

# Draft Finding of No Significant Impact:

## Fort Rucker, Alabama

### Construction and Operation of a Consolidated Elementary School

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There are two schools on Fort Rucker: a primary school serving pre-kindergarten and first grade and an elementary school for grades 2 through 6. The purpose of the Proposed Action is to construct a new consolidated elementary school to replace the existing primary school and elementary school. The new school would comply with current building codes and standards and would meet the education needs of the Fort Rucker community. Construction is essential to ensure that the facility meets all Department of Defense Education Activity (DoDEA) criteria and functional requirements.

Fort Rucker has prepared an Environmental Assessment (EA) that provides an evaluation of the environmental and socioeconomic impacts of constructing and operating a consolidated elementary school to replace the existing primary school and elementary school.

The actions considered in the EA are part of a major federal action, which must be evaluated under the National Environmental Policy Act (NEPA) of 1969. The attached EA, which is incorporated by reference, was prepared pursuant to 32 Code of Federal Regulations Part 651 and the President's Council on Environmental Quality regulations (Title 40, U.S. Code, Parts 1500-1508) for implementing the procedural requirements of NEPA.

In preparation of the EA, it was determined that the implementation of the Elementary School Alternative and the Elementary School Playfields Alternative would not have significant adverse direct, indirect, or cumulative effects on the quality of the environment. One other site in the Fort Rucker cantonment area, the Primary School Alternative site, was considered but dismissed due to the unknown nature and extent of contamination at the site.

## Description of the Proposed Action

The Proposed Action would entail the construction of a new two-story elementary school consisting of conventional shallow-type foundations, steel column and beam interior structural framing, and load-bearing exterior walls of either reinforced concrete masonry with brick veneer or reinforced concrete tilt walls with thin brick inlay construction. Interior construction would consist of light gauge metal stud framing with abuse-resistant gypsum wallboard and acoustical sound batt insulation for halls, learning studios, mechanical rooms, meeting rooms, and counseling rooms; interior construction at restrooms would consist of light gauge metal stud framing with cementitious backer board; operable partitions would be installed in the learning studios to encourage collaborative learning; ceilings would be suspended acoustical ceiling grid and tiles with high-efficiency fluorescent and light-emitting diode lighting fixtures; some "accent" ceiling areas would be constructed with light gauge metal framing and gypsum wallboard; flooring in learning studios, hallways, and academic spaces would be resilient flooring (linoleum); flooring in administrative areas would be carpet; flooring in food service and restroom areas would be non-slip ceramic tile; and service areas would have sealed exposed concrete floors.

The Proposed Action would also include site improvements such as exterior site signage, parking and interior vehicle circulation, non-reinforced fencing, modular pavers, covered walkways, exterior site and building lighting, landscaping, site utilities, playground equipment, bike storage and racks, exterior learning areas, outdoor seating, multi-purpose fields, play courts, and flagpoles. Interior spaces would include Academic Neighborhoods, learning studios, staff collaboration areas, learning-impaired classrooms, flex labs, art room, music suite, therapy classroom, commons, performance space, stage, information center, gymnasium, auxiliary, food service and kitchen, administrative offices, guidance counseling center, special education office, professional development center, health services, building services, storage, and other required areas for a fully functioning elementary school. Cafeteria, food service, and information center areas were sized for the future elementary school population (Fort Rucker, 2012b).

Related infrastructure included in the Proposed Action includes vehicular drives and parking, mechanical rooms, electrical rooms, communications rooms, maintenance support areas, central energy plant, and service and delivery area with dock lift.

The project would require demolishing buildings #21037, #21038, and #21040 on the existing elementary school site and building #22210 on the existing primary school site for a total of 176,518 square feet. If the Primary School Alternative or the Elementary School Alternative is chosen, the facility at the site chosen for construction would be demolished prior to construction of the new elementary school and the facility at the other site would be demolished after the new consolidated school has been constructed. If the Elementary School Playfields Alternative is selected, the existing facilities would be demolished after construction is complete (Fort Rucker, 2012b).

Sustainability principles would be maximized in the design, development, and construction of the project, in accordance with Executive Order (EO) 13123 and other applicable laws and EOs. Energy conservation and environmentally safe measures would be incorporated into this project wherever feasible, practical, or required by regulation. Energy and natural resource conservation measures would be maximized in the design to the extent practical. In accordance with Leadership in Energy and Environmental Design (LEED) for Schools, Silver certification would be the minimum goal of the project (Fort Rucker, 2012b).

Facilities would be designed in accordance with DoDEA Education Facilities Specifications, Americans with Disabilities Act (ADA) Accessibility Guidelines, the Architectural Barriers Act (ABA), National Fire Protection Association (NFPA) Life Safety Codes, Standards of Seismic Safety for Federally Owned Buildings, and energy and water conservation standards (Fort Rucker, 2012b). The proposed Fort Rucker Elementary School would be in compliance with the Installation master plan and would be constructed in an area appropriately zoned for community support functions.

## Alternatives

### Primary School Alternative

The Fort Rucker Primary School site (approximately 15.3 acres) is bounded on the east by Artillery Road and on all other sides by forest. Use of the primary school site would require relocation of the students and faculty to the elementary school to allow for the demolition of

the existing buildings and construction of the new school. The existing primary school site is within walking distance of several residential communities. However, there could be increased busing of students at the current elementary school. Fill material placed at this site may contain materials of concern associated with historical activities. Initial geotechnical investigations revealed areas of concern (AOCs) which require further investigation. Subsequent environmental and geotechnical investigations, as required by the Alabama Department of Environmental Management (ADEM), would determine whether remediation requirements must be implemented prior to construction.

There are no forested areas on this site, so no forest would be cleared. Utilities are present and adequately sized in the immediate vicinity of the site and would meet the demands of the new school.

#### **Elementary School Alternative**

The Fort Rucker Elementary School site (approximately 19.5 acres) is bounded on the west by Farrel Road, on the north by Red Cloud Road, on the east by Boyce Lane, and on the south by forest. This site is partially cleared and partially forested. Site topography descends gradually from the front of the site (north) to the back (south) until reaching the forested portion of the site. The slope increases dramatically in the forest. Use of the elementary school site would require relocation of students and faculty to a temporary facility to allow for the demolition of the existing buildings and subsequent construction of the new school. A small portion of the forested part of the site would be cleared to accommodate a new access road and parking lot. The elementary school site is within a residential community and within allowable walking distance of several other residential areas. However, there could be increased busing of students at the current primary school. Site design would address existing traffic issues with an enlarged stacking area for vehicles off of Red Cloud Road. Utilities are present and adequately sized in the vicinity of the site and would meet the demands of the new elementary school.

#### **Elementary School Playfields Alternative**

The Fort Rucker Elementary School Playfields site (approximately 19.5 acres) is bounded on the west by Farrel Road, on the north by Red Cloud Road, on the east by Boyce Lane, and on the south by forest. This site is partially cleared and partially forested. Site topography descends gradually from the front of the site (north) to the back (south) until reaching the forested portion of the site. The slope increases dramatically in the forest. Use of the site would allow the existing schools to remain in operation during construction. A portion of the forested portion of the site would be cleared to accommodate the proposed school, access road, and parking lot. Extensive fill at the southern end of the site would be required to accommodate proposed site plans. The site is within a residential community and is within allowable walking distance of several other residential areas. However, there could be increased busing of students at the current primary school. Site design would address existing traffic issues with an enlarged stacking area for vehicles off of Red Cloud Road. Utilities are present and adequately sized in the vicinity and would meet the demands of the new elementary school.

## No Action Alternative

Under the No Action Alternative, Fort Rucker would continue to use the existing elementary school and primary school and no new construction would occur. The schools would continue to be outdated and undersized and would require maintenance and repair costs that would exceed the value of the buildings. The existing schools do not meet current codes and criteria for building requirements and equipment. The current facilities are not able to support the DoDEA 21<sup>st</sup> Century curriculum and DoDEA's energy savings and sustainability initiatives. Soldiers and their families would not have access to adequate academic facilities under the No Action Alternative (Fort Rucker, 2012b).

## Environmental Consequences

### Consequences of the Primary School Alternative

Implementation of the Primary School Alternative would result in negative impacts on soils, air quality, surface water quality, traffic, and solid waste and would result in the generation of construction-related noise during demolition and subsequent construction activities. All of these impacts, however, would be temporary and less than significant without mitigation measures. There may be incidental wildlife mortality associated with construction, but animal losses would not threaten regional population levels. There also would be limited displacement of wildlife from the project areas, but the animals would either return to adjacent areas or acclimate to the new areas.

Implementation of the Primary School Alternative could result in significant environmental health and safety risks to children and significant negative impacts from hazardous and toxic substances. The nature and extent of contamination at the site is unknown. Based on results of a geotechnical investigation of the site (Parsons, 2012) and the findings of ADEM (ADEM, 2013), the Primary School Alternative site is now a pending Installation Restoration Program (IRP) site. In addition, due to the request to do a full Resource Conservation and Recovery Act Facility Investigation (RFI), utilizing the Primary School Alternative site no longer meets the project objectives because construction on this site would not meet the time line for project implementation.

There would be a temporary minor positive impact on the local economy resulting from construction-related jobs and construction-related purchases of supplies and materials.

Primary school classes and activities would be temporarily conducted at the existing elementary school during construction of the proposed consolidated school. With proper planning and coordination, this would be a less than significant impact. Long-term positive impacts on children would result from the new school due to improved safety conditions and an improved learning environment.

There would be no impacts on other resource areas.

### Consequences of the Elementary School Alternative

Implementation of the Elementary School Alternative would result in negative impacts on soils, air quality, surface water quality, traffic, and solid waste and would result in the generation of construction-related noise during demolition and subsequent construction activities. All of these impacts, however, would be temporary and less than significant

without mitigation measures. There may be incidental wildlife mortality associated with construction, but animal losses would not threaten regional population levels. There also would be limited displacement of wildlife from the project areas, but the animals would either return to adjacent areas or acclimate to the new areas.

There would be a temporary minor positive impact on the local economy resulting from construction-related jobs and construction-related purchases of supplies and materials.

Disruptions to elementary school classes and operations could occur during construction of the proposed school. Elementary school classes would be held in temporary trailers until the proposed school is completed, which would incur additional costs. With proper planning and coordination, impacts to children from elementary school disruptions due to construction would be less than significant. Long-term positive impacts on children would result from the new school due to improved safety conditions and an improved learning environment.

There would be minor long-term positive impacts to traffic from an improved stacking area.

There would be no appreciable impacts on hazardous materials or fuels and no impacts to any IRP sites. There would be no impacts on other resource areas.

### **Consequences of the Elementary School Playfields Alternative**

Implementation of the Proposed Action at the Elementary School Playfields Alternative site would be the same as at the Elementary School Alternative site with four exceptions. There would be fewer disruptions to elementary school classes and operations due to no relocation of children during construction, there would be potential for short-term minor environmental health and safety risks to children during construction of the proposed school, extensive fill would be required to accommodate site plans, and there would be long-term less than significant negative impacts to flora due to the permanent conversion of 4.5 acres of forested habitat.

Both the primary school and the elementary school would stay in operation while construction of the proposed new school occurs on the playfields; however, there would be potential safety issues due to construction activities occurring in proximity to the elementary school and potential noise disturbances from construction activities while classes are in session. With proper planning and coordination and construction site security, impacts to child safety and elementary school disruptions due to construction activities at the playfields would be less than significant.

### **Consequences of the No Action Alternative**

Under the No Action Alternative, conditions and facilities would remain as they are on Fort Rucker. There would be no impacts on any resource areas. Under the No Action Alternative, Fort Rucker would continue to use the existing elementary school and primary school and no new construction would occur. The schools would continue to be outdated and undersized and would require maintenance and repair costs that would exceed the value of the buildings. The existing schools do not meet current codes and criteria for building requirements and equipment. The current facilities are not able to support the DoDEA 21<sup>st</sup> Century curriculum and DoDEA's energy savings and sustainability initiatives. Soldiers and

their families would not have access to adequate academic facilities under the No Action Alternative (Fort Rucker, 2012b). In addition, there would be long-term negative impacts on children and there would be no short-term positive impact on the local economy.

## Opportunities for Public Involvement

The EA and Draft Finding of No Significant Impact (FNSI) will be made available to the public for comment for a period of 30 days.

Throughout this process, the public may obtain information on the status and progress of the Proposed Action and the EA through Ms. Suzanne Rohrs, Fort Rucker Directorate of Public Works, Environmental and Natural Resources Division, at 334-255-3993 or by email to Ms. Rohrs at [suzanne.a.rohrs.civ@mail.mil](mailto:suzanne.a.rohrs.civ@mail.mil).

## Conclusion

The Proposed Action would result in long-term positive impacts on children enrolled at Fort Rucker schools. Implementation of the Elementary School Alternative or the Elementary School Playfields Alternative would not have significant adverse direct, indirect, or cumulative effects on the quality of the environment. Either of these alternatives could be selected to implement the Proposed Action, as there would be no significant impacts. Fort Rucker and the DoDEA have chosen the Elementary School Alternative. Therefore, a FNSI is issued for the Proposed Action at the Elementary School Alternative, and no Environmental Impact Statement is required.

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Date

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Stuart J. McRae  
Colonel, US Army  
Garrison Commander