

B Agency Correspondence

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DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

BPMO NE/TS
Ser 11-137
September 15, 2011

Ms. Susan M. Zacher
Historic Structures Section Chief
Pennsylvania Historical & Museum Commission
(Bureau for Historic Preservation)
Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Dear Ms. Zacher:

The intent of this letter is to obtain your concurrence on the National Register of Historic Places (National Register)-eligibility of the architectural resources associated with the closure of Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. Under legislation enacted in 2005, the Navy closed NAS JRB Willow Grove and its associated properties on September 15, 2011 and will subsequently transfer portions of the United States Navy (Navy)-owned property for redevelopment to non-federal entities. The Horsham Township Land Reuse Authority (HLRA) will coordinate redevelopment efforts for the main base and for the two off-base housing sites.

As part of the closure process, National Register-eligibility evaluations were conducted to comply with Sections 106 and 110 of the National Historic Preservation Act (NHPA), as amended, and in support of National Environmental Policy Act (NEPA) documents. The Navy coordinated architectural and archaeological investigations, in accordance with federal law and Navy procedures. Additional information regarding the evaluation of archaeological resources will be forthcoming.

On September 13, 2010, representatives of the Navy and Southeastern Archaeological Research (SEARCH), Inc. met with representatives of the Pennsylvania State Historic Preservation Office (PA SHPO) to kick-off consultation regarding the planned closure. A general framework for National Register evaluations at the base was discussed and cultural resources study began immediately following the meeting.

The Navy determined that the area of potential effect (APE) for this undertaking is the Navy-owned property associated with NAS JRB Willow Grove that will potentially be transferred out of federal ownership. The APE includes the 1,170-acre main base in Horsham Township, Montgomery County, the 2.5-acre Jacksonville Road housing enclave in Ivyland Borough, Bucks County, and the 51-acre Shenandoah Woods housing site in Warminster Township, Bucks County. The following two enclosed comprehensive reports detail these facilities:

- 1) *Architectural Assessment and National Register of Historic Places Evaluation of Above-Ground Navy-Owned Resources Located at Naval Air Station Joint Reserve Base Willow Grove, Willow Grove, Pennsylvania* (March 2011 Draft-**SEARCH**). (enclosure 1)
- 2) *Historic Structures Survey and Determination of Eligibility Report of Select Facilities at Naval Air Station Joint Reserve Base Willow Grove, Willow Grove, Horsham Township, Montgomery County, Pennsylvania and Off-Base Housing Enclaves in Warminster Township, Bucks County, Pennsylvania* (August 2011 Draft-**AECOM**). (enclosure 2)

At the **main base**, the SEARCH report surveyed 121 architectural resources, and concluded that six ammunition magazines may meet National Register criteria under the “Program Comment for World War II and Cold War-Era (1939-1974) Ammunition Storage Facilities.” After receiving the draft SEARCH report, the Navy sought clarification in the utilization of the ammunition storage program comments. While there is no definitive guidance on whether the program comments make ammunition storage facilities covered under its stipulations automatically National Register-eligible, it appears that the interpretation of this agreement commonly varies. The Navy feels that the ammunition storage representatives at NAS JRB Willow Grove are not significant resources, and are, therefore, not National Register-eligible. If, however, the PA SHPO disagrees with this interpretation, the six resources which fall under the program comment will require no further compliance with preservation statutes. SEARCH concluded that the remaining 115 resources are not eligible for inclusion in the National Register either as individual resources or a historic district. AECOM inventoried an additional 14 resources at the main base and concluded that none are National Register-eligible.

AECOM inventoried six houses at the off-base **Jacksonville Road** enclave, and concluded that the Jacksonville Road Off-Base Housing Enclave Historic District is eligible under the “Program Comment for Capehart and Wherry Era Housing and Associated Structures and Landscape Features (1949-1962).” AECOM recommended the buildings as eligible as a district only, citing their significance as representatives of the Wherry Act program, not in their individual characteristics.

At the **Shenandoah Woods** off-base housing site, AECOM concluded that the development as a whole does not meet National Register Criteria Consideration G for exceptional importance as a Cold War-era resource. The report details the housing types utilized at Shenandoah Woods and includes associated structures and features.

Pursuant to Section 106 of the NHPA, AECOM report CDs, PHMC BHP Access database, and Pennsylvania historic resource survey forms, (enclosures 3-5) are provided to continue consultation with your agency, to facilitate effective planning in conjunction with the NEPA process, and to plan for the disposal of the Navy-owned facilities.

Based on the information enumerated above, multiple site visits by Navy cultural resources staff, and the enclosed deliverables, the Navy has determined the following:

- The NAS JRB Willow Grove **main base** contains no individually National Register-eligible architectural resources, nor does the assembly or any portion of resources on the main base constitute an eligible historic district.
- The **Jacksonville Road** Off-Base Housing Enclave Historic District is National Register-eligible, however, the program comment for Wherry housing covers all compliance with preservation statutes.
- The **Shenandoah Woods** off-base housing site does not meet National Register Criteria Consideration G for exceptional importance, and is therefore, not eligible.

In accordance with Section 106 of the NHPA and other applicable historic preservation statutes and procedures, the Navy requests you to concur with these findings by letter, within thirty days to foster adequate planning for the pending transfers. Please provide us with an environmental review number for this project, if necessary. Feel free to contact NAVFAC Atlantic architectural historian Darrell E. Cook, at (757) 322-4282, or by email at darrell.e.cook@navy.mil, if you have questions about the architectural survey materials.

Sincerely,



David Drozd
Director

Enclosures:

1. March 2011 SEARCH Report (2 copies)
2. August 2011 AECOM Report (2 copies)
3. AECOM Report CDs
4. PHMC BHP Access Database
5. March 2011 SEARCH Forms



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

October 11, 2011

David Drozd, Director
Department of the Navy
Base Realignment and Closure, Program Management Office
4911 South Broad Street
Philadelphia, PA 19112-1303

TO EXPEDITE REVIEW USE
BHP REFERENCE NUMBER

Re: ER 08-1580-091-B
DOD: Proposed BRAC Closure of Naval Air Station Joint NAS JRB Willow Grove,
Horsham Township, Montgomery County
Determination of Eligibility

Dear Mr. Drozd:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation as revised in 1999 and 2004. These regulations require consideration of the project's potential effect upon both historic and archaeological resources.

We concur with the findings of the agency that the following properties are not eligible for the National Register of Historic Places. They are not historically or architecturally significant.

NAS JRB Willow Grove, Horsham Township, Montgomery County
Jacksonville Road Housing Enclave, Ivyland, Bucks County
Shenandoal Woods Housing Enclave, Warminster Township, Bucks County

If you need further information in this matter please consult Susan Zacher at (717) 783-9920.

Sincerely,

Andrea L. MacDonald, Chief
Division of Preservation Services

AM/smz



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
BPMP NE/TS
Ser 12-094
July 5, 2012

Mr. Douglas McLearen
Chief, Division of Archaeology and Protection
Pennsylvania Historical & Museum Commission (PHMC)
Bureau for Historic Preservation
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

Dear Mr. McLearen:

We are responding to your letter dated February 17, 2012, (ER# 1993-1228-091-AA), which detailed the PHMC comprehensive review of the draft report titled "*Phase I Archaeological Survey at Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove Located in Montgomery County and Bucks County, Pennsylvania*" prepared under contract for the Navy by AECOM and authored by Nancy A. Stehling, RPA. The contractor has revised the draft report, addressing comments from your Division as well as those prepared by the Archaeological Staff at Naval Facilities Engineering Command (NAVFAC) Atlantic. We are requesting your concurrence that this draft report meets the reporting standards for archaeological research in the Commonwealth of Pennsylvania. Furthermore, we believe that data as presented in the report is sufficient to arrive at determinations of National Register eligibility of the seven archaeological sites identified and recorded during this survey.

This revised draft report documents the results of a July 2011 Phase I archaeological inventory of two areas of moderate-to-high historic sensitivity, two areas of low-to-moderate historic sensitivity, and one overlapping area of low-to-moderate prehistoric sensitivity on the main base (designated as areas A, B, C, D and E). A 30+ acre section of the wooded area along the western boundary of the main base that incorporates a nature trail was subjected to a pedestrian survey and the placement of judgmental shovel test pits to confirm prior disturbance. This was designated as Area E. One off-base housing parcel was designated as Area F (Jacksonville Road), and another off-base housing parcel (Shenandoah Woods) of low-to-moderate archaeological sensitivity was designated as Area G.

Each of the seven survey areas are discussed briefly below:

Area A is located at the intersection of Horsham and Privet Roads, and it had previously been documented as having low-to-moderate archaeological potential due to prior disturbance. AECOM conducted a reconnaissance on four acres, and placed 25 shovel test pits (STPs) across one acre of the area. One archaeological site was identified and recorded during this investigation; 36-MG-0458. Although 467 artifacts were recovered, they were all found in severely disturbed soils with no associated features. The Navy has determined that Site 36-MG-0458 lacks sufficient integrity to warrant listing on the National Register of Historic Places; therefore, no additional archaeological investigations are recommended in Area A.

Area B is located immediately north of the intersections of Maple Avenue and Horsham Road. Background research confirmed that this area has had multiple underground utilities installed, and that portions of the area had been subjected to a variety of soil disturbing activities. That said however, the archaeological investigation and associated data indicate that portions of survey Area B does possess stratigraphic integrity. One archaeological site was identified during the field investigation; 36-MG-0459. A total of 67 shovel test pits were excavated across Area B. Excavation of these STPs recovered 311 artifacts, of these; seventeen STPs contained 192 artifacts and define the site area. The Navy has determined that Site 36-MG-0459 has the potential for providing additional historical/scientific data consistent with criterion D of the National Register of Historic Places. Therefore, the Navy recommends that additional evaluative investigations be undertaken to assess the National Register Eligibility of Site 36-MG-0459.

Area C had previously been noted to have low-to-moderate archaeological potential due to extensive modern development. This area was developed as part of the Pitcairn Airfield in the 1920's. Subsequent Navy construction, destruction, and remediation efforts over the years have reduced the likelihood of this area as having any archaeological integrity. The Navy has determined that no additional survey is required within Area C.

Area D is located near the northwest intersection of Easton and Governor Roads. One archaeological site was identified and recorded during the survey: 36-MG-0460 (The Hallowell House

Site) Twenty-seven STPs were dug across the one acre project area and yielded 811 artifacts. Shovel testing revealed disturbed, graded conditions, including a buried section of asphalt. However, archaeological testing also revealed one post-hole feature and identified a possible buried A soil horizon within the site boundary. While there is evidence of soil disturbance within the site boundary, there are compelling data that suggest there may in-fact be a buried intact archaeological deposit. The Navy has determined that Site 36-MG-0460 has the potential for providing additional historical/scientific data consistent with criterion D of the National Register of Historic Places. Therefore, the Navy recommends that additional evaluative investigations be undertaken to assess the National Register Eligibility of site 36-MG-0460.

Area E is located on the western boundary of the installation and includes the location of a nature trail that is no longer maintained. Due to the presence of bulldozed dirt piles, boulders, modem debris, storm water outfalls, and a subsurface gas line, the area has been extensively disturbed. Twelve judgmental shovel test pits were dug across ten acres which yielded seven artifacts. The shovel tests confirmed that this area has been previously disturbed. One archaeological site was identified during the archaeological field investigations: 36-MG-0461. Given the severely disturbed nature of the site, the Navy has determined that Site 36-MG-0461 is not eligible for inclusion in the National Register of Historic Places; therefore, no further archaeological investigations are recommended in Area E.

Area F is the 2.5-acre Jacksonville Road off-base housing located approximately six miles from the main base. A reconnaissance survey indicated that the parcel has been heavily disturbed by housing construction and the repeated installation of subsurface utility lines including storm water, telephone, electric and gas lines. Three judgmental shovel tests were excavated, confirmed that the area has been subjected to extensive grading activities. No archaeological deposits were identified in Area F; therefore, the Navy has determined that no further archaeological investigations are warranted.

Area G is the 15-acre Shenandoah Woods housing enclave located eight miles from-the main base. A total of 175 STPs and one 50cm x 50 cm Test Unit were excavated across 14 acres. Although prior soil disturbance was noted throughout Area G, three artifact concentrations were identified and recorded as

sites: 36-BU-0427, 36-BU-0429 and 36-BU-0430. Artifact surface scatters and the STP excavation data suggest that additional archaeological investigations are warranted in Area G. The Navy has determined that site 36-BU-0427 and site 36-BU-0429 have the potential for providing additional historical/ scientific data consistent with criterion D of the National Register of Historic Places. Therefore, the Navy recommends that additional evaluative investigations be undertaken to assess the National Register Eligibility of sites 36-BU-0427 and 36-BU-0429. The Navy has determined that additional archaeological investigations are not warranted at site 36-BU-430 due to lack of integrity.

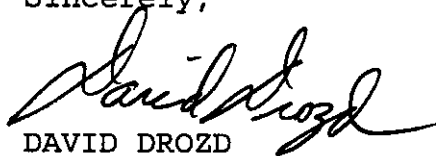
Based on the information above, the Navy has determined the following:

- The NAS JRB Willow Grove main base (Survey Areas A-E) archaeological survey is completed and no additional identification survey efforts are recommended.
- The Jacksonville Road off-base housing area (Survey Area F) contains no National Register-eligible archaeology sites or resources, no further archaeological investigations are warranted.
- The Shenandoah Woods off-base housing area (Survey Area G) archaeological survey is completed, no additional identification survey efforts are warranted.
- Archaeological sites: 36-MG-0458 (Area A), 36-MG-0461 (Area E) and 36-BU-0430 Area G) are not eligible for inclusion in the National Register of Historic Places, and no further archaeological investigations are warranted.
- Archaeological sites 36-MG-0459 (Area B), 36-MG-0460 (Area D), 36-BU-0427 (Area G) and 36-BU-0429 (Area G) are potentially eligible for the National Register and are recommended for evaluative testing to assess their eligibility status. Evaluations to be completed by recipients of this property.

This report and the Navy's recommendations are submitted to PHMC in partial fulfillment of the Navy's National Historic Preservation Act (NHPA) Section 106 and Section 110 obligations. The Navy respectfully requests PHMC concurrence with the data as presented in the report, our determination of significance, proposed evaluative plans and determination of effect. This office would greatly appreciate your agencies review comments,

by letter, within thirty days. All agency comments shall be included in the Final Report. If you have any questions, please contact NAVFAC Atlantic archaeologist Susan Ritter at (757) 322-4975, or e-mail Susan.ritter@navy.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "David Drozd". The signature is fluid and cursive, with a large initial "D".

DAVID DROZD
Director

Enclosure:

Draft Report Phase I Archaeological Survey at NAS JRB
Willow Grove, PA



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

August 14, 2012

Department of the Navy
Base Realignment and Closure Program
Management Office, Northeast
Attn: David Drozd, Director
4911 South Broad Street
Philadelphia, PA 19112-1303

RE: ER# 93-1228-091-EE
Revised Phase I Report, Naval Air Station
Joint Reserve Base Willow Grove, Bucks
and Montgomery Counties

Dear Mr. Drozd:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 *et seq.* (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

We appreciate your providing the revised Phase I report for this project. This information is very well organized.

We agree with the recommendation that archaeological site identification efforts are complete for Areas A, B, C, D, E, F and G.

We agree with the recommendation that the following archaeological sites are not eligible for listing in the National register of Historic Places:

36 Mg 0458 (Area A), 36 Mg 0461 (Area E), 36 Bu 430 (Area G).



Page Two
Mr. Drozd
August 14, 2012

We agree with the recommendation that the following archaeological sites are potentially eligible for listing in the National Register of Historic Places under Criterion D, and we agree with the recommendation for evaluative testing to assess their eligibility status:

36 Mg 0459 (Area B), 36 Mg 0460 (Area D), 36 Bu 0427 (Area G), 36 Bu 0429 (Area G).

Your correspondence of July 5, 2012 indicates the evaluative testing for these four sites will be completed by the recipients of these properties. This would appear to infer that legally binding agreements are or will be in place with the property recipients prior to the disposal of these properties from federal ownership in order to provide for the recommended evaluative testing of these four sites. We would appreciate your confirming this.

Please provide two additional copies of this report (one copy unbound) for our files and for distribution to the other report repositories. We suggest that provisions be made to have the artifact collections from all archaeological sites identified through this survey curated with the State Museum, unless you have made arrangements to have the collections curated with another appropriate artifact repository.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology and Protection



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

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BPMO NE/TS
Ser 12-113
August 30, 2012

Mr. Douglas C. McLearen, Chief
Division of Archaeology and Protection
Pennsylvania Historical & Museum Commission
(Bureau for Historic Preservation)
Commonwealth Keystone Building, 2nd Floor,
400 North Street
Harrisburg, PA 17120-0093

Dear Mr. McLearen:

Thank you for your letter of August 14, 2012 concurring with the Navy recommendation that archaeological sites 36 Mg 0459 (Area B); 36 Mg 0460 (Area D); 36 Bu 0427 (Area G); and 36 Bu 0429 (Area G), at Willow Grove PA are potentially eligible for listing in the National Register of Historic Places under Criterion D.

As you requested, we confirm that Navy will provide deed restrictions and covenants with the property recipients in order to provide for the evaluative testing of these four sites. These covenants and deed restrictions will require that no disturbance of the ground surface or any other thing shall be undertaken or permitted to be undertaken on the archeological sites that would affect the physical integrity of the archeological sites without first obtaining the prior written permission of the PA SHPO. (See enclosure for an example). We will also provide two additional copies of the final report for your files under separate cover as requested.

Based on these actions contained in this correspondence, we have satisfied Section 106 of the National Historical Preservation Act of 1966 and its implementing regulation. Questions may be directed to Thomas Stephan at (215) 897-4916, or by email at tom.stephan.ctr@navy.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "David Drozd".

DAVID DROZD
Director

Enclosure:

Covenant re Archaeological Matters NAS JRB Willow Grove PA

Enclosure
NAS JRB Willow Grove PA JRB Willow Grove PA

Covenant re Archeological Matters: As more fully described in the document attached to this Quitclaim Deed and incorporated herein as Exhibit A, areas within NAS JRB Willow Grove PA have been identified and are referred to within, collectively, as Archeological Sites. GRANTEE, its successors, and its assigns hereby covenant at all times to the Pennsylvania State Historic Preservation Officer ("PA SHPO") to maintain and preserve the Archeological Site as follows:

1. No disturbance of the ground surface or any other thing shall be undertaken or permitted to be undertaken on the Archeological Sites that would affect the physical integrity of the Archeological Site without first obtaining the prior written permission of the PA SHPO (signed by a fully authorized representative thereof). Should the PA SHPO require, as a condition to granting of such permission, that GRANTEE conduct a Phase II survey, archeological data recovery operations or other activities designed to mitigate the adverse effect of the proposed activity on the Archeological Site, GRANTEE shall at its own expense conduct such activities in accordance with the Secretary of the Interior's Standards and Guidelines for Archeological Documentation (48 FR 447344-37) and such standards and guidelines as PA SHPO may specify (including, but not limited to, standards and guidelines for research design, field work, analysis, preparation and dissemination of reports, disposition of artifacts and other materials, consultation with Native American or other organizations, and re-interment of human remains).

2. GRANTEE shall make every reasonable effort to prohibit any person from vandalizing or otherwise disturbing the Archeological Site and shall promptly report any such disturbance to the PA SHPO.

3. GRANTEE will allow the PA SHPO or his/her designee, upon reasonable advance notice to GRANTEE, an annual inspection of the Archeological Sites in order to ascertain whether GRANTEE is complying with the conditions of this preservation covenant.

4. In the event of a violation of this covenant, and in addition to any remedy now or hereafter provided by law, GOVERNMENT, or (upon 60 days prior notice to GOVERNMENT) PA SHPO, may, following reasonable written notice to GRANTEE, institute a suit to enjoin said violation or to require the restoration of the Archeological Site.

5. The failure by GOVERNMENT or by the PA SHPO to exercise any right or remedy granted under this covenant shall not have the effect of waiving or limiting the exercise by GOVERNMENT or by the PA SHPO of any

other right or remedy or the use of such right or remedy at any other time

6. This covenant shall be binding on GRANTEE, its successors, and its assigns in perpetuity. The restrictions, stipulations, and covenants contained herein shall be inserted by GRANTEE, its successors, and its assigns, verbatim or by express reference in any deed or other legal instrument by which such party divests itself of either the fee-simple title or any lesser estate in the archeological site or any part thereof.

7. This covenant shall be a binding servitude upon the real property that includes the Archeological Site and shall be deemed to run with the land. Recording this Quitclaim Deed shall constitute conclusive evidence that GRANTEE agrees to be bound by the foregoing conditions and restrictions and to perform the obligations herein set forth.



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

December 26, 2012

Department of the Navy
Base Realignment and Closure Program Management Office Northeast
ATTN: David Drozd, Director
4911 South Broad Street
Philadelphia, PA 19112-1303

RE: ER# 1993-1228-091-GG
DOD: NAS JRB Willow Grove PA
JRB Willow Grove PA, Deed Restrictions
and Covenants, Sites 36 MG 0459, 36
MG 0460, 36 BU 0427, 36 BU 0429
Bucks and Montgomery Counties

Dear Mr. Drozd:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

Thank you for providing the Deed Restrictions and Covenants for the above referenced archaeological sites, as requested. We appreciate your cooperation in this matter.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology and Protection



Pennsylvania Historical & Museum Commission

Tom Corbett, Governor • Andrew E. Masich, Chairman • James M. Vaughan, Executive Director



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/13-063
March 27, 2013

Ms. Olivia Mowery
Wildlife Impact Review Coordinator
Pennsylvania Game Commission
Bureau of Wildlife Habitat Management
Division of Environmental Planning and Habitat Protection
2001 Elmerton Avenue
Harrisburg, PA 17110-9797

Dear Ms. Mowery:

The Navy closed Naval Air Station Joint Reserve Base (NASJRB) Willow Grove, located in Horsham Township, Montgomery County, Pennsylvania in accordance with the Defense Base Closure and Realignment Act (BRAC) of 1990, as amended in 2005. The Navy is preparing an Environmental Impact Statement (EIS) for the disposal and reuse of the property. An online Pennsylvania Natural Diversity Inventory (PNDI) search of the project area was conducted on March 8, 2013 using the PNDI Environmental Review Tool and is provided in enclosure 1. Although the results of the search indicate that no further review is required by your office, the Navy is requesting information from your office regarding the potential occurrence of threatened, endangered, and/or special concern species, unique natural communities, or other significant wildlife communities at or near NASJRB Willow Grove. This letter contains all information requested on the *PNDI Project Planning and Environmental Review Form*. The Department of Conservation and Natural Resources, Bureau of Forestry; Pennsylvania Fish and Boat Commission, Natural Diversity Section; and, the U.S. Fish and Wildlife Service are also being contacted to request similar information.

The proposed project is within the NE Ambler Quad of the USGS 7.5-minute quadrangle map (enclosure 2). The EIS would analyze the potential environmental consequences of the reuse of the property in a manner consistent with the Horsham Township Authority for NASJRB Willow Grove (HLRA) *NASJRB Willow Grove Redevelopment Plan* (March 2012). The entire property encompasses approximately 862 acres. Full build-out is proposed to be implemented over a 20-year period and three action alternatives are being assessed for this project:

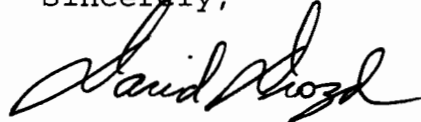
1. Alternative 1 (HLRA Plan - Preferred Alternative): The *Redevelopment Plan* calls for the redevelopment of most of the installation property (enclosure 3). Two facilities, the Navy Lodge and the installation fire station, would be reused and all other facilities, including the airfield, would be demolished. The *Redevelopment Plan* includes a mix of land use types and densities, as well as open space and natural areas. The *Redevelopment Plan* was designed to incorporate mixed-use, pedestrian-oriented features (e.g., a town center, walkable neighborhoods, and bike lanes), open spaces, best management practices for storm water management, and green and sustainable design principles. This alternative calls for the development of approximately 650 acres (76%) of the total installation property.
2. Alternative 2 (HLRA Plan with Increased Residential Development): Alternative 2 provides for a higher density of residential and community mixed-use development (enclosure 4). As with Alternative 1, the airfield and most installation facilities would be demolished. This alternative includes a mix of land use types, open space and natural areas, and incorporates smart-growth principles that include pedestrian-friendly transportation and compact development. This alternative calls for the development of approximately 580 acres (67%) of the total installation property.
3. Alternative 3 (Airfield Reuse): Alternative 3 would maintain the existing runway and a portion of the taxiways, parking aprons, and hanger space for airfield operations (enclosure 5). After accounting for the area taken up by critical airfield/air operation elements, the remaining land available for redevelopment is approximately 380 acres (44%). The layout of Alternative 3 incorporates the approximate sizes and locations of several Alternative 1 elements, such as the recreation center, aviation museum, and golf course. However, due to the proximity to the airfield and the limited available land, this option excludes virtually all residential development land uses, including the town center. Areas such as the hotel and conference center have been moved to the southern portion of the property (along Horsham Road), away from the airfield. Alternative 3 would provide more green space compared to Alternative 1 due to safety requirements for

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March 27, 2013

open space surrounding the airfield. This alternative calls for the development of approximately 580 acres (65%) of the total installation property.

We would appreciate a response within 30 days of this request. If you have any questions regarding this correspondence and request, or require additional project information, please do not hesitate to call Tom Stephan, Project Manager at (215) 897-4916 or via e-mail at tom.stephan.ctr@navy.mil. I appreciate your assistance and thank you for your attention to this request.

Sincerely,



DAVID DROZD
Director

Enclosures:

1. PNDI Project Environmental Review Receipt
2. Proposed Project Location
3. Alternative 1 (HLRA Plan - Preferred Alternative)
4. Alternative 2 (HLRA Plan with Increased Residential Development)
5. Alternative 3 (Airfield Reuse)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/13-064
March 27, 2013

Ms. Rebecca Bowen
Environmental Review Coordinator
PA Department of Conservation and Natural Resources
Bureau of Forestry, Ecological Services Section
400 Market Street
P.O. Box 8552
Harrisburg, PA 17105-8552

Dear Ms. Bowen:

The Navy closed Naval Air Station Joint Reserve Base (NASJRB) Willow Grove, located in Horsham Township, Montgomery County, Pennsylvania in accordance with the Defense Base Closure and Realignment Act (BRAC) of 1990, as amended in 2005. The Navy is preparing an Environmental Impact Statement (EIS) for the disposal and reuse of the property. An online Pennsylvania Natural Diversity Inventory (PNDI) search of the project area was conducted on March 8, 2013 using the PNDI Environmental Review Tool and is provided in enclosure 1. Although the results of the search indicate that no further review is required by the Pennsylvania Department of Conservation and Natural Resources, the Navy is requesting information from your office regarding the potential occurrence of threatened, endangered, and/or special concern species, unique natural communities, or other significant wildlife communities at or near NAS JRB Willow Grove. This letter contains all information requested on the *PNDI Project Planning and Environmental Review Form*. The Pennsylvania Game Commission, Bureau of Wildlife Habitat Management; Pennsylvania Fish and Boat Commission, Natural Diversity Section; and, the U.S. Fish and Wildlife Service are also being contacted to request similar information.

The proposed project is within the NE Ambler Quad of the USGS 7.5-minute quadrangle map (enclosure 2). The EIS would analyze the potential environmental consequences of the reuse of the property in a manner consistent with the Horsham Township Authority for NASJRB Willow Grove (HLRA) *NASJRB Willow Grove Redevelopment Plan* (March 2012). The entire property encompasses approximately 862 Acres. Full build-out is proposed to be implemented over a 20-year period and three action alternatives are being assessed for this project:

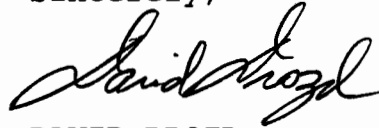
1. Alternative 1 (HLRA Plan - Preferred Alternative): The *Redevelopment Plan* calls for the redevelopment of most of the installation property (enclosure 3). Two facilities, the Navy Lodge and the installation fire station, would be reused and all other facilities, including the airfield, would be demolished. The *Redevelopment Plan* includes a mix of land use types and densities, as well as open space and natural areas. The *Redevelopment Plan* was designed to incorporate mixed-use, pedestrian-oriented features (e.g., a town center, walkable neighborhoods, and bike lanes), open spaces, best management practices for storm water management, and green and sustainable design principles. This alternative calls for the development of approximately 650 acres (76%) of the total installation property.
2. Alternative 2 (HLRA Plan with Increased Residential Development): Alternative 2 provides for a higher density of residential and community mixed-use development (enclosure 4). As with Alternative 1, the airfield and most installation facilities would be demolished. This alternative includes a mix of land use types, open space and natural areas, and incorporates smart-growth principles that include pedestrian-friendly transportation and compact development. This alternative calls for the development of approximately 580 acres (67%) of the total installation property.
3. Alternative 3 (Airfield Reuse): Alternative 3 would maintain the existing runway and a portion of the taxiways, parking aprons, and hanger space for airfield operations (enclosure 5). After accounting for the area taken up by critical airfield/air operation elements, the remaining land available for redevelopment is approximately 380 acres (44%). The layout of Alternative 3 incorporates the approximate sizes and locations of several Alternative 1 elements, such as the recreation center, aviation museum, and golf course. However, due to the proximity to the airfield and the limited available land, this option excludes virtually all residential development land uses, including the town center. Areas such as the hotel and conference center have been moved to the southern portion of the property (along Horsham Road), away

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March 27, 2013

from the airfield. Alternative 3 would provide more green space compared to Alternative 1 due to safety requirements for open space surrounding the airfield. This alternative calls for the development of approximately 580 acres (65%) of the total installation property.

We would appreciate a response within 30 days of this request. If you have any questions regarding this correspondence and request, or require additional project information, please do not hesitate to call Tom Stephan, Project Manager at (215) 897-4916 or via e-mail at tom.stephan.ctr@navy.mil. I appreciate your assistance and thank you for your attention to this request.

Sincerely,



DAVID DROZD
Director

Enclosures:

1. PNDI Project Environmental Review Receipt
2. Proposed Project Location
3. Alternative 1 (HLRA Plan - Preferred Alternative)
4. Alternative 2 (HLRA Plan with Increased Residential Development)
5. Alternative 3 (Airfield Reuse)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/13-065
March 27, 2013

Pennsylvania Fish and Boat Commission
Natural Diversity Section
450 Robinson Lane
Pleasant Gap, PA 16823

Dear Sir:

The Navy closed Naval Air Station Joint Reserve Base (NASJRB) Willow Grove, located in Horsham Township, Montgomery County, Pennsylvania in accordance with the Defense Base Closure and Realignment Act (BRAC) of 1990, as amended in 2005. The Navy is preparing an Environmental Impact Statement (EIS) for the disposal and reuse of the property. An online Pennsylvania Natural Diversity Inventory (PNDI) search of the project area was conducted on March 8, 2013 using the PNDI Environmental Review Tool and is provided in enclosure 1. The results of the search indicate that there is a potential impact from the proposed project for species under the jurisdiction of the Pennsylvania Fish and Boat Commission, and that further review is required by your agency. The Navy is requesting information from your office regarding the potential occurrence of threatened, endangered, and/or special concern species, unique natural communities, or other significant wildlife communities at or near NASJRB Willow Grove. This letter contains all information requested on the *PNDI Project Planning and Environmental Review Form*. The Pennsylvania Game Commission, Bureau of Wildlife Habitat Management; Department of Conservation and Natural Resources, Bureau of Forestry; and, the U.S. Fish and Wildlife Service are also being contacted to request similar information.

The proposed project is within the NE Ambler Quad of the USGS 7.5-minute quadrangle map (enclosure 2). The EIS would analyze the potential environmental consequences of the reuse of the property in a manner consistent with the Horsham Township Authority for NASJRB Willow Grove (HLRA) *NASJRB Willow Grove Redevelopment Plan* (March 2012). The entire property encompasses approximately 862 acres. Full build-out is proposed to be implemented over a 20-year period and three action alternatives are being assessed for this project:

1. Alternative 1 (HLRA Plan - Preferred Alternative): The *Redevelopment Plan* calls for the redevelopment of most of the installation property (enclosure 3). Two facilities, the Navy Lodge and the installation fire station, would be reused and all other facilities, including the airfield, would be demolished. The *Redevelopment Plan* includes a mix of land use types and densities, as well as open space and natural areas. The *Redevelopment Plan* was designed to incorporate mixed-use, pedestrian-oriented features (e.g., a town center, walkable neighborhoods, and bike lanes), open spaces, best management practices for storm water management, and green and sustainable design principles. This alternative calls for the development of approximately 650 acres (76%) of the total installation property.
2. Alternative 2 (HLRA Plan with Increased Residential Development): Alternative 2 provides for higher density of residential and community mixed-use development (enclosure 4). As with Alternative 1, the airfield and most installation facilities would be demolished. This alternative includes a mix of land use types, open space and natural areas, and incorporates smart-growth principles that include pedestrian-friendly transportation and compact development. This alternative calls for the development of approximately 580 acres (67%) of the total installation property.
3. Alternative 3 (Airfield Reuse): Alternative 3 would maintain the existing runway and a portion of the taxiways, parking aprons, and hanger space for airfield operations (enclosure 5). After accounting for the area taken up by critical airfield/air operation elements, the remaining land available for redevelopment is approximately 380 acres (44%). The layout of Alternative 3 incorporates the approximate sizes and locations of several Alternative 1 elements, such as the recreation center, aviation museum, and golf course. However, due to the proximity to the airfield and the limited available land, this option excludes virtually all residential development land uses, including the town center. Areas such as the hotel and conference center have been moved to the southern portion of the property (along Horsham road), away

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March 27, 2013

from the airfield. Alternative 3 would provide more green space compared to Alternative 1 due to safety requirements for open space surrounding the airfield. This alternative calls for the development of approximately 580 acres (65%) of the total installation property.

We would appreciate a response within 30 days of this request. If you have any questions regarding this correspondence and request, or require additional project information, please do not hesitate to call Tom Stephan, Project Manager at (215) 897-4916 or via e-mail at tom.stephan.ctr@navy.mil. I appreciate your assistance and thank you for your attention to this request.

Sincerely,



DAVID DROZD
Director

Enclosures:

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DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/13-066
March 27, 2013

Ms. Pamela Shellenberger
Endangered Species Biologist
U.S. Fish and Wildlife Service
315 South Allen Street, Suite 322
State College, PA 16801-4851

Dear Ms. Shellenberger:

The Navy closed Naval Air Station Joint Reserve Base (NASJRB) Willow Grove, located in Horsham Township, Montgomery County, Pennsylvania in accordance with the Defense Base Closure and Realignment Act (BRAC) of 1990, as amended in 2005. The Navy is preparing an Environmental Impact Statement (EIS) for the disposal and reuse of the property. An online Pennsylvania Natural Diversity Inventory (PNDI) search of the project area was conducted on March 8, 2013 using the PNDI Environmental Review Tool and is provided in enclosure 1. Although the results of the search indicate that no further review is required by the U.S. Fish and Wildlife Service, the Navy is requesting information from your office regarding the potential occurrence of threatened, endangered, and/or special concern species, unique natural communities, or other significant wildlife communities at or near NASJRB Willow Grove. This letter contains all information requested on the *PNDI Project Planning and Environmental Review Form*. The Pennsylvania Game Commission, Bureau of Wildlife Habitat Management; Pennsylvania Fish and Boat Commission, Natural Diversity Section; and, the Pennsylvania Department of Conservation and Natural Resources, Bureau of Forestry are also being contacted to request similar information.

The proposed project is within the NE Ambler Quad of the USGS 7.5-minute quadrangle map (enclosure 2). The EIS would analyze the potential environmental consequences of the reuse of the property in a manner consistent with the Horsham Township Authority for NASJRB Willow Gove (HLRA) *NASJRB Willow Grove Redevelopment Plan* (March 2012). The entire property encompasses approximately 862 acres. Full build-out is

proposed to be implemented over a 20-year period and three action alternatives are being assessed for this project:

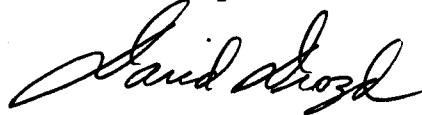
1. Alternative 1 (HLRA Plan - Preferred Alternative): The *Redevelopment Plan* calls for the redevelopment of most of the installation property (enclosure 3). Two facilities, the Navy Lodge and the installation fire station, would be reused and all other facilities, including the airfield, would be demolished. The *Redevelopment Plan* includes a mix of land use types and densities, as well as open space and natural areas. The *Redevelopment Plan* was designed to incorporate mixed-use, pedestrian-oriented features (e.g., a town center, walkable neighborhoods, and bike lanes), open spaces, best management practices for storm water management, and green and sustainable design principles. This alternative calls for the development of approximately 650 acres (76%) of the total installation property.
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3. Alternative 3 (Airfield Reuse): Alternative 3 would maintain the existing runway and a portion of the taxiways, parking aprons, and hanger space for airfield operations (enclosure 5). After accounting for the area taken up by critical airfield/air operation elements, the remaining land available for redevelopment is approximately 380 acres (44%). The layout of Alternative 3 incorporates the approximate sizes and locations of several Alternative 1 elements, such as the recreation center, aviation museum, and golf course. However, due to the proximity to the airfield and the limited available land, this option excludes virtually all residential

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development land uses, including the town center. Areas such as the hotel and conference center have been moved to the southern portion of the property (along Horsham Road), away from the airfield. Alternative 3 would provide more green space compared to Alternative 1 due to safety requirements for open space surrounding the airfield. This alternative calls for the development of approximately 580 acres (65%) of the total installation property.

We would appreciate a response within 30 days of this request. If you have any questions regarding this correspondence and request, or require additional project information, please do not hesitate to call Tom Stephan, Project Manager at (215) 897-4916 or via e-mail at tom.stephan.ctr@navy.mil. I appreciate your assistance and thank you for your attention to this request.

Sincerely,



DAVID DROZD
Director

Enclosures:

1. PNDI Project Environmental Review Receipt
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3. Alternative 1 (HLRA Plan - Preferred Alternative)
4. Alternative 2 (HLRA Plan with Increased Residential Development)
5. Alternative 3 (Airfield Reuse Alternative)



Pennsylvania Fish & Boat Commission

Division of Environmental Services
 Natural Diversity Section
 450 Robinson Lane
 Bellefonte, PA 16823-9620
 (814) 359-5237 Fax: (814) 359-5175
 April 16, 2013

IN REPLY REFER TO
 SIR # 40589

DAVID DROZD
 DEPARTMENT OF THE NAVY
 4911 SOUTH BROAD STREET
 PHILADELPHIA, PA 19112-1303

RE: Species Impact Review (SIR) - Rare, Candidate, Threatened and Endangered Species
 WILLOW GROVE BASE CLOSURE AND REALIGNMENT ACT
 PNDI Search Number (if available): 20130308394445
 HORSHAM Township/Borough, MONTGOMERY County, Pennsylvania

This responds to your inquiry about a Pennsylvania Natural Diversity Inventory (PNDI) Internet Database search "potential conflict" or a threatened and endangered species impact review. These projects are screened for potential conflicts with rare, candidate, threatened or endangered species under Pennsylvania Fish & Boat Commission jurisdiction (fish, reptiles, amphibians, aquatic invertebrates only) using the Pennsylvania Natural Diversity Inventory (PNDI) database and our own files. These species of special concern are listed under the Endangered Species Act of 1973, the Wild Resource Conservation Act, and the Pennsylvania Fish & Boat Code (Chapter 75), or the Wildlife Code.

X **NO ADVERSE IMPACTS EXPECTED FROM THE PROPOSED PROJECT**

____ Except for occasional transient species, rare, candidate, threatened or endangered species under our jurisdiction are not known to exist in the vicinity of the project area. Therefore, no biological assessment or further consultation regarding rare species is needed with the Commission. Should project plans change, or if additional information on listed or proposed species becomes available, this determination may be reconsidered.

X An element occurrence of a rare, candidate, threatened, or endangered species under our jurisdiction is known from the vicinity of the proposed project. However, given the nature of the proposed project, the immediate location, or the current status of the nearby element occurrence(s), no adverse impacts are expected to the species of special concern.

This response represents the most up-to-date summary of the PNDI data and our files and is valid for two (2) years from the date of this letter. An absence of recorded species information does not necessarily imply species absence. Our data files and the PNDI system are continuously being updated with species occurrence information. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered, and consultation shall be re-initiated.

If you have any questions regarding this review, please contact the biologist indicated below:

____ Chris Urban	814-359-5113	____ Kathy Gipe	814-359-5186
____ Douglas Fischer	814-359-5195	<u>X</u> Bob Morgan	814-359-5129

Thank you in advance for your cooperation and attention to this important matter of species conservation and habitat protection.

SIGNATURE: _____

Christopher A. Urban

DATE: September 19, 2013

Christopher A. Urban
 Chief, Natural Diversity Section

Our Mission:

www.fishandboat.com

To protect, conserve and enhance the Commonwealth's aquatic resources and provide fishing and boating opportunities.



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-083
February 20, 2014

Ms. Tamara Francis
Cultural Preservation Director
Delaware Nation, Oklahoma
NAGPRA/Cultural Preservation
P.O. Box 825
Anadarko, OK 73005

Dear Ms. Francis:

The purpose of this letter is to initiate Section 106 consultation with the Delaware Nation, Oklahoma regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. This undertaking and its effects are being considered under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, and as part of compliance with Section 106 of the NHPA, and compliance with Executive Orders No. 13007, 13084 and 13287. The Navy has declared the former NAS JRB Willow Grove to be surplus property and recognizes that the Delaware Nation, Oklahoma may have an interest in the property affected by the proposed undertaking.

The proposed undertaking consists of the disposal (i.e., transfer out of federal ownership) of the former NAS JRB Willow Grove property, including the Main Base property, and its reuse in a manner consistent with the *NAS JRB Willow Grove Redevelopment Plan* (Redevelopment Plan) and the *Amendment and Supplement to: Redevelopment Plan and Homeless Assistance Submission*. As shown in enclosure 1, the surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The area of potential effects (APE) for the proposed undertaking consists of the areas within the boundaries of the surplus property.

At the Main Base property, three redevelopment alternatives and the No Action Alternative have been considered for reuse. Alternative 1, the Preferred Alternative, is the reuse of the property in accordance with the Redevelopment Plan and its Amendment, including mixed-use development, open space, and natural areas. The airfield and most installation facilities would be demolished. Alternative 2 consists of a higher density of residential development than under Alternative 1, a similar level of mixed-use development, and demolition of the airfield and most installation facilities. Alternative 3 includes commercial and mixed-use development, minimal residential development, and conversion of the military airfield to a

general aviation airfield. The No Action Alternative is the retention of the former NAS JRB Willow Grove property by the U.S. government in caretaker status.

At the Jacksonville Road housing area, redevelopment consists of disposal by a homeless conveyance to the Bucks County Housing Group (BCHG), demolition of the existing housing units and construction of an office building. At the Shenandoah Woods housing area, two redevelopment alternatives have been considered for reuse. Alternative 1 consists of disposal of a portion of the property by conveyance to the Bucks County Redevelopment Authority (BCRDA), demolition of a portion of the existing units, and redevelopment with a maximum build-out of 113 housing units; a proposed conveyance of a portion of the property to the Township of Warminster for use as public open space and development of storm water management basins; and transfer of 20 townhouses by a homeless conveyance for use as transitional housing for individuals and families recovering from substance abuse. Alternative 2 is the same as Alternative 1 except that the portion of the property that would be conveyed to the BCRDA would be redeveloped at a higher density than under Alternative 1, with a maximum build-out of 166 housing units, all of which would be semi-detached duplex homes. The No Action Alternative for both the Jacksonville Road and Shenandoah Woods housing areas consists of the retention of the properties by the U.S. government in caretaker status.

In 2011, we conducted Phase I archaeological investigations at NAS JRB Willow Grove. A total of seven archaeological sites were identified: four at the Main Base property (Sites 36 Mg 0458, 36 Mg 0459, 36 Mg 0460, and 36 Mg 0461) and three at the Shenandoah Woods housing area (Sites 36 Bu 0427, 36 Bu 429, and 36 Bu 0430). No archaeological resources were identified at the Jacksonville Road housing area. Based on the results of the Phase I archaeological investigations, four of the seven archaeological sites were identified as potentially eligible for listing on the National Register of Historic Places (NRHP): Sites 36-MG-0459 and 36 Mg 0460 at the Main Base property (both multicomponent sites), and Sites 36 Bu 0427 and 36 Bu 0429 at the Shenandoah Woods housing area (both historic archaeological sites). The other three archaeological sites were identified as not NRHP-eligible (Sites 36 Mg 0458 and 36 Mg 0461 at the Main Base property and Site 36 Bu 0430 at the Shenandoah Woods housing area), and no further archaeological investigations were recommended. The Pennsylvania State Historic Preservation Officer (SHPO) concurred with the NRHP-eligibility determinations for the archaeological resources.

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Ser BPMOE/14-083
February 20, 2014

The Pennsylvania SHPO requested confirmation that legally binding agreements to protect the NRHP-eligible archaeological resources are or would be in place with property recipients prior to disposal of the NAS JRB Willow Grove property. The Navy provided this confirmation to the Pennsylvania SHPO, indicating that deed restrictions and covenants with property recipients would provide for evaluative testing of the two potentially NRHP-eligible multi-component sites at the Main Base property and the two potentially NRHP-eligible historic archaeological sites at the Shenandoah Woods housing area prior to any ground-disturbing activities. The Pennsylvania SHPO acknowledged receiving the information for deed restrictions and covenants without further comment.

In 2011, we also conducted architectural surveys and evaluations at the NAS JRB Willow Grove property. A majority of the architectural resources at the Main Base property and all of the architectural resources at the Shenandoah Woods housing area were determined to be not historically or architecturally significant and were recommended as not NRHP-eligible. Six ammunition magazines at the Main Base property and the Jacksonville Road Housing area are NRHP-eligible, but the ACHP's 2004 and 2006 Program Comments for World War II and Cold War era ammunition storage facilities and Wherry housing, respectively, cover all compliance with preservation statutes, including compliance with Section 106 of the NHPA. The Pennsylvania SHPO has concurred with the NRHP-eligibility determinations for architectural resources.

We are currently requesting your input to assist in the identification of any Native American resources, properties of traditional religious and cultural importance, sacred sites, or historic properties within or in the vicinity of the proposed undertaking that may be affected by this undertaking. We are in the process of initiating consultation with other federally recognized Indian tribes and other consulting parties, including representatives of local government and groups with an interest in historic preservation.

We appreciate your assistance in this matter, and thank you in advance for any information you can provide. Please indicate whether you wish to participate in the Section 106 consultation for the proposed undertaking for NAS JRB Willow Grove.

If you have any questions concerning this request, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful

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Ser BPMOE/14-083
February 20, 2014

consultation and coordination with the Delaware Nation, Oklahoma. In order to support our project timeline, the Navy would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,



GREGORY C. PRESTON
Director

Enclosure:

NAS JRB Willow Grove and the Jacksonville Road and Shenandoah Woods
Housing Areas

Copy to:

NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-084
February 20, 2014

Mr. Bruce Obermeyer
Director
Delaware Tribe Historic Preservation Office
Delaware Tribe of Indians
Roosevelt Hall, Room 212
1200 Commercial Street
Emporia, KS 66801

Dear Mr. Obermeyer:

The purpose of this letter is to initiate Section 106 consultation with the Delaware Tribe of Indians regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. This undertaking and its effects are being considered under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, and as part of compliance with Section 106 of the NHPA, and compliance with Executive Orders No. 13007, 13084 and 13287. The Navy has declared the former NAS JRB Willow Grove to be surplus property and recognizes that the Delaware Tribe of Indians may have an interest in the property affected by the proposed undertaking.

The proposed undertaking consists of the disposal (i.e., transfer out of federal ownership) of the former NAS JRB Willow Grove property, including the Main Base property, and its reuse in a manner consistent with the *NAS JRB Willow Grove Redevelopment Plan* (Redevelopment Plan) and the *Amendment and Supplement to: Redevelopment Plan and Homeless Assistance Submission*. As shown in enclosure 1, the surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The area of potential effects (APE) for the proposed undertaking consists of the areas within the boundaries of the surplus property.

At the Main Base property, three redevelopment alternatives and the No Action Alternative have been considered for reuse. Alternative 1, the Preferred Alternative, is the reuse of the property in accordance with the Redevelopment Plan and its Amendment, including mixed-use development, open space, and natural areas. The airfield and most installation facilities would be demolished. Alternative 2 consists of a higher density of residential development than under Alternative 1, a similar level of mixed-use development, and demolition of the airfield and most installation facilities. Alternative 3 includes commercial and mixed-use development, minimal

residential development, and conversion of the military airfield to a general aviation airfield. The No Action Alternative is the retention of the former NAS JRB Willow Grove property by the U.S. government in caretaker status.

At the Jacksonville Road housing area, redevelopment consists of disposal by a homeless conveyance to the Bucks County Housing Group (BCHG), demolition of the existing housing units and construction of an office building. At the Shenandoah Woods housing area, two redevelopment alternatives have been considered for reuse. Alternative 1 consists of disposal of a portion of the property by conveyance to the Bucks County Redevelopment Authority (BCRDA), demolition of a portion of the existing units, and redevelopment with a maximum build-out of 113 housing units; a proposed conveyance of a portion of the property to the Township of Warminster for use as public open space and development of storm water management basins; and transfer of 20 townhouses by a homeless conveyance for use as transitional housing for individuals and families recovering from substance abuse. Alternative 2 is the same as Alternative 1 except that the portion of the property that would be conveyed to the BCRDA would be redeveloped at a higher density than under Alternative 1, with a maximum build-out of 166 housing units, all of which would be semi-detached duplex homes. The No Action Alternative for both the Jacksonville Road and Shenandoah Woods housing areas consists of the retention of the properties by the U.S. government in caretaker status.

In 2011, we conducted Phase I archaeological investigations at NAS JRB Willow Grove. A total of seven archaeological sites were identified: four at the Main Base property (Sites 36 Mg 0458, 36 Mg 0459, 36 Mg 0460, and 36 Mg 0461) and three at the Shenandoah Woods housing area (Sites 36 Bu 0427, 36 Bu 429, and 36 Bu 0430). No archaeological resources were identified at the Jacksonville Road housing area. Based on the results of the Phase I archaeological investigations, four of the seven archaeological sites were identified as potentially eligible for listing on the National Register of Historic Places (NRHP): Sites 36-MG-0459 and 36 Mg 0460 at the Main Base property (both multicomponent sites), and Sites 36 Bu 0427 and 36 Bu 0429 at the Shenandoah Woods housing area (both historic archaeological sites). The other three archaeological sites were identified as not NRHP-eligible (Sites 36 Mg 0458 and 36 Mg 0461 at the Main Base property and Site 36 Bu 0430 at the Shenandoah Woods housing area), and no further archaeological investigations were recommended. The Pennsylvania State Historic Preservation Officer (SHPO) concurred with the NRHP-eligibility determinations for the archaeological resources.

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We are currently requesting your input to assist in the identification of any Native American resources, properties of traditional religious and cultural importance, sacred sites, or historic properties within or in the vicinity of the proposed undertaking that may be affected by this undertaking. We are in the process of initiating consultation with other federally recognized Indian tribes and other consulting parties, including representatives of local government and groups with an interest in historic preservation.

We appreciate your assistance in this matter, and thank you in advance for any information you can provide. Please indicate whether you wish to participate in the Section 106 consultation for the proposed undertaking for NAS JRB Willow Grove.

If you have any questions concerning this request, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful

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February 20, 2014

consultation and coordination with the Delaware Tribe of Indians. In order to support our project timeline, the Navy would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure:
NAS JRB Willow Grove and the Jacksonville Road and Shenandoah Woods
Housing Areas

Copy to:
NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-085
February 20, 2014

Ms. Sherry White
Historic Preservation Officer
Stockbridge Munsee Community of Wisconsin
P.O. Box 70
N8476 Moh-He-Con-Nuck Road
1200 Commercial Street
Bowler, WI 54416

Dear Ms. White:

The purpose of this letter is to initiate Section 106 consultation with the Stockbridge Munsee Community of Wisconsin regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. This undertaking and its effects are being considered under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, and as part of compliance with Section 106 of the NHPA, and compliance with Executive Orders No. 13007, 13084 and 13287. The Navy has declared the former NAS JRB Willow Grove to be surplus property and recognizes that the Stockbridge Munsee Community of Wisconsin may have an interest in the property affected by the proposed undertaking.

The proposed undertaking consists of the disposal (i.e., transfer out of federal ownership) of the former NAS JRB Willow Grove property, including the Main Base property, and its reuse in a manner consistent with the *NAS JRB Willow Grove Redevelopment Plan* (Redevelopment Plan) and the *Amendment and Supplement to: Redevelopment Plan and Homeless Assistance Submission*. As shown in enclosure 1, the surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The area of potential effects (APE) for the proposed undertaking consists of the areas within the boundaries of the surplus property.

At the Main Base property, three redevelopment alternatives and the No Action Alternative have been considered for reuse. Alternative 1, the Preferred Alternative, is the reuse of the property in accordance with the Redevelopment Plan and its Amendment, including mixed-use development, open space, and natural areas. The airfield and most installation facilities would be demolished. Alternative 2 consists of a higher density of residential development than under Alternative 1, a similar level of mixed-use development, and demolition of the airfield and most installation facilities. Alternative 3 includes commercial and mixed-use development, minimal

residential development, and conversion of the military airfield to a general aviation airfield. The No Action Alternative is the retention of the former NAS JRB Willow Grove property by the U.S. government in caretaker status.

At the Jacksonville Road housing area, redevelopment consists of disposal by a homeless conveyance to the Bucks County Housing Group (BCHG), demolition of the existing housing units and construction of an office building. At the Shenandoah Woods housing area, two redevelopment alternatives have been considered for reuse. Alternative 1 consists of disposal of a portion of the property by conveyance to the Bucks County Redevelopment Authority (BCRDA), demolition of a portion of the existing units, and redevelopment with a maximum build-out of 113 housing units; a proposed conveyance of a portion of the property to the Township of Warminster for use as public open space and development of storm water management basins; and transfer of 20 townhouses by a homeless conveyance for use as transitional housing for individuals and families recovering from substance abuse. Alternative 2 is the same as Alternative 1 except that the portion of the property that would be conveyed to the BCRDA would be redeveloped at a higher density than under Alternative 1, with a maximum build-out of 166 housing units, all of which would be semi-detached duplex homes. The No Action Alternative for both the Jacksonville Road and Shenandoah Woods housing areas consists of the retention of the properties by the U.S. government in caretaker status.

In 2011, we conducted Phase I archaeological investigations at NAS JRB Willow Grove. A total of seven archaeological sites were identified: four at the Main Base property (Sites 36 Mg 0458, 36 Mg 0459, 36 Mg 0460, and 36 Mg 0461) and three at the Shenandoah Woods housing area (Sites 36 Bu 0427, 36 Bu 429, and 36 Bu 0430). No archaeological resources were identified at the Jacksonville Road housing area. Based on the results of the Phase I archaeological investigations, four of the seven archaeological sites were identified as potentially eligible for listing on the National Register of Historic Places (NRHP): Sites 36-MG-0459 and 36 Mg 0460 at the Main Base property (both multicomponent sites), and Sites 36 Bu 0427 and 36 Bu 0429 at the Shenandoah Woods housing area (both historic archaeological sites). The other three archaeological sites were identified as not NRHP-eligible (Sites 36 Mg 0458 and 36 Mg 0461 at the Main Base property and Site 36 Bu 0430 at the Shenandoah Woods housing area), and no further archaeological investigations were recommended. The Pennsylvania State Historic Preservation Officer (SHPO) concurred with the NRHP-eligibility determinations for the archaeological resources.

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The Pennsylvania SHPO requested confirmation that legally binding agreements to protect the NRHP-eligible archaeological resources are or would be in place with property recipients prior to disposal of the NAS JRB Willow Grove property. The Navy provided this confirmation to the Pennsylvania SHPO, indicating that deed restrictions and covenants with property recipients would provide for evaluative testing of the two potentially NRHP-eligible multi-component sites at the Main Base property and the two potentially NRHP-eligible historic archaeological sites at the Shenandoah Woods housing area prior to any ground-disturbing activities. The Pennsylvania SHPO acknowledged receiving the information for deed restrictions and covenants without further comment.

In 2011, we also conducted architectural surveys and evaluations at the NAS JRB Willow Grove property. A majority of the architectural resources at the Main Base property and all of the architectural resources at the Shenandoah Woods housing area were determined to be not historically or architecturally significant and were recommended as not NRHP-eligible. Six ammunition magazines at the Main Base property and the Jacksonville Road Housing area are NRHP-eligible, but the ACHP's 2004 and 2006 Program Comments for World War II and Cold War era ammunition storage facilities and Wherry housing, respectively, cover all compliance with preservation statutes, including compliance with Section 106 of the NHPA. The Pennsylvania SHPO has concurred with the NRHP-eligibility determinations for architectural resources.

We are currently requesting your input to assist in the identification of any Native American resources, properties of traditional religious and cultural importance, sacred sites, or historic properties within or in the vicinity of the proposed undertaking that may be affected by this undertaking. We are in the process of initiating consultation with other federally recognized Indian tribes and other consulting parties, including representatives of local government and groups with an interest in historic preservation.


We appreciate your assistance in this matter, and thank you in advance for any information you can provide. Please indicate whether you wish to participate in the Section 106 consultation for the proposed undertaking for NAS JRB Willow Grove.

If you have any questions concerning this request, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful

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consultation and coordination with the Stockbridge Munsee Community of Wisconsin. In order to support our project timeline, the Navy would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure:
NAS JRB Willow Grove and the Jacksonville Road and Shenandoah Woods
Housing Areas

Copy to:
NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

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February 20, 2014

Mr. Mark McCouch
President, Horsham Township Council
Horsham Township Municipal Building
1025 Horsham Road
Horsham, PA 19044

Dear Mr. McCouch:

The purpose of this letter is to initiate Section 106 consultation with the Horsham Township Council regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. This undertaking and its effects are being considered under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. The Navy has declared the former NAS JRB Willow Grove to be surplus property and recognizes that the Horsham Township Council may have an interest in the property affected by the proposed undertaking.

The proposed undertaking consists of the disposal (i.e., transfer out of federal ownership) of the former NAS JRB Willow Grove property, including the Main Base property, and its reuse in a manner consistent with the *NAS JRB Willow Grove Redevelopment Plan* (Redevelopment Plan) and the *Amendment and Supplement to: Redevelopment Plan and Homeless Assistance Submission*. As shown in enclosure 1, the surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The area of potential effects (APE) for the proposed undertaking consists of the areas within the boundaries of the surplus property.

At the Main Base property, three redevelopment alternatives and the No Action Alternative have been considered for reuse. Alternative 1, the Preferred Alternative, is the reuse of the property in accordance with the Redevelopment Plan and its Amendment, including mixed-use development, open space, and natural areas. The airfield and most installation facilities would be demolished. Alternative 2 consists of a higher density of residential development than under Alternative 1, a similar level of mixed-use development, and demolition of the airfield and most installation facilities. Alternative 3 includes commercial and mixed-use development, minimal residential development, and conversion of the military airfield to a general aviation airfield. The No Action Alternative is the retention of the former NAS JRB Willow Grove property by the U.S. government in caretaker status.

At the Jacksonville Road housing area, redevelopment consists of disposal by a homeless conveyance to the Bucks County Housing Group (BCHG), demolition of the existing housing units, and construction of an office building. At the Shenandoah Woods housing area, two redevelopment alternatives have been considered for reuse. Alternative 1 consists of disposal of a portion of the property by conveyance to the Bucks County Redevelopment Authority (BCRDA), demolition of a portion of the existing units, and redevelopment with a maximum build-out of 113 housing units; a proposed conveyance of a portion of the property to the Township of Warminster for use as public open space and development of storm water management basins; and transfer of 20 townhouses by a homeless conveyance for use as transitional housing for individuals and families recovering from substance abuse. Alternative 2 is the same as Alternative 1 except that the portion of the property that would be conveyed to the BCRDA would be redeveloped at a higher density than under Alternative 1, with a maximum build-out of 166 housing units, all of which would be semi-detached duplex homes. The No Action Alternative for both the Jacksonville Road and Shenandoah Woods housing areas consists of the retention of the properties by the U.S. government in caretaker status.

In 2011, we conducted Phase I archaeological investigations at NAS JRB Willow Grove. A total of seven archaeological sites were identified: four at the Main Base property (Sites 36 Mg 0458, 36 Mg 0459, 36 Mg 0460, and 36 Mg 0461) and three at the Shenandoah Woods housing area (Sites 36 Bu 0427, 36 Bu 429, and 36 Bu 0430). No archaeological resources were identified at the Jacksonville Road housing area. Based on the results of the Phase I archaeological investigations, four of the seven archaeological sites were identified as potentially eligible for listing in the National Register of Historic Places (NRHP): Sites 36-MG-0459 and 36 Mg 0460 at the Main Base property (both multicomponent sites) and Sites 36 Bu 0427 and 36 Bu 0429 at the Shenandoah Woods housing area (both historic archaeological sites). The other three archaeological sites were identified as not NRHP-eligible (Sites 36 Mg 0458 and 36 Mg 0461 at the Main Base property, and Site 36 Bu 0430 at the Shenandoah Woods housing area), and no further archaeological investigations were recommended. The Pennsylvania State Historic Preservation Officer (SHPO) concurred with the NRHP-eligibility determinations for the archaeological resources.

The Pennsylvania SHPO requested confirmation that legally binding agreements to protect the NRHP-eligible archaeological resources are or would be in place with property recipients prior to disposal of the NAS JRB Willow Grove property. The Navy provided this confirmation to the Pennsylvania SHPO, indicating that deed restrictions and covenants with property recipients would provide for evaluative testing of the two potentially NRHP-eligible multi-component sites at Main Base and

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the two potentially NRHP-eligible historic archaeological sites at the Shenandoah Woods housing area prior to any ground-disturbing activities. The Pennsylvania SHPO acknowledged receiving the information for deed restrictions and covenants without further comment.

In 2011, we also conducted architectural surveys and evaluations at the NAS JRB Willow Grove property. A majority of the architectural resources at the Main Base property and all of the architectural resources at the Shenandoah Woods housing area were determined to be not historically or architecturally significant and were recommended as not NRHP-eligible. Six ammunition magazines at Main Base property and the Jacksonville Road Housing area are NRHP-eligible, but the ACHP's 2004 and 2006 Program Comments for World War II and Cold War era ammunition storage facilities and Wherry housing, respectively, cover all compliance with preservation statutes, including compliance with Section 106 of the NHPA. The Pennsylvania SHPO concurred with the NRHP-eligibility determinations for architectural resources.

We are requesting your input to assist in the identification of any issues or concerns for cultural resources or historic properties within or in the vicinity of the proposed undertaking that may be affected by this undertaking. We are in the process of initiating consultation with federally recognized Indian tribes and other consulting parties, including representatives of local government and groups with an interest in historic preservation. Please also indicate whether you wish to participate in the Section 106 consultation for the proposed undertaking for NAS JRB Willow Grove.

If you have any questions concerning this request, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Horsham Township Council. In order to support our project timeline, we would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure: NAS JRB Willow Grove and the Jacksonville Road and
Shenandoah Woods Housing Areas

Copy to:
NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

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February 20, 2014

Mr. Robert Severn
Ivyland Borough Council President
c/o Ivyland Borough Office
15 Gough Avenue
Ivyland, PA 18974

Dear Mr. Severn:

The purpose of this letter is to initiate Section 106 consultation with the Ivyland Borough Council regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. This undertaking and its effects are being considered under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. The Navy has declared the former NAS JRB Willow Grove to be surplus property and recognizes that the Ivyland Borough Council may have an interest in the property affected by the proposed undertaking.

The proposed undertaking consists of the disposal (i.e., transfer out of federal ownership) of the former NAS JRB Willow Grove property, including the Main Base property, and its reuse in a manner consistent with the *NAS JRB Willow Grove Redevelopment Plan* (Redevelopment Plan) and the *Amendment and Supplement to: Redevelopment Plan and Homeless Assistance Submission*. As shown in enclosure 1, the surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The area of potential effects (APE) for the proposed undertaking consists of the areas within the boundaries of the surplus property.

At the Main Base property, three redevelopment alternatives and the No Action Alternative have been considered for reuse. Alternative 1, the Preferred Alternative, is the reuse of the property in accordance with the Redevelopment Plan and its Amendment, including mixed-use development, open space, and natural areas. The airfield and most installation facilities would be demolished. Alternative 2 consists of a higher density of residential development than under Alternative 1, a similar level of mixed-use development, and demolition of the airfield and most installation facilities. Alternative 3 includes commercial and mixed-use development, minimal residential development, and conversion of the military airfield to a general aviation airfield. The No Action Alternative is the retention of the former NAS JRB Willow Grove property by the U.S. government in caretaker status.

At the Jacksonville Road housing area, redevelopment consists of disposal by a homeless conveyance to the Bucks County Housing Group (BCHG), demolition of the existing housing units, and construction of an office building. At the Shenandoah Woods housing area, two redevelopment alternatives have been considered for reuse. Alternative 1 consists of disposal of a portion of the property by conveyance to the Bucks County Redevelopment Authority (BCRDA), demolition of a portion of the existing units, and redevelopment with a maximum build-out of 113 housing units; a proposed conveyance of a portion of the property to the Township of Warminster for use as public open space and development of storm water management basins; and transfer of 20 townhouses by a homeless conveyance for use as transitional housing for individuals and families recovering from substance abuse. Alternative 2 is the same as Alternative 1 except that the portion of the property that would be conveyed to the BCRDA would be redeveloped at a higher density than under Alternative 1, with a maximum build-out of 166 housing units, all of which would be semi-detached duplex homes. The No Action Alternative for both the Jacksonville Road and Shenandoah Woods housing areas consists of the retention of the properties by the U.S. government in caretaker status.

In 2011, we conducted Phase I archaeological investigations at NAS JRB Willow Grove. A total of seven archaeological sites were identified: four at the Main Base property (Sites 36 Mg 0458, 36 Mg 0459, 36 Mg 0460, and 36 Mg 0461) and three at the Shenandoah Woods housing area (Sites 36 Bu 0427, 36 Bu 429, and 36 Bu 0430). No archaeological resources were identified at the Jacksonville Road housing area. Based on the results of the Phase I archaeological investigations, four of the seven archaeological sites were identified as potentially eligible for listing in the National Register of Historic Places (NRHP): Sites 36-MG-0459 and 36 Mg 0460 at the Main Base property (both multicomponent sites) and Sites 36 Bu 0427 and 36 Bu 0429 at the Shenandoah Woods housing area (both historic archaeological sites). The other three archaeological sites were identified as not NRHP-eligible (Sites 36 Mg 0458 and 36 Mg 0461 at the Main Base property, and Site 36 Bu 0430 at the Shenandoah Woods housing area), and no further archaeological investigations were recommended. The Pennsylvania State Historic Preservation Officer (SHPO) concurred with the NRHP-eligibility determinations for the archaeological resources.

The Pennsylvania SHPO requested confirmation that legally binding agreements to protect the NRHP-eligible archaeological resources are or would be in place with property recipients prior to disposal of the NAS JRB Willow Grove property. The Navy provided this confirmation to the Pennsylvania SHPO, indicating that deed restrictions and

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covenants with property recipients would provide for evaluative testing of the two potentially NRHP-eligible multi-component sites at Main Base and the two potentially NRHP-eligible historic archaeological sites at the Shenandoah Woods housing area prior to any ground-disturbing activities. The Pennsylvania SHPO acknowledged receiving the information for deed restrictions and covenants without further comment.

In 2011, we also conducted architectural surveys and evaluations at the NAS JRB Willow Grove property. A majority of the architectural resources at the Main Base property and all of the architectural resources at the Shenandoah Woods housing area were determined to be not historically or architecturally significant and were recommended as not NRHP-eligible. Six ammunition magazines at Main Base property and the Jacksonville Road Housing area are NRHP-eligible, but the ACHP's 2004 and 2006 Program Comments for World War II and Cold War era ammunition storage facilities and Wherry housing, respectively, cover all compliance with preservation statutes, including compliance with Section 106 of the NHPA. The Pennsylvania SHPO concurred with the NRHP-eligibility determinations for architectural resources.

We are requesting your input to assist in the identification of any issues or concerns for cultural resources or historic properties within or in the vicinity of the proposed undertaking that may be affected by this undertaking. We are in the process of initiating consultation with federally recognized Indian tribes and other consulting parties, including representatives of local government and groups with an interest in historic preservation. Please also indicate whether you wish to participate in the Section 106 consultation for the proposed undertaking for NAS JRB Willow Grove.

If you have any questions concerning this request, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Ivyland Borough Council. In order to support our project timeline, we would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure: NAS JRB Willow Grove and the Jacksonville Road and Shenandoah Woods Housing Areas

Copy to:
NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

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Ser BPMOE/14-089
February 20, 2014

Mr. Leo I. Quinn, III
Chairman
Warminster Township Board of Supervisors
401 Gibson Avenue
Warminster, PA 18974

Dear Mr. Quinn:

The purpose of this letter is to initiate Section 106 consultation with the Warminster Township Board of Supervisors regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. This undertaking and its effects are being considered under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. The Navy has declared the former NAS JRB Willow Grove to be surplus property and recognizes that the Warminster Township Board of Supervisors may have an interest in the property affected by the proposed undertaking.

The proposed undertaking consists of the disposal (i.e., transfer out of federal ownership) of the former NAS JRB Willow Grove property, including the Main Base property, and its reuse in a manner consistent with the *NAS JRB Willow Grove Redevelopment Plan* (Redevelopment Plan) and the *Amendment and Supplement to: Redevelopment Plan and Homeless Assistance Submission*. As shown in enclosure 1, the surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The area of potential effects (APE) for the proposed undertaking consists of the areas within the boundaries of the surplus property.

At the Main Base property, three redevelopment alternatives and the No Action Alternative have been considered for reuse. Alternative 1, the Preferred Alternative, is the reuse of the property in accordance with the Redevelopment Plan and its Amendment, including mixed-use development, open space, and natural areas. The airfield and most installation facilities would be demolished. Alternative 2 consists of a higher density of residential development than under Alternative 1, a similar level of mixed-use development, and demolition of the airfield and most installation facilities. Alternative 3 includes commercial and mixed-use development, minimal residential development, and conversion of the military airfield to a general aviation airfield. The No Action Alternative is the retention of the former NAS JRB Willow Grove property by the U.S. government in caretaker status.

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At the Jacksonville Road housing area, redevelopment consists of disposal by a homeless conveyance to the Bucks County Housing Group (BCHG), demolition of the existing housing units, and construction of an office building. At the Shenandoah Woods housing area, two redevelopment alternatives have been considered for reuse. Alternative 1 consists of disposal of a portion of the property by conveyance to the Bucks County Redevelopment Authority (BCRDA), demolition of a portion of the existing units, and redevelopment with a maximum build-out of 113 housing units; a proposed conveyance of a portion of the property to the Township of Warminster for use as public open space and development of storm water management basins; and transfer of 20 townhouses by a homeless conveyance for use as transitional housing for individuals and families recovering from substance abuse. Alternative 2 is the same as Alternative 1 except that the portion of the property that would be conveyed to the BCRDA would be redeveloped at a higher density than under Alternative 1, with a maximum build-out of 166 housing units, all of which would be semi-detached duplex homes. The No Action Alternative for both the Jacksonville Road and Shenandoah Woods housing areas consists of the retention of the properties by the U.S. government in caretaker status.

In 2011, we conducted Phase I archaeological investigations at NAS JRB Willow Grove. A total of seven archaeological sites were identified: four at the Main Base property (Sites 36 Mg 0458, 36 Mg 0459, 36 Mg 0460, and 36 Mg 0461) and three at the Shenandoah Woods housing area (Sites 36 Bu 0427, 36 Bu 429, and 36 Bu 0430). No archaeological resources were identified at the Jacksonville Road housing area. Based on the results of the Phase I archaeological investigations, four of the seven archaeological sites were identified as potentially eligible for listing in the National Register of Historic Places (NRHP): Sites 36-MG-0459 and 36 Mg 0460 at the Main Base property (both multicomponent sites) and Sites 36 Bu 0427 and 36 Bu 0429 at the Shenandoah Woods housing area (both historic archaeological sites). The other three archaeological sites were identified as not NRHP-eligible (Sites 36 Mg 0458 and 36 Mg 0461 at the Main Base property, and Site 36 Bu 0430 at the Shenandoah Woods housing area), and no further archaeological investigations were recommended. The Pennsylvania State Historic Preservation Officer (SHPO) concurred with the NRHP-eligibility determinations for the archaeological resources.

The Pennsylvania SHPO requested confirmation that legally binding agreements to protect the NRHP-eligible archaeological resources are or would be in place with property recipients prior to disposal of the NAS JRB Willow Grove property. The Navy provided this confirmation to the Pennsylvania SHPO, indicating that deed restrictions and

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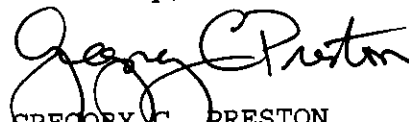
covenants with property recipients would provide for evaluative testing of the two potentially NRHP-eligible multi-component sites at Main Base and the two potentially NRHP-eligible historic archaeological sites at the Shenandoah Woods housing area prior to any ground-disturbing activities. The Pennsylvania SHPO acknowledged receiving the information for deed restrictions and covenants without further comment.

In 2011, we also conducted architectural surveys and evaluations at the NAS JRB Willow Grove property. A majority of the architectural resources at the Main Base property and all of the architectural resources at the Shenandoah Woods housing area were determined to be not historically or architecturally significant and were recommended as not NRHP-eligible. Six ammunition magazines at Main Base property and the Jacksonville Road Housing area are NRHP-eligible, but the ACHP's 2004 and 2006 Program Comments for World War II and Cold War era ammunition storage facilities and Wherry housing, respectively, cover all compliance with preservation statutes, including compliance with Section 106 of the NHPA. The Pennsylvania SHPO concurred with the NRHP-eligibility determinations for architectural resources.

We are requesting your input to assist in the identification of any issues or concerns for cultural resources or historic properties within or in the vicinity of the proposed undertaking that may be affected by this undertaking. We are in the process of initiating consultation with federally recognized Indian tribes and other consulting parties, including representatives of local government and groups with an interest in historic preservation. Please also indicate whether you wish to participate in the Section 106 consultation for the proposed undertaking for NAS JRB Willow Grove.

If you have any questions concerning this request, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Warminster Township Board of Supervisors. In order to support our project timeline, we would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure: NAS JRB Willow Grove and the Jacksonville Road and Shenandoah Woods Housing Areas

Copy to:
NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

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Ser BPMOE/14-090
February 20, 2014

Historical Society of Montgomery County
1654 DeKalb Street
Norristown, PA 18401-5415

Dear Sir:

The purpose of this letter is to initiate Section 106 consultation with the Historical Society of Montgomery County regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. This undertaking and its effects are being considered under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. The Navy has declared the former NAS JRB Willow Grove to be surplus property and recognizes that the Historical Society of Montgomery County may have an interest in the property affected by the proposed undertaking.

The proposed undertaking consists of the disposal (i.e., transfer out of federal ownership) of the former NAS JRB Willow Grove property, including the Main Base property, and its reuse in a manner consistent with the *NAS JRB Willow Grove Redevelopment Plan (Redevelopment Plan)* and the *Amendment and Supplement to: Redevelopment Plan and Homeless Assistance Submission*. As shown in enclosure 1, the surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The area of potential effects (APE) for the proposed undertaking consists of the areas within the boundaries of the surplus property.

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In 2011, we conducted Phase I archaeological investigations at NAS JRB Willow Grove. A total of seven archaeological sites were identified: four at the Main Base property (Sites 36 Mg 0458, 36 Mg 0459, 36 Mg 0460, and 36 Mg 0461) and three at the Shenandoah Woods housing area (Sites 36 Bu 0427, 36 Bu 429, and 36 Bu 0430). No archaeological resources were identified at the Jacksonville Road housing area. Based on the results of the Phase I archaeological investigations, four of the seven archaeological sites were identified as potentially eligible for listing in the National Register of Historic Places (NRHP): Sites 36-MG-0459 and 36 Mg 0460 at the Main Base property (both multicomponent sites) and Sites 36 Bu 0427 and 36 Bu 0429 at the Shenandoah Woods housing area (both historic archaeological sites). The other three archaeological sites were identified as not NRHP-eligible (Sites 36 Mg 0458 and 36 Mg 0461 at the Main Base property, and Site 36 Bu 0430 at the Shenandoah Woods housing area), and no further archaeological investigations were recommended. The Pennsylvania State Historic Preservation Officer (SHPO) concurred with the NRHP-eligibility determinations for the archaeological resources.

The Pennsylvania SHPO requested confirmation that legally binding agreements to protect the NRHP-eligible archaeological resources are or would be in place with property recipients prior to disposal of the NAS JRB Willow Grove property. The Navy provided this confirmation to the Pennsylvania SHPO, indicating that deed restrictions and covenants

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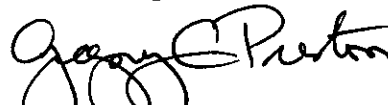
with property recipients would provide for evaluative testing of the two potentially NRHP-eligible multi-component sites at Main Base and the two potentially NRHP-eligible historic archaeological sites at the Shenandoah Woods housing area prior to any ground-disturbing activities. The Pennsylvania SHPO acknowledged receiving the information for deed restrictions and covenants without further comment.

In 2011, we also conducted architectural surveys and evaluations at the NAS JRB Willow Grove property. A majority of the architectural resources at the Main Base property and all of the architectural resources at the Shenandoah Woods housing area were determined to be not historically or architecturally significant and were recommended as not NRHP-eligible. Six ammunition magazines at Main Base property and the Jacksonville Road Housing area are NRHP-eligible, but the ACHP's 2004 and 2006 Program Comments for World War II and Cold War era ammunition storage facilities and Wherry housing, respectively, cover all compliance with preservation statutes, including compliance with Section 106 of the NHPA. The Pennsylvania SHPO concurred with the NRHP-eligibility determinations for architectural resources.

We are requesting your input to assist in the identification of any issues or concerns for cultural resources or historic properties within or in the vicinity of the proposed undertaking that may be affected by this undertaking. We are in the process of initiating consultation with federally recognized Indian tribes and other consulting parties, including representatives of local government and groups with an interest in historic preservation. Please also indicate whether you wish to participate in the Section 106 consultation for the proposed undertaking for NAS JRB Willow Grove.

If you have any questions concerning this request, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Historical Society of Montgomery County. In order to support our project timeline, we would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure: NAS JRB Willow Grove and the Jacksonville Road and Shenandoah Woods Housing Areas

Copy to:
NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-091
February 20, 2014

Mr. Kevin Winters
President
Horsham Preservation & Historic Association
900 Governors Road
Horsham, PA 19044

Dear Mr. Winters:

The purpose of this letter is to initiate Section 106 consultation with the Horsham Preservation & Historic Association regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. This undertaking and its effects are being considered under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. The Navy has declared the former NAS JRB Willow Grove to be surplus property and recognizes that the Horsham Preservation & Historic Association may have an interest in the property affected by the proposed undertaking.

The proposed undertaking consists of the disposal (i.e., transfer out of federal ownership) of the former NAS JRB Willow Grove property, including the Main Base property, and its reuse in a manner consistent with the *NAS JRB Willow Grove Redevelopment Plan* (Redevelopment Plan) and the *Amendment and Supplement to: Redevelopment Plan and Homeless Assistance Submission*. As shown in enclosure 1, the surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The area of potential effects (APE) for the proposed undertaking consists of the areas within the boundaries of the surplus property.

At the Main Base property, three redevelopment alternatives and the No Action Alternative have been considered for reuse. Alternative 1, the Preferred Alternative, is the reuse of the property in accordance with the Redevelopment Plan and its Amendment, including mixed-use development, open space, and natural areas. The airfield and most installation facilities would be demolished. Alternative 2 consists of a higher density of residential development than under Alternative 1, a similar level of mixed-use development, and demolition of the airfield and most installation facilities. Alternative 3 includes commercial and mixed-use development, minimal residential development, and conversion of the military airfield to a general aviation airfield. The No Action Alternative is the retention of the former NAS JRB Willow Grove property by the U.S. government in caretaker status.

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February 20, 2014

At the Jacksonville Road housing area, redevelopment consists of disposal by a homeless conveyance to the Bucks County Housing Group (BCHG), demolition of the existing housing units, and construction of an office building. At the Shenandoah Woods housing area, two redevelopment alternatives have been considered for reuse. Alternative 1 consists of disposal of a portion of the property by conveyance to the Bucks County Redevelopment Authority (BCRDA), demolition of a portion of the existing units, and redevelopment with a maximum build-out of 113 housing units; a proposed conveyance of a portion of the property to the Township of Warminster for use as public open space and development of storm water management basins; and transfer of 20 townhouses by a homeless conveyance for use as transitional housing for individuals and families recovering from substance abuse. Alternative 2 is the same as Alternative 1 except that the portion of the property that would be conveyed to the BCRDA would be redeveloped at a higher density than under Alternative 1, with a maximum build-out of 166 housing units, all of which would be semi-detached duplex homes. The No Action Alternative for both the Jacksonville Road and Shenandoah Woods housing areas consists of the retention of the properties by the U.S. government in caretaker status.

In 2011, we conducted Phase I archaeological investigations at NAS JRB Willow Grove. A total of seven archaeological sites were identified: four at the Main Base property (Sites 36 Mg 0458, 36 Mg 0459, 36 Mg 0460, and 36 Mg 0461) and three at the Shenandoah Woods housing area (Sites 36 Bu 0427, 36 Bu 429, and 36 Bu 0430). No archaeological resources were identified at the Jacksonville Road housing area. Based on the results of the Phase I archaeological investigations, four of the seven archaeological sites were identified as potentially eligible for listing in the National Register of Historic Places (NRHP): Sites 36-MG-0459 and 36 Mg 0460 at the Main Base property (both multicomponent sites) and Sites 36 Bu 0427 and 36 Bu 0429 at the Shenandoah Woods housing area (both historic archaeological sites). The other three archaeological sites were identified as not NRHP-eligible (Sites 36 Mg 0458 and 36 Mg 0461 at the Main Base property, and Site 36 Bu 0430 at the Shenandoah Woods housing area), and no further archaeological investigations were recommended. The Pennsylvania State Historic Preservation Officer (SHPO) concurred with the NRHP-eligibility determinations for the archaeological resources.

The Pennsylvania SHPO requested confirmation that legally binding agreements to protect the NRHP-eligible archaeological resources are or would be in place with property recipients prior to disposal of the NAS JRB Willow Grove property. The Navy provided this confirmation to the Pennsylvania SHPO, indicating that deed restrictions and

5090
Ser BPMOE/14-091
February 20, 2014

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We are requesting your input to assist in the identification of any issues or concerns for cultural resources or historic properties within or in the vicinity of the proposed undertaking that may be affected by this undertaking. We are in the process of initiating consultation with federally recognized Indian tribes and other consulting parties, including representatives of local government and groups with an interest in historic preservation. Please also indicate whether you wish to participate in the Section 106 consultation for the proposed undertaking for NAS JRB Willow Grove.

If you have any questions concerning this request, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Horsham Preservation & Historic Association. In order to support our project timeline, we would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY S. PRESTON
Director

Enclosure: NAS JRB Willow Grove and the Jacksonville Road and Shenandoah Woods Housing Areas

Copy to:
NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-092
February 20, 2014

Mr. Douglas C. Dolan
Executive Director
Bucks County Historical Society
Mercer Museum, 84 South Pine Street
Doylestown, PA 18901

Dear Mr. Dolan:

The purpose of this letter is to initiate Section 106 consultation with the Bucks County Historical Society regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. This undertaking and its effects are being considered under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. The Navy has declared the former NAS JRB Willow Grove to be surplus property and recognizes that the Bucks County Historical Society may have an interest in the property affected by the proposed undertaking.

The proposed undertaking consists of the disposal (i.e., transfer out of federal ownership) of the former NAS JRB Willow Grove property, including the Main Base property, and its reuse in a manner consistent with the *NAS JRB Willow Grove Redevelopment Plan* (Redevelopment Plan) and the *Amendment and Supplement to: Redevelopment Plan and Homeless Assistance Submission*. As shown in enclosure 1, the surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The area of potential effects (APE) for the proposed undertaking consists of the areas within the boundaries of the surplus property.

At the Main Base property, three redevelopment alternatives and the No Action Alternative have been considered for reuse. Alternative 1, the Preferred Alternative, is the reuse of the property in accordance with the Redevelopment Plan and its Amendment, including mixed-use development, open space, and natural areas. The airfield and most installation facilities would be demolished. Alternative 2 consists of a higher density of residential development than under Alternative 1, a similar level of mixed-use development, and demolition of the airfield and most installation facilities. Alternative 3 includes commercial and mixed-use development, minimal residential development, and conversion of the military airfield to a general aviation airfield. The No Action Alternative is the retention of the former NAS JRB Willow Grove property by the U.S. government in caretaker status.

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February 20, 2014

At the Jacksonville Road housing area, redevelopment consists of disposal by a homeless conveyance to the Bucks County Housing Group (BCHG), demolition of the existing housing units, and construction of an office building. At the Shenandoah Woods housing area, two redevelopment alternatives have been considered for reuse. Alternative 1 consists of disposal of a portion of the property by conveyance to the Bucks County Redevelopment Authority (BCRDA), demolition of a portion of the existing units, and redevelopment with a maximum build-out of 113 housing units; a proposed conveyance of a portion of the property to the Township of Warminster for use as public open space and development of storm water management basins; and transfer of 20 townhouses by a homeless conveyance for use as transitional housing for individuals and families recovering from substance abuse. Alternative 2 is the same as Alternative 1 except that the portion of the property that would be conveyed to the BCRDA would be redeveloped at a higher density than under Alternative 1, with a maximum build-out of 166 housing units, all of which would be semi-detached duplex homes. The No Action Alternative for both the Jacksonville Road and Shenandoah Woods housing areas consists of the retention of the properties by the U.S. government in caretaker status.

In 2011, we conducted Phase I archaeological investigations at NAS JRB Willow Grove. A total of seven archaeological sites were identified: four at the Main Base property (Sites 36 Mg 0458, 36 Mg 0459, 36 Mg 0460, and 36 Mg 0461) and three at the Shenandoah Woods housing area (Sites 36 Bu 0427, 36 Bu 429, and 36 Bu 0430). No archaeological resources were identified at the Jacksonville Road housing area. Based on the results of the Phase I archaeological investigations, four of the seven archaeological sites were identified as potentially eligible for listing in the National Register of Historic Places (NRHP): Sites 36-MG-0459 and 36 Mg 0460 at the Main Base property (both multicomponent sites) and Sites 36 Bu 0427 and 36 Bu 0429 at the Shenandoah Woods housing area (both historic archaeological sites). The other three archaeological sites were identified as not NRHP-eligible (Sites 36 Mg 0458 and 36 Mg 0461 at the Main Base property, and Site 36 Bu 0430 at the Shenandoah Woods housing area), and no further archaeological investigations were recommended. The Pennsylvania State Historic Preservation Officer (SHPO) concurred with the NRHP-eligibility determinations for the archaeological resources.

The Pennsylvania SHPO requested confirmation that legally binding agreements to protect the NRHP-eligible archaeological resources are or would be in place with property recipients prior to disposal of the NAS JRB Willow Grove property. The Navy provided this confirmation to the Pennsylvania SHPO, indicating that deed restrictions and covenants with property recipients would provide for evaluative testing of the two potentially NRHP-eligible multi-component sites at Main Base and

5090
Ser BPMOE/14-092
February 20, 2014

the two potentially NRHP-eligible historic archaeological sites at the Shenandoah Woods housing area prior to any ground-disturbing activities. The Pennsylvania SHPO acknowledged receiving the information for deed restrictions and covenants without further comment.

In 2011, we also conducted architectural surveys and evaluations at the NAS JRB Willow Grove property. A majority of the architectural resources at the Main Base property and all of the architectural resources at the Shenandoah Woods housing area were determined to be not historically or architecturally significant and were recommended as not NRHP-eligible. Six ammunition magazines at Main Base property and the Jacksonville Road Housing area are NRHP-eligible, but the ACHP's 2004 and 2006 Program Comments for World War II and Cold War era ammunition storage facilities and Wherry housing, respectively, cover all compliance with preservation statutes, including compliance with Section 106 of the NHPA. The Pennsylvania SHPO concurred with the NRHP-eligibility determinations for architectural resources.

We are requesting your input to assist in the identification of any issues or concerns for cultural resources or historic properties within or in the vicinity of the proposed undertaking that may be affected by this undertaking. We are in the process of initiating consultation with federally recognized Indian tribes and other consulting parties, including representatives of local government and groups with an interest in historic preservation. Please also indicate whether you wish to participate in the Section 106 consultation for the proposed undertaking for NAS JRB Willow Grove.

If you have any questions concerning this request, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Bucks County Historical Society. In order to support our project timeline, we would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure: NAS JRB Willow Grove and the Jacksonville Road and Shenandoah Woods Housing Areas

Copy to:
NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-093
February 20, 2014

Ivyland Heritage Association
199 Pennsylvania Avenue
Ivyland, PA 19874

Dear Sir:

The purpose of this letter is to initiate Section 106 consultation with the Ivyland Heritage Association regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. This undertaking and its effects are being considered under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. The Navy has declared the former NAS JRB Willow Grove to be surplus property and recognizes that the Ivyland Heritage Association may have an interest in the property affected by the proposed undertaking.

The proposed undertaking consists of the disposal (i.e., transfer out of federal ownership) of the former NAS JRB Willow Grove property, including the Main Base property, and its reuse in a manner consistent with the *NAS JRB Willow Grove Redevelopment Plan* (Redevelopment Plan) and the *Amendment and Supplement to: Redevelopment Plan and Homeless Assistance Submission*. As shown in enclosure 1, the surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The area of potential effects (APE) for the proposed undertaking consists of the areas within the boundaries of the surplus property.

At the Main Base property, three redevelopment alternatives and the No Action Alternative have been considered for reuse. Alternative 1, the Preferred Alternative, is the reuse of the property in accordance with the Redevelopment Plan and its Amendment, including mixed-use development, open space, and natural areas. The airfield and most installation facilities would be demolished. Alternative 2 consists of a higher density of residential development than under Alternative 1, a similar level of mixed-use development, and demolition of the airfield and most installation facilities. Alternative 3 includes commercial and mixed-use development, minimal residential development, and conversion of the military airfield to a general aviation airfield. The No Action Alternative is the retention of the former NAS JRB Willow Grove property by the U.S. government in caretaker status.

At the Jacksonville Road housing area, redevelopment consists of disposal by a homeless conveyance to the Bucks County Housing Group (BCHG), demolition of the existing housing units, and construction of an office building. At the Shenandoah Woods housing area, two redevelopment alternatives have been considered for reuse. Alternative 1 consists of disposal of a portion of the property by conveyance to the Bucks County Redevelopment Authority (BCRDA), demolition of a portion of the existing units, and redevelopment with a maximum build-out of 113 housing units; a proposed conveyance of a portion of the property to the Township of Warminster for use as public open space and development of storm water management basins; and transfer of 20 townhouses by a homeless conveyance for use as transitional housing for individuals and families recovering from substance abuse. Alternative 2 is the same as Alternative 1 except that the portion of the property that would be conveyed to the BCRDA would be redeveloped at a higher density than under Alternative 1, with a maximum build-out of 166 housing units, all of which would be semi-detached duplex homes. The No Action Alternative for both the Jacksonville Road and Shenandoah Woods housing areas consists of the retention of the properties by the U.S. government in caretaker status.

In 2011, we conducted Phase I archaeological investigations at NAS JRB Willow Grove. A total of seven archaeological sites were identified: four at the Main Base property (Sites 36 Mg 0458, 36 Mg 0459, 36 Mg 0460, and 36 Mg 0461) and three at the Shenandoah Woods housing area (Sites 36 Bu 0427, 36 Bu 429, and 36 Bu 0430). No archaeological resources were identified at the Jacksonville Road housing area. Based on the results of the Phase I archaeological investigations, four of the seven archaeological sites were identified as potentially eligible for listing in the National Register of Historic Places (NRHP): Sites 36-MG-0459 and 36 Mg 0460 at the Main Base property (both multicomponent sites) and Sites 36 Bu 0427 and 36 Bu 0429 at the Shenandoah Woods housing area (both historic archaeological sites). The other three archaeological sites were identified as not NRHP-eligible (Sites 36 Mg 0458 and 36 Mg 0461 at the Main Base property, and Site 36 Bu 0430 at the Shenandoah Woods housing area), and no further archaeological investigations were recommended. The Pennsylvania State Historic Preservation Officer (SHPO) concurred with the NRHP-eligibility determinations for the archaeological resources.

The Pennsylvania SHPO requested confirmation that legally binding agreements to protect the NRHP-eligible archaeological resources are or would be in place with property recipients prior to disposal of the NAS JRB Willow Grove property. The Navy provided this confirmation to the Pennsylvania SHPO, indicating that deed restrictions and covenants with property recipients would provide for evaluative testing of the

5090
Ser BPMOE/14-093
February 20, 2014


two potentially NRHP-eligible multi-component sites at Main Base and the two potentially NRHP-eligible historic archaeological sites at the Shenandoah Woods housing area prior to any ground-disturbing activities. The Pennsylvania SHPO acknowledged receiving the information for deed restrictions and covenants without further comment.

In 2011, we also conducted architectural surveys and evaluations at the NAS JRB Willow Grove property. A majority of the architectural resources at the Main Base property and all of the architectural resources at the Shenandoah Woods housing area were determined to be not historically or architecturally significant and were recommended as not NRHP-eligible. Six ammunition magazines at Main Base property and the Jacksonville Road Housing area are NRHP-eligible, but the ACHP's 2004 and 2006 Program Comments for World War II and Cold War era ammunition storage facilities and Wherry housing, respectively, cover all compliance with preservation statutes, including compliance with Section 106 of the NHPA. The Pennsylvania SHPO concurred with the NRHP-eligibility determinations for architectural resources.

We are requesting your input to assist in the identification of any issues or concerns for cultural resources or historic properties within or in the vicinity of the proposed undertaking that may be affected by this undertaking. We are in the process of initiating consultation with federally recognized Indian tribes and other consulting parties, including representatives of local government and groups with an interest in historic preservation. Please also indicate whether you wish to participate in the Section 106 consultation for the proposed undertaking for NAS JRB Willow Grove.

If you have any questions concerning this request, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Ivyland Heritage Association. In order to support our project timeline, we would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY S. PRESTON
Director

Enclosure: NAS JRB Willow Grove and the Jacksonville Road and Shenandoah Woods Housing Areas

Copy to:
NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-094
February 20, 2014

Mr. Erik Fleischer
President, Craven Hall Historical Society, Inc.
P.O. Box 2042
Corner of Newtown and Street Roads
Warminster, PA 18974

Dear Mr. Fleischer:

The purpose of this letter is to initiate Section 106 consultation with the Craven Hall Historical Society, Inc. regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. This undertaking and its effects are being considered under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. The Navy has declared the former NAS JRB Willow Grove to be surplus property and recognizes that the Craven Hall Historical Society, Inc. may have an interest in the property affected by the proposed undertaking.

The proposed undertaking consists of the disposal (i.e., transfer out of federal ownership) of the former NAS JRB Willow Grove property, including the Main Base property, and its reuse in a manner consistent with the *NAS JRB Willow Grove Redevelopment Plan* (Redevelopment Plan) and the *Amendment and Supplement to: Redevelopment Plan and Homeless Assistance Submission*. As shown in enclosure 1, the surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The area of potential effects (APE) for the proposed undertaking consists of the areas within the boundaries of the surplus property.

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5090
Ser BPMOE/14-094
February 20, 2014

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If you have any questions concerning this request, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Craven Hall Historical Society, Inc. In order to support our project timeline, we would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure: NAS JRB Willow Grove and the Jacksonville Road and Shenandoah Woods Housing Areas

Copy to:
NAVFAC Atlantic (D. Cook)

HORSHAM TOWNSHIP



1025 HORSHAM ROAD

P: (215) 643-3131
F: (215) 643-0448

HORSHAM, PA 19044

www.horsham.org
horsham@horsham.org

February 28, 2014

Mr. Gregory Preston
Base Realignment and Closure
Program Management Office, Northeast
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Section 106 Consultation Relating to the Former NAS-JRB Willow Grove

Dear Mr. Preston:

Horsham Township acknowledges receipt of your letter dated February 20, 2014 relating to Section 106 consultation regarding the proposed disposal of surplus federal property at the former NAS-JRB Willow Grove.

We sincerely appreciate the information provided relating to the historic architectural and archaeological surveys conducted to date. We wish to participate in the National Historic Preservation Act Section 106 consultation process.

As the Township Manager of Horsham Township, I would be the point of contact for the Section 106 Consultation. Please feel free to contact me by phone at (215) 643-3131 or via email at wwalker@horsham.org.

Very truly yours,

William T. Walker
Township Manager

cc: Mark McCouch, President, Horsham Township Council
Mike McGee, Executive Director, Horsham Land Redevelopment Authority



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-113
April 3, 2014

Ms. Sherry White
Historic Preservation Officer
Stockbridge Munsee Community of Wisconsin
P.O. Box 70
N8476 Moh-He-Con-Nuck Road
1200 Commercial Street
Bowler, WI 54416

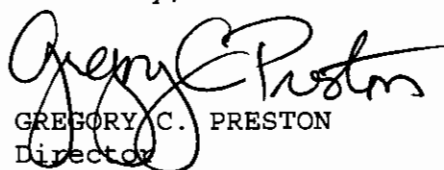
Dear Ms. White:

Responding to your request for additional information regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove, PA, the following reports are provided on the enclosed CD for your review:

- NAS JRB Willow Grove Redevelopment Plan, March 2012
- Phase 1 Archaeological Survey NAS JRB Willow Grove Report, August 2012
- Phase 1 Archaeological Survey NAS JRB Willow Grove Appendices, August 2012

If you have any questions, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Stockbridge Munsee Community of Wisconsin. In order to support our project timeline, the Navy would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure:
CD with Willow Grove PA Reports

Copy to:
NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-091
March 4, 2014

Mr. Peter J. Choate
Executive Director
Horsham Preservation & Historical Association
900 Governor Road
Horsham, PA 19044

Dear Mr. Choate:

The purpose of this letter is to initiate Section 106 consultation with the Horsham Preservation & Historical Association regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove. This undertaking and its effects are being considered under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. The Navy has declared the former NAS JRB Willow Grove to be surplus property and recognizes that the Horsham Preservation & Historical Association may have an interest in the property affected by the proposed undertaking.

The proposed undertaking consists of the disposal (i.e., transfer out of federal ownership) of the former NAS JRB Willow Grove property, including the Main Base property, and its reuse in a manner consistent with the *NAS JRB Willow Grove Redevelopment Plan* (Redevelopment Plan) and the *Amendment and Supplement to: Redevelopment Plan and Homeless Assistance Submission*. As shown in enclosure 1, the surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The area of potential effects (APE) for the proposed undertaking consists of the areas within the boundaries of the surplus property.

At the Main Base property, three redevelopment alternatives and the No Action Alternative have been considered for reuse. Alternative 1, the Preferred Alternative, is the reuse of the property in accordance with the Redevelopment Plan and its Amendment, including mixed-use development, open space, and natural areas. The airfield and most installation facilities would be demolished. Alternative 2 consists of a higher density of residential development than under Alternative 1, a similar level of mixed-use development, and demolition of the airfield and most installation facilities. Alternative 3 includes commercial and mixed-use development, minimal residential development, and conversion of the military airfield to a general aviation airfield. The No Action Alternative is the retention of the former NAS JRB Willow Grove property by the U.S. government in caretaker status.

At the Jacksonville Road housing area, redevelopment consists of disposal by a homeless conveyance to the Bucks County Housing Group (BCHG), demolition of the existing housing units, and construction of an office building. At the Shenandoah Woods housing area, two redevelopment alternatives have been considered for reuse. Alternative 1 consists of disposal of a portion of the property by conveyance to the Bucks County Redevelopment Authority (BCRDA), demolition of a portion of the existing units, and redevelopment with a maximum build-out of 113 housing units; a proposed conveyance of a portion of the property to the Township of Warminster for use as public open space and development of storm water management basins; and transfer of 20 townhouses by a homeless conveyance for use as transitional housing for individuals and families recovering from substance abuse. Alternative 2 is the same as Alternative 1 except that the portion of the property that would be conveyed to the BCRDA would be redeveloped at a higher density than under Alternative 1, with a maximum build-out of 166 housing units, all of which would be semi-detached duplex homes. The No Action Alternative for both the Jacksonville Road and Shenandoah Woods housing areas consists of the retention of the properties by the U.S. government in caretaker status.

In 2011, we conducted Phase I archaeological investigations at NAS JRB Willow Grove. A total of seven archaeological sites were identified: four at the Main Base property (Sites 36 Mg 0458, 36 Mg 0459, 36 Mg 0460, and 36 Mg 0461) and three at the Shenandoah Woods housing area (Sites 36 Bu 0427, 36 Bu 429, and 36 Bu 0430). No archaeological resources were identified at the Jacksonville Road housing area. Based on the results of the Phase I archaeological investigations, four of the seven archaeological sites were identified as potentially eligible for listing in the National Register of Historic Places (NRHP): Sites 36-MG-0459 and 36 Mg 0460 at the Main Base property (both multicomponent sites) and Sites 36 Bu 0427 and 36 Bu 0429 at the Shenandoah Woods housing area (both historic archaeological sites). The other three archaeological sites were identified as not NRHP-eligible (Sites 36 Mg 0458 and 36 Mg 0461 at the Main Base property, and Site 36 Bu 0430 at the Shenandoah Woods housing area), and no further archaeological investigations were recommended. The Pennsylvania State Historic Preservation Officer (SHPO) concurred with the NRHP-eligibility determinations for the archaeological resources.

The Pennsylvania SHPO requested confirmation that legally binding agreements to protect the NRHP-eligible archaeological resources are or would be in place with property recipients prior to disposal of the NAS JRB Willow Grove property. The Navy provided this confirmation to the Pennsylvania SHPO, indicating that deed restrictions and

5090
Ser BPMOE/14-091
March 4, 2014

covenants with property recipients would provide for evaluative testing of the two potentially NRHP-eligible multi-component sites at Main Base and the two potentially NRHP-eligible historic archaeological sites at the Shenandoah Woods housing area prior to any ground-disturbing activities. The Pennsylvania SHPO acknowledged receiving the information for deed restrictions and covenants without further comment.

In 2011, we also conducted architectural surveys and evaluations at the NAS JRB Willow Grove property. A majority of the architectural resources at the Main Base property and all of the architectural resources at the Shenandoah Woods housing area were determined to be not historically or architecturally significant and were recommended as not NRHP-eligible. Six ammunition magazines at Main Base property and the Jacksonville Road Housing area are NRHP-eligible, but the ACHP's 2004 and 2006 Program Comments for World War II and Cold War era ammunition storage facilities and Wherry housing, respectively, cover all compliance with preservation statutes, including compliance with Section 106 of the NHPA. The Pennsylvania SHPO concurred with the NRHP-eligibility determinations for architectural resources.

We are requesting your input to assist in the identification of any issues or concerns for cultural resources or historic properties within or in the vicinity of the proposed undertaking that may be affected by this undertaking. We are in the process of initiating consultation with federally recognized Indian tribes and other consulting parties, including representatives of local government and groups with an interest in historic preservation. Please also indicate whether you wish to participate in the Section 106 consultation for the proposed undertaking for NAS JRB Willow Grove.

If you have any questions concerning this request, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Horsham Preservation & Historical Association. In order to support our project timeline, we would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure: NAS JRB Willow Grove and the Jacksonville Road and Shenandoah Woods Housing Areas

Copy to:
NAVFAC Atlantic (D. Cook)



Delaware Tribe Historic Preservation Office

1200 Commercial St
Roosevelt Hall, RM 212
Emporia State University
Emporia, KS 66801
(620) 341-6699
bobermeyer@delawaretribe.org

March 4, 2014

Department of the Navy
Attn: Gregory C. Preston
Base Realignment and Closure
Program Management Office East
4911 South Broad Street
Philadelphia, PA 19112

Re: Disposal of Surplus Property at Willow Grove

Dear Gregory C. Preston,

Thank you for informing the Delaware Tribe on the proposed construction associated with the above referenced project. Our review indicates that there are no religious or culturally significant sites in the project area. As such, we defer comment to your office as well as to the State Historic Preservation Office and/or the State Archaeologist.

We wish to continue as a consulting party on this project and look forward to receiving a copy of the cultural resources survey report if one is performed. We also ask that if any human remains are accidentally unearthed during the course of the survey and/or the construction project that you cease development immediately and inform the Delaware Tribe of Indians of the inadvertent discovery.

If you have any questions, please feel free to contact this office by phone at (620) 341-6699 or by e-mail at bobermeyer@delawaretribe.org

Sincerely,

Brice Obermeyer
Delaware Tribe Historic Preservation Office
1200 Commercial St
Roosevelt Hall, RM 212
Emporia State University
Emporia, KS 66801

Snyder, Natasha B.

From: Butwin, Matthew
Sent: Thursday, March 06, 2014 10:25 AM
To: Snyder, Natasha B.
Cc: Farrell, Peggy
Subject: FW: Willow Grove
Attachments: image001.gif

FYI

-----Original Message-----

From: Preston, Gregory C CIV NAVFACHQ, BRAC PMO [<mailto:gregory.preston@navy.mil>]
Sent: Thursday, March 06, 2014 10:08 AM
To: Stephan, Tom CTR NAVFACHQ, BRAC PMO; Butwin, Matthew
Cc: Fielding, Thuane B CIV NAVFAC HQ, BRAC PMO
Subject: FW: Willow Grove

Forwarding an e-mail from the Delaware nation on consultation at Willow Grove.

v/r,

Greg

Gregory C. Preston
Director
BRAC Program Management Office East
4911 S. Broad Street
Building 679
Philadelphia, PA 19112

Phone: (215) 897-4909
Fax: (215) 897-4902
e-mail: gregory.preston@navy.mil

-----Original Message-----

From: Tamara Francis [<mailto:TFrancis@delawarenation.com>]
Sent: Thursday, March 06, 2014 9:32
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO
Subject: Willow Grove

Good Morning,

Thank you for contacting the Delaware Nation regarding this project the former NAS JRB Willow Grove closure and disposal. At this time we have no further information to provide. We do wish to consult on this project.

Please continue to contact our offices regarding this project.

Sincerely,

Mrs. Francis-Fourkiller

Cultural Preservation Director

The Delaware Nation

31064 State Highway 281

Anadarko, OK 73005

Phone: 405/247-2448

Fax: 405/247-8905

Stockbridge-Munsee Tribal Historic Preservation Office

Sherry White - Tribal Historic Preservation Officer
W13447 Camp 14 Road
P.O. Box 70
Bowler, WI 54416

Date 3/24/14
Project Number Ser BPMOE/14-085 / WILLOW GROVE NAS JRB
TCNS Number _____
Company Name Navy

We have received your letter for the above listed project. Before we can process the request we need more information. The additional items needed are checked below.

Additional Information Required:

- Site visit by Tribal Historic Preservation Officer
 - Archeological survey, Phase 1
 - Colored maps
 - Pictures of the site
 - Any reports the State Historic Preservation Office may have
 - Review fee of \$300.00 must be included with letter
 - Has site been previously disturbed, please explain what the use was and when it was disturbed
 - Please send "NAS JRB Willow Grove Redevelopment Plan"
- After reviewing your letter:

- We are in the process of gathering more information on this site and will respond to your project request once all information has been gathered.
- This project has the potential to affect a Mohican cultural site, please contact us
- This project is not within Mohican area of interest
- This project is within Mohican territory, but we are not aware of any cultural site within the project area.

Additional comments

Thank you for your letter dated Feb. 20 2014 informing us of this project. However we need more information on the project plans and archeological history to properly assess the potential impact to any Mohican cultural materials. When these reports are received from your office we will respond. Thank you!

Should this project inadvertently uncover a Native American site, we require you to halt all construction and notify the Stockbridge-Munsee Tribe immediately.

Please do not resubmit projects for changes that are not ground disturbance

S. Hantley for S. White
Sherry White, Tribal Historic Preservation Officer



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-115
April 9, 2014

Mr. Bruce Obermeyer
Director
Delaware Tribe Historic Preservation Office
Delaware Tribe of Indians
Roosevelt Hall, Room 212
1200 Commercial Street
Emporia, KS 66801

Dear Mr. Obermeyer:

Responding to your request for additional information regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove, PA, the following reports are provided on the enclosed CD for your review:

- Architectural Assessment and National Register of Historic Places Evaluation of Above-ground Navy-owned Resources Located at NAS JRB Willow Grove, PA, November 2011
- Historic Architectural Survey of Select Facilities at NAS JRB Willow Grove, PA and Off-Base Housing Enclaves, November 2011
- Phase 1 Archaeological Survey NAS JRB Willow Grove Report, August 2012
- Phase 1 Archaeological Survey NAS JRB Willow Grove Appendices, August 2012

If you have any questions, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Delaware Tribe of Indians. In order to support our project timeline, the Navy would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure:
CD with NAS JRB Willow Grove, PA Reports

Copy to:
NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-119
April 16, 2014

Mr. Bruce Obermeyer
Director
Delaware Tribe Historic Preservation Office
Delaware Tribe of Indians
Roosevelt Hall, Room 212
1200 Commercial Street
Emporia, KS 66801

Dear Mr. Obermeyer:

Responding to your request for additional information regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove, PA, the enclosed revised CD is provided to replace the CD previously sent for your review.

If you have any problems with this CD, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Delaware Tribe of Indians. In order to support our project timeline, the Navy would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure:
Revised CD with NAS JRB Willow Grove, PA Reports

Copy to:
NAVFAC Atlantic (D. Cook)



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-120
April 16, 2014

Ms. Sherry White
Historic Preservation Officer
Stockbridge Munsee Community of Wisconsin
P.O. Box 70
N8476 Moh-He-Con-Nuck Road
1200 Commercial Street
Bowler, WI 54416

Dear Ms. White:

Responding to your request for additional information regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove, PA, the enclosed revised CD is provided to replace the CD previously sent for your review.

If you have any problems with this CD, please contact Mr. Tom Stephan at (215) 897-4916. We look forward to successful consultation and coordination with the Stockbridge Munsee Community of Wisconsin. In order to support our project timeline, the Navy would appreciate receiving your input within 30 calendar days of your receipt of this letter.

Sincerely,


GREGORY C PRESTON
Director

Enclosure:
Revised CD with NAS JRB Willow Grove, PA Reports

Copy to:
NAVFAC Atlantic (D. Cook)

Stockbridge-Munsee Tribal Historic Preservation Office

Bonney Hartley – Tribal Historic Preservation Assistant

W13447 Camp 14 Road

P.O. Box 70

Bowler, WI 54416

Gregory Preston
Director
Department of the Navy
Base Realignment and Closure
Program Management Office East
4911 S. Broad St
Philadelphia P A 19112-1303

May 7, 2014

**RE: 5090 Ser BPMOE/14-120 Naval Air Station Joint Reserve Base
WILLOW GROVE, PA**

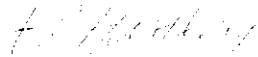
Dear Mr. Preston:

Thank you for sending us the additional information regarding the proposed disposal of surplus property associated with the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove, PA.

We have reviewed the materials on the CD and have determined that we do not have cultural resource concerns with this project and do not have an interest in being involved in the surplus property. Therefore, we can successfully close our involvement in the Section 106 process.

Thank you for engaging us in consultation on this project.

Kind regards,



Bonney Hartley
Tribal Historic Preservation Assistant

Snyder, Natasha B.

From: Brice Obermeyer <bobermeyer@delawaretribe.org>
Sent: Thursday, May 29, 2014 4:40 PM
To: Cook, Darrell E CIV NAVFAC LANT, EV
Subject: Re: Section 106 Consultation for BRAC Willow Grove, Pennsylvania

Hi Darrell,

Thank you for double checking with us about the Willow Grove project. We do have the survey reports and we have no questions or concerns about the survey or the undertaking. We do wish to stay informed about the project as it moves forward but do not anticipate any objections unless there is an inadvertent discovery of human remains.

Best Wishes,

Brice Obermeyer

Delaware Tribe Historic Preservation Office

Roosevelt Hall, Rm 212

1200 Commercial St.

Emporia, KS 66801

"Cook, Darrell E CIV NAVFAC LANT, EV" <darrell.e.cook@navy.mil> , 5/28/2014 2:54 PM:
Good afternoon, Brice.

I am assisting the BRAC office with the Section 106 consultation at our Navy location in Willow Grove, Pennsylvania. On March 4, 2014, you requested to continue as a consulting party on this undertaking, and you requested copies of survey reports. BRAC provided the requested materials in April (I apologize for the typo on your name in the two Navy letters).

I am writing today, to see if you have been able to review the reports, and if you have any concerns or questions regarding the surveys, or the undertaking. The Navy is hoping to make an effect determination soon, and we want to make sure we capture all concerns before moving forward. Should we expect a formal response by letter?

I am available by phone tomorrow and Friday of this week at 757-322-4282, or you may reply to this email.

Thank you,

Darrell E. Cook, M.A.
Architectural Historian
NAVFAC Atlantic, EV54
6506 Hampton Boulevard
Norfolk, Virginia 23508
757.322.4282, DSN 262



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-156
June 11, 2014

Mr. Douglas C. McLearen
Chief, Division of Archaeology and Protection
Bureau for Historic Preservation
Pennsylvania Historical and Museum Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Dear Mr. McLearen:

SUBJECT: SECTION 106 EFFECT DETERMINATION FOR THE BRAC UNDERTAKING AT
THE FORMER NAVAL AIR STATION JOINT RESERVE BASE WILLOW
GROVE, BUCKS AND MONTGOMERY COUNTIES ER# 1993-1228-091-GG

The Navy requests your concurrence on the effect determination, and provides supporting information regarding the disposal of the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove, as surplus property, in accordance with Public Law 101-510, the Defense Base Closure and Realignment Act of 1990, as amended in 2005 (BRAC Law). The Navy, under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing regulations at 36 CFR Part 800, considered the effects of the former NAS JRB Willow Grove's disposal under the BRAC Law.

Identification of Historic Properties:

In prior correspondence, the Navy consulted with the Pennsylvania Historical and Museum Commission (PHMC) regarding the proposed undertaking and the National Register of Historic Places (NRHP)-eligibility of archaeological and built resources identified as part of the BRAC project at the former NAS JRB Willow Grove. The area of potential effects (APE) includes the transfer areas at the Main Base and the housing areas at Shenandoah Woods and Jacksonville Road. Enclosure (1) contains previous consultation documents on the NRHP-eligibility of cultural resources at the former NAS JRB Willow Grove.

The Navy conducted archaeological investigations and architectural surveys, which resulted in a focus on four potentially eligible archaeological sites: Sites 36 Mg 0459 and 36 Mg 0460 at the Main Base; and Sites 36 Bu 0427 and 36 Bu 0429 at the Shenandoah Woods housing area. The PHMC concurred with the comprehensive NRHP-eligibility recommendations for archaeological and architectural resources.

The Navy also recommended evaluative testing for the four potentially NRHP-eligible archaeological sites, to assess their eligibility status, and indicated that such evaluation would be

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June 11, 2014

completed by recipients of the properties containing the sites. The Navy provided an example covenant regarding measures to maintain and protect the NRHP-eligible resources at the former NAS JRB Willow Grove, which would serve as a deed restriction for property recipients. Enclosure (2) contains correspondence between the Navy and the PHMC detailing the example covenant for protection of sites and consultation on archaeological matters at the former NAS JRB Willow Grove.

Consultation Summary:

In fulfillment of Section 106 of the NHPA, the Navy provided information about the known cultural resources and the planned BRAC undertaking at NAS JRB Willow Grove to at least 11 consulting parties and the public, through direct correspondence and the NEPA process, and asked for their participation in the consultation process. After receiving detailed information about the cultural resources surveys, the Stockbridge-Munsee Community of Wisconsin indicated that they did not wish to participate in additional Section 106 consultation. The Delaware Nation, Oklahoma, the Delaware Tribe of Indians, and Horsham Township requested that the Navy continue to include them in the consultation. During consultation, the tribes requested notification of any unanticipated discoveries of human remains. The Navy invited the participation of eight additional consulting parties, but the groups did not indicate a desire to consult.

Determination of Effect:

In order to facilitate your consideration of the Navy's finding of effect, the body of this letter and enclosure (3) present a summary of information regarding the proposed disposal and reuse of the former NAS JRB Willow Grove property, pursuant to Section 106 of the NHPA. The surplus property associated with the former NAS JRB Willow Grove includes: the Main Base in Horsham Township, Montgomery County; the Jacksonville Road housing area in Ivyland Borough, Bucks County; and the Shenandoah Woods housing area in Warminster Township, Bucks County, Pennsylvania. The APE for the proposed undertaking consists of the areas within the boundaries of the surplus property.

Section 106 of the NHPA states that the, "Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure the long-term preservation of the property's historic significance," will result in an adverse effect determination for such an undertaking. In order to avoid adverse effects, the Navy, in previous correspondence, proposed to transfer the former NAS JRB Willow Grove property to the grantee (the Horsham Land Redevelopment Authority [HLRA]), with a covenant that stipulates consultation and preservation measures for

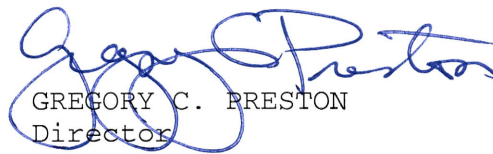
5090
Ser BPMOE/14-156
June 11, 2014

the archaeological sites after transfer. Enclosure (2) details the covenant and consultation with your office on this solution.

Based on the nature of the historic resources, the proposed undertaking, and implementation of the conditions listed above, the Navy has determined that the transfer of the former NAS JRB Willow Grove property out of federal ownership will result in a finding of no adverse effect. The Navy invites you to concur with this finding, within 30 days after your receipt of this letter. Upon concurrence, the Navy will notify the HLRA, Horsham Township, the Advisory Council on Historic Preservation (ACHP), the Delaware Nation, Oklahoma and the Delaware Tribe of Indians (federally recognized tribes) of the concurrence on effect and the conclusion of the Section 106 process.

Thank you for your assistance throughout the Section 106 process for the BRAC undertaking at the former NAS JRB Willow Grove. Please contact Mr. Tom Stephan at (215) 897-4916, or tom.stephan.ctr@navy.mil with any additional questions or concerns.

Sincerely,


GREGORY C. PRESTON
Director

Enclosures:

1. Previous Consultation on the NRHP-Eligibility of Cultural Resources at the Former NAS JRB Willow Grove
2. Previous Correspondence on an Example Covenant
3. Summary of Proposed Disposal and Reuse of the Former NAS JRB Willow Grove

Copy to:

NAVFAC Atlantic (D. Cook)
NAVFAC Midlant (H. McDonald)
Horsham Land Redevelopment Authority (HLRA)
Horsham Township
Advisory Council on Historic Preservation (ACHP)
Delaware Nation, Oklahoma
Delaware Tribe of Indians

Williams, Nicole L.

From: Stephan, Tom CTR NAVFACHQ, BRAC PMO <tom.stephan.ctr@navy.mil>
Sent: Wednesday, July 09, 2014 2:08 PM
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO; Fielding, Thuane B CIV NAVFAC HQ, BRAC PMO; Lin, Willie CIV NAVFAC HQ, BRAC PMO; Butwin, Matthew; Zamorski, Stephanie CIV NAVFACHQ, BRAC PMO; Preston, Elaine M CIV NAVFACHQ, BRAC PMO; Snyder, Natasha B.; Cook, Darrell E CIV NAVFAC LANT, EV
Subject: FW: Naval Air Station Joint Reserve Base Willow Grove

FYI.

I will work with Matt to get the documents to Blair.

Vr-tom

-----Original Message-----

From: Temple University Archaeology [<mailto:temple@delawaretribe.org>]
Sent: Monday, July 07, 2014 8:59 PM
To: Stephan, Tom CTR NAVFACHQ, BRAC PMO
Subject: Naval Air Station Joint Reserve Base Willow Grove

Mr. Stephan,

My name is Blair Fink, and I have recently been hired by the Delaware Tribe of Indians to conduct Section 106 consultations. We have received your packet of information regarding the above referenced project. I have a few questions pertaining to the proposed project. Could you please send electronic copies of the survey reports that identified the four potentially eligible archaeological sites? How will the locations of these sites be protected during the land transfer? Under the proposed alternatives for each site, will the archaeological sites be incorporated into open space or will they be impacted by future construction based on the plans available to the Navy? This additional information would be greatly appreciated. We appreciate your cooperation in this matter and look forward to hearing your responses soon.

Sincerely,

Blair Fink
Delaware Tribe Historic Preservation Representatives Department of Anthropology Gladfelter Hall, Rm. 207 Temple University
1115 W. Polett Walk
Philadelphia, PA 19122
temple@delawaretribe.org
(609) 220-1047

This electronic message contains information from the Delaware Tribe of Indians that may be confidential, privileged or proprietary in nature. The information is intended solely for the specific use of the individual or entity to which this is addressed. If you are not the intended recipient of this message, you are notified that any use, distribution, copying, or disclosure of this communication is strictly prohibited. If you received this message in error, please notify the sender then delete this message.



Delaware Tribe Historic Preservation Representatives
Department of Anthropology
Gladfelter Hall
Temple University
1115 W. Polett Walk
Philadelphia, PA 19122
temple@delawaretribe.org

July 17, 2014

Department of the Navy
Base Realignment and Closure
Program Management Office East
Attn: Tom Stephan
4911 South Broad Street
Philadelphia, PA 19112

Re: BRAC Closure of Naval Air Station Joint NAS JRB Willow Grove

Dear Tom Stephan,

Thank you for notifying the Delaware Tribe of the plans for the above referenced project. Our review indicates that there are no religious or culturally significant sites in this project area and we have no objection to the proposed project. We defer further comment to your office.

We wish to continue as a consulting party on this project if Phase II surveys are conducted after the land transfer. We ask that if any human remains are accidentally unearthed during the course of the project that you cease development immediately and inform the Delaware Tribe of Indians of the inadvertent discovery.

If you have any questions, feel free to contact this office by phone at (609) 220-1047 or by e-mail at temple@delawaretribe.org.

Sincerely,

Blair Fink
Delaware Tribe Historic Preservation Representatives
Department of Anthropology
Gladfelter Hall
Temple University
1115 W. Polett Walk
Philadelphia, PA 19122



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

July 21, 2014

Department of the Navy
Base Realignment and Closure
Program Management Office East
Attn: Gregory C. Preston, Director
4911 South Broad Street
Philadelphia, PA 19112-1303

RE: ER# 1993-1228-091-KK
Section 106 Effect Determination for the
BRAC Undertaking at the Former Naval
Air Station Joint Reserve Base (NAS JRB)
Willow Grove, Bucks and Montgomery
Counties

Dear Mr. Preston:

The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. Our comments are as follows:

Based on the deed restrictions and covenants that have been developed for archaeological sites 36MG0459, 36 MG 0460, 36BU0427 and 36BU0429, we concur with your determination that the transfer of the former NAS JRB Willow Grove property out of federal ownership will result in a finding of no adverse effect.

Please provide a copy of the signed transfer agreement, including the deed restrictions and covenants, between GOVERNMENT (Department of the Navy) and the GRANTEE (Horsham Land Redevelopment Authority) for our project file. We appreciate your cooperation.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology and Protection



Pennsylvania Historical & Museum Commission

Tom Corbett, Governor • Andrew E. Masich, Chairman • James M. Vaughan, Executive Director



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-183
July 22, 2014

Ms. Barbara Rudnick
U.S. Environmental Protection Agency Region III
1650 Arch Street
Philadelphia, PA 19106

Dear Ms. Rudnick:

Thank you for your agency review and comment on the Draft Environmental Impact Statement (DEIS) for the Disposal and Reuse of the former Naval Air Station Joint Reserve Base (NASJRB) Willow Gove, Horsham, PA dated February 10, 2014, and your input at our review meeting on May 20, 2014. We have incorporated your comments in the attached enclosure that include the following sections: Environmental Management, Traffic and Environmental Justice. Revisions to the text are highlighted.

We would appreciate your comments by July 31, 2014. If you have any questions, please do not hesitate to contact Mr. Tom Stephan at (215) 897-4916.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure:

CD with Revised Sections of the DEIS for the Disposal and Reuse of the former NASJRB Willow Grove, Horsham, PA

Williams, Nicole L.

From: Stephan, Tom CTR NAVFACHQ, BRAC PMO <tom.stephan.ctr@navy.mil>
Sent: Monday, August 11, 2014 9:59 AM
To: Butwin, Matthew
Subject: FW: Willow Grove -- Comments on Preliminary FEIS
Attachments: Willow Grove Preliminary Responses from Navy 7-2014.docx

Some of EPA's comments.

-----Original Message-----

From: Delgrosso, Karen [<mailto:Delgrosso.Karen@epa.gov>]
Sent: Friday, August 08, 2014 3:58 PM
To: Stephan, Tom CTR NAVFACHQ, BRAC PMO
Cc: Rudnick, Barbara; Delgrosso, Karen
Subject: Willow Grove -- Comments on Preliminary FEIS

Hi Tom,

Attached are EPA's comments on the Environmental Justice and Transportation sections. Comments on the Environmental Management section will be forthcoming next week.

Thank you for the opportunity to review.

Karen

Karen DelGrosso

U.S. EPA Region III (3EA30)

1650 Arch Street

Philadelphia, PA 19103

215-8142765

delgrosso.karen@epa.gov

Socioeconomics and Environmental Justice

Table 3.2-15 Environmental Justice Population Characteristics, would be more useful if it contained the state demographics for comparison, and the characteristics of the targeted study area.

Please highlight all values that exceed the benchmark values in Table 4.2-5 Environmental Justice Demographic Data, by Block Group, under Alternative 1

Please highlight all values that exceed the benchmark values in Table 4.2-6 Environmental Justice Economic Data – Population Below Poverty Level, by Census Tract, under Alternative 1

A more thoughtful discussion of the potential impacts associated with the activities related to this project would be helpful. Impacts related to the construction of homes, truck traffic, noise, dust, vibration, transportation, and other activities comprehensively impacting the residents of the study area.

Please be sure that Block Groups exceeding benchmarks are correctly listed in the document. The Tables and text should be in agreement.

Page 15-16 states, “According to DVRPC projections for the period from 2010 to 2030, total population in the township is expected increase by approximately 17.1 percent, or by nearly 5,500 residents, to 30,614 residents (DVRPC 2012a).” Please insert the word “to” after the word expected.

Transportation

Although some of what EPA requested has been added, it is uncertain as to how it has been translated into the cumulative section of the FEIS. Also, it is not clear what the potential natural/community adverse impacts are that may occur from the required mitigation measures. EPA anticipates a more comprehensive transportation component will be addressed in the cumulative impact analysis which was not provided for our review even though specific suggestions were made in our Technical Comments documents on the DEIS. Although the preferred alternative will likely have unavoidable and significant transportation impacts; the new information does not change this, but makes it slightly better documented.

Environmental Management

Comments forthcoming.

Williams, Nicole L.

From: Stephan, Tom CTR NAVFACHQ, BRAC PMO <tom.stephan.ctr@navy.mil>
Sent: Monday, August 18, 2014 11:03 AM
To: Cummins, John M CIV NAVFAC SW; Butwin, Matthew; Lin, Willie CIV NAVFAC HQ, BRAC PMO; Rugh, James L CIV NAVFAC HQ, BRAC PMO; Schy, Martin NAVFAC HQ, BRAC PMO
Cc: Preston, Gregory C CIV NAVFACHQ, BRAC PMO; Fielding, Thuane B CIV NAVFAC HQ, BRAC PMO; Preston, Elaine M CIV NAVFACHQ, BRAC PMO; Zamorski, Stephanie CIV NAVFACHQ, BRAC PMO
Subject: FW: Comments on the Final EIS for NAS JRB Willow Grove

Team,

EPA comments received, we will discuss tomorrow on our conference call.

vr-tom

-----Original Message-----

From: Delgrosso, Karen [<mailto:Delgrosso.Karen@epa.gov>]
Sent: Thursday, August 14, 2014 11:25 AM
To: Stephan, Tom CTR NAVFACHQ, BRAC PMO
Cc: Rudnick, Barbara; Leipert, Mark; Delgrosso, Karen
Subject: FW: Comments on the Final EIS for NAS JRB Willow Grove

Tom,

As requested, below are EPA's comments on the Environmental Management section.

Thank you for the opportunity to review. If you have questions, do not hesitate to contact me or Mark Leipert (215-814-3341).

Karen

Karen DelGrosso

U.S. EPA, Region III (3EA30)

1650 Arch Street

Philadelphia, PA 19103

215-814-2765

delgrosso.karen@epa.gov

Environmental Management

1. Based on recent concerns with PFOS and PFOAs at NAS JRB Willow Grove, testing is recommended at the locations of the aboveground storage tanks (AST) which were used to store AFFF (Buildings 80, 177, 183, 650 and 681 are all potential source areas).
2. Page 11, Section 3.5.3.8, Pesticides, first paragraph: Please explain what happened to the Pest Management Plan for NAS JRB Willow Grove prior to 2001? The Base was required to keep the records of pesticide use. In the 1990's the Public Works Office maintained these records.
3. Page 12, Section 3.5.3.9, Potential Radioactive Materials Sites: Please spell out the acronym for AEC and include it in the List of Acronyms.
4. Figure 4-3, depicts the locations of ASTs: Please add this figure to the List of Figures.
5. Page 18, Table 3.5-6, IRP Sites Associated with the Former NAS JRB Willow Grove Property: Site 1 - Privet Road Compound, third column, add to "Current Status" that the Air Force is also sampling some additional monitoring wells to help close out the site.
6. Page 18, Table 3.5-6, IRP Sites Associated with the Former NAS JRB Willow Grove Property: Site 5 - Fire Training Area, add to "Brief Description" the newest contaminant of concern, Perfluorinated Compounds.
7. Page 18, Table 3.5-6, IRP Associated with the Former NAS JRB Willow Grove Property: Site 8, Building 118 Abandoned Fuel Tank, under the "Brief Description" column, it states, "Soils around the tank did not indicate the presence of released materials." Please state whether samples were taken and analyzed.
8. Page 21, Section 4.5, Environmental Management, fourth paragraph: Spell out the acronym for "ICs" and include in the List of Acronyms.
9. Page 22, paragraph 4, last sentence: add "at this time". The sentence should read: The HLRA has not requested that any property be transferred under the early transfer process at this time.

10. Page 25 states, "As discussed in Section 3.5.3.8, documentation on the use and storage of pesticides and herbicides at the installation prior to 2001 was unavailable." See above comment (2) and explain why the documentation for pesticide and herbicide use and storage is unavailable prior to 2001?

11. Table 4.5-1, IRP Site Impacts under Alternative 1, "Potential Impact" column, Site 12, add "According to geophysics there is debris buried in place." Discuss the need to dispose of this debris.

12. Page 28, Section 4.5.1.2 Environmental Restoration Program, Reuse Constraints from VOC-Contaminated Groundwater: add new information for Site 5 PFOS/PFOA contaminants of concern and restrictions.

13. Page 32, Section 4.5.2.1, Potential Radioactive Materials Sites, sentence four, add potential for "radioactive" contamination. The sentence should read: "Under Alternative 2, eight sites (Buildings 20, 23, 29, 80, 118, and 680 and IRP sites 3 and 12) of the nine sites with a "likely" or "unknown" potential for radioactive contamination would be located in areas designated as golf course, ground floor retail, hotel/conference center, office park, open space, park, roads/plazas, or town center."

14. Page 33, Table 4.5-2, IRP Site Impacts under Alternative 2, third column - "Potential Impact": Sites 3 and 12: add "subsurface debris" see Geophysics.

15. Page 35, 4.5.3.1 Hazardous Waste and Materials, Potential Radioactive Materials Sites, sentence three, add potential for "radioactive" contamination. The sentence should read: Under Alternative 3, eight sites (Buildings 20, 23, 29, 80, 118, and 680 and IRP sites 3 and 12) of the nine sites with a "likely" or "unknown" potential for radioactive contamination would be located in areas designated as airfield, airfield operations, golf course, hotel/conference center, office park, open space, park, or roads/parking."

16. Page 40, Table 4.5-3, IRP Site Impacts under Alternative 3, the third column -"Potential Impact": Sites 3 and 12, add the need to be aware of subsurface debris as shown in Geophysical Investigation.



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-182
July 22, 2014

Mr. Francis Hanney
PA Department of Transportation
Engineering District 6-0
7000 Geerdes Boulevard
King of Prussia, PA 19406-1525

Dear Mr. Hanney:

Thank you for your agency review and comment on the Draft Environmental Impact Statement (DEIS) for the Disposal and Reuse of the former Naval Air Station Joint Reserve Base (NASJRB) Willow Grove, Horsham, PA dated February 6, 2014 and your input during our conference call on May 15, 2014. We have incorporated your comments in the attached Traffic section. Revisions to the text are highlighted.

We would appreciate your comments by July 31, 2014. If you have any questions, please do not hesitate to contact Mr. Tom Stephan at (215) 897-4916.

Sincerely,


GREGORY C. PRESTON
Director

Enclosure:

CD with Revised Traffic Section of the DEIS for the Disposal and Reuse of the Former NASJRB Willow Grove, Horsham, PA

Williams, Nicole L.

From: Hanney, Francis J. <FHANNEY@pa.gov>
Sent: Wednesday, August 06, 2014 2:27 PM
To: Butwin, Matthew
Cc: Stephan, Tom CTR NAVFACHQ, BRAC PMO
Subject: RE: NAS JRB Willow Grove EIS comments

I apologize for the delay. The revised study is acceptable and we have no further comments. Thank you for making the requested changes. We do hope this will give the planners and decision makers insight on the challenges ahead. Will we get a formal final copy?

-----Original Message-----

From: Butwin, Matthew [<mailto:MButwin@ene.com>]
Sent: Wednesday, August 06, 2014 10:47 AM
To: Hanney, Francis J.
Cc: Stephan, Tom CTR NAVFACHQ, BRAC PMO
Subject: RE: NAS JRB Willow Grove EIS comments

Good morning Fran -

I wanted to touch base on the Willow Grove BRAC EIS and see if you had any questions on your review of the sections we supplied in late July.
I am available to discuss, if needed.

Thank you ,
Regards,
Matt

-----Original Message-----

From: Hanney, Francis J. [<mailto:FHANNEY@pa.gov>]
Sent: Wednesday, July 23, 2014 4:13 PM
To: Butwin, Matthew
Cc: Stephan, Tom CTR NAVFACHQ, BRAC PMO
Subject: RE: NAS JRB Willow Grove EIS comments

Thank you for making the changes and incorporating the concepts and concerns we had stated during our May conference call. We will review and get back to you by the 31st or sooner.

-----Original Message-----

From: Butwin, Matthew [<mailto:MButwin@ene.com>]
Sent: Wednesday, July 23, 2014 1:56 PM
To: Hanney, Francis J.
Cc: Stephan, Tom CTR NAVFACHQ, BRAC PMO
Subject: RE: NAS JRB Willow Grove EIS comments

Mr. Hanney -

To follow-up on Tom's e-mail, I am also attaching PennDOT's original comments on the Navy's Draft EIS along with the proposed responses.

V/R,
Matt

-----Original Message-----

From: Stephan, Tom CTR NAVFACHQ, BRAC PMO [<mailto:tom.stephan.ctr@navy.mil>]

Sent: Wednesday, July 23, 2014 11:28 AM

To: Hanney, Francis J.

Cc: Butwin, Matthew

Subject: RE: NAS JRB Willow Grove EIS comments

Mr. Hanney,

Thank you for your review and comments on the Draft Environmental Impact Statement (DEIS) for the Disposal and Reuse of the former Naval Air Station Joint Reserve Base (NASJRB) Willow Grove, Horsham, PA dated February 6, 2014 and your input during our conference call on May 15, 2014. We have incorporated your comments in the attached Traffic section. Revisions to the text are highlighted.

Attached is the updated traffic section for the EIS NAS JRB Willow Grove and the original PennDOT comments.

We would appreciate your comments by July 31, 2014. If you have any questions, please do not hesitate to me at (215) 897-4916.

Vr-tom

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Message scanned by the Symantec Email Security service. If you suspect that this email is actually spam, please send it as an ATTACHMENT to spamsample@message labs.com

From: Corey Smith [<mailto:CSmith@delawarenation.com>]

Sent: Tuesday, August 19, 2014 9:42 AM

To: Stephan, Tom CTR NAVFACHQ, BRAC PMO

Subject: BRAC Undertaking at Former Naval Air Station Joint Reserve Base Willow Grove, Bucks and Montgomery Counties ER# 1993-1228-091-GG

Description: Description: Description: Description: Description: Description: Large Embossed Turtle with TM.jpg

Delaware Nation	EC
Corey Smith	TA
Assistant Director	ATA
	Director
	Supervisor
	Employee

Mr. Tom Stephan,

This e-mail is in regards to the BRAC Undertaking at Former Naval Air Station Joint Reserve Base Willow Grove, Bucks and Montgomery Counties ER# 1993-1228-091-GG. The Delaware Nation concurs with the finding.

Have a great day.

Thank you,

Corey Smith
Assistant Director
Delaware Nation Cultural Preservation
31064 State Highway 281
P.O. Box 825
Anadarko, OK 73005
Phone: (405) 247-2448
Fax: (405) 247-8905

Subject: FW: Willow Grove EIS
Attachments: FEIS for Willow Grove Naval Airbasesds (3)sds.docx

-----Original Message-----

From: Shamet, Stefania [<mailto:Shamet.Stefania@epa.gov>]

Sent: Thursday, December 11, 2014 2:40 PM

To: Cummins, John M CIV NAVFAC SW

Cc: Kier, Lori; Antoine, Ami

Subject: Willow Grove

John:

Thanks again for our discussion on Monday and for providing relevant policies and guidance documents. As we discussed, attached are EPA's requested bullet points. We believe that consideration in the NEPA document of the issues raised in the bullets would provide documentation that the Navy has made an informed decision as contemplated by NEPA regarding proposed transfer of the subject property. We do not believe that discussion of these bullets introduces the CERCLA process into the NEPA process.

While the attached bullets reference specific chapters of the Final EIS, we also believe that, in lieu of scattering revisions throughout the Final EIS, an appendix could be utilized as a locus for a full discussion of the PFCs issue. Indeed, use of an appendix might make the discussion more transparent to the public.

We hope and trust that the attached clarifies and narrows any remaining issues sufficiently to render a meeting unnecessary. To the extent there are remaining issues, we would be more than happy to discuss those by conference call at your and your clients' convenience. To the extent a meeting is scheduled, I believe you and I could both participate productively in any meeting by telephone.

Thanks again for your assistance. Please feel free to contact me by email or phone (work: 215-814-2682 ; cell: 609-254-1654) if you have any questions.

Regards,

Stefania D. Shamet

Senior Assistant Regional Counsel

USEPA Region III

We recognize and agree that NEPA, as a matter of law, does not apply to actions under CERCLA. We also acknowledge DOD policy to keep its CERCLA response separate from NEPA documentation. Nevertheless, it is equally clear that NEPA does apply to disposal decisions under BRAC. The decision regarding transfer of the government property should be informed by the condition of the site, the proposed reuse, and the relationship between the two, all of which should be elements presented in the NEPA document.

We appreciate that the significance and severity of issues related to PFCs became apparent only after the draft EIS had been through the public comment process. We also acknowledge that site investigation remains ongoing and that the Navy has not yet completed a preliminary assessment. Nevertheless we believe that additional detail regarding the potential presence of PFCs at the Site should be included in the Final EIS in order to document that the Navy has made an informed decision regarding site disposal. To that end, we believe that appropriate documentation under NEPA would include discussion of the following points. We do not believe any of the following introduces the CERCLA process into the NEPA process:

Chapter 3 (Affected Environment) should be expanded to include the following:

- Discussion of the current status of investigation at the site for radiological issues and PFCs
- Explanation of provisional health advisory levels and the risk associated with the levels.
- Discussion of levels in groundwater
- Discussion of potential for soil contamination and the potential for soil to be an on-going source of contamination to groundwater, and associated risk. This should include a statement that health advisory levels have not been established for soil and a discussion of exposure pathways. There should also be an explanation of acceptable levels of risk commensurate with type of land use e.g., industrial, residential, etc.

Chapter 4 (Environmental Consequences) should be expanded to include the following:

- While portions of Chapters 3 and 4 acknowledge that some alternatives will result in increased water demand, the discussion in those sections is limited to increased water demand in terms of quantity. Those sections do not acknowledge the complications introduced by the need to account for well and groundwater (and possibly soil) contamination from PFCs. By way of example, tables ES-1 and 2.2 and Sections 3.8 and 4.8.1.1 note the potential increased water demand, but do not address the complications in providing sufficient drinking water to meet anticipated demand associated with the discovery of PFCs and potential for well contamination. Effects of increased groundwater withdrawal on public water supply and treatment, the potential movement of the contaminant plume by the additional withdrawal, protection of the surrounding community's private drinking water wells, and the feasibility of meeting the

increased demand should be acknowledged and considered as part of informed decisionmaking under NEPA. Any effect on land reuse plan or plan to transfer should be considered. These complications deserve discussion to ensure that an informed decision is made.

- Any preliminary results should be included, including building surveys, spill records, plane crashes, etc; areas targeted for investigation. Spill areas and areas where fires were suppressed should be identified. These areas should be identified on a map to clearly show location relative to property transfer.
- A discussion identifying next steps in the investigation should be included either in Chapter 4 or Chapter 6, such as preparation of Preliminary Assessment (PA) or Remedial Investigation (RI). We are not suggesting any discussion of the PA or RI process specifically, rather a simple summary of intended next steps in the process to inform both decision-makers and the public as to what those next steps are likely to be.

Chapter 2 (Proposed Action and Alternatives) should include the following discussion points:

- Chapter 2 should clarify whether the preferred alternative contemplates transfer prior to completion of remediation, and the anticipated timing of any FOST. This discussion should address how any on-site source areas of PFC contamination that are part of land transfer could be handled and how they would be addressed in the transfer document.
- There should be an acknowledgment that the outcome of investigation, potential change in health advisory standards, etc. might affect land use, transfer, etc. Given the status of the investigation, Chapter 2 should include a statement that, if the outcome of the investigation ultimately results in use restrictions incompatible with that described in the preferred alternative, preparation of a Supplemental Environmental Impact Statement would be appropriate.
- Clearly state responsibilities of DOD (Navy, Air Force, Air National Guard) for assessment and cleanup (including surface or ground water, soils, on or off base, drinking water supply systems, individual wells, etc) either by describing the responsibility of each component or by reference to appropriate statutory authority for each (including as appropriate reference to sections of the DERP, CERCLA, etc).
- Chapter 4 appears to state an expectation that Horsham would be responsible for meeting increased water demand in terms of quantity. There is no discussion as to which entity (Horsham or DOD) would be responsible for meeting water demand complications arising from PFC contamination. That issue should be clarified.
- The document would benefit from an explanation of whether respective responsibilities for assessment, remediation, and long-term supply of drinking water would change upon transfer, and if so, how.
- The document would benefit from defining how the public will be able to communicate to DOD on project/issues for the long-term.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

February 19, 2015

Mr. Gregory C. Preston
Director
BRAC Program Management Office, East
4911 S. Broad Street
Building 679
Philadelphia, PA 19112

Re: Preliminary Final Environmental Impact Statement for the Disposal and Reuse of the Former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove, Horsham, PA

Dear Mr. Preston:

This letter is in response to the Environmental Protection Agency's (EPA) review of the Preliminary Final Environmental Impact Statement that was shared with EPA on February 6, 2015 (February 6, 2015 Preliminary FEIS). EPA appreciates the engagement that the Navy has offered and the effort put forward to address EPA's concerns regarding how issues related to the presence of Perfluorinated Compounds (PFCs) at the site would be addressed in the FEIS. We believe that the February 6, 2016 Preliminary FEIS greatly improves documentation of an informed decision by the Navy regarding the disposal and reuse of the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove, Horsham, Pennsylvania. The information provided in the February 6, 2015 Preliminary FEIS clarifies the status to date of sampling and investigation into the presence of PFCs at the site. The revisions also clarify that the contamination will be addressed and remediated through the CERCLA process. In addition, prior to the transfer or lease of the former NAS JRB Base Willow Grove property, the Navy will prepare a Finding of Suitability to Transfer (FOST) or Finding of Suitability to Lease (FOSL) and will forward these documents to the EPA for review. I would like to thank you and your staff for working in cooperation with our office to develop NEPA documentation that reflects an informed decision, specifically as it relates to the presence of PFCs at the former NAS JRB Willow Grove site.

As you prepare to release the Final Environmental Impact Statement, EPA would like to offer for your consideration the following suggestions to further enhance the FEIS. In addition to the information provided in the Preliminary FEIS on the FOST/FOSL process, it would be very helpful to describe more detail of the process (including what is entailed in the process and the level of information that can be expected in the FOST). It is also suggested that a



communication point-of-contact be designated and disclosed to address long-term questions that may arise from the public.

Please be aware that, while EPA has reviewed the February 6, 2015 Preliminary FEIS, EPA remains obligated to review the signed and published FEIS. At that time, we will send a more formal letter. Assuming the published FEIS will be nearly identical to the February 6, 2015 Preliminary FEIS that we have reviewed, we do not anticipate raising concerns or objections.

EPA appreciates your efforts in working with us to address issues that have significant potential to impact human health and the environment for future generations. If you have questions on this response, please feel free to contact Mrs. Karen DelGrosso of my staff at 215-814-2765 or email at delgrosso.karen@epa.gov.

Sincerely,



Jeffrey D. Lapp
Associate Director
Office of Environmental Programs

