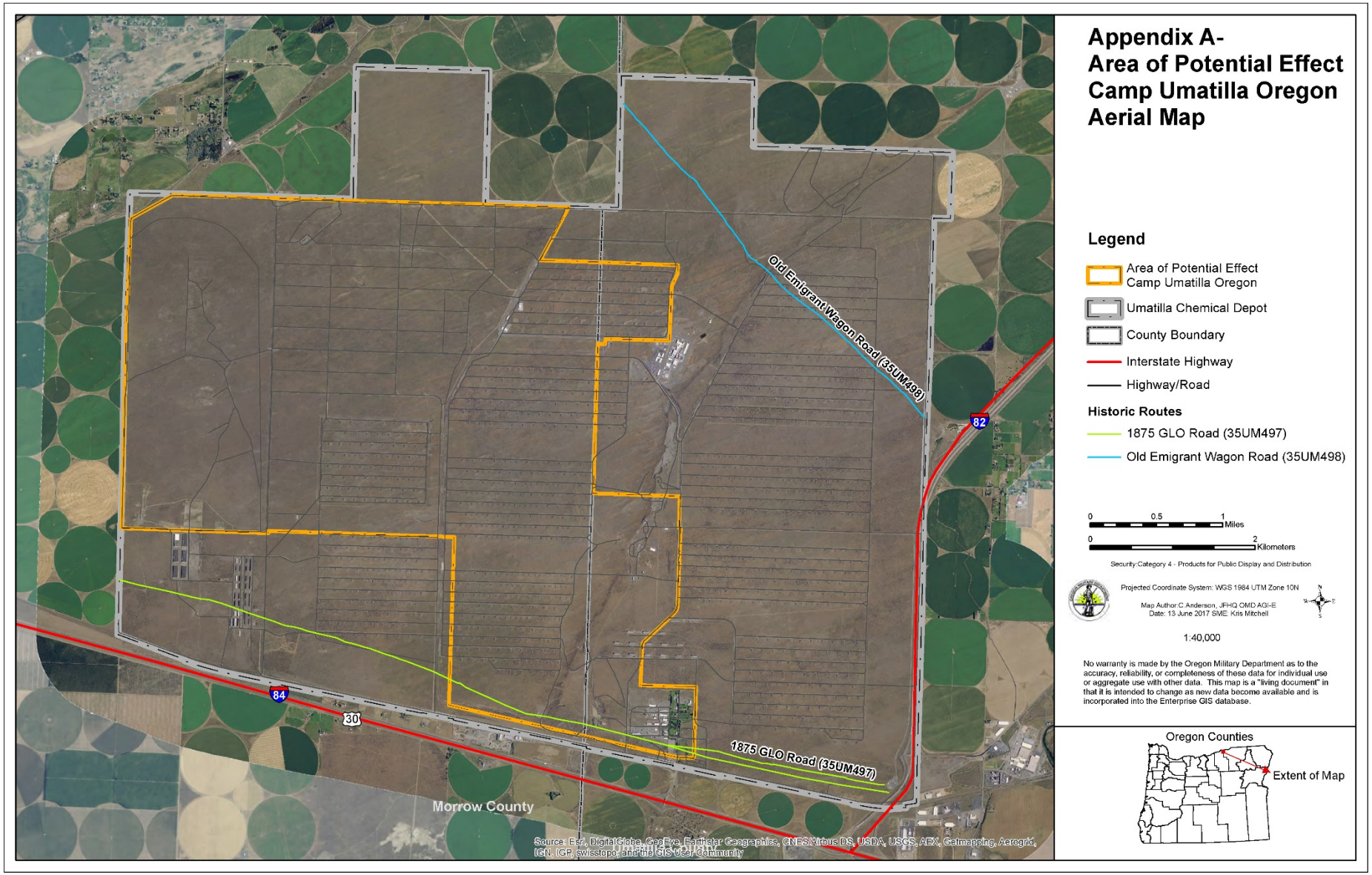
John M. Fowler

Date: 9/14/18

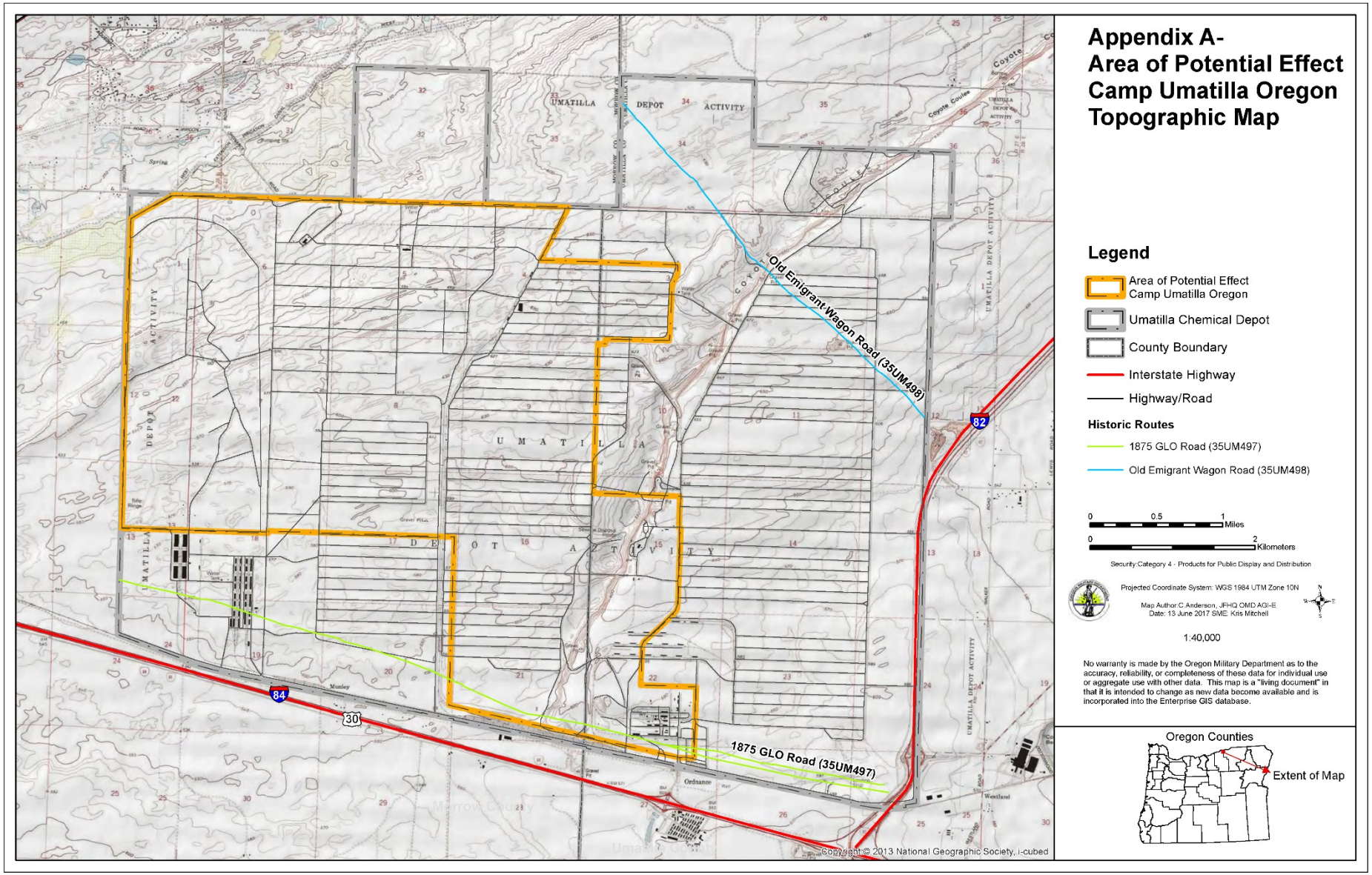
JOHN M. FOWLER
Executive Director

Appendix A – APE Map
Appendix B – List of Historic Properties with Eligibility
Appendix C – Archaeological Surveys
Appendix D – Representative Historic District Map
Appendix E – Annual Report Template
Appendix F – Public Notice

Appendix A – APE Map (Aerial)



Appendix A – APE Map (Topographic)



Appendix B: List of Historic Properties with Eligibility

Building Number	Building Name	Constr Date	Last Use	Original Use	Notes	Army Retains Integrity	Army Contributes to District	ORARNG Historic District	SHPO Historic District
00001	Headquarters	1942	Headquarters Building	Headquarters Building		YES	YES	YES	YES
00002	Fire Dept/ Security	1941	Fire Station	Fire and Guard and Dispensary	Also: Administration General Purpose, Police Station, General Store House, Telephone exchange building	YES	YES	YES	YES
00003	Police Headquarters	1942	Police Headquarters	Provost Marshal and Military Police Admin Building		YES	YES	YES	YES
00004	Machine Shop	1942	Machine Shop	Facilities Engineering Maintenance Shop	Also, Vehicle storage, Engineering Administration building, Maintenance Shop, General Purpose	YES	YES	YES	YES
00005	Garage	1942	Garage	Garage	Also, Vehicle Maintenance Shop, Supply Maintenance Warehouse, Administration General Purpose	YES	YES	YES	YES
00006	Motor Fuel Station	1942	Motor Fuel Station	Gas Station with Building	16 Gauge steel tar coated fuel tanks 60,900 gal - installed 1984	YES	YES	YES	YES
00007	Carpenter Shop	1942	Carpenter Shop	Facilities Engineering Maintenance Shop		YES	YES	YES	YES
00008	Pest Control Building	1942	Pest Control Building	Facilities Engineering Maintenance Shop		YES	YES	NO	NO
00009	Housing Warehouse	1942	Housing Warehouse	Paint Storage Building		YES	YES	NO	NO
00010	Locomotive House	1942	Locomotive House	Locomotive House		YES	YES	YES	YES
00011	Dispensary	1942	Dispensary	General Purpose Warehouse	18 Oct 1978 - converted to Dispensary with beds to support chemical mission; calibration facility, engineering Maintenance, shop, medical supply.	YES	YES	NO	NO
00012	Recycle	1953	Recycle	Recycle		YES	YES	NO	NO
00014	Transformer House	1942	Substation Building/ Switching Station	Transformer House		YES	YES	YES	YES
00015	Family Quarters	1942	Family Quarters	NCO Quarters		YES	YES	YES	YES
00016	Family Quarters	1942	Family Quarters	NCO Quarters		YES	YES	YES	YES
00017	Inert Storage Warehouse	1942	General Purpose Warehouse	Inert Storage Warehouse		YES	YES	NO	NO

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00018	Warehouse Office	1942	Warehouse Office	Inert Storage Warehouse, General Purpose Warehouse, General Storage, Family Housing, Support Services Admin Building, Facility Engineer Storehouse	Added 4 metal and fiberglass canopies in 1982. Added over 13,000 square feet in 1984	YES	YES	NO	NO
00019	Inert Storage Warehouse	1942	Inert Storage Warehouse	Inflammable Material Storehouse	Added ramps in 1952	YES	YES	NO	NO
00021	Tower and Tank Well, Numbers 1 & 2	1941	Elevated Water Storage Tank	Elevated Water Storage Tank		YES	YES	NO	NO
00023	Pump and Sand Dryer House	1941	Pump and Sand Dryer House	Fuel Oil Pump and Sand Dryer House, DSL Station w/Building, Utility Structure/ Diesel Oil Tank		YES	YES	NO	NO
00024	Pump House, Well No. 1	1941	Pump House, Well #1	Pump House Well #1	Not significant in context	N/A	NO	NO	NO
00025	Water Treatment Building (Chlorine)	1941	Water Treatment Building	Pump House Well #2	Not significant in context	N/A	NO	NO	NO
00026	Motor Truck Scale House	1941	Vacant	Motor Truck Scale House		YES	YES	NO	NO
00027	HAS MAT Storage	1988	Vacant	Battery Charging Building				NO	NO
00028	Boiler House, Building #11	1942	Boiler Room (Building #11)	Boiler Room (Building #11)				NO	NO
00029	Supply Shed (adj. To Building 4)	1953	Supply Shed	Lumber and Pipe Shed, Supply Shed		YES	YES	NO	NO
00030	Box and Crate Shop	1942	Box and Crate Shop	Box and Crate Shop, General Purpose Warehouse, Admin General Purpose	Highly modified -Windows replaced, aluminum siding added, various modifications	NO	NO	NO	NO
00031	Dispatch Office and Equipment Pool	1942	Dispatch Office and Equipment Pool	Storage Garage and Motor Pool, Admin General Purpose, Battery Shop, Vehicle Storage	Highly modified. Aluminum Siding added. Various modifications.	NO	NO	NO	NO

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Appendix B: List of Historic Properties with Eligibility

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00032	Office and Theatre	1942	Office and Theatre	Admin General Purpose, unaccompanied Officer Quarters, Gymnasium, Theatre, Officer Quarters Tran., Exchange, Applied Instruction Building	Highly modified -Windows replaced, aluminum siding added, various modifications	NO	NO	NO	NO
00033	Community Center	1962	Community Center	Tank Storage, Batchelor Officers Quarters, 3 Mess Hall, Community Center, Applied Instruction Building And Auditorium General Purpose	Windows replaced, aluminum siding added, various modifications	NO	NO	NO	NO
00034	Housing NCO	1950	Housing NCO	Bachelor Officer Quarters - Male, Enlisted Barracks without Mess, Family Officer Quarters	Windows replaced, aluminum siding added, various modifications	NO	NO	NO	NO
00035	Housing Quarters	1942	Housing Quarters	Family Officer Quarters	Boiler Room was extended in 1951	NO	NO	NO	NO
00036	Crew Room, Kitchen	1943	Chemical Treaty related	Applied Instruction Building Lunchroom	Highly Modified	NO	NO	NO	NO
00037	Boiler House	1961	Boiler House	Heating Plant		YES	YES	NO	NO
00038	Sep Toil/Shower	1969	Latrine	Latrine				NO	NO
00041	Pwr PLT Building	1972	Power Plant Building					NO	NO
00042	Storge GP	1976	Storage General Purpose					NO	NO
00038	Separate Toilet/Shower	1969	Separate Toilet/Shower	Separate Toilet/Shower				NO	NO
00041	PWR PLT BLDG	1972						NO	NO
00042	Storage GP INST	1976						NO	NO
00044	Substation, 66,000-volt	1941	Switching Station	Switching Station	Highly Modified	NO	NO	NO	NO
00045	Access Control Facility	1982	Vacant					NO	NO

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Appendix B: List of Historic Properties with Eligibility

Building Number	Building Name	Constr Date	Last Use	Original Use	Notes	Army Retains Integrity	Army Contributes to District	ORARNG Historic District	SHPO Historic District
00046	Valve House for Diesel Fuel Tanks	1944	Valve House for Diesel Fuel Tanks	Pump House for Diesel Fuel Tanks	Not significant in context	N/A	NO	NO	NO
00047	Viewing Platform	1960	Viewing Platform	Loading Platform, Personnel	Highly Modified	NO	NO	NO	NO
00051	Housing Quarters	1941	Commander's Quarters	Housing	Highly Modified	NO	NO	NO	NO
00052	Office Building	1941	Admin General Purpose	Admin General Purpose	Highly Modified	NO	NO	NO	NO
00053	Office Building	1941	Admin General Purpose	Field Office Stock Control	Highly Modified	NO	NO	NO	NO
00054	Treaty Building	1941	Treaty Building	Area Engineer Building, Recreation Building, Civilian Personnel Building	Highly Modified	NO	NO	NO	NO
00055	Office Space	1941	Office Space	Family Quarters	Highly Modified	NO	NO	NO	NO
00057	Info Systems Fac	1995	Info Systems Facility					NO	
00061	Tennis Court	1953	Abandoned	Tennis Court	Not significant in context	NO	NO	NO	NO
00062	Physical Fitness Center	1993	RTI Physical Fitness Center	Physical Fitness Center				NO	NO
00063	Riding Stables	1948	Abandoned	Stable	Dilapidated				NO
00070	NCO Quarters Garage	1942	NCO Quarters Garage	Detached Garage, Family Housing		YES	YES	YES	YES
00071	BOQ Shed Garage	1944	BOQ Shed Garage	Detached Garage, Family Housing	Highly Modified	NO	NO	NO	NO
00072	Garage for Building 35	1942		Garage for Housing				NO	NO
00073	Garage for Building 51	1941	Garage	Garage for Housing	Highly Modified	NO	NO	NO	NO
00074	Garage for Building 55	1941	Garage	Garage for Housing	Highly Modified	NO	NO	NO	NO
00076	Traffic Control Center - Main Gate	1953	Traffic Control	Sentry Station, Police Station		YES	YES	NO	NO
00077	UTES	1975	UTES	Storage Shed General Purpose				NO	NO
00082	Drum Storage Shed	1960	Storage Shed	Tarp Storage Building	Not significant in context	N/A	NO	NO	NO
00328	Storage Shed	1953	Storage Shed	Storage Shed	Not significant in context	N/A	NO	NO	NO
00343	Concrete Vault	1941	Concrete Vault	Imhoff Tank Utility Structure		YES	YES	NO	NO
00344	Imhoff Tank (Large)	1942	Imhoff Tank (Large)	Imhoff Tank (Large)	Not significant in context	N/A	NO	NO	NO

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Appendix B: List of Historic Properties with Eligibility

Building Number	Building Name	Constr Date	Last Use	Original Use	Notes	Army Retains Integrity	Army Contributes to District	ORARNG Historic District	SHPO Historic District
00401	Standard Magazine	1941	Standard Magazine	Standard Magazine	Program Comment-ACHP 2006	YES	YES	NO	NO
00402	Standard Magazine	1941	Standard Magazine	Standard Magazine	Program Comment-ACHP 2006	YES	YES	NO	NO
00407	Standard Magazine	1941	Standard Magazine	Standard Magazine	Program Comment-ACHP 2006	YES	YES	NO	NO
00408	Standard Magazine	1941	Standard Magazine	Standard Magazine	Program Comment-ACHP 2006	YES	YES	NO	NO
00412	Standard Magazine	1941	Standard Magazine	Standard Magazine	Program Comment-ACHP 2006	YES	YES	NO	NO
00413	Standard Magazine	1941	Standard Magazine	Standard Magazine	Program Comment-ACHP 2006	YES	YES	NO	NO
00415	Inspector's Workshop	1942	Inspector's Workshop	Inspector's Workshop	2 ramps 81/3 c 23' concrete, 1 concrete Platform 8" x 40', 1 Platform 114' 6" x 40' 8"	YES	YES	NO	NO
00416	Boiler Room for Building 415	1942	Boiler Room for Building 415			YES	YES	NO	NO
00417	Renovation Building	1953	Ammo Renovation Depot Vacant	Renovation Building		YES	YES	NO	NO
00418	Latrine	1952	Latrine	Public Toilet		YES	YES	NO	NO
00419	Renovation field Office No. 2	1942	Renovation field Office No. 2	Laundry Room also Lunchroom	Highly Modified	NO	NO	NO	NO
00420	Inspector's Workshop / Lunchroom	1953	Inspector's Workshop / Lunchroom	Lunchroom	Highly Modified	YES	YES	NO	NO
00422	Rabbit House	1942	Rabbit House (Vacant)	Dunnage Building	Cold War Significance	YES	YES	NO	NO
00426	Dunnage Building	1942	Dunnage Building	Dunnage Building		YES	YES	NO	NO
00427	Dunnage Building	1942	Dunnage Building	Dunnage Building		YES	YES	NO	NO
00438	Siren Tower	1951	Siren Tower	Siren Tower		YES	YES	NO	NO
00447	Transmitter House	1941	Transmitter House	transformer House #2		YES	YES	NO	NO
00449	Pwr Plt Bldg	1972	Power Plant Building	Power Plant Building	Dilapidated			NO	NO
00455	Pump House Well No. 3	1962	Pump House Well No. 3	Pump House Well No. 3	Not significant in context	N/A	NO	NO	NO
00457	Guard House I block	1962		Security Sentry House	Cold War Significance	YES	YES	NO	NO
00478	Booster Pump House	1954	Booster Pump House	Booster Pump House	Not significant in context	N/A	NO	NO	NO
00485	Service Magazine	1953	Service Magazine	Service Magazine	Program Comment-ACHP 2006	YES	YES	NO	NO
00486	Boiler House	1954	Vacant			YES	YES	NO	NO

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Building Number	Building Name	Constr Date	Last Use	Original Use	Notes	Army Retains Integrity	Army Contributes to District	ORARNG Historic District	SHPO Historic District
00493	Clean and Paint Shop Renovation	1953	Clean and Paint Shop Renovation Vacant	Clean and Paint Shop Renovation	also: Ammunition Renovation Shop	YES	YES	NO	NO
00494	Paint Storage Building Renovation	1953	Vacant	Paint Storage Building Renovation	Not significant in context	N/A	NO	NO	NO
00495	Air Compressor Building Renovation	1953	Air Compressor Building Renovation	Air Compressor Building Renovation		YES	YES	NO	NO
00601	Ammo Disassembly Plant Retaining Water	1950	Vacant	Vacant		YES	YES	NO	NO
00602	Ammo Disassembly Plant Operating Barricade	1950	Vacant	Vacant		YES	YES	NO	NO
00604	Ammo Disassembly Plant splinter-proof Shelter	1950	Vacant	Vacant		YES	YES	NO	NO
00605	Storehouse Disassembly Plant	1950	Vacant	Vacant		YES	YES	NO	NO
00606	latrine	1950	Vacant	Vacant	Not significant in context	N/A	NO	NO	NO
00608	Ammo Normal Maintenance Building	1955	Vacant	Vacant		YES	YES	NO	NO
00609	Storehouse Ammo	1955	Ammo	Ammo	Program Comment-ACHP 2006	YES	YES	NO	NO
00610	Vacuum Collector Barricade	1955	Barricade	Barricade	Also: ammunition renovation shop	YES	YES	NO	NO
00611	Storehouse (Flammable)	1955	Storehouse (Flammable)	Storehouse (Flammable)	also: fixed ammunition magazine	YES	YES	NO	NO
00612	Heating Plant and Air Compressor	1955	Heating Plant and Air Compressor	Heating Plant and Air Compressor	Not significant in context	N/A	NO	NO	NO
00613	Pump House Well No.6	1955	Pump House Well No.6	Water Well w/Pump House	Not significant in context	N/A	NO	NO	NO
00614	Ammo Disassembly and Renovation Building	1958	Ammo Disassembly and Renovation Building	Ammo Disassembly Renovation Building		YES	YES	NO	NO

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Building Number	Building Name	Constr Date	Last Use	Original Use	Notes	Army Retains Integrity	Army Contributes to District	ORARNG Historic District	SHPO Historic District
00615	Vacuum Collector Barricade	1958	Vacuum Collector Barricade	Vacuum Collector Barricade		YES	YES	NO	NO
00616	Mounded Concrete Box Magazine	1958	Mounded Concrete Box Magazine	Magazine Mounded Concrete Box		YES	YES	NO	NO
00617	Boiler Plant and Compressor Room	1955	Boiler Plant and Compressor Room	Temporary Steam Boiler Plant	underground steel tank (1958)	YES	YES	NO	NO
00618	Water Tower	1955	Water Tower	Tank elevated Water Storage		YES	YES	NO	NO
00619	Quonset Hut, Lunchroom	1959	Quonset Hut, Lunchroom	Quonset Hut, Lunchroom	Highly Modified - deterioration	NO	NO	NO	NO
00620	Barricade (near Building 609)	1955	Barricade	Barricade Explosives		YES	YES	NO	NO
00621	Pump House Well No.7	1961	Pump House Well No.7	Water will with Pumping Station	Not significant in context	N/A	NO	NO	NO
00622	Firing Range Bunker	1961	Firing Range Bunker	Change House		YES	YES	NO	NO
00653	Storage	1953	General Storehouse Standby Generator Plant K Block	General Storehouse Standby Generator Plant	Not significant in context	N/A	NO	NO	NO
670	access cnt fac	?		NW Gate Building				NO	NO
00746-764	Safety Shelter	1943	Safety Shelter	Safety Shelter		YES	YES	NO	NO
00775-800 (minus 786, 789)	Safety Shelter	1943	Safety Shelter	Safety Shelter		YES	YES	NO	NO
00805-808	Tool House	1941	Tool House	Transfer Depot Explosives Building		YES	YES	NO	NO
00824-838	Tool House	1941	Tool House	Transfer Depot Explosives Building		YES	YES	NO	NO
01348	F Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	YES	YES
01349	F Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	YES	YES
01350	F Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	YES	YES
01351	F Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	YES	YES
01352	F Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	YES	YES
01353	F Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	YES	YES

Green font indicates preserved in OMD Historic District, red font indicates not included in original USACE table, and black font indicates included in original USACE table.

Page Number 7

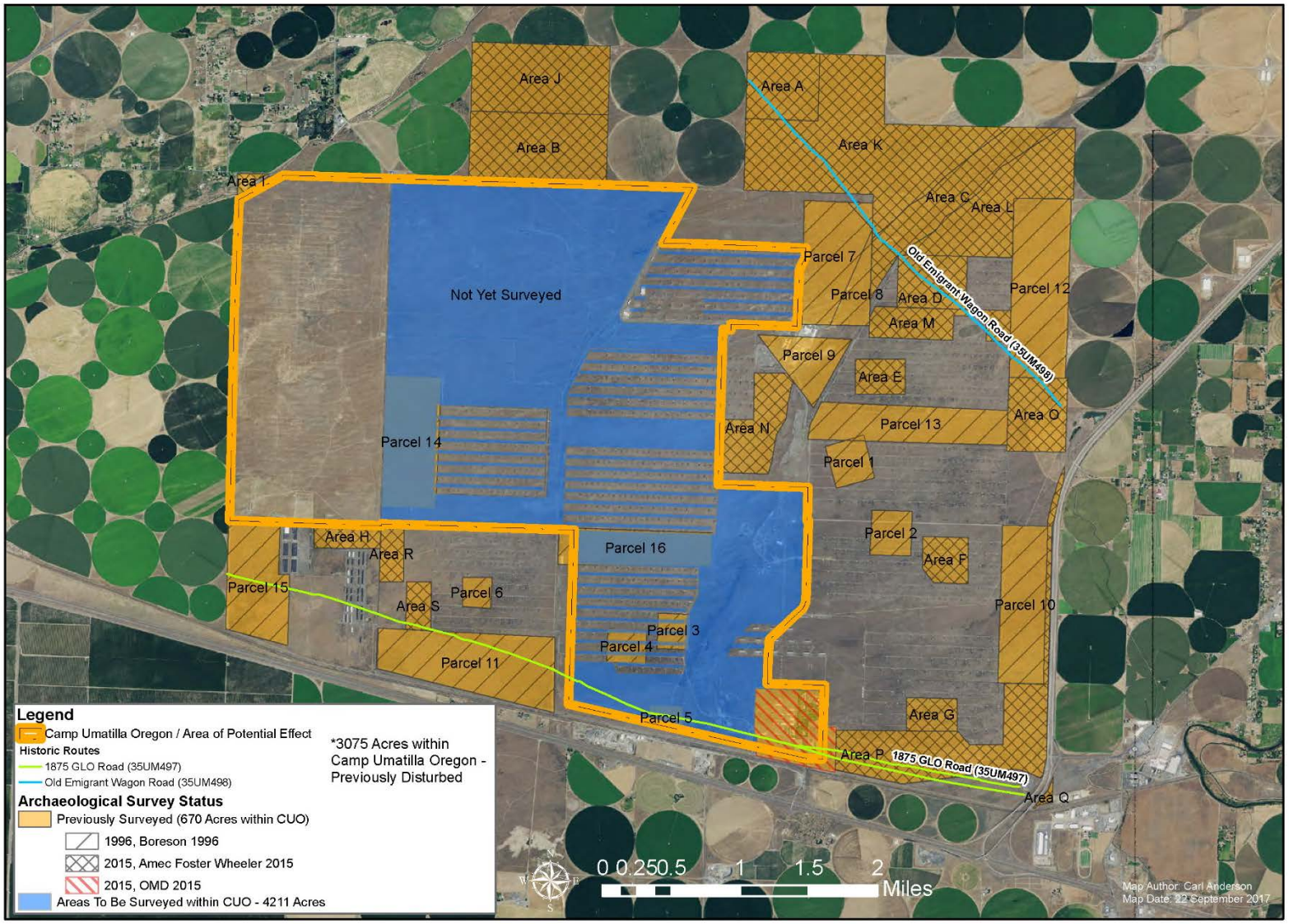
Appendix B: List of Historic Properties with Eligibility

Building Number	Building Name	Constr Date	Last Use	Original Use	Notes	Army Retains Integrity	Army Contributes to District	ORARNG Historic District	SHPO Historic District
01354-1447	F Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	NO	NO
01448-1542	G Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	NO	NO
01643-1722	I Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	NO	NO
01723-1734	J Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	NO	NO
01737-1749	J Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	NO	NO
01753-1764	J Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	NO	NO
01768-1779	J Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	NO	NO
01783-1793	J Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	NO	NO
01797-1807	J Block Igloo	1941	Conventional Ammo Storage	Conventional Ammo Storage	Program Comment-ACHP 2006	YES	YES	NO	NO
01811-1900	K Block Igloo	1941	Chemical Weapon Storage	Conventional Ammo Storage	Program Comment-ACHP 2006 Cold War Significance	YES	YES	NO	NO
Known Archaeological Sites on Camp Umatilla Oregon (7,500 Acres)									
	SHPO Site Number		**Site Type**		**Site Description**		**Army Eligible**	**ORARNG Eligible**	**SHPO Eligible**
	35UM489		artifact/feature scatter		light scatter of military-related archaeology features and artifacts associated with WWII and Cold War			NO	NO
	35UM497		wagon road		two-track linear depression		YES		YES
Known Property of Traditional Religious and Cultural Importance to an Indian Tribe on Camp Umatilla Oregon (7,500 Acres)									
	SHPO Site Number		**Site Type**		**Site Description**		**Army Eligible**	**ORARNG Eligible**	**SHPO Eligible**
	Temp		PTRCI		geographic feature that crosses CUO		Unknown	Treat as though eligible	NA

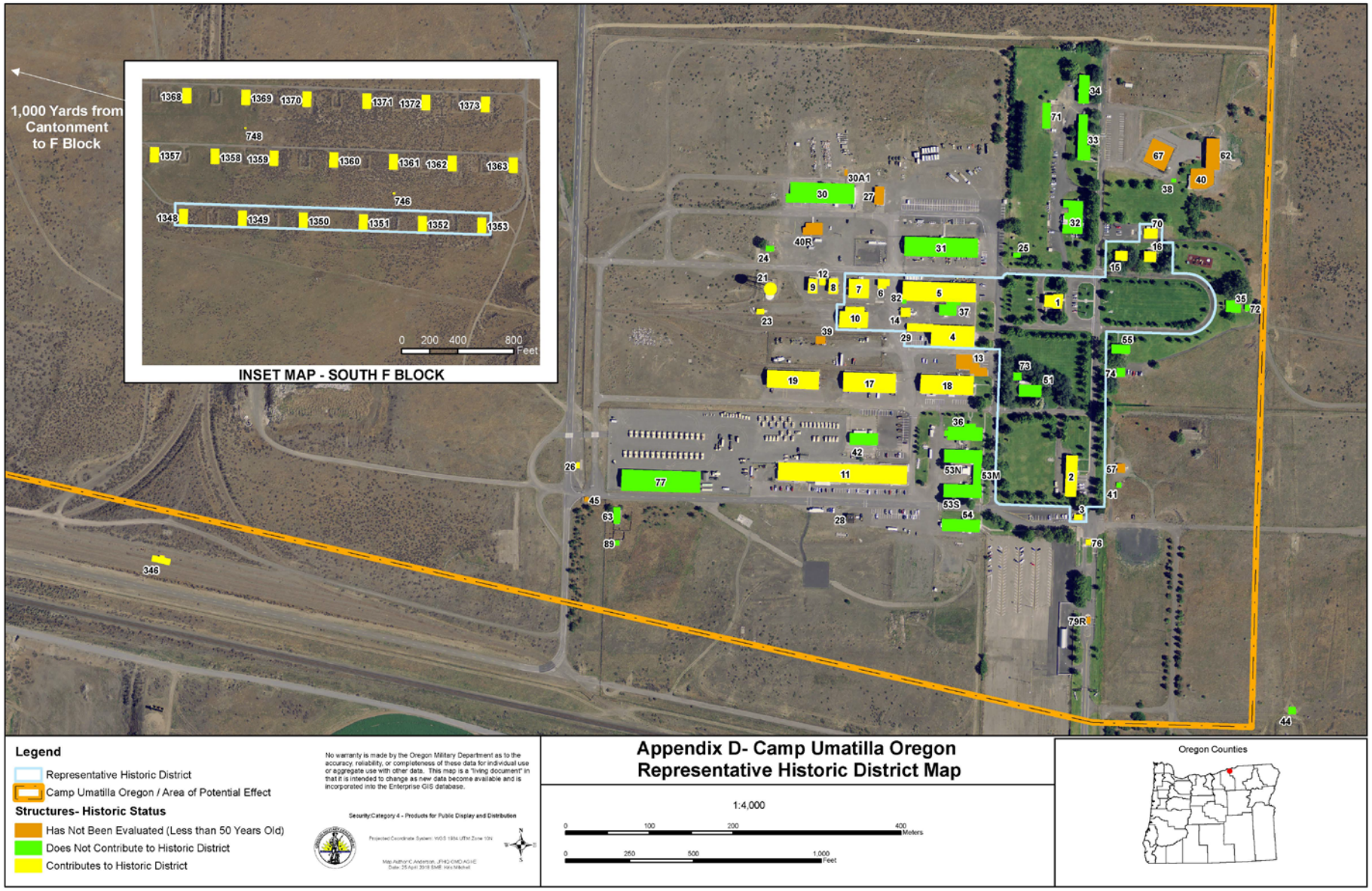
Green font indicates preserved in OMD Historic District, red font indicates not included in original USACE table, and black font indicates included in original USACE table.

Page Number 8

Appendix D- Camp Umatilla Oregon Archaeology Survey Overview Map



Appendix D – Representative Historic District Map



Appendix E: Annual Report Template

Programmatic Agreement
Camp Umatilla Oregon Development, Expansion and Operations Project
Annual Report Template
2017

I. Provide status update on the following PA stipulations (original stipulations in *italics*).

A. ***Designation of representative historic district****. The ORARNG shall designate an area within the central cantonment as a smaller historic district that is representative of the larger World War II and Cold War-era historic district identified by the Corps of Engineers. This smaller historic district would be reflected in the Final Environmental Assessment for Expanded Operations at the Oregon National Guard's Camp Umatilla Oregon and Finding of No Significant Impact (CUO EA/FNSI) and in the updated Site Development Plan. The ORARNG will maintain this designated historic district for the foreseeable future maintaining the architectural integrity of the historic buildings and structures as outlined in the Historic District Management Manual (HDMM) discussed below. Those buildings and structures outside the designated historic district would no longer be subject to the Section 106 process and may be demolished, modified, maintained or otherwise altered without further consultation.*

Status:

B. ***Develop a Historic District Management Manual****. The ORARNG shall develop, in consultation with the Oregon SHPO, a maintenance and management manual for the newly designated representative historic district that will outline in more detail the acceptable building and structure modifications and new construction that are allowable to ensure that the historic buildings and structures are viable long-term contributors to the ORARNG's mission and readiness. The HDMM would be completed within four years of execution of this PA and would allow 30 day Oregon SHPO review of contract scope and draft HDMM. The HDMM would include the following main outline elements for those historic properties included within the representative historic district.*

Status:

C. ***Potential Property of Traditional Religious and Cultural Significance to an Indian Tribe Protection and Access****. The ORARNG will protect the potential property of traditional religious and cultural significance to an Indian tribe identified by CTUIR as though it is eligible for the National Register by 1) limiting off-road vehicular traffic or new construction within previously undisturbed portions of the potential historic property and 2) by consulting with the CTUIR to develop within two years of execution of this PA a protocol allowing tribal member access during certain times of the year to carry out cultural practices.*

Status:

D. ***Archaeological Surveys****. The ORARNG will complete additional archaeological pedestrian surveys in previously undisturbed and un-surveyed areas prior to any CUO Expansion, Development and Operations Project ground-disturbing actions in that area or within five years of execution of this PA. Survey results and reports will be prepared according to State of Oregon Field and Reporting Guidelines and will allow 30 day review by the Oregon SHPO and the CTUIR prior to any ground disturbing actions in the related area. Testing will not be conducted unless a site is identified*.

Status:

E. ***Historic Wagon Road****. The ORARNG will photographically document that portion of the 1874 wagon road (35UM497) that is located on CUO and update the existing SHPO site form as needed. Within five years of execution of this PA, the wagon road (35UM497) will be included in a Light Detection and Ranging (LIDAR) study to better document its exact track across the CUO.*

Status:

II. ORARNG will document the status of the undertaking completed during the reporting year.

Status:

Started	**Under Construction**	**Completed**
(Example) Construct Unit Training Equipment Site (UTES)		
	(Example) Construct Centralized Vehicle Wash Facility	
		(Example) Construct 400-person dining facility

APPENDIX F

Public Notice

IN THE CIRCUIT COURT OF THE STATE OF OREGON FOR UMATILLA COUNTY

}AFFIDAVIT OF PUBLICATION

STATE OF OREGON
County of Umatilla } ss

I, Dayle Stinson being duly sworn, depose and say that I am the principal clerk of the publisher of the East Oregonian, eastoregonian.com, a newspaper of general circulation, as defined by ORS 193.010 and 193.020; that the

EO-9679 PUBLIC NOTICE The Oregon Mil

a printed copy of which is hereto annexed; was published in the entire issue of said newspaper for **1** successive and consecutive issues in the following issues:
07/03/2018

Subscribed and sworn to before me on this **3rd day of July, A.D. 2018**

Dayle Stynson

Notary Public of Oregon

OFFICIAL STAMP
GRACE ELLEN BUBAR
NOTARY PUBLIC-OREGON
COMMISSION NO. 975656
MY COMMISSION EXPIRES JUNE 19, 2022

EO-9679
PUBLIC NOTICE

The Oregon Military Department (OMD), the administrative head of the Oregon Army National Guard, recently acquired a license for 7,500 acres of the former Umatilla Army Chemical Depot for use as a military training site. This 7,500-acre training site, called Camp Umatilla Oregon, remains under federal ownership and includes many of the original buildings that the US Army has determined are eligible for inclusion on the National Register of Historic Places as contributing elements to a Historic District. According to the National Historic Preservation Act, the OMD has consulted with the Advisory Council on Historic Preservation, National Guard Bureau, Oregon State Historic Preservation Office, and the Confederated Tribes of the Umatilla Indian Reservation and developed a Programmatic Agreement describing how proposed adverse effects will be mitigated. The consulting parties have agreed to preserve and continue to use 12 historic buildings as a smaller representative historic district within the existing cantonment area. Now in its final draft form, this Programmatic Agreement is available for public comment. Those interested in commenting should contact Mr. Kris Mitchell via email at *kris.c.mitchell.nfg@mail.mil* or via regular post at Oregon Military Department (AGI-ENV), PO Box 14350, Salem, OR 97309.
July 3, 2018

EO-9679
PUBLIC NOTICE

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July 3, 2018

IN THE CIRCUIT COURT OF
THE STATE OF OREGON FOR
UMATILLA COUNTY

}AFFIDAVIT OF PUBLICATION

STATE OF OREGON
County of Umatilla } ss

I, Dayle Stinson being duly sworn, depose and say that I am the principal clerk of the publisher of the Hermiston Herald, hermistonherald.com, a newspaper of general circulation, as defined by ORS 193.010 and 193.020; that the

HH-5680 PUBLIC NOTICE The Oregon Mil

a printed copy of which is hereto annexed; was published in the entire issue of said newspaper for **1** successive and consecutive issues in the following issues:
07/04/2018

Subscribed and sworn to before me on this **3rd day of July, A.D. 2018**

Dayle Stinson

Grace Bubar
Notary Public of Oregon

OFFICIAL STAMP
GRACE ELLEN BUBAR
NOTARY PUBLIC-OREGON
COMMISSION NO. 975656
MY COMMISSION EXPIRES JUNE 19, 2022

HH-5680
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July 3, 2018

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APPENDIX F

Public Notice

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APPENDIX D:

MEMORANDUM OF AGREEMENT

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Order and Agreement for the Maintenance of Institutional Controls

Pursuant to ORS 465.260(4), the Oregon Department of Environmental Quality (DEQ), enters into this Order and Agreement for the Maintenance of Institutional Controls (Agreement) with the Oregon Military Department (OMD).

1. Purpose

The Mutual objective of DEQ and OMD in entering into this Agreement is to protect public health, safety and welfare and the environment by continued implementation of institutional controls at the former Umatilla Chemical Depot (UMCD).

2. Recitals

A. OMD is the State licensee for a portion of the former UMCD. The portion of the former UMCD subject to this agreement is approximately 7,500-acres at 78798 Ordinance Road, Hermiston, OR 97838, located north of Interstate 84 at exit 177). The location of the UMCD is shown in Exhibit 1 to this Agreement. The legal description of the site is provided in Exhibit 2 to this agreement.

B. In 1940, the Army selected a 16,000-acre plot of northeastern Oregon sage land for a new depot for munitions and general supply storage. Construction work began in January 1941, and 10 months later, on 14 October 1941, officials opened the U.S. Army Umatilla Ordnance Depot, named for the Umatilla Indian Tribe. The first ordnance shipment arrived on 27 October 1941. During its more than 70 years in operation, the depot grew to almost 20,000 acres and continued to support other war efforts, including the Korean Conflict, Vietnam, Grenada, Panama, and Desert Storm. In addition to its conventional ammunition and general supply missions, the depot received a new mission in 1962 – receiving and storing chemical ammunition. Between 1962 and 1969, the depot received various types of chemical ammunition. In 1988, UMCD was identified for realignment under Base Realignment and Closure (BRAC), which relocated the depot's conventional ammunition and general supplies missions to other U.S. depots and installations. As a result of the 1988 BRAC decision, OMD worked collaboratively with an Army appointed Local Redevelopment Authority in an effort to preserve a permanent training center that would accommodate the National Guard. These redevelopment planning efforts were reinvigorated by the decision to ultimately close UMCD as a result of 2005 BRAC legislation. Destruction of the chemical agents stored at the depot began in the fall of 2004 and the last stockpiled ton containers filled with mustard chemical agent were incinerated on October 20, 2011. The formal closing of UMCD occurred on August 1, 2012 and resulted in the Department of the Army declaring 19,729 acres of real property as excess to its future needs. On November 27, 2017, OMD finalized a license with the US Army Corps of Engineers for 7,500 acres as described in Exhibits 1 and 2.

C. The UMCD has a RCRA storage permit (DEQ I.D. No. OR6 213 820 917) that was issued in 1984. A RCRA "Part B" Storage Permit Application, to update conditions applicable to hazardous waste storage operations at UMCD, was recently submitted by the U.S. Army, underwent a public comment period and has been determined by DEQ to be substantially

complete. The RCRA Part B Storage Permit addresses conventional wastes and governs all aspects of hazardous waste storage operations at UMCD.

D. On September 11, 2011, DEQ issued the Umatilla Chemical Agent Disposal Facility (UMCDF) RCRA permit (DEQ I.D. No. ORQ 000 009 431-01) to the U.S. Army Chemical Materials Agency (CMA) for operation of the UMCDF disposal facility. That permit's closure plan required clean closure of the UMCDF to industrial exposure risk based standards. On April 27, 2017 the CMA submitted certification that the closure standards were met. On December 20, 2017 DEQ accepted certification of clean closure to risk based standards. Institutional controls for the UMCDF were placed in the UMCD RCRA permit and the UMCDF RCRA permit was terminated.

E. Closure of the UMCD and UMCDF to risk based standard will leave hazardous substances in place above levels that would be acceptable for the protection of human health and the environment if the site were allowed to be used for unrestricted uses.

F. In order to clean close the UMCD permit to industrial risk based standards, institutional controls limiting the use of the property to industrial uses are necessary

G. The contaminants described in Subsection 2.E are "hazardous substances" within the meaning of ORS 465.200(16) and the presence of hazardous substances in the soil, soil vapor, ambient air, or groundwater constitutes a "release" or threat of release" into the environment within the meaning of ORS 465.200(22). The UMCD is a "facility" within the meaning of ORS 465.200(13).

H. The institutional controls required by this agreement are necessary to protect the public health, safety, and the welfare and the environment.

3. Institutional controls

OMD agrees that it will not allow the following use and operations at the site:

A. Residential and Agricultural Use Restriction. The property located in the K-Block, J-Block, I-Block, Administration Area, building 419 area, Groundwater Pump and Treat Area, and the Ammunition Disposal Area shall not be used for the following purposes:

1. Residential use of any type (military barracks or billets related to military training are exempt from residential use restrictions);
2. Agricultural (food crop) use of any type;
2. Child care facilities; and nursing home or assisted living facilities; and
3. Educational facilities for children/young adults in grades K through 12.

B. Groundwater Restriction. Groundwater underlying the Groundwater Pump and Treat Area contains the contaminant Hexahydro-1,3,5 trinitro-1,3,5,-triazine (RDX), and 2,4,6-

Trinitrotoluene (TNT) which is actively undergoing a pump and treat groundwater remedy. Neither withdrawal of groundwater nor any activity that may interfere with the groundwater remedy is allowed within the Groundwater Pump and Treat Area without prior written approval of the Army National Guard Environmental Programs Division (ARNG-ILE), USEPA, and DEQ. For the purpose of this restriction, "groundwater" shall have the same meaning as in section 101(12) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

C. Groundwater Remedy Equipment and Monitoring Wells. The Property contains groundwater remedy equipment, infiltration galleries, and associated piping, both above and below the ground, and monitoring wells. OMD shall not disturb or permit others to disturb the groundwater remedy equipment, infiltration galleries, associated piping, and monitoring wells located on the Property now or in the future without the prior approval from ARNG-ILE, USEPA, and DEQ. Upon the appropriate regulatory agency determination that the infiltration galleries or a monitoring well is no longer necessary, they will be decommissioned in accordance with applicable laws, regulations, and ordinances.

D. Ammunition Disposal Area (ADA) Access Restrictions. The ADA has on-going remediation and munitions response actions. Until completion of remediation, access to this area or other interference with on-going remediation in this area is prohibited without prior written approval of the Army BRAC Division, USEPA, and DEQ.

4. DEQ Access

During reasonable hours, and subject to reasonable security requirements imposed by OMD, DEQ may enter upon and inspect any portion of the Site to determine whether the requirements of this Agreement have been or are being complied with. Except when necessary to address an imminent threat to human health or the environment or effectively determine whether the requirements of this Agreement have been or are being complied with, DEQ will use its best efforts to provide OMD 72 hours advance notice. DEQ may enter upon the site at any time to abate, mitigate, or cure a violation of any condition or restriction contained in this Agreement, provided DEQ first gives written notice of the violation to OMD describing what is necessary to correct the violation and OMD fails to cure the violation within the time specified in such notice. Any such entry upon the Site by DEQ to evaluate compliance or to abate, mitigate, or cure a violation may not be deemed a trespass.

5. Reporting

OMD will immediately notify DEQ of any condition or occurrence at the UMCD that does not conform with provisions of this Agreement.

6. Release of Institutional Controls

OMD may request release of any or all of the conditions or restrictions contained in this Agreement by submitting such request to the DEQ in writing, with evidence that the conditions

or restrictions are no longer necessary to protect human health and the environment. The decision to release any or all of the conditions or restrictions in this Agreement will be within the sole discretion of DEQ. DEQ will, as appropriate, issue written confirmation of a release of specific conditions or restrictions.

7. Enforcement

This Agreement is an enforceable order under ORS 465.260 and 465.900.

8. Termination of Agreement

This agreement will remain in effect until the OMD no longer occupies or uses the property or has been released of institutional controls by DEQ. If the OMD in any way transfers its interest in the property to another party other than the Army OMD will continue to be responsible for the maintenance of the institutional controls contained in this agreement unless DEQ agrees in writing otherwise.

IN WITNESS WHEREOF OMD and DEQ have executed this Agreement for the Maintenance of Institutional Controls as of the date and year first set forth below.

Oregon Military Department

By: _____ Date: _____
Roy D. Swafford
Director of Installations
Oregon Military Department

STATE OF OREGON)
) ss.
County of _____)

The foregoing instrument is acknowledged before me this _____ day of _____, 2018, by _____ [Name] of the Oregon Military Department, on its behalf.

_____
NOTARY PUBLIC FOR OREGON
My commission expires:_____

State of Oregon, acting by and through the Oregon Department of Environmental Quality

By: _____ Date: _____
David Anderson, Cleanup, Emergency Response, and Hydrogeology Programs Manager, Eastern Region

STATE OF OREGON)
) ss.
County of _____)

The foregoing instrument is acknowledged before me this _____ day of _____, 2018, by _____ [Name] of the Oregon Department of Environmental Quality, on its behalf.

_____
NOTARY PUBLIC FOR OREGON
My commission expires:_____

Exhibit 1

Location of Umatilla Chemical Depot (UMCD)

Exhibit 2

Legal Description and Survey Depiction

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APPENDIX E

WATER RIGHTS AGREEMENT

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NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

ARNG-IER

23 MAY 2017

MEMORANDUM FOR The US Army Corps of Engineers, Seattle District, Attn: CENWS-RE, PO Box 3755, Seattle, WA 98124-3755

SUBJECT: Reassignment of 7500 Acres and Related Interests at the Former Umatilla Army Chemical Depot to the United States Property and Fiscal Officer for Oregon and Subsequent License for Use by the Oregon Army National Guard (ORARNG)

1. References: nine references are listed in the enclosures.

2. In anticipation of DASA(IH&P) approval of the NGB request for the subject reassignment of real estate interests, request that the Seattle District prepare the necessary documents to execute the action as described in the enclosures. In addition, request a license be prepared to the ORARNG for use of the reassigned interests and submitted with the execution package. This will reduce delay to the overall process. The final documents will be subject to the terms and conditions approved by DASA(IH&P). Any administrative fees for these actions will be the responsibility of the ORARNG.

3. The point of contact for this memorandum is Mr. Robert McCabe, Chief, Real Estate Branch at DSN 329-6900, 703-601-6900, or robert.e.mccabe.civ@mail.mil.

ERIK T. GORDON
COL, GS
I&E, Army National Guard

Encls
as

CF: (w/encls)
CFMO, OR
USPFO, OR

NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

ARNG-IER

15 MAY 2017

MEMORANDUM FOR Deputy Assistant Secretary of the Army for Installations, Housing and Partnerships (DASA(IH&P)), 110 Army Pentagon, Room 3E475, Washington, DC 20310-0110

SUBJECT: Request for Reassignment of 7500 Acres and Related Interests at the Former Umatilla Chemical Depot (UMCD), OR to the United States Property and Fiscal Officer for Oregon and Subsequent Licensing to the Oregon Army National Guard (ORARNG)

1. References: thirteen references are listed in the enclosures.

2. The former UMCD is located in eastern Oregon and contains approximately 17,148.75 acres of land, 2,668.40 acres of safety easements, and eight water right certificates. UMCD was recommended for closure and published in the Federal Register on 16 May 2005. In accordance with the Defense Base Closure and Realignment Act of 1990 (Public Law No. 101-510 or 10 U.S.C. § 2687 note), as amended, it was published in the Federal Register on 17 November 2008 with a surplus property determination. A Local Redevelopment Authority, now the CDA, completed The U.S. Army Umatilla Chemical Depot Base Redevelopment Plan and HUD Application, dated August 2010, which identified military reuse by the Oregon Army National Guard as one of the three overarching goals and a site of 7,421 acres was specified for that purpose. Public Law 112-74 authorized the Army to retain 7,500 acres for a training enclave for reserve components of the Armed Forces.

3. As a result, the ORARNG conducted substantial studies to justify use of the 7500 acres and related interests. The resulting requirements were documented in a Real Estate Action Plan (REAP) and a series of REAP Modifications at references (a-d). The required NEPA documentation to support the reassignment has been completed in accordance with AR 200-1. National Guard Bureau (NGB) has reviewed these documents and concurs with the reassignment for the proposed establishment of the Umatilla Training Center, subject to the following conditions:

a. Environmental Remediation and Land Use Controls. Reference (e) outlines the environmental responsibilities of both NGB and DAIM-ODB to ensure that the property is adequate, both before and after reassignment, for ORARNG training requirements. In addition, NGB will ensure any use of the property is subject to the land use restrictions in reference (f).

b. Water Rights. There is a need to retain water rights equivalent to 1,186 gpm from wells 1, 2, 3 and 6 for ORARNG use. An agreement on the division of water rights has been reached with the CDA, as detailed in references (g) and (h).

c. Land and Facilities. A total of 7,500 acres with 1,404,989 SF of improvements will be reassigned for ORARNG use. The site was determined by a formal survey completed by

Ferguson Survey & Engineering for the ORARNG, and recorded in Morrow and Umatilla Counties. The facilities within the 7,500 acres were verified by record review and field verification. See legal description and map at reference (i).

d. Easements.

i. Safety Easements. North of the 7500 acres and the firing ranges, perpetual easements across Tracts 108E, 109E and 110E (totaling 1,092.61 acres) will be assigned to the United States Property and Fiscal Officer (USPFO) for Oregon to maintain safety areas. See maps at reference (j).

ii. Rights of Way (ROWs). Perpetual and Temporary ROWs for roads, railroad, safety, noise, and utilities will be assigned to the USPFO for Oregon. These will be reserved as easements in the quit claim deed of surrounding lands to the CDA. See descriptions at reference (k).

4. In accordance with reference (l), this office requests approval of the reassignment to allow the USPFO for Oregon to accept real property accountability for the property via a DD Form 1354, and for subsequent execution by USACE of an indefinite term license to the State of Oregon for use by the ORARNG. If approved, USACE is prepared to submit a request to remove the lands and interests from surplus status. The reassignment request has been duly coordinated with the IMCOM as the agency assigned accountability of the former UMCD per reference (m).

5. The point of contact for this memorandum is Mr. Robert McCabe, Chief, Real Estate Branch at DSN 329-6900, 703-601-6900, or robert.e.mccabe.civ@mail.mil.

Encls
as

ERIK T. GORDON
COL, GS
I&E, Army National Guard

CF: (w/encls)
CENWS-RE
CFMO, OR
DAIM-ODB
USPFO, OR

Enclosure Contents:

a. Memorandum, AGI, 30 March 2012, subject: Real Estate Action Plan (REAP)/Umatilla Chemical Depot (UMCD) License DACA67-3-08-109 (enclosure 1).

b. Memorandum, AGI-CFMO, 22 April 2014, subject: Modification (Safety Easements) to Real Estate Action Plan (REAP) dated 30 Mar 2012/Umatilla Chemical Depot (UMCD) License DACA67-3-08-109, Hermiston, Oregon (enclosure 2).

c. Memorandum, AGI, 20 April 2015, subject: Modification 2 (Water Rights and Supporting Easements) to Real Estate Action Plan (REAP) dated 30 Mar 12/Umatilla Chemical Depot (UMAD) License DACA67-3-08-109, Hermiston, Oregon (enclosure 3).

d. Memorandum, AGI, 22 December 2016, subject: Modification 3 (Noise) to Real Estate Action Plan (REAP) dated 30 Mar 12/Umatilla Army Depot (UMAD) License DACA67-3-08-109, Hermiston, Oregon (enclosure 4).

e. Memorandum of Agreement between the National Guard Bureau and the U.S. Army Base Realignment and Closure Division, 2 August 2016, subject: Real Property Assignment and Transfer of Responsibility for Real Property Located on the Former Umatilla Chemical Depot, Umatilla and Morrow Counties, Oregon (enclosure 5).

f. Land Use Restrictions for Environmental Sites on Property at UMCD, 4 April 2017 (enclosure 6).

g. Letter from Mr. Lederle, Chief, OACSIM BRAC Division, to the Columbia Development Authority (CDA), 22 December 2016 (enclosure 7).

h. Table on Umatilla Water Wells and Rights (enclosure 8).

i. Legal Description and Map for the Proposed Umatilla Training Center, 16 April 2015 (enclosure 9).

j. Maps for Tracts 108E, 109E, and 110E, 6 February 2017 (enclosure 10).

k. Summary of Rights of Way Estates to be Retained by Army (enclosure 11).

l. Memorandum, ASA IEE, 25 Nov 2013, subject: U.S. Army Installations and Sites Accountability Policy (enclosure 12).

m. General Orders No. 2012-12, 25 June 2013 (enclosure 13).

DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

December 22, 2016

Don Russell
Chair, Columbia Development Authority
Two Marine Drive
P.O. Box 200
Boardman, OR 97818

Dear Mr. Russell:

I am writing in response to your letter of 16 December 2016 addressed to COL Gordon, Chief of Installations & Environmental Division for the Army National Guard, regarding water rights at Umatilla Chemical Depot.

I am pleased to confirm that the Army is now in agreement with the division of water rights described in the Memorandum of Agreement between the Columbia Development Authority (CDA) and the Oregon Military Department in July 2016. The Army will retain water rights sufficient to pump up to 1,186 gallons per minute and will convey to the CDA water rights sufficient to pump up to 3,231 gallons per minute.

This agreement will be included in the Economic Development Conveyance Memorandum of Agreement between the Army and the CDA.

Respectfully,

Thomas E. Lederle
Chief, Base Realignment and Closure Division
Office of the Assistant Chief of Staff
for Installation Management

Umatilla Water Wells and Rights

	Aquifer	Well	Depth	Pumping Capacity	Status	Permitted (gpm)		Permitted Use
Army Retain	Shallow Basalt Aquifer	1	327	750	Requires well repair	153; 449	1186 gpm	Irrigation; Fire Protection
		2	360	375	Requires well repair	350		Domestic
		3	453	-		10		Fire Protection
	Deep Basalt Aquifer	6	710	550	Requires pipeline	224		Domestic
		7	682	500	Requires pipeline	0		
Transfer to CDA		4	600	400	Temp Easement	498	3231 gpm	Fire Protection
		5	618	800	Temp Easement	498		Fire Protection
	CDA subject to transfer application from well #1					449		Fire Protection
	CDA subject to transfer application well #7					1014		Manufacturing
	CDA subject to transfer application from well #7					772		Fire Protection

Pumping capacity of wells 1 & 2 may differ depending on repair or replacement
Well #7 is permitted to be used equally with well #6 (either/or)
Current split is 26.85% Army, 73.15% CDA
Wells #1 & #2 have inherent Federal Reserve Water Right status
Certificates for Fire Protection state "limited to maintaining the fire suppression system and to periods of actual fire emergency."

MEMORANDUM OF AGREEMENT BETWEEN

OREGON MILITARY DEPARTMENT ("OMD")
AND
COLUMBIA DEVELOPMENT AUTHORITY (CDA)

1. **PARTIES. THIS MEMORANDUM OF AGREEMENT,** dated 25 July 2016 is by and between the **OREGON MILITARY DEPARTMENT** (hereafter referred to as **OMD**) and the **COLUMBIA DEVELOPMENT AUTHORITY (CDA)** (hereafter referred to as **CDA**). The OMD's supervising representative for this agreement is the OMD's Adjutant General Deputy Director. The CDA authorized representative for this agreement is the CDA Executive Director.

2. **PURPOSE**. This MOA formalizes an agreement between the parties concerning the division of water rights at the former Umatilla Army Depot. Both parties were directed by the U.S. Army Base Realignment and Closure Office (BRAC) to enter into an agreement for how water rights supporting this site are to be assigned to the parties.

3. **BACKGROUND**. The United States Army, by and through its Base Realignment and Closure (BRAC) Office, accepted in 2011 the proposal submitted by the Local Reuse Authority (LRA) for reutilization of the federal lands declared excess. Within that accepted proposal, the Oregon Army National Guard (ORARNG) was to receive a federal license for 7,500 acres, retained in the federal register, as training lands. Umatilla County, Morrow County and the Confederated Tribes of the Umatilla Indian Reservation will also be future property owners, or have in interest in former Depot lands.

   Enclosure1 is a map showing the location of the water infrastructure. Of note are well locations. Current water infrastructure use does not match with future property ownership (boundaries). Example: Wells 4 and 5 are on future Morrow County property, and are the primary potable water source for the ORARNG. Wells on future ORARNG property do not have infrastructure connecting them to the buildings / location where the water use is needed. The Oregon Military Department (OMD) contracted a Water Study in 2012. This study defined requirements based on soldier population, patterns of use, and planned build out of infrastructure to facilitate training of up to 1,200 soldiers.

   In May 2016 the BRAC Office directed OMD and the CDA to come to a joint agreement recommending division of water rights. The OMD and CDA did conduct meetings and have arrived at an amicable solution. We believe that this solution provides adequate water to meet the ORARNG training mission, and that with some constructed build-out for water storage will allow the OMD to meet the 3,000 GPM for 3 hour pumping requirement for compliance with fire code. ARNG and CDA's to discuss and come to an amicable solution to determine the percentage of water rights for each entity.

4. **DIVISION OF WATER RIGHTS**.

   The following represents the agreement for disposition of water rights by well:

Well	Water Rights	Type Water Right	Conveyance To
Well 4	1.11 cfs/498 gpm	Fire Protection	CDA
Well 5	1.11 cfs/498 gpm	Fire Protection	CDA
Well 7	2.26 cfs/1014 gpm	Fire Protection/Manufacturing	CDA
Well 7	1.72 cfs/772 gpm	Fire Protection	CDA
Well 3	0.02 cfs/10 gpm	Fire Protection	Army
Well 1	2.0 cfs/898 gpm	Fire Protection	CDA / Army
Well 1	0.34 cfs/153 gpm	Irrigation	Army
Well 2	0.78 cfs/350 gpm	Domestic	Army
Well 6	0.5 cfs/224 gpm	Domestic	Army

Following the negotiating between the ORARNG and the CDA, it was agreed that an equal split of the fire protection water rights in Well 1 could still allow for the military mission to be met. This results in 27% of the water being retained by the Army for the military mission and the remaining 73% to be transferred to the CDA through the BRAC disposal process.

5. **SEVERABILITY**. The Army and the National Guard Bureau (NGB) has expressed interest in the net water rights to be retained for the site from a water resource and security position. The Oregon Water Resources Department has also provided input for the transfer criteria, the aquifers, and states water rights interests. These positions are separate and aside from the negotiations between the ORARNG and CDA. Both Office of Secretary of Defense (OSD) and Army water rights retention policy were considered.

6. **GOVERNING LAW.** This Agreement shall be governed and construed to be in accordance with the water rights Oregon Law as directed through the Oregon Water Rights Division.

7. **MERGER.** This agreement constitutes the entire agreement between the parties. There are no understandings, agreements, or representations, oral or written, not specified herein regarding this agreement. No amendment, consent, or waiver of terms of this agreement shall bind either party unless in writing and signed by all parties. Any such amendment, consent or waiver, shall be effective only in the specific instance and for the specific purpose given. OMD and USCG by the signatures below of its authorized representatives acknowledge having read and understood this agreement and agree to be bound by its terms and conditions.

IN WITNESS WHEREOF the parties hereto have caused this Agreement to be executed by their duly authorized officers as of the dates shown

APPROVED BY:

Michael E. Stencel
Major General
The Adjutant General

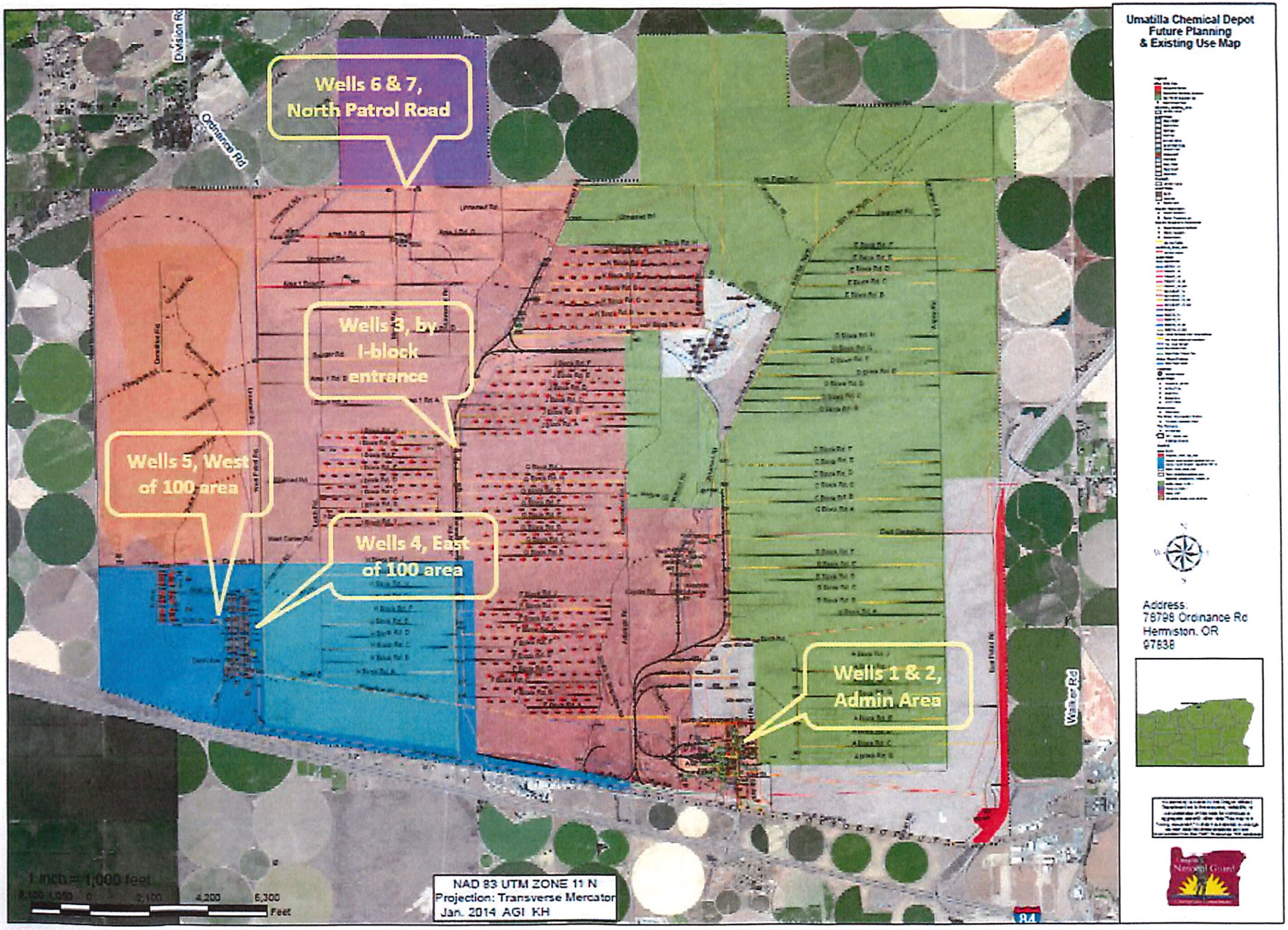
Date: 25 Jul 16

Gregory V. Smith
GREGORY V. SMITH
Executive Director
Columbia Development Authority

Date: 7/26/16

Umatilla Chemical Depot Well Locations

Oregon National Guard



Columbia Development Authority

December 16, 2016

COL Erik Gordon
Chief, Installations & Environmental Division (ARNG-IEZ)
Office of the Under Secretary for Personnel and Readiness
Arlington Hall Station
111 S. George Mason Dr.
Arlington, VA 22204-1382

Dear COL Erik Gordon:

At the conclusion of our meeting and conference call on November 28, 2016 involving representatives of the Columbia Development Authority (CDA), Oregon Military Department/Oregon Army National Guard (ORANG), National Guard Bureau (NGB), Army Corps of Engineers (ACOE) and BRAC office representatives, we understood there was an agreement among all participants to move forward with an allocation of water rights as described in the Memorandum of Agreement entered into between the OMD and CDA in July, 2016. We viewed the letters sent by the ACOE to the Oregon Water Resources Department on December 2, 2016, regarding the change from "specific" to "general" industrial uses for some of the water rights, as an indication of the joint agreement and first step toward implementation.

At this point, however, we are concerned about the lack of an affirmative statement from NGB or the BRAC to confirm acceptance of the water rights distribution plan. As we have previously stated, acceptance of the water rights plan is of paramount concern to the CDA. We cannot proceed with the title transfer process without this commitment.

Because time is of the essence, we ask that you please respond promptly to clarify the status of the water rights agreement.

Best Regards,

Don Russell, Chair
Columbia Development Authority

cc: Congressman Greg Walden
cc: Randy Chambers

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