

FINAL

**ENVIRONMENTAL ASSESSMENT
FOR BRAC 05 RECOMMENDATIONS FOR
CLOSURE, DISPOSAL, AND REUSE OF THE HORSHAM MEMORIAL
UNITED STATES ARMY RESERVE CENTER,
HORSHAM TOWNSHIP, PENNSYLVANIA
FAC ID PA046**



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February 2011



DRAFT FINDING OF NO SIGNIFICANT IMPACT

Environmental Assessment for BRAC 05 Recommendations for Closure, Disposal, and Reuse of the Horsham Memorial US Army Reserve Center, Horsham Township, Pennsylvania

FAC ID PA046

Pursuant to the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508) for implementing the procedural provisions of the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and 32 CFR 651 (Environmental Analysis of Army Actions), as well as policy and guidance provided by the *Base Realignment and closure Manual for Compliance with the National Environmental Policy Act*, the U.S. Army Corps of Engineers, Mobile District has prepared an Environmental Assessment (EA) of the potential environmental and socioeconomic effects associated with the closure, disposal, and reuse of the Horsham Memorial United States Army Reserve Center (USARC), Horsham, Pennsylvania.

PURPOSE AND NEED

On September 8, 2005, the Defense Base Closure and Realignment (BRAC) Commission recommended that the Department of Defense (DoD) close the Horsham Memorial USARC in Horsham, Pennsylvania; and relocate units to a new Armed Forces Reserve Center with organizational maintenance facility at Willow Grove Joint Reserve Base, Pennsylvania. This recommendation was approved by the President on September 23, 2005 and was forwarded to Congress, and on November 9, 2005, the recommendation became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended. The BRAC Commission made the following recommendations concerning the Horsham USARC, Horsham, Pennsylvania:

*Close the Reese United States Army Reserve Center in Chester, PA, the United States Army Reserve Organizational Maintenance Shop in Chester, PA, the Germantown Veterans Memorial United States Army Reserve Center in Philadelphia, PA, **the Horsham Memorial United States Army Reserve Center in Horsham, PA**, the 1 LT Ray S. Musselman Memorial United States Army Reserve Center in Norristown, PA, and the North Penn Memorial United States Army Reserve Center in Norristown, PA, and relocate units to a new Armed Forces Reserve Center with an organizational maintenance facility at Willow Grove Joint Reserve Base, PA. The Army shall establish an enclave at Willow Grove Joint Reserve Base, PA, to retain essential facilities to support activities of the Reserve Components.*

PROPOSED ACTION

The proposed action is the closure, disposal, and reuse of the Horsham Memorial USARC. Reuse of the surplus property made available by the closure of the Horsham Memorial USARC would occur as a secondary action resulting from disposal. The

Horsham Memorial USARC, located at 936 Easton Road in Horsham, Pennsylvania, was built in 1959. This site consists of approximately 7 acres of developed land with two permanent structures, a 24,527-square-foot main administration building built in 1959, and a 3,710-square-foot Organizational Maintenance Shop (OMS) building built in 1959.

ALTERNATIVES CONSIDERED

Alternative 1, No Action Alternative

The No Action Alternative is included as required by the Council on Environmental Quality regulations. The No Action Alternative would be to continue the missions at BRAC-affected installations as they were in April 2010. Because the law mandates closure and realignment of installations, this alternative would not be feasible. Nevertheless, it serves as a baseline alternative against which to compare the other alternatives.

Alternative 2, Caretaker Status

Under Alternative 2, the Army would secure the property after the military mission has ended to ensure public safety and security of remaining government property and environmental remediation actions. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment. If the property were not transferred within an agreed-to period of time, under this alternative, the Army would reduce maintenance levels to the minimum level for surplus government property.

Alternative 3, Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Under Alternative 3, the Army would transfer the Horsham Memorial USARC to the Hatboro Horsham School District (HHSD). The HHSD proposes to utilize a portion of the OMS to store the HHSD's spare transportation vehicles (*e.g.*, buses and vans) to help reduce congestion at their existing facility. The HHSD would be able to house their tire and wheel inventory and spare parts in the OMS. In addition, the HHSD would be able to conduct light maintenance on vans. The HHSD also proposes to demolish the existing administrative building and use this portion of the property for additional playing fields.

FACTORS CONSIDERED IN DETERMINING THAT NO ENVIRONMENTAL IMPACT STATEMENT IS REQUIRED

The EA analyzed 12 resource areas for each alternative: land use, aesthetics and visual resources, air quality, noise, geology and soil, water resources, biological resources, cultural resources, socioeconomic, transportation, utilities, and hazardous and toxic substances. The analyses in the EA concluded that there will be no significant adverse or significant beneficial environmental impacts resulting from the Proposed Action or alternatives.

As discussed in the EA, implementing any of the proposed implementation alternatives or the No Action Alternative is not anticipated to result in any significant impacts. Consequently, no mitigation measures are required as part of this EA to reduce impacts to non-significant levels.

CONCLUSION

Based upon the EA, it has been determined that implementation of any of the alternatives will not result in a significant impact on the quality of the human or natural environment. The Army is committed to implementing the Best Management Practices described in the EA. Therefore, issuance of a Find of No Significant Impact (FNSI) is warranted, and preparation of an Environmental Impact Statement is not required and will not be prepared.

Alternative 3 is the preferred alternative of the Army and the Local Redevelopment Authority, and will be the selected alternative as it satisfies the proposed action. This alternative would also allow future development in support of the need of the HHSD.

PUBLIC AVAILABILITY

The EA and Draft FNSI have undergone an appropriate 30-day public comment period in accordance with requirements specified in 32 CFR Part 651.

The 30-day, public review period was initiated by placing a Notice of Availability of the final EA and a draft Finding of No Significant Impact (FNSI) in *The Intelligencer*, and *The Philadelphia Inquirer*. The EA and draft FNSI will be available at the Horsham Township Library, 435 Babylon Road, Horsham, Pennsylvania 19044, Warminster Township Library; 1076 Emma Lane, Warminster, Pennsylvania 18974; and on the BRAC website at http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

Date

Jeffrey M. Hrzic
Chief, Environmental Division
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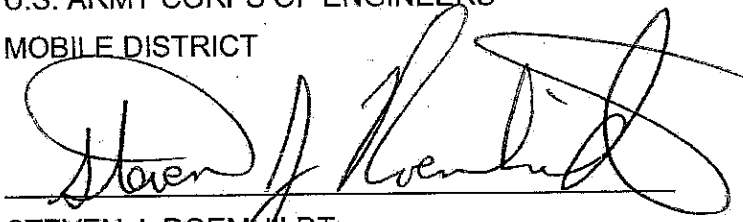
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Prepared by:

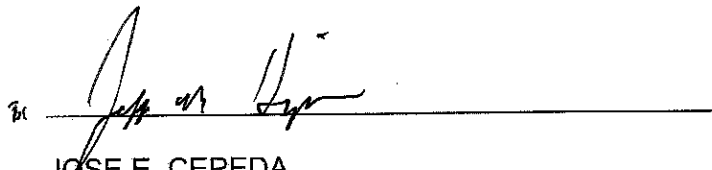
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EXECUTIVE SUMMARY

ES 1 INTRODUCTION

This environmental assessment (EA) analyzes the potential environmental impacts associated with the United States Army's (Army) Proposed Action on the disposal and reuse of the Horsham Memorial (FAC ID PA046) United States (US) Army Reserve Center (USARC) in Horsham, Pennsylvania. This EA was developed in accordance with the *National Environmental Policy Act* (NEPA) (42 United States Code [USC] § 4321 et seq.); implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 *Code of Federal Regulations* (CFR) Parts 1500-1508; and *Environmental Analysis of Army Actions*, 32 CFR Part 651. Its purpose is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and alternatives.

This EA addresses the potential environmental, cultural, and socioeconomic effects of the Horsham Memorial USARC closure, disposal, and reuse. The potential effects of the relocation of the units stationed at the Horsham Memorial USARC have been addressed in a separate Environmental Assessment (USACE Mobile 2009).

ES 2 Setting

The Horsham Memorial USARC, located at 936 Easton Road in Horsham, Pennsylvania, was built in 1959. The USARC is surrounded by small businesses, residential homes, Hallowell Elementary School, and the Willow Grove Joint Reserve Base. This site consists of approximately 7 acres of developed land with two permanent structures:

- 24,527-square-foot main administration building built in 1959,
- 3,710-square-foot Organizational Maintenance Shop (OMS) building built in 1959.

ES 3 PROPOSED ACTION

The purpose and need of the proposed action is to implement the Defense Base Closure and Realignment (BRAC) Commission recommendation at Horsham memorial USARC. The action from the BRAC Recommendation is to:

Close the Reese United States Army Reserve Center in Chester, PA, the United States Army Reserve Organizational Maintenance Shop in Chester, PA, the Germantown Veterans Memorial United States Army Reserve Center in Philadelphia, PA, the Horsham Memorial United States Army Reserve Center in Horsham, PA, the 1 LT Ray S. Musselman Memorial United States Army Reserve Center in Norristown, PA, and the North Penn Memorial United States Army Reserve Center in Norristown, PA, and relocate units to a new Armed Forces Reserve Center with an organizational maintenance facility at Willow Grove Joint Reserve Base, PA. The Army shall establish an enclave at Willow Grove Joint Reserve Base, PA, to retain essential facilities to support activities of the Reserve Components.

This Environmental Assessment (EA) addresses the potential environmental, cultural, and socioeconomic effects of the Horsham Memorial USARC closure, disposal, and reuse. The potential effects of the relocation of the units stationed at the Horsham Memorial USARC have been addressed in a separate NEPA analysis (USACE Mobile 2009).

The main administration building is an irregularly shaped two-story structure, with a two-story drill hall connected by a one-story enclosed corridor. The building's interior consists of office space, classrooms, kitchen area, storage, former indoor firing range, and drill hall. The OMS is a four-bay maintenance garage with heat. The buildings are on concrete foundations and constructed of concrete block walls covered with brick veneer. The property also has two parking lots: Military Equipment Parking (MEP) and Privately Owned Vehicle (POV). Most of the site is covered by impervious surfaces such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land is maintained lawn with grass and trees (USACE 2007). The site is currently unoccupied because personnel were relocated early in 2009 (USARC 2010).

ES 4 ALTERNATIVES CONSIDERED

ES 4.1 Alternative 1, No Action Alternative

The No Action Alternative will be included as required by the Council on Environmental Quality (CEQ) regulations. The No Action Alternative would be to continue the missions at installations affected by the BRAC Act as they were in April 2010. Because the law mandates closure and realignment of installations, this alternative would not be feasible. Nevertheless, it serves as a baseline alternative against which to compare the other alternatives.

ES 4.2 Alternative 2, Caretaker Status

Under Alternative 2, the Army would secure the property after the military mission has ended to ensure public safety and the security of remaining government property and environmental remediation actions. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment. If the property were not transferred within an agreed-to period of time, under this alternative, the Army would reduce maintenance levels to the minimum level for surplus government property.

ES 4.3 Alternative 3, Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Under Alternative 3, the Army would transfer the Horsham Memorial USARC to the Hatboro Horsham School District (HHSD). The HHSD proposes to utilize a portion of the OMS to store the District's spare transportation vehicles (e.g., buses and vans) to help reduce congestion at their existing facility. The HHSD would be able to house their tire and wheel inventory, and spare parts in the OMS. In addition, the district would be able to conduct light maintenance on vans. HHSD also proposes to demolish the existing administrative building and use this portion of the property for additional playing fields.

ES 5 ENVIRONMENTAL CONSEQUENCES

The EA analyzed 12 resource areas for each alternative: land use, aesthetics and visual resources, air quality, noise, geology and soil, water resources, biological resources, cultural resources, socioeconomics, transportation, utilities, and hazardous and toxic substances. The analyses in the EA concluded there would be no significant adverse or significant beneficial environmental impacts resulting from the Proposed Action or alternatives. Therefore, issuance of a Finding of No Significant Impact (FNSI) is warranted, and preparation of an Environmental Impact Statement (EIS) is not required.

ES 6 MITIGATION SUMMARY

No significant adverse or significant beneficial impacts were identified or are anticipated as a result of implementing any of the Proposed Action alternatives or the No Action Alternative. No mitigation measures are required as part of this EA to reduce impacts to non-significant levels.

ES 7 CONCLUSIONS

As analyzed and discussed in the EA, direct, indirect, and cumulative impacts of each of the implementation alternatives and the No Action Alternative have been considered and no significant impacts (either beneficial or adverse) have been identified. Therefore, issuance of a FNSI is warranted, and preparation of an EIS is not required. Table ES.1 provides a summary of the impacts identified in this analysis.

Therefore, any of the alternatives considered could be implemented. However, the No Action Alternative would not support Congressional requirements under the BRAC laws (Public Laws 101-510 and 107-107); consequently, it has not been selected for implementation.

Alternative 3 is the preferred alternative of the Army and the Local Redevelopment Authority. This alternative would allow future development in support of the need of the HHSD.

Table ES.1 Impact Summary							
RESOURCE AREA	NO ACTION	Alternative 2			Alternative 3		
		Direct	Indirect	Cumulative	Direct	Indirect	Cumulative
Land Use					□		
Aesthetic and Visual Resources		●		●	○, □		○
Air Quality		□			○	○	○
Noise					○, ●		○
Geology and Soil					●, ■	□	●
Water Resources					□	○, □	●
Biological Resources		□			○, □	○, □	○
Cultural Resources							
Socioeconomics		○	○		□	■, □	□
Transportation		○, □			○		○
Utilities		□					
Hazardous and Toxic Substances		□			○, ■, ●		

□ Beneficial Effect (Negligible)	○ Adverse Effect (Negligible)
■ Beneficial Effect (Minor)	● Adverse Effect (Minor)
■ Beneficial Effect (Moderate)	● Adverse Effect (Moderate)
◆ Beneficial Effect (Significant)	◇ Adverse Effect (Significant)

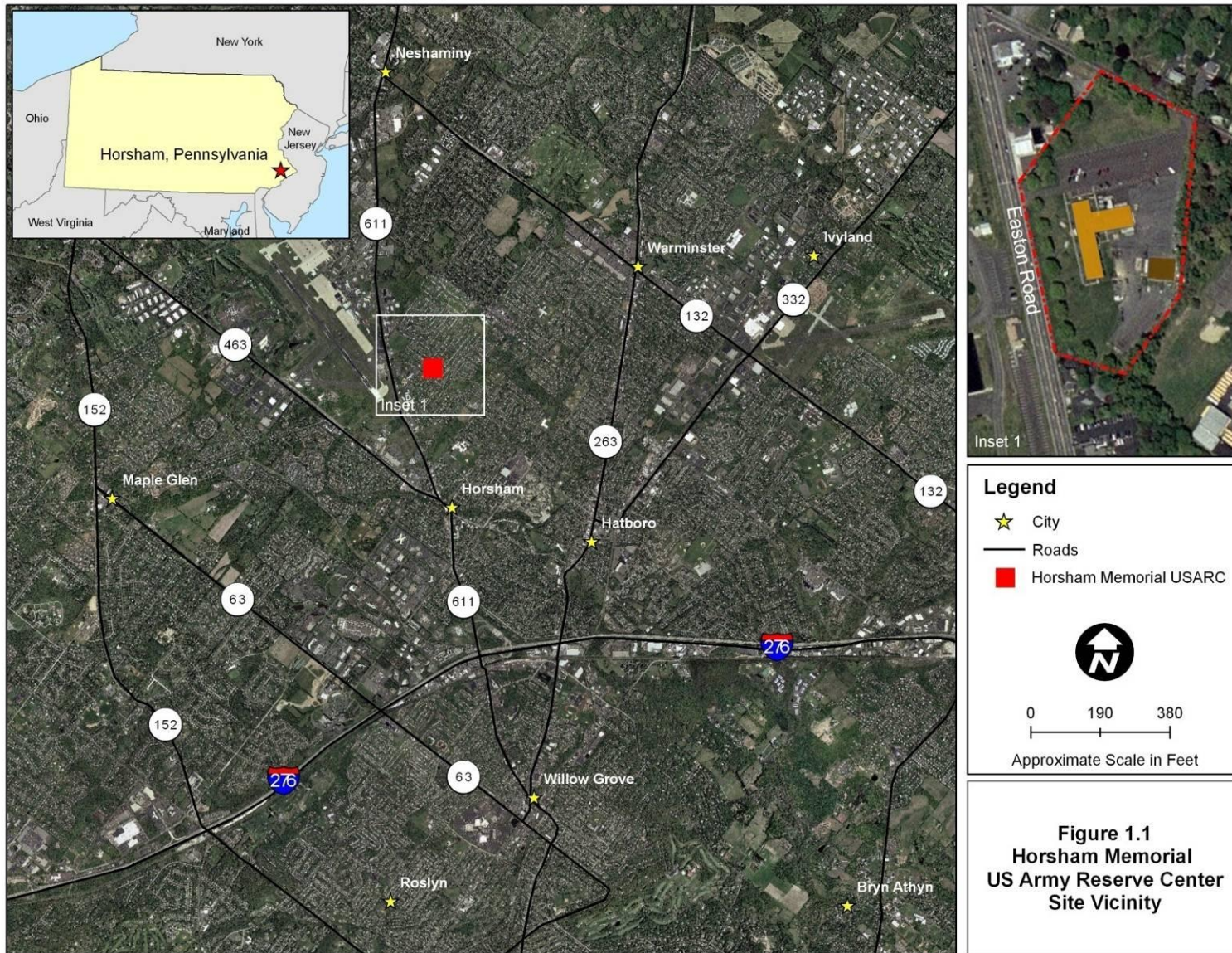
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SECTION 1 INTRODUCTION

This environmental assessment (EA) analyzes the potential environmental impacts associated with the United States (US) Army's (Army) Proposed Action on the disposal and reuse of the Horsham Memorial US Army Reserve Center (USARC), Horsham, Pennsylvania. Figures 1.1 shows the location of the Horsham Memorial USARC in Horsham, Pennsylvania and Figure 1.2 shows the site layout on an aerial photograph. This EA was developed in accordance with the National Environmental Policy Act (NEPA) (42 United States Code [USC] § 4321 et seq.); implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 Code of Federal Regulations (CFR) Parts 1500-1508; and Environmental Analysis of Army *Actions*, 32 CFR Part 651. Its purpose is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and alternatives.




1.1 PURPOSE AND NEED

On September 8, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended closure of the Horsham Memorial USARC and realignment of essential missions to other installations. Units stationed at Horsham Memorial USARC included the HHC 2nd Battalion, 228th Aviation Regiment, and the 367th Military Police Company. The deactivated USARC property is excess to Army military need and will be disposed of according to applicable laws, regulations, and national policy. Pursuant to (NEPA) and its implementing regulations, the Army has prepared this environmental assessment to address the environmental and socioeconomic impacts of disposing of the property and reasonable, foreseeable reuse alternatives.





Legend

-  Installation Boundary
-  Administration Building
-  Operation Maintenance Shop



0 180 360
 Approximate Scale in Feet

Figure 1.2
Horsham Memorial
US Army Reserve Center

1.2 PUBLIC INVOLVEMENT

The Army is committed to open decision-making. The collaborative involvement of other agencies, organizations, and individuals in the NEPA process enhances issue identification and problem solving. In preparing this EA, the Army consulted with the State Historic Preservation Officer, US Fish and Wildlife Service (USFWS), Native American Tribes, federal, state, and local regulatory agencies, state and local governments, and others as appropriate.

The Army begins a 30-day public review period by placing a Notice of Availability of the final EA and a draft Finding of No Significant Impact (FNSI) in a local newspaper, *The Intelligencer*, and a regional newspaper, *The Philadelphia Inquirer*. The EA and draft FNSI will be available at the Horsham Township Library, 435 Babylon Road, Horsham, Pennsylvania 19044, Warminster Township Library; 1076 Emma Lane, Warminster, Pennsylvania 18974, and on the BRAC web site at http://www.hqda.army.mil/acsim/brac/env_ea_review.htm. The Army invites the public and all interested and affected parties to review and comment on this EA and the draft FNSI. Comments and requests for information should be submitted to the Environmental Coordinator of the United States Army Reserve (USAR) 99th Regional Support Command (RSC): Ms. Amanda Murphy at 5231 South Scott Plaza, Fort Dix, New Jersey, 08640 or amanda.w.murphy@usar.army.mil.

At the end of the 30-day public review period, the Army will review all comments received, compare environmental impacts associated with reasonable alternatives, revise the FNSI (if necessary), and make a decision. If the impacts of the proposed action are not significant, the Army will execute the FNSI and the action can proceed immediately. If potential impacts are found to be significant, the Army either will commit to mitigation to reduce the anticipated impact to a less significant level, or will publish a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) in the Federal Register.

SECTION 2 DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action is closure, disposal, and reuse of the Horsham Memorial USARC per the BRAC Commission's recommendation:

Close the Reese United States Army Reserve Center in Chester, PA, the United States Army Reserve Organizational Maintenance Shop in Chester, PA, the Germantown Veterans Memorial United States Army Reserve Center in Philadelphia, PA, the Horsham Memorial United States Army Reserve Center in Horsham, PA, the 1 LT Ray S. Musselman Memorial United States Army Reserve Center in Norristown, PA, and the North Penn Memorial United States Army Reserve Center in Norristown, PA, and relocate units to a new Armed Forces Reserve Center with an organizational maintenance facility at Willow Grove Joint Reserve Base, PA. The Army shall establish an enclave at Willow Grove Joint Reserve Base, PA, to retain essential facilities to support activities of the Reserve Components.

In 1953, the US Government purchased property for the Horsham Memorial USARC, located at 936 Easton Road in Horsham, Pennsylvania. This site consists of approximately 7 acres of developed land with two permanent structures:

- 24,527-square-foot main administration building built in 1959
- 3,710-square-foot Organizational Maintenance Shop (OMS) building built in 1959.

Figure 1.2 shows the Horsham Memorial USARC site layout. The main administration building is an irregularly shaped two-story structure, with a two-story drill hall connected by a one-story enclosed corridor. The building's interior consists of office space, classrooms, kitchen area, storage, former indoor firing range, and drill hall. The OMS is a four bay maintenance garage with heat. The buildings are on concrete foundations and constructed of concrete block walls covered with a brick veneer. The property also has two parking lots: Military Equipment Parking (MEP) and a Privately Owned Vehicle (POV). Most of the site is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land is maintained lawn with grass and trees (USACE 2007). The site is currently unoccupied because personnel were relocated early in 2009 (USARC 2010). BRAC legislation and process allow for the Army to dispose of property no longer required to support Army missions.

2.1 ARMY CLOSURE

Under BRAC law, the Army must initiate all closures and realignments not later than September 15, 2007 and complete all closures and realignments not later than September 15, 2011. USAR has begun the processes involved with implementing closure by realigning personnel, evaluating site environmental conditions, and evaluating a proposed action that is scheduled to be implemented by the closure date required under BRAC law.

After the Horsham Memorial USARC is closed in 2011, the Army will dispose of the property. As a part of the disposal process, the Army screened the property for reuse with the Department of Defense and other federal agencies. No federal agency expressed an interest in reusing this property for another purpose.

2.2 ARMY DISPOSAL AND LOCAL REUSE

Due to the Army's proposed action, the Horsham Township Council adopted a resolution on October 12, 2005, establishing a committee that would ultimately be recognized as the Local Redevelopment Authority (LRA) for planning the reuse of the Horsham Memorial USARC. On February 16, 2006, formal application for recognition as a LRA was submitted to the Office of the Secretary of Defense, and that office was asked to recognize the Horsham Township Authority LRA (HLRA) as the official body responsible for preparing the necessary land use plan and recommendation. Subsequently, the HLRA was designated by the Office of Economic Adjustment, Office of the Secretary of Defense, as the recognized agency for reuse planning.

Following a review of the property reuse options available to them, the HLRA voted to recommend that the Horsham Memorial USARC be transferred to the Hatboro Horsham School District (HHSD) for vehicle maintenance and storage and recreational use. HHSD would demolish the administration building, reuse the OMS, and construct new recreational fields. Based upon the HLRA recommendation, the Army proposes to dispose of the Horsham Memorial USARC as a single parcel for public benefit conveyance.

SECTION 3 ALTERNATIVES

3.1 ALTERNATIVE 1 – NO ACTION ALTERNATIVE

Inclusion of the No Action Alternative is prescribed by CEQ regulations and serves as a benchmark against which federal actions can be evaluated. The No Action Alternative would continue the mission at Horsham Memorial USARC as it was being performed in April 2010. The No Action Alternative is not feasible because the law mandates closure and realignment of the installation. There is no legal “no action” alternative; therefore, the No Action Alternative will be used as a baseline for the Proposed Action of this EA.

3.2 ALTERNATIVE 2 – CARETAKER STATUS ALTERNATIVE

The Army would secure the property after the military mission has ended to ensure public safety and the security of remaining government property and environmental remediation actions. Under BRAC law, the Army must initiate closure of installations within 2 years after the President submits the BRAC report to Congress. Because of site-specific requirements, there may be a period between the military presence and the transfer of the property. This condition should not be a permanent one because Army policy is to dispose of the closed installation. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment. If the property were not transferred within an agreed-to period of time, under this alternative, the Army would reduce maintenance levels to the minimum level for surplus government property required by 41 CFR 101-47.402, 41 CFR 101-47-4913, and Army Regulation 420-70 (Buildings and Structures).

3.3 ALTERNATIVE 3 – DEMOLISH ADMINISTRATION BUILDING, REUSE ORGANIZATION MAINTENANCE SHOP, AND CONSTRUCT RECREATIONAL FIELDS (PREFERRED ALTERNATIVE)

Under Alternative 3, the Army would close the Horsham Memorial USARC by September 15, 2011, and assign the property to HHSD through a public benefit conveyance. HHSD proposes to utilize a portion of the OMS to store the District’s spare transportation vehicles (*e.g.*, buses and vans) to help reduce the congestion at their existing facility. HHSD would be able to house their tire and wheel inventory, and spare parts in the OMS. In addition, the district would be able to conduct light maintenance on vans. HHSD also proposes to demolish the existing administrative building and use this portion of the property for additional playing fields (Figure 3.1).

3.4 ALTERNATIVES CONSIDERED AND ELIMINATED FROM FURTHER ANALYSIS

The HLRA screened the Horsham Memorial USARC Federal Government surplus property by soliciting NOIs from state and local governments, representatives of the homeless, and other interested parties, as required by the Federal Property

Administrative Services Act of 1949 and the Base Closure Community Redevelopment and Homeless Assistance Act of 1994. The HLRA received two NOIs: one from HHSD and one from the Willow Grove Community Development Corporation. After hearing presentations of each entity's proposed use for the Horsham Memorial USARC on February 21, 2007, the HLRA approved the reuse plan proposed by HHSD. In addition to the Reuse Plan described in the preferred alternative (recreational use), the HLRA considered adoption of the following reuses of the property:

- Willow Grove Community Development Corporation submitted a Notice of Interest to develop affordable and workforce housing. After review of the correspondence and the NOI the HLRA committee determined that the proposal was not an eligible public benefit conveyance.

Since this alternative was not selected by the HLRA as their official reuse plan, it was not carried forward for further analysis in this EA.



Legend

-  Installation Boundary
-  Motor Vehicle Maintenance Shed
-  Athletic Field
-  General Parking
-  Proposed Bus/RV Parking



0 195 390
 Approximate Scale in Feet

Figure 3.1
Horsham Memorial
US Army Reserve Center
Conceptual Reuse Plan

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SECTION 4 AFFECTED ENVIRONMENT AND CONSEQUENCES

4.1 INTRODUCTION

This section describes the existing environment and analyzes the significance of direct, indirect, and cumulative effects of the proposed action and alternatives on the environment.

4.1.1 Definition of Key Terms

4.1.1.1 Environmental Baseline

The existing environmental baseline conditions have been established based on conditions at the Horsham Memorial USARC as of April 2010.

4.1.1.2 Impact

An environmental consequence or impact (referred to in this document as an impact) is defined as a noticeable change in a resource from the existing environmental baseline conditions caused by or resulting from the proposed action. The terms “impact” and “effect” are synonymous as used in this EA. Impacts may be determined to be beneficial or adverse and may apply to the full range of natural, aesthetic, cultural, and economic resources of the installation and its surrounding environment.

4.1.1.3 Direct Versus Indirect Impacts

Where applicable, analysis of impacts associated with each course of action has been further divided into direct and indirect impacts. Definitions and examples of direct and indirect impacts as used in this document are as follows:

- **Direct Impacts.** Direct impacts are caused by the action and occur at the same time and place. Both short-term and long-term direct impacts can be applicable.
- **Indirect Impacts.** Indirect impacts are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.
- **Application of Direct Versus Indirect Impacts.** For direct impacts to occur, a resource must be present in a particular area. For example, if highly erodible soil were disturbed due to construction, there would be a direct impact to soil from erosion at the development site. Sediment-laden runoff might indirectly affect surface water quality in adjacent areas downstream from the development site.

4.1.1.4 Impact Characterization

Impacts include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic,

cultural, economic, social, or health, whether direct, indirect, or cumulative. Impacts may also include those resulting from actions which may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial. The relative magnitude of an impact is characterized. Adverse or beneficial impacts that are significant are the highest level of impacts. Conversely, negligible adverse or beneficial impacts are the lowest level of impacts.

4.1.1.5 Significance

The term “significant,” as defined in Section 1508.27 of the Regulations for Implementing NEPA (40 CFR 1500), <http://ceq.hss.doe.gov/nepa/regs/ceq/1508.htm#1508.27>, requires consideration of both the context and intensity of the impact evaluated.

Context. Significance can vary in relation to the context of the action. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short-term and long-term effects may be relevant.

Intensity. In accordance with the CEQ implementing guidance, impacts are also evaluated in terms of their intensity or severity. Factors contributing to the evaluation of the intensity of an impact are listed in Section 1508.27 of the Regulations for Implementing NEPA.

As noted in the following analysis, none of the potential impacts identified in this EA are significant at this time.

4.2 LAND USE

4.2.1 Affected Environment

4.2.1.1 Regional Geographic Setting and Location

The Horsham Memorial USARC is located in Montgomery County, on the west side of Horsham Township, Pennsylvania, at 936 Easton Road (Figures 1.1 and 1.2). The parcel occupies approximately 7 acres and is situated on a main thoroughfare (State Route 611). The parcel is surrounded by single-family homes to the north and east, commercial development to the south, an elementary school to the southeast, and a school bus parking lot and service center. The Willow Grove Naval Air Station/Joint Reserve Base (NAS/JRB) is located west of the property on the west side of Route 611.

4.2.1.2 Installation Land/Airspace Use

The Horsham Memorial USARC property is currently zoned for commercial use. The site contains two permanent structures:

- 24,527-square-foot main administration building built in 1959, and
- 3,710-square-foot OMS building built in 1959.

The main administration building is an irregularly shaped two-story structure, with a two-story drill hall connected by a one-story enclosed corridor. The OMS is a four-bay maintenance garage with heat. The property also has an MEP parking area and a POV parking area. Approximately two-thirds of the property is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land is maintained lawn with grass and trees (USACE 2007). The site is currently unoccupied because personnel were relocated early in 2009 (USARC 2010).

4.2.1.3 Surrounding Land/Airspace Use

Land use south of the Horsham Memorial USARC includes real estate offices and a restaurant. Southeast of the property is Hallowell Elementary School and Hatboro Horsham Operations. The Hatboro Horsham Operations consists of a large school bus parking lot and service center.

A small wooded area and West Moreland Road, a two-lane residential road, bound the eastern side of the property. The land east of the property is agricultural land transitioning to residential use, and over time, increasing numbers of single-family residences have been developed on the former fields. The property directly north of the Horsham Memorial USARC is a gas station.

4.2.1.4 Current and Future Development in the Region of Influence

The local community has formed an LRA recognized by the Secretary of Defense through the DoD Office of Economic Adjustment on April 27, 2006 (71 *Federal Register* 24843). The LRA developed a plan for reuse of the Horsham Memorial USARC property that would incorporate the NOI submitted to the LRA and reflect an overall reuse strategy for the installation (LRA 2007).

4.2.2 Consequences

4.2.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions of land use are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned; no direct impacts to land use are anticipated.

Indirect Impacts. No changes to the existing baseline conditions of land use are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned; no indirect impacts to land use are anticipated.

4.2.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. No direct impacts on land use are anticipated as maintenance activities are expected to continue for the current facilities. There would be no changes to land use under this alternative.

Indirect Impacts. No indirect impacts on land use are anticipated as maintenance activities are expected to continue for the current facilities. There would be no changes to land use under this alternative.

4.2.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Direct Impacts. There would be negligible beneficial direct impacts to land use under this alternative. The most likely reuse for the buildings and real estate under this scenario would be additional parking and maintenance and repair facilities for the HHSD bus garage in addition to play fields for the adjacent Hallowell Elementary School. The proposed project area consists of lands previously disturbed or already containing development, including buildings and parking lots. The proposed developments would be similar to and would not conflict with the adjacent land uses. A negligible beneficial impact to land use is expected under this alternative because some of the currently developed land would be converted to recreational fields.

Indirect Impacts. No indirect impacts on land use are anticipated, as there would be no changes to land use on adjacent properties as a result of this action.

4.3 AESTHETICS AND VISUAL RESOURCES

4.3.1 Affected Environment

The Horsham Memorial USARC site has two permanent buildings. The main administration building is an irregularly shaped two-story structure, with a two-story drill hall connected by a one-story enclosed corridor. The OMS is a four bay maintenance garage. The buildings are constructed of concrete block walls covered with a brick veneer. The architecture of the main administration building and OMS are consistent with the design of other Army Reserve Centers constructed as part of a nationwide building campaign in the early Cold War and are influenced by the 1950s contemporary movement (Moore et al. 2008). For additional information on architectural resources at the Horsham USARC, see Section 4.9.1.2. The property also has two parking lots. Chain-link security fencing topped with barbed wire encloses the area designated for MEP and the OMS building. Approximately two-thirds of the site is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land is grassed with trees around the parking lots and administration building.

The view from USARC is dominated by an urban landscape. Residential, commercial, and industrial properties lay adjacent to the USARC on its northern, southern, and eastern sides. State Route 611 (Easton Road), runs approximately north-south, and is located adjacent to the Horsham Memorial USARC site to the west (Figure 1.2) and the Willow Grove NAS/JRB is located on the west side of Easton Road.

4.3.2 Consequences

4.3.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions of aesthetics and visual resources are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned; no direct impacts to these resources are anticipated.

Indirect Impacts. No changes to the existing baseline conditions of aesthetics and visual resources are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned; no indirect impacts to these resources are anticipated.

4.3.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. There would be minor adverse short-term direct impacts under this alternative. Although the caretaker would insure public safety and security of the remaining government property, caretaker status creates potential for a decrease in the frequency of mowing, weeding, and visual maintenance.

Indirect Impacts. There would be no indirect impacts under this alternative, as the caretaker status of the USARC would not affect the aesthetics and visual resources of adjacent properties.

4.3.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Direct Impacts. There would be direct, short-term negligible adverse impacts to aesthetic and visual resources under Alternative 3. During demolition of the existing building, remodeling of the OMS, and construction of the outdoor recreational field there would be adverse impacts from construction equipment and activities.

The proposed use would be constructed within an area currently developed with an array of commercial, residential, and industrial structures. The proposed reuse plan includes the construction of an outdoor play field and the reuse of the existing OMS building. The overall percentage of property covered in asphalt would be reduced by approximately eight percent, which would be a negligible beneficial impact to the aesthetics of the existing property. This would result in a long-term negligible beneficial impact to visual and aesthetic resources, given the existing visual environment.

Indirect Impacts. No indirect impacts to aesthetics and visual resources would be expected under Alternative 3, as this action would not cause a change in the visual or aesthetic resources in surrounding properties. Construction impacts would be short-term and confined to the Horsham USARC; therefore, no indirect impacts are expected.

4.4 AIR QUALITY

4.4.1 Affected Environment

4.4.1.1 Ambient Air Quality Conditions

The status of the air quality in a given area is determined by the concentrations of various pollutants in the atmosphere. The Federal Clean Air Act (CAA) (42 USC 7401-7671q) required the USEPA to establish a series of National Ambient Air Quality Standards (NAAQS) for air quality throughout the United States.

Individual states can adopt the NAAQS or establish state ambient air quality standards, which may not be less stringent than the NAAQS. The Pennsylvania Department of Environmental Protection (PDEP) has adopted the NAAQS.

The primary NAAQS are intended to protect public health, while the secondary NAAQS are intended to protect the environment (e.g., crops, wildlife, buildings). Areas where ambient concentrations of a given pollutant are below the applicable ambient standards are designated as being in “attainment” for that pollutant. An area that does not meet the NAAQS for a given pollutant is classified as a “non-attainment” area for that pollutant. Non-attainment areas are under strict regulatory restriction in an effort to lower pollutant concentrations to regulatory standards. Three of the criteria pollutants (ozone, carbon monoxide, and PM₁₀), are classified according to severity.

The USEPA requires each state to prepare a State Implementation Plan (SIP) to ensure these goals are met. A SIP is a compilation of goals, strategies, source emission limitations and control requirements, schedules, and enforcement actions that would lead the state to compliance with all NAAQS. The SIP includes measures to maintain air quality standards in maintenance areas.

4.4.1.2 Air Pollutant Emissions at Installation

Horsham Memorial USARC is located within an Air Quality Region currently designated as moderate non-attainment for the 8-hour ozone standard and non-attainment for PM-2.5 for ambient air quality. Emission sources at the current site include stationary, mobile, and fugitive categorizations. Potential stationary sources include a boiler room on the western side of the south wing of the administrative building. There is a water heater, three natural gas heating units, and a bypass feeder. There is also a four-bay maintenance shop for light vehicle repair work that includes oil changes and vehicle repair and washing (USACE 2007). Mobile sources include both private and government owned vehicles and generators. The maintenance shop has a small generator. Fugitive sources would include dust generated from construction activities and roadway traffic.

4.4.1.3 Regional Air Pollutant Emissions Summary

A General Conformity Analysis, in accordance with 40 CFR Part 93 Subpart B, is required prior to this project being initiated. A General Conformity Determination is not required due to the activity being exempt under 40 CFR 93.153 (c) (1) and (2) (x). Additionally, calculations from associated activities demonstrate air emission levels well below applicable threshold levels. Appendix B contains the Record of Non-Applicability (RONA) and discusses the conformity process.

4.4.2 Consequences

4.4.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for air quality resources are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned, no direct impacts to these resources are anticipated.

Indirect Impacts. No changes to the existing baseline conditions for air quality resources are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned, no indirect impacts to these resources are anticipated.

4.4.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Under Alternative 2, the Army would provide for maintenance to preserve and protect the facility and equipment until there is a permanent transfer of property. Following the closure, there would be a reduction of mobile emissions from government and privately owned vehicles. The only on-site vehicles would be those there for minimal maintenance activities. During the implementation of the caretaker status, there would be negligible emissions from the vehicles and equipment needed to perform maintenance activities on-site.

During caretaker status there would be a reduction in air emissions associated with the operation of the boiler and electric generator. During caretaker status the existing buildings would not require heating and cooling for human comfort; consequently emissions associated with these activities would be reduced.

Indirect Impacts. There are no anticipated indirect impacts under this alternative because following the closure and during caretaker status there would be a net decrease in emissions since there would be no operations occurring at the site.

4.4.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Direct Impacts. The proposed action is located in Montgomery County, Pennsylvania, which is designated as moderate non-attainment for ozone and non-attainment for PM. As such, ozone precursor pollutants NO_x and VOCs also apply. A General Conformity Determination is not required because total maximum annual direct and indirect emissions from this project have been calculated to be below the *de minimis* threshold levels associated with the air conformity provisions.

The primary emission sources for this project would be those associated with demolition and construction activities, with demolition being the predominant emission-generating activity. Cumulative air emissions were calculated for various types of diesel-engine construction vehicles and related equipment.

The project could reasonably qualify for the 40 CFR 93.153 (c)(1) and (2)(x) exemptions because the replacement activity would actually result in a net decrease in air emissions. The construction activity associated with the reuse would result in a temporary negligible increase in air emissions as demonstrated in the calculations shown in Appendix B.

The proposed reuse of the site as play fields would potentially add more regular vehicle emissions from patrons using the site on evenings and weekends. The increased mobile emissions associated with this modification would be a negligible increase in air emissions in the immediate area of the Horsham USARC as demonstrated in the calculations shown in Appendix B.

Montgomery County is in attainment for all other NAAQS criteria pollutants and therefore is not subject to an air conformity review. Supporting documentation and emission estimates can be found in Appendix B.

Indirect Impacts. The proposed reuse of the site as play fields would potentially add more regular vehicle emissions from patrons driving to and from the site on evenings and weekends. The increased mobile emissions associated with this modification would be a negligible increase in air emissions across the general area as demonstrated in the calculations shown in Appendix B.

4.5 NOISE

4.5.1 Affected Environment

To account for these fluctuations in noise levels across installations, USEPA defined a long-term average noise descriptor, the “equivalent” noise level, or L_{eq} . Finding that the L_{eq} did not adequately account for an individual’s increased sensitivity to sound at night, USEPA defined the Day-Night Average Sound Level (DNL), which consists of the L_{eq} with a 10-dB penalty for nighttime noise. USEPA endorses the DNL as the accepted noise descriptor for assessing community noise impacts.

The Army recognizes three noise impact zones for its installations, the definitions of which are based on A-weighted noise levels (dBA) for transportation and small-arms noise, and C-weighted noise levels (dBC) for blast noise. dBA is used interchangeably with the term A-weighted day-night level (ADNL) and dBC is used interchangeably with the term C-weighted day-night level (CDNL). These Noise Zones (NZ) are as follows:

- Zone III (Unacceptable [for noise-sensitive activities]) is the area where the DNL is greater than 75 dBA for aircraft, vehicle, and small arms range noise, and greater than 70 dBC for noise from weapon systems larger than 20 millimeter. This zone is considered an area of severe noise exposure and is unacceptable for noise-sensitive activities.
- Zone II (Normally Unacceptable [for noise-sensitive activities]) is the area where the DNL is between 65 and 75 dBA or between 62 and 70 dBC. This area is considered to have a significant noise exposure and is, therefore, normally only acceptable for activities such as industrial, manufacturing, transportation, and resource production. However, if the community determines that these land areas must be used for residential purposes, then noise level reduction features should be incorporated into the design and construction of the buildings.
- Zone I (Acceptable [for noise-sensitive activities]) is the area where the DNL is less than 65 dBA or less than 62 dBC. This area, considered to have moderate to minimal noise exposure from aircraft operations, weapons firing and other noise sources, is acceptable for noise-sensitive land uses including housing, schools, and medical facilities.

The major sources of noise at the Horsham Memorial USARC are automobiles and trucks. Noise levels attributed to the property comply with Zone I as listed above and do not have adverse impacts on adjacent residential and commercial areas. The Horsham Memorial USARC is surrounded by private residences to the northeast, a retail gasoline station to the north, Willow Grove Naval Air Station Joint Reserve Base to the west, commercial offices to the south, and Hallowell Elementary School and a HHSD school

bus maintenance garage to the east. Horsham Memorial USARC is located on Easton Road (State Route 611), a heavily used four-lane thoroughfare. Aircraft runways associated with Willow Grove NAS/JRB are located approximately 360 feet from the Horsham Memorial USARC. The nearest sensitive noise receptors are the private residences that are adjacent to the northeast of the property and Hallowell Elementary School to the east.

4.5.2 Consequences

4.5.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions of noise are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned; no direct impacts to noise are anticipated. Current noise levels from vehicle operations would continue at existing baseline levels.

Indirect Impacts. No changes to the existing baseline conditions of noise are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned; no indirect impacts to noise are anticipated. Current noise levels from vehicle operations would continue at existing baseline levels.

4.5.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. No direct impacts to noise would occur under this alternative. If the Army finds it necessary to place the Horsham Memorial USARC in caretaker status for an indefinite period, the Army would assume safeguards against fire, theft, and damage from the elements. It is likely these caretaker activities would result in noise levels below current baseline levels. Any maintenance activities required under caretaker status would be similar to activities currently taking place at the Horsham Memorial USARC.

Indirect Impacts. No indirect impacts due to noise are anticipated as compared to baseline conditions as changes in noise levels would be limited to on-site caretaker activities which would not occur at a later time or farther removed in distance.

4.5.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Direct Impacts. Both minor short-term and negligible long-term adverse direct impacts would occur at the Horsham Memorial USARC due to increased noise levels associated with the reuse of the property. Minor short-term adverse direct impacts would be expected due to demolition of the Horsham Memorial USARC buildings and construction of new play fields. Construction noise, including construction vehicle and equipment noise, typically does not contribute substantially to long-term average noise levels but consists of frequent, highly intrusive sounds of 87 to 96 dBA (Suter 2002). To reduce impacts associated with noise levels, construction will be limited to daylight hours.

Negligible long-term adverse direct impacts would occur based on increased vehicle use for future activities at the new HHSD school bus garage and maintenance facility. Maintenance activities would be similar to the baseline vehicle maintenance activities;

however, more vehicles (e.g., school buses) would use the facility. In the past, vehicle noise increased during weekend activities at the USARC. Increased vehicle noise would be experienced during weekdays at the beginning and end of school days due to bus traffic and during the transition between different athletic events on the play fields. Increased noise would be negligible in comparison with background noise associated with the nearby roadway and Willow Grove NAS/JRB.

Indirect Impacts. No indirect impacts are anticipated, as no changes to surrounding properties are necessary to accommodate a change in noise levels. No additional impacts are expected beyond the direct impacts associated with construction and future vehicle use at the property.

4.6 GEOLOGY AND SOIL

4.6.1 Affected Environment

4.6.1.1 Geologic and Topographic Conditions

The Horsham Memorial USARC is located within the Gettysburg-Newark Lowlands Section of the Piedmont Physiographic Province, which is characterized by rolling low hills and valleys developed on sedimentary rock (PADCNR 2010). The area is underlain by rocks of the Stockton Formation, which consists of sedimentary rocks of Triassic Age. The Stockton Formation is subdivided into three members consisting of sandstone, shale, and siltstone (Sloto 2002). There are no known geologic hazards or unique geologic features at the Horsham USARC property.

The Horsham Memorial USARC property has relatively flat terrain and is located at an average elevation of approximately 369 feet above sea level. The topography slopes slightly down toward the southeast.

4.6.1.2 Soil

The Natural Resource Conservation Service (NRCS) Web Soil Survey was used to evaluate the type of soils at the site (USDA 2010). The soil on the Horsham USARC property consists of 88 percent Urban land.. The soil in the northeast corner of the property is classified as Lansdale loam, 3 to 8 percent slopes, and soil in the southeast corner of the USARC property is mapped as Urban Land-Lawrenceville complex, 0 to 8 percent slopes. Urban soil is generally an area where construction and development activities have modified or removed the original soil. This soil varies in depth and drainage conditions. The Lansdale loam is characterized as moderately deep, well-drained loam. The Urban Land-Lawrenceville complex predominantly consists of urban soil with inclusions of moderately well-drained silt loam of the Lawrenceville complex. The soils are not limited for supporting dwellings or commercial buildings.

4.6.1.3 Prime Farmland

The Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to non-agricultural uses. It assures that - to the extent possible - federal programs are administered to be compatible with state, local units of government, and private programs and policies to protect farmland. For the purpose of FPPA, farmland includes Prime Farmland, unique farmland, and land of statewide or local importance. Farmland

subject to FPPA requirements can be forest land, pastureland, cropland, or other land, but not water or urban built-up land. The Lansdale loam, 3-8 percent slopes, located on approximately one-half acre in the northeast corner of the property is classified as Prime Farmland (USDA 2010).

NRCS uses a land evaluation and site assessment system to establish a farmland conversion impact rating score on proposed sites of federally funded and assisted projects. This score is used as an indicator for the project sponsor to consider alternative sites if the potential adverse impacts on the farmland exceed the recommended allowable level. Soil classified as Prime Farmland on the Horsham Memorial USARC property is not currently used for farming; in addition, the property is located in an area developed to such a degree that the requirements for the FPPA do not apply (White 2010). No further coordination with the NRCS is required.

4.6.2 Consequences

4.6.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions of geology and soil are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned; no direct impacts to these resources are anticipated.

Indirect Impacts. No changes to the existing baseline conditions of geology and soil are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned; no indirect impacts to these resources are anticipated.

4.6.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. No direct impacts to geology or soil are anticipated under Alternative 2 because no construction or demolition would occur. The Army would maintain the property as needed for reuse in an economical manner that facilitates redevelopment. No construction or demolition would occur.

Indirect Impacts. No indirect impacts to geology or soil are anticipated under Alternative 2 because no construction or demolition would occur. The Army would maintain the property as needed for reuse in an economical manner that facilitates redevelopment. No construction or demolition would occur.

4.6.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Direct Impacts. Minor direct short-term adverse and long-term beneficial impacts to soil would be expected. Minor short-term adverse impacts to soil would occur because of soil disturbance associated with demolition of existing structures and construction of new facilities. To reduce impacts of soil disturbance and compaction during and after construction, appropriate local best management practices (BMP) concerning sediment control would be applied. Such controls may include silt fences, hay bales, and seeding of cleared areas that are to remain exposed for long periods of time. Minor long-term beneficial impacts to soil on the site would be expected, as there would be a reduction in erosion due to the increase in the amount of vegetated surface on the property.

Vegetative cover tends to slow down the movement of surface runoff and allows excess surface water to infiltrate rather than runoff. Currently, approximately two-thirds of the Horsham USARC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. With the demolition of buildings and construction of a 360-foot by 180-foot outdoor recreational field, it is reasonable to anticipate that there would be up to a 8 percent a reduction in the amount of impervious surface area throughout the facility once it is redeveloped.

Construction and demolition activities under the proposed action would have no impact on topography, as significant land contouring would be not required. Implementation of Alternative 3 would not involve any intrusive construction activity that would affect subsurface geological formations.

No impacts to farmland are anticipated, as the proposed action will not convert any areas currently used for farming into another use.

Indirect Impacts. Implementation of Alternative 3 would have a negligible long-term beneficial effect on soil resources in areas downslope from the site, as there would be a reduction in erosion due to the increase in the amount of vegetated surface on the USARC property. Vegetative cover tends to slow down the movement of surface runoff and allows excess surface water to infiltrate rather than runoff. Currently, approximately two-thirds of the Horsham USARC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. With the demolition of buildings and construction of a 360-foot by 180-foot outdoor recreational field, it is reasonable to anticipate that there would be up to a 8 percent a reduction in the amount of impervious surface area throughout the facility once it is redeveloped. This reduction in impervious surface area would reduce the likelihood of erosion in areas downslope from the Horsham USARC.

4.7 WATER RESOURCES

4.7.1 Affected Environment

4.7.1.1 Surface Water

No surface water features are located in the immediate vicinity of the Horsham Memorial USARC. Pennypack Creek is located about 0.5 mile to the east, and the Schuylkill and Delaware Rivers are located about 10 miles southwest and 12 miles southeast, respectively. The Schuylkill River discharges into the Delaware River, which ultimately discharges into Delaware Bay and the Atlantic Ocean (USACE 2007). Pennypack Creek has a watershed of 56 square miles (CDC 2006). Its designated uses are warm water fishery, migratory fishes, and trout stock fishery. Pennypack Creek is also a source of drinking water. The Upper Moreland-Hatboro Wastewater Treatment Plant discharges high concentrations of nutrients to Pennypack Creek. Observed nitrate concentrations range from 10 to 22 mg/L and phosphorus levels are also well above recommended limits (CSC 2006).

There is no stormwater permit, spill prevention control and countermeasures plan (SPCCP), or stormwater pollution prevention plan (SWPPP) associated with the Horsham USARC (USACE 2007). The Horsham USARC utilizes one oil/water separator on the property. Exterior drains on the property feed into the oil/water

separator and eventually discharge into the Willow Grove NAS/JRB sewer system (USACE 2007).

4.7.1.2 Hydrology/Groundwater

Water on the property flows to storm drains located in the MEP and POV parking areas. A storm drain also is located in the grassy area south of the administration building and drains west toward State Route 611.

The groundwater flow direction on the Horsham Memorial USARC is generally to the north (EDR 2006). The regional aquifer beneath the property, the Stockton Aquifer, has been characterized as consisting of two hydraulic systems, the water table and the artesian aquifers. The water table aquifer extends to a depth of between 75 and 100 feet below the land surface, and it discharges to nearby streams and open bodies of water. Underlying the water table aquifer is the artesian aquifer, the principal potable water source in Horsham Township. The water table aquifer furnishes recharge to the artesian aquifer (Sloto 2002).

A release of both leaded and unleaded gasoline from a leaking underground storage tank (UST) was reported in 1995 at the JOT Fuel Inc. property north of the Horsham Memorial USARC. The location of monitoring wells and initial water quality data indicates the Horsham Memorial USARC property groundwater was affected by the release. Concentrations of methyl-tert butyl ether (MTBE) above PADEP standards were detected in the downgradient monitoring well at the Horsham Memorial USARC property boundary and in the monitoring well approximately 90 feet west of the center of the western Horsham Memorial USARC property boundary. Recent sampling data collected as part of post pump and treat monitoring indicates the contaminants of concern (COC) in the upgradient and downgradient monitoring wells along the property boundary have been at non-detectable levels. Detections of COCs were still present in other monitoring wells in 2007, including the well 90 feet directly west of the center of the Horsham Memorial USARC property; therefore, PADEP has not yet closed the site (USACE 2007).

4.7.1.3 Floodplains

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Community Panel 42091C0284E, the Horsham Memorial USARC property is not within the 100-year floodplain elevation (FEMA 2010)

4.7.1.4 Coastal Zone

The PADEP, Water Planning Office is the lead agency for the Pennsylvania Coastal Zone Management Program. The Horsham Memorial USARC is not in a coastal zone and is, therefore, not included in a Coastal Zone Management Plan (PADEP 2010).

4.7.2 Consequences

4.7.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes are anticipated to the existing baseline conditions of water resources. Because the Horsham Memorial USARC would not close and personnel would not be realigned no direct impacts to these resources are anticipated.

Indirect Impacts. No changes are anticipated to the existing baseline conditions of water resources. Because the Horsham Memorial USARC would not close and personnel would not be realigned no indirect impacts to these resources are anticipated.

4.7.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. No direct impacts to water resources are anticipated under Alternative 2. Although the Horsham USARC would close and personnel would be realigned, there would be no changes to site conditions. No demolition or construction activities would occur.

Indirect Impacts. No indirect impacts to water resources are anticipated under Alternative 2. Although the Horsham USARC would close and personnel would be realigned, there would be no changes to site conditions. No demolition or construction activities would occur.

4.7.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Direct Impacts. No short-term direct impacts to surface water are anticipated from demolition of the current administration building and construction of a recreational field. There are no surface water bodies on the property.

Current regulations require the proponents of any construction activity that disturbs 1 or more acres of land must file a National Pollutant Discharge Elimination System (NPDES) permit application for the resulting storm water runoff caused by the construction activity.

There would be minor long-term beneficial impacts to groundwater. After construction of the recreational field, there would be an increase in groundwater recharge rates from the increase in vegetated surface area on the property. Vegetative cover tends to slow down the movement of surface runoff and may reduce erosion on-site. Currently, approximately two-thirds of the Horsham USARC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. With the demolition of buildings and construction of an outdoor recreational field, it is reasonable to anticipate that there would be up to an 8 percent a reduction in the amount of impervious surface area throughout the facility once it is redeveloped. This reduction in impervious surface area would increase groundwater recharge rates.

There will be no direct impacts to coastal zones because the Horsham USARC is not located within a coastal zone.

There will be no direct impacts to floodplains because the Horsham Memorial USARC is not located within a floodplain.

Indirect Impacts. Indirect negligible short-term adverse and negligible long-term beneficial impacts are anticipated to water resources.

Demolition of the administration building and construction of the recreational field may cause a short-term increase sediment runoff and loading into off-site water bodies from activities such as grading, vegetative clearing, and excavating. BMPs that may be used prior to demolition and construction, such as barriers, tree protection, and buffer/filter

strips, could minimize the effects. Recommendations during and following construction include silt fences, sediment traps, temporary cover crops, and other erosion control BMPs to reduce soil erosion at the site and the associated impacts on off-site surface water. Although BMPs are not 100 percent effective in preventing sediment runoff, the Proposed Action would incorporate construction contractor compliance with established permit requirements. Even with implementation of controls, short-term soil erosion is anticipated.

Current regulations require the proponents of any construction activity that disturbs 1 or more acres of land must file a NPDES permit application for the resulting storm water runoff caused by the construction activity.

After construction of the recreational field, there would be a reduction in surface water runoff into off-site water bodies, and an increase in off-site groundwater seepage from the increase in vegetated surface area on the property. This would be a negligible, long-term beneficial impact. Currently, approximately two-thirds of the Horsham USARC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. With the demolition of buildings and construction of an outdoor recreational field, it is reasonable to anticipate that there would be up to an 8 percent a reduction in the amount of impervious surface area throughout the facility once it is redeveloped. This reduction in impervious surface area would reduce surface water runoff into off-site water bodies, and increase off-site groundwater seepage.

4.8 BIOLOGICAL RESOURCES

4.8.1 Affected Environment

4.8.1.1 Vegetation

The Horsham Memorial USARC is developed and urbanized. The vegetation is mowed cool season grass with ornamental shrubs and trees. The site does not have any known habitat suitable to support rare, threatened, and endangered plant species that may occur in Pennsylvania (USACE 2007).

4.8.1.2 Wildlife

Wildlife present at the Horsham Memorial USARC consists of few species found in typical urban environments such as songbirds, amphibians and reptiles, rabbits, and rodents. The site has no known habitat or water source to support a wide variety of species.

4.8.1.3 Sensitive Species

Results of on-site surveys indicate that habitat for state or federally listed species is not present on the Horsham Memorial USARC property. A letter was sent to the US Fish and Wildlife Service (USFWS) requesting information related to federally listed threatened or endangered plant or animal species within the project area. USFWS responded on June 17, 2010 (see response in Appendix A). The response confirmed that no federally listed species are known or likely to occur within the project area.

The Pennsylvania Natural Diversity Inventory online website was reviewed to identify the potential presence of state listed species or protected communities within the Horsham Memorial USARC. Based on this review, there are no known state-listed species or protected communities within the proposed project area (PNDI 2010).

4.8.1.4 Wetlands

During the site reconnaissance, no wetlands were observed on the Horsham Memorial USARC property. According to the USFWS National Wetlands Inventory (NWI) map for Horsham Township, the Horsham Memorial USARC does not have any NWI wetlands located on or adjacent to the property. According to the NWI map, the wetland nearest the Horsham Memorial USARC property is approximately 0.5 mile to the east (USFWS 2010).

4.8.2 Consequences

4.8.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions of biological resources are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned; no direct impacts to these resources are anticipated.

Indirect Impacts. No changes to the existing baseline conditions of biological resources are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned; no indirect impacts to these resources are anticipated.

4.8.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. There would be negligible beneficial impacts to biological resources under Alternative 2. The Army would reduce maintenance levels to the minimum level for surplus government property. With reduced maintenance procedures, there may be less frequent grass mowing. As the grass would get longer and resemble more of an old field, there would be a negligible increase in habitat potential. The impacts would continue for the duration of caretaker status, which could continue indefinitely.

Indirect Impacts. Because Alternative 2 is limited to the Horsham Memorial USARC property, indirect impacts to biological resources are not anticipated.

4.8.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Direct Impacts. Negligible short-term adverse direct impacts and negligible long-term beneficial direct impacts are anticipated to biological resources under Alternative 3. Demolition of the main administration building and removal of associated ornamental vegetation including some trees and shrubs would result in negligible short-term impacts to vegetation and wildlife habitat. After demolition is complete, cleared areas would be landscaped and replanted with grasses, as well as native and non-native (ornamental) plant species. Replacing a building and associated asphalt areas with a recreational field would provide a negligible increase in habitat to some urban wildlife species, such as songbirds, amphibians and reptiles, rodents, and rabbits.

There are no known wetlands, or federal or state threatened or endangered species or species habitat currently at the Horsham Memorial USARC; consequently, impacts to these resources are not anticipated.

Indirect Impacts. Indirect negligible short-term adverse and negligible long-term beneficial impacts are anticipated to biological resources under Alternative 3.

Indirect negligible short-term adverse impacts are anticipated to biological resources under Alternative 3 from demolition of the existing main administration building and construction of recreational fields. Demolition and construction activities may increase sediment runoff and loading into off-site aquatic habitat and wetlands downstream of Horsham Memorial USARC property. BMPs that may be used prior to demolition and construction, such as barriers, tree protection, and buffer/filter strips, could minimize the effects. Recommendations during and following construction include silt fences, sediment traps, temporary cover crops, and other erosion control BMPs to reduce soil erosion at the site and the associated impacts to off-site wetlands. Even with implementation of controls, short-term soil erosion is anticipated.

Implementation of Alternative 3 would have a negligible long-term beneficial impact on biological resources, as there would be a reduction in storm water runoff that could affect off-site aquatic habitat and wetlands downstream of the Horsham Memorial USARC property due to the increase in the amount of vegetated surface on the property. Vegetative cover tends to slow down the movement of surface runoff and allows excess surface water to infiltrate. Currently, approximately two-thirds of the Horsham USARC property is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. The proposed reuse plan includes the demolition of the administration building and construction of an outdoor recreational field. The overall percentage of impervious surface would be reduced by 24,527 SF (8%).

4.9 CULTURAL RESOURCES

Cultural resources are prehistoric and historic sites, structures, districts, artifacts, or any other physical evidence of human activity considered important to a culture, subculture, or community for traditional, religious, scientific, or any other reason. Cultural resources are discussed here in terms of archaeological sites, including both prehistoric and historical occupations, architectural resources, and locations of concern to Native American groups, including Traditional Cultural Properties.

Procedures for the identification, evaluation, and treatment of cultural resources are contained in a series of federal and state laws and regulations and agency guidelines. Archaeological, architectural, and Native American resources are protected by a variety of laws and their implementing regulations: the National Historic Preservation Act (NHPA) of 1966, as amended in 2006; the Archeological and Historic Preservation Act of 1974; the Archaeological Resources Protection Act (ARPA) of 1979; the American Indian Religious Freedom Act (AIRFA) of 1978; the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990; and AR 200-1, Environmental Protection and Enhancement. The Advisory Council on Historic Preservation (ACHP) further guides treatment of archaeological and architectural resources through the regulations,

Protection of Historic Properties (36 CFR 800). Historic properties, as defined by the NHPA, represent the subset of cultural resources listed on, or eligible for, inclusion in the National Register of Historic Places (NRHP).

The NHPA requires tribal consultation if the historic property (1) is located on tribal lands, or (2) has religious or cultural significance to a Native American Tribe. ARPA prohibits any activity that impacts an archaeological resource located on public or Indian lands without a permit. NAGPRA protects cultural items -- human remains, funerary objects, sacred objects, and objects of cultural patrimony -- of Native American Tribes from inadvertent discovery or intentional excavation. AIRFA requires agencies to consult with traditional religious leaders and consider Native American religious practices.

The Proposed Action is sponsored by the USAR and involves federal assistance and federal permitting, licensing, or approval (36 CFR 800.16(y)). As a result, the Proposed Action is under the purview of Section 106 of the NHPA. Section 106 of the NHPA governs federal actions that could affect NRHP-eligible resources (*i.e.*, historic properties). Section 106 requires federal agencies to take into account the effects of their undertakings, including licensing and approvals, on NRHP-eligible resources and to afford the ACHP and other interested parties a reasonable opportunity to comment.

Identification of NRHP-eligible resources, including archaeological sites, architectural resources, and Native American resources, was conducted according to requirements of 36 CFR 800 for Section 106 of the NHPA. The Section 106 process was initiated with the Bureau for Historic Preservation (BHP), Pennsylvania Historical and Museum Commission (PHMC), the Pennsylvania State Historic Preservation Office (SHPO) on June 6, 2010 (Appendix A). The Area of Potential Effect (APE) was established in coordination with that office and a determination of eligibility for resources identified in the APE and a determination of effect were submitted to the SHPO as part of the Section 106 coordination process.

4.9.1 Affected Environment

To identify cultural resources that could be potentially affected by the Proposed Action, the area within which archaeological, architectural, and Native American resources would have the potential to be affected must be determined. As defined by 36 CFR 800.16(d) of Section 106 of the NHPA, the APE represents the "...geographic area or areas within which an undertaking could cause changes in the character or use of historic properties, if any such exists." In delineating the APE, factors taken into account include the elements of the Proposed Action, the existence of buildings, vegetation, and terrain with respect to potential visual or audible impacts, and construction activities necessary for the Proposed Action.

The APE for cultural resources for the Proposed Action at the Horsham Memorial USARC is the USAR property, defined as the footprint of the existing USAR facility, including the two buildings, paved and landscaped areas on the property (Figure 1.2).

A literature review was conducted to identify previously recorded archaeological, architectural, and Native American resources and assess the probability of undiscovered archaeological sites in the APE. The literature review assessed the

following documents and resources provided by the 99th RSC Department of Public Works, Environmental Division, Cultural Resources Manager, documents prepared for the U.S. Army Reserve, including previous management plans and historic context studies, and online research:

- updated *US Army Reserve 99th Regional Support Command Integrated Cultural Resources Management Plan (ICRMP) 2009 – 2014* (USACE Baltimore 2009);
- the previous *US Army Reserve Integrated Cultural Resources Management Plan, Historic Properties Component, 99th Regional Support Command, Pennsylvania*, covering 2004-2009 (Crane, et al. 2004);
- the *79th Army Reserve Command Cultural Resource Management Plan* including an inventory of cultural resources at Army Reserve facilities in Pennsylvania (KFS Historic Preservation Group 1995);
- *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* (Moore et al. 2008);
- Pennsylvania SHPO site files search using the online Pennsylvania Cultural Resources Geographic Information System conducted in May 2010;
- Environmental Condition of Property Report (USACE 2007);

4.9.1.1 Prehistoric and Historic Background (Cultural Contexts)

Detailed cultural contexts for USAR facilities in Pennsylvania, including the Horsham Memorial USARC were developed during preparation of the USAR ICRMP, Historic Properties Component, 99th RSC, Pennsylvania (Crane, et al. 2004).

In 2008, Hardy Heck, Moore (HHM), Inc. prepared *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* for the DoD Legacy Resource Management Program (Moore, et al. 2008). The study identified and categorized the various property types associated with the historical development of U.S. Army Reserve Centers, concentrating on the post-World War II and early Cold War eras, and provides a historic context that can be used to evaluate them for eligibility for listing in the National Register of Historic Places (NRHP). Property types associated with the early Cold War period were further divided into three categories by plan type and named accordingly as the “Compact Plan,” the “Sprawling Plan”, and the “Vertical Plan.” The study further stipulates the character-defining features that must be present for an Army Reserve Center constructed according to standardized plans to retain its integrity and convey its significance as an exemplar of its property type. Examples of these required character defining features include the original building footprint, original number of stories, original fenestration pattern, and original exterior finish (Moore, et al. 2008).

The document does not evaluate individual Army Reserve Centers but identifies known examples of each property type. Although the Horsham Memorial USARC is not documented in this study, the application of guidelines for evaluating the NRHP eligibility of Army Reserve Centers developed in this study has been recommended by the U.S. Army Corps of Engineers to evaluate the NRHP eligibility of the Horsham Memorial USARC.

4.9.1.2 Status of Cultural Resources Inventories and Section 106 Consultations

The 99th RSC (or its predecessor command) completed one cultural resources investigation at the Horsham Memorial USARC prior to the cultural resources assessment, including an architectural resources evaluation, conducted as part of the development of this EA. In 1995, the KFS Historic Preservation Group of Kise Franks and Straw, Inc., in association with Hunter Research, Inc., prepared the *79th Army Reserve Command (ARCOM) Cultural Resource Management Plan*, on behalf of the 79th ARCOM and the U.S. Army Corps of Engineers (USACE), Baltimore District. Architectural resources and archaeological site potential at 32 Pennsylvania Army Reserve facilities then managed under the 79th ARCOM were identified and evaluated. The investigation included background research, a site files search at the Pennsylvania BHP, and a pedestrian reconnaissance survey at each facility. None of the buildings at the Horsham Memorial USARC were more than 50 years old at the time of the survey and were not evaluated for eligibility for the NRHP. No archaeological sites had been previously identified at the facility at the time of the survey. The Horsham Memorial USARC was considered to have limited potential for archaeological resources, although an 18th century structure was identified just south of the facility. No further work, such as subsurface testing in a Phase 1B survey, was recommended for the Horsham Memorial USARC (KFS Historic Preservation Group 1995).

Section 106 consultation was conducted with the Pennsylvania SHPO as a result of this proposed undertaking. Section 106 responsibilities have been completed by the USAR with the concurrence of the Determination of Effect by the Pennsylvania SHPO.

Archaeological Resources. Previous archaeological survey at the Horsham Memorial USARC consisted of a pedestrian reconnaissance survey which resulted in the finding that the probability of archaeological sites occurring on the property is low (KFS Historic Preservation Group 1995). The Pennsylvania SHPO indicates there is high probability for both prehistoric and historic archaeological resources to be located in the project area; however, the SHPO concurred the types of activities associated with undertaking would have no effect on archaeological resources and that no archaeological investigations are necessary for the project (McLearn 2010a and 2010b; Appendix A).

Architectural Resources. No architectural resources determined eligible for the NRHP have been identified at the Horsham Memorial USARC. The facility was less than 50 years old at the time of the 1995 cultural resources survey and the buildings were not documented or evaluated. The two buildings in the APE,, the administration building and OMS, are now more than 50 years old and were evaluated for NRHP eligibility using guidelines from the *2008 Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* (Historic Context) for the Department of Defense Legacy Resource Management Program (Moore et al. 2008).

The buildings were constructed in 1959 of concrete block covered with brick veneer on concrete foundations (USACE 2007). The plan or footprint of the 24,527-square-foot administration building is an asymmetrical T. The main two-story block forms the top portion on the T and faces the street. The main block is connected, via a one-story hyphen, to a rear wing. The rear wing is a double-height space with clerestory lights on

the side elevations. The main block is used for administrative and classroom space while the rear wing is a drill or assembly hall.

The OMS building is a 3,710-square-foot single-story brick structure with a shed roof situated on the eastern edge of the parcel. The main (north) elevation is accessed by three vehicle service bays with roll up metal doors. The rear (south) elevation exhibits three sets of one- light clerestory windows. The OMS is an auxiliary maintenance building, typically located to the rear of Army Reserve training centers, and would have been used to house large vehicles and machinery. The OMS serves only the maintenance needs of the on-site reserve/training center (Moore et al. 2008: 189).

Based on the layout, design, and time period of construction, the Horsham Memorial USARC appears to be based on standardized plans for U.S. Army Reserve Centers categorized in the Historic Context Study as the “Sprawling Plan” within the Early Cold War property type (Moore, et al. 2008). These standardized plans were initially developed by the architectural firm of Reisner and Urbahn in 1952, updated in 1953, and last revised by the successor firm of Urbahn, Brayton, and Burrows in 1956, in collaboration with the USACE. Known examples of this plan type were constructed from 1953 through 1964, possibly continuing later, by the Army at reserve facilities across the country (Moore, et al. 2008). Unaltered examples of buildings based on these standardized plans have been determined NRHP eligible at other USARC facilities in the 99th RSC and in other areas of the country (Adams and Kierstead 1997; Cultural Site Research and Management with Paula S. Reed and Associates 2007).

Because buildings categorized in the Sprawling Plan sub-type are part of a nationwide building program and are common throughout the United States, a strict set of guidelines to examine their physical integrity through the presence of unaltered character-defining features, as identified in the Historic Context study (Moore, et al. 2008) was established to identify the most intact and representative examples of this property type.

The Horsham Memorial USARC exhibits alterations to three character-defining features including the original fenestration pattern, replacement of what were likely the original windows, and alterations to the main entrance. Based on the 2008 Historic Context standards for assessing integrity, these alterations represent the loss of character-defining elements required for NRHP eligibility. In a letter dated December 22, 2010, the Pennsylvania SHPO concurred that the facility is not eligible for the NRHP (MacDonald 2010; Appendix A).

Because an OMS is a support structure for the main Army Reserve center and lacks sufficient historical associations and/or design qualities on its own to meet any of the NRHP Criteria for eligibility, an OMS is not likely to be eligible on its own for inclusion on the NRHP. “If the associated Army Reserve Center lacks significance or integrity to be eligible for the NRHP, the [OMS] likewise is not eligible” (Moore et al. 2008: 189). Because the Horsham Memorial USARC main building is not considered eligible for the NRHP, neither is the OMS considered eligible for the NRHP.

Native American Resources. Native American resources can include, but are not limited to, archaeological sites, burial sites, ceremonial areas, caves, mountains, water sources, trails, plant habitat or gathering areas, or any other natural area important to a

culture for religious or heritage reasons. NRHP-eligible Native American resources or traditional sites are subject to the same regulations, and afforded the same protection, as other types of historic properties.

As part of the preparation of the 2004-2009 ICRMP, the 99th RSC identified Native American groups with a potential interest in areas in Pennsylvania where U.S. Army Reserve facilities are located. The PHMC does not identify any properties of traditional, religious, or cultural significance within the state as of 2008.

Consultation with one Native American group (Delaware Nation) was initiated for the current proposed project at the Horsham Memorial USARC on June 6, 2010. On August 3, 2010, the Delaware Nation responded that the location of the project does not endanger known sites of interest to the Delaware Nation, and they have no concerns with the project as planned. The Tribe requests that if archaeological sites are inadvertently discovered that they be contacted along with other appropriate agencies and that all construction and ground disturbing activities be halted until consultation has occurred (Francis 2010). This consultation is documented by correspondence included in Appendix A.

4.9.2 Consequences

An undertaking is considered to have an effect on a historic property when the undertaking may alter characteristics of the property that may qualify it for inclusion in the NRHP. An effect is considered adverse when it diminishes the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Adverse effects on historic properties would include, but not be limited to:

- Physical destruction, damage, or alteration of all or part of the property;
- Isolation of the property from or alteration of the character of the property's setting when that character contributes to the property's qualification for the NRHP;
- Introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting;
- Neglect of a property resulting in its deterioration or destruction; and
- Transfer, lease, or sale of the property (36 CFR 800.9[b]).

For the purposes of this EA, a significant impact under NEPA is defined as an "unresolvable" adverse effect under Section 106 of the NHPA. "Unresolvable" adverse effects may occur when the terms of mitigation cannot be agreed upon, or if the NHPA Section 106 process is foreclosed due to an inability to reach agreement.

4.9.2.1 Alternative 1 – No Action Alternative

Direct Impacts.

Under the No Action Alternative, the USAR would not implement the Proposed Action and would continue the mission at the Horsham Memorial USARC as it was being performed in April 2010. No direct impacts to cultural resources differing from the baseline condition would be expected.

Indirect Impacts.

Because the Proposed Action would not be implemented under the No Action Alternative, no indirect impacts to cultural resources differing from the baseline condition would be expected.

4.9.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts.

Archaeological Resources. Direct impacts to archaeological resources from implementing caretaker status under Alternative 2 are not anticipated. Although archaeological potential at the facility may be high, no impacts to potential archaeological resources are anticipated under Alternative 2.

Architectural Resources. Direct impacts to architectural resources from implementing caretaker status under Alternative 2 are not anticipated. No NRHP-eligible architectural resources occur at the facility.

Native American Resources. Direct impacts to Native American resources under Alternative 2 are not anticipated. No Native American resources have been identified at the facility.

Indirect Impacts. Because Alternative 2 is limited in geographical extent and scope, future new construction or architectural modification in nearby areas for public facilities and utilities associated with this project are not anticipated. Therefore, no indirect impacts to cultural resources would occur.

4.9.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Direct Impacts.

Archaeological Resources. Direct impacts to archaeological resources from ground disturbing activities such as building and pavement demolition and removal, surface grading, and use of staging areas for heavy equipment and supplies under Alternative 3 are not anticipated. Although archaeological potential at the facility may be high, no impacts to potentially intact archaeological resources are anticipated as a result of the minimal ground disturbance that would occur under Alternative 3 (McLearn 2010a).

Architectural Resources. Under the Alternative 3, no direct impacts to cultural resources would be expected because no NRHP-eligible architectural resources occur at the facility.

Native American Resources. Direct impacts to Native American resources under Alternative 3 are not anticipated. No Native American resources have been identified at the facility.

Indirect Impacts. Because Alternative 3 is limited in geographical extent and scope, future new construction or architectural modification in nearby areas for public facilities and utilities associated with this project are not anticipated. Therefore, no indirect impacts to cultural resources would occur.

4.10 SOCIOECONOMICS

The following six sections discuss the existing economic and social conditions of the Region of Influence (ROI):

- economic development,
- demographics,
- housing,
- quality of life,
- environmental justice in minority and low-income populations, and
- protection of children from environmental health risks and safety risks.

The Horsham Memorial USARC is located in Horsham Township, Pennsylvania in Montgomery County. It is approximately 18 miles north of Philadelphia, Pennsylvania. The Horsham Memorial USARC is located within the Philadelphia, Pennsylvania Metropolitan Division, which includes Bucks County, Chester County, Delaware County, Montgomery County, and Philadelphia County. The term Metropolitan Divisions is defined by the Office of Management and Budget (OMB) and is used to refer to a county or group of counties within a larger metropolitan statistical area. While the Metropolitan Division is part of a larger region, it often functions as a distinct social, economic, and cultural area (OMB 2009). The Philadelphia, Pennsylvania Metropolitan Division is the Region of Influence (ROI) for this socioeconomic analysis.

4.10.1 Affected Environment

The following sections discuss the existing economic and social conditions of the ROI in respect to labor force, employment, population, housing, and quality of life. Information for Horsham, Montgomery County, and the State of Pennsylvania were added when available.

4.10.1.1 Economic Development

Regional Economic Activity

The civilian labor force for Montgomery County and the ROI increased from 2004-2009. Three organizations in the ROI (CEO Council for Growth, Select Greater Philadelphia, and the Greater Philadelphia Chamber of Commerce) have created a working partnership to expand and create business opportunities in the eleven counties that make up the greater Philadelphia region. The partnership conducts programs and events to make the greater Philadelphia region an attractive place to do business (Philadelphia Chamber of Commerce 2010). Montgomery County has a very diverse economy with major industries that include mutual funds, pharmaceuticals, insurance, computer design, and education, and it has an Economic Development Plan to help direct growth and development in the area (Montgomery County 2010). Civilian labor force statistics are given in Table 4.1.

Jurisdiction	% Increase, (Decrease) 2004-2009	2009 Labor Force	2009 Unemployment Rate (%)
Montgomery County	3.9	434,515	6.7
Philadelphia, PA Metropolitan Division	6.6	1,972,796	7.5
Pennsylvania	1.2	6,332,000	7.9
United States	-	154,142,000	9.3

Source: US Department of Labor, Bureau of Labor Statistics, 2009 (BLS 2009)

In the ROI, approximately 31 percent of employment is in the services industry. Employment in the major industry sectors by “place of work” for 2008 is shown in Table 4.2.

Industry	Total	Percent
Farm Employment	7,146	<1.0
Forestry, Fisheries	(D)	(D)
Mining	(D)	(D)
Construction	119,480	4.9
Manufacturing	156,614	6.5
Transportation, Warehousing, Utilities	71,784	3.0
Wholesale Trade	92,316	3.8
Retail Trade	226,289	9.4
Finance, Insurance, Real Estate	270,053	11.2
Services	757,657	31.4
Government	230,465	9.5
TOTAL EMPLOYMENT¹	2,416,724	100

(D) Not shown to avoid disclosure of confidential information.

¹Total of column does not equal 261,810 because of non-disclosure of employment information industry sectors.

Source: US Department of Commerce, Bureau of Economic Analysis, Regional Economic Information System, 2008

4.10.1.2 Demographics

Regional Population

The ROI covers approximately 1,066 square miles with a density of 437 people per square mile. The smallest county within the ROI, Philadelphia County, is 135 square

miles with a density of 10,723 people per square mile while the largest county, Chester County, is 756 square miles with a density of 642 people per square mile. The average age of residents for the ROI in 2009 was 37 years old, equal to the state average of 37 years old (City Data 2009). The average household size in 2000 was 2.3 people with a median household income of \$68,658. The youngest county, Philadelphia County has a median age of 34.2 years and the median household income is 46 percent lower than the average for the ROI. The Horsham Memorial USARC is located in Montgomery County. The county has the oldest median age of 38 years and a higher median household income (\$78,092) than the ROI as a whole.

Although both Montgomery County and the Philadelphia, Pennsylvania Metropolitan Division have seen growth between 1990 and 2000, Horsham experienced a nearly two percent population decline during the same time period. Between 2000 and 2009, Montgomery County ranked 5th out of 66 counties in Pennsylvania for overall growth. It has a high birth rate compared to other counties ranking 3rd out of 66 counties. Nearly 40 percent of the growth between 2000 and 2009 was due to international migration (USCB 2008). Regional and local population trends are shown in Table 4.3.

Jurisdiction	2020 Projected Population¹	2009 Population Estimates²	Percent Change 1990-2000	2000 Population	1990 Population
Horsham	NA	NA	(1.8)	14,779	15,051
Montgomery County	854,994	782,339	10.6	750,097	678,111
Philadelphia, PA Metropolitan Division	4,120,619	4,012,573	3.1	3,843,647	3,728,909
Pennsylvania	12,871,923	12,604,767	3.4	12,281,054	11,881,643

¹ Pennsylvania State Data Center, 2010.
² US Census Bureau, Population Estimates Program.
 Note: Parentheses denote decrease.
 Source: US Department of Commerce, US Census Bureau, 1990 and 2000 US Census.

4.10.1.3 Housing

In 2009, the ROI had a higher than average cost of living with a rating of 105 (the U.S. average is 100). The median value of an owner occupied housing unit in the ROI is 39 percent higher than the U.S. average of \$192,400. Approximately 56 percent of the housing in Montgomery County is single family housing. The next most common type of housing is one-unit attached with 20 percent classified as this unit type (USCB 2008). Housing characteristics for the area are shown in Table 4.4.

Jurisdiction	Total Housing Units 2008	Percent Vacant 2008	Percent Owner Occupied 2008	Median Value Owner Occupied 2008	Median Rent Renter Occupied 2008	Median Household Income 2008
Horsham (CDP*)	5,917	2.0	72.1	\$147,100	\$697	\$56,500
Montgomery County	313,514	4.6	75.0	\$302,100	\$875	\$76,834
Philadelphia, PA Metropolitan Division	1,618,626	7.2	72.0	\$266,600	\$810	\$68,350
Pennsylvania	5,476,136	10.9	71.4	\$155,400	\$569	\$50,272
United States	127,762,925	12.0	67.1	\$192,400	\$819	\$52,175

*CDP – Census Designated Place
Source: US Department of Commerce, Bureau of the Census, American Community Survey 2006-08.

There are 28,631 residential homes listed for sale in the ROI. Table 4.5 shows the price breakdown for the listed homes.

Listed Price Range	Number of Homes Listed					
	Bucks County	Chester County	Delaware County	Montgomery County	Philadelphia County	Total ROI
\$0-\$150,000	423	206	1,014	626	4,248	6,517
\$150,000 - \$250,000	822	816	1,052	1,348	1,963	6,001
\$250,000 - \$350,000	1,245	1,022	2,066	1,974	1,062	7,369
\$350,000 - \$450,000	665	733	246	698	534	2,876
\$450,000 - \$600,000	521	572	252	553	446	2,344
Over \$600,000	846	838	472	863	505	3,524
TOTAL	4,522	4,187	5,102	6,062	8,758	28,631

4.10.1.4 Quality of Life

Education

Each of the counties within the ROI has a county-wide public school district in addition to private schools. School information is shown in Table 4.6.

Number	Bucks County	Chester County	Delaware County	Montgomery County	Philadelphia County	Total ROI
Public School Districts	15	14	17	23	42	111
Elementary Schools	195	136	166	240	380	1,117
Middle Schools	31	20	18	30	48	147
High Schools	24	21	21	39	69	174
TOTAL	265	191	222	332	539	1,549
<i>Source: Schooltree, 2009</i>						

In Montgomery County, approximately 92 percent of the population 25 years or older have a high school diploma, and approximately 43 percent have a bachelor’s degree. In the Philadelphia, Pennsylvania Metropolitan Division, approximately 89 percent of the population 25 years old or older has a high school diploma, and approximately 36 percent have a bachelor’s degree (USCB 2008). For the State of Pennsylvania, approximately 87 percent of the population 25 years old or older has a high school diploma, and approximately 26 percent have a bachelor’s degree (USCB 2008).

Health

The ROI has 76 medical and health facilities. Of the five counties in the ROI, Montgomery ranks second for number of hospitals with 17 facilities. In the ROI, Pennsylvania County has the most with 39 hospitals, while Delaware County has the least with 5.

Law Enforcement

Law enforcement within the ROI is provided by county and municipal police departments. Horsham Township has a police department comprising 40 men and women supported by a nine-member dispatch and clerical staff team. The department serves a population of approximately 24,263 and answers over 15,000 calls a year. In addition to patrol and investigation, the police department also runs a variety of programs such as adopt-a-cop, child restraint safety, and citizen police academy (Horsham Township 2010).

Fire Protection

Fire protection and emergency medical services are provided by municipal and township fire departments throughout the ROI. Horsham Fire Company has a variety of equipment that includes pumpers, ladders, rescue trucks, ambulances, and command vehicles. There are two fire stations. One on Meetinghouse Road, and one on Horsham Road. The fire company has 60 fire responders, 20 ambulance responders, and 10 special fire police. The fire company is run by volunteers and managed with a career staff of two firefighters/Emergency Medical Technicians (EMT) and fire firefighter/paramedics. The Horsham Fire Company Ambulance Corps Division is run with a combination of over 35 volunteer and career staff EMTs, paramedics, and rescue workers (Horsham Fire Company 2010).

Recreation

The ROI has an array of recreational facilities and opportunities for public use. Horsham has a department that manages recreation opportunities for the township. Residents have access to more than 814 acres at 46 sites that range from community parks to open space (Horsham Township 2010). Montgomery County manages more than 6,000 acres of public open space that includes a mix of parks, natural areas, historic sites, and greenways. There are approximately 60 miles of county trails that connect green space around the county (Montgomery County 2010).

4.10.1.5 Environmental Justice

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations

On February 11, 1994, President Clinton issued EO 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*. The purpose of this EO is to avoid the disproportionate placement of adverse environmental, economic, social, or health impacts from federal actions and policies on minority and low-income populations or communities.

For environmental justice considerations, these populations are defined as individuals or groups of individuals subject to an actual or potential health, economic, or environmental threat arising from existing or proposed federal actions and policies. Low-income, *i.e.*, at or below the poverty threshold, is defined as the aggregate annual mean income for a family of four in 2006 was \$20,444 and \$22,025 in 2008.

The ROI has a higher percentage of minorities than the state. Approximately 16 percent of the population in the five-county area is African American and four percent is Asian. Five percent of the population is of Hispanic origin. Philadelphia County has the highest percentage of minorities at 57.5 percent. Montgomery County is similar to the state with 16 percent minorities. According to US Census Bureau estimates, the highest concentration of individuals below the poverty level is in Philadelphia County at 24.3 percent, which is higher than the state value of 11.9 percent. Montgomery County has approximately six percent of the population below the poverty line. Table 4.7 summarizes this information.

Jurisdiction	Total Population (2008)	Percent Minority Race Population (2008)	Percent Black or African American Population (2008)	Percent Hispanic Population (2008)	Percent American Indian and Alaska Native Population (2008)	Percent Asian Population (2008)	Median Household Income in Dollars (2008)	Percent of individuals Below Poverty (2008)
Horsham CDP ¹	14,779	9.9	3.8	1.4	0.2	4.3	\$56,500	3.1
Montgomery County	775,304	15.9	8.1	3.2	0.1	5.2	\$76,834	5.7
Philadelphia, PA Metropolitan Division (ROI)	3,882,589	23.8	21.8	6.2	0.5	5.0	\$68,350	10.0
Pennsylvania	12,418,756	16.2	10.3	4.6	0.1	2.4	\$50,272	11.9
United States	301,237,703	25.7	12.3	15.1	0.8	4.4	\$52,175	9.6

¹ Census 2000
Source: US Department of Commerce, US Census Bureau, American Community Survey 2006-2008.

4.10.1.6 Protection of Children

Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks.

On April 21, 1997, President Clinton issued EO 13045, Protection of Children from Environmental Health Risks and Safety Risks. This EO recognizes that a growing body of scientific knowledge demonstrates that children may suffer disproportionately from environmental health risks and safety risks.

It is Army policy to fully comply with EO 13045 by incorporating these concerns in decision-making processes supporting Army policies, programs, projects, and activities. In this regard, the Army ensures that it would identify, disclose, and respond to potential adverse social and environmental impacts on children within the area affected by a proposed Army action.

Within 1 mile of the Horsham Memorial USARC, there is one child care facility and four elementary and secondary schools. The areas surrounding the Horsham USARC are primarily residential and commercial uses with the Willow Grove NAS/JRB to the west.

4.10.2 Consequences

4.10.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions for socioeconomic resources are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned, no direct impacts to these resources are anticipated.

Indirect Impacts. No changes to the existing baseline conditions for socioeconomic resources are anticipated. Because the Horsham Memorial USARC would not close

and personnel would not be realigned, no indirect impacts to these resources are anticipated.

4.10.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. The Horsham Memorial USARC would close and relocate to a new Armed Forces Reserve Center with an organizational maintenance facility at Willow Grove NAS/JRB. The Willow Grove NAS/JRB is located adjacent to the west side of Horsham Memorial USARC. Both of the installations are located within the Philadelphia, Pennsylvania Metropolitan Division; therefore, the impacts on the ROI and regional economy would not differ from baseline conditions. The potential exists for negligible adverse impacts to businesses immediately surrounding the current facility.

There would be no need for any of the personnel to relocate; thus, there would be no impacts to housing, education, fire protection, law enforcement, health care, and other public resources.

Indirect Impacts. Under this alternative, there would be benefits foregone from the delayed reuse of the property. The City of Horsham would lose immediate economic benefits from potential employment, sales, and payment of property taxes from the reuse of the site. Potential developers of the site would lose the immediate redevelopment opportunity and potential economic benefits. Residents of the Horsham community would lose any potential immediate employment that may be created through the construction phase and reuse of the property.

4.10.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Direct Impacts. Under Alternative 3, negligible direct short-term beneficial economic impacts would be realized by the regional and local economy during the construction phase of the proposed reuse. Employment generated by construction activities would result in wages paid; an increase in sales (business) volume; and expenditures for local and regional services, materials, and supplies.

The Economic Impact Forecast System (EIFS) model, developed by the USACE Construction Engineering Research Laboratory, was used to assess the impacts of this alternative on the economy. The EIFS model provides a systematic method for evaluating the regional socioeconomic effects of government actions, particularly military actions. Using employment and income multipliers developed with a comprehensive regional/local database combined with economic export base techniques, the EIFS model estimates the regional economic impacts in terms of changes in employment generated, changes in population, and expenditures directly and indirectly resulting from project construction. The EIFS model evaluates economic impacts in terms of regional change in business volume, employment and personal income, and expenditures for local and regional services, materials, and supplies. Although the EIFS model does not provide an exact measure of actual dollar amounts, it does offer an accurate relative comparison of alternatives.

The estimated total construction cost, including demolition of the existing administration building, of the new construction projects under Alternative 3 is approximately \$637,000

(2011 dollars). The estimated construction period for the new facilities is 1 year. The EIFS employment and income multiplier for the ROI is 3.95.

Table 4.8 provides the estimated direct, indirect, and total annual economic impacts of construction activities on business volume, income, and employment, as estimated by the EIFS model. These impacts would be realized annually over the length of the construction period. The increase in business volume, income, and employment includes capital expenditures, income, and labor directly associated with the construction activity. Table 4.8 also provides the indirect impacts on business volume, income, and employment because of the initial direct impacts of the construction activities. It should be noted that construction phase workers would not be expected to relocate. Appendix C contains the EIFS reports on impacts.

Table 4.8 Estimated Annual Economic Impacts : Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)				
Variable	Direct Impacts	Indirect Impacts	Total	RTV¹
Annual Construction Impacts²				
Sales (Business) Volume	\$452,190	\$1,333,961	\$1,786,151	0.0%
Income	\$258,058	\$236,744	\$494,803	0.0%
Employment	6	5	11	0.0%
<p>¹ Rational Threshold Value.</p> <p>² 2011 Dollars.</p> <p>Source: Economic Impact Forecast System, US Army Corps of Engineers, Construction Engineering Research Laboratory.</p>				

The EIFS model also includes a Rational Threshold Value (RTV) profile used in conjunction with the forecast models to assess the degree of the impacts of an activity for a specific geographic area. For each variable (business volume, employment, income, and population), the current time-series data available from the United States Bureau of Economic Analysis are calculated along with the annual change, deviation from the average annual change, and the percent deviation for each of these variables, which then defines a threshold for important annual regional economic impacts for a variable. Within the EIFS model, the RTV is calculated for each of these variables when assessing the regional economic impacts of a specific project. If the RTV for a particular variable associated with the impacts of a specific project exceeds the maximum annual historic deviation for that variable, then the economic impacts are considered significant. If the RTV for a variable is less than the maximum annual historic deviation for that variable, then the regional economic impacts are not considered significant.

Table 4.8 provides the RTV associated with each of the economic impacts resulting from the construction activity. The regional positive RTVs for each economic variable are as follows: sales volume (12.75%); income (11.15%); employment (2.7%); and population (0.93%). Thus, the RTV for each of the variables was found to be considerably less than the respective regional RTV. For this reason, impacts

associated with construction would occur on a regional basis, and not result in substantial annual beneficial impacts.

The Willow Grove NAS/JRB is adjacent to the west side of the existing Horsham Memorial USARC. There would be no need for any of the personnel to relocate; thus, there would be no impacts to housing, education, fire protection, law enforcement, health care, and other public resources.

There are no anticipated socioeconomic impacts of the Proposed Action related to environmental justice. However, some economic benefits could accrue to minority and low-income populations through employment during the construction phase of the Proposed Action.

There are no anticipated impacts to children from the Proposed Action; therefore, no measures are necessary to protect children. The Proposed Action would enhance the ability of the HHSD to service the community by providing additional school district transportation storage and playing fields.

Indirect Impacts. The anticipated increase in construction activity would have indirect socioeconomic impacts on the region. These impacts would be in employment; income; business volume; housing; educational and community facilities; public services; and government revenues and expenditures.

Indirect short-term beneficial economic impacts would be realized by the regional and local economy during the construction phase of this alternative. Employment generated by construction activities would result in additional indirect wages paid; an increase in indirect business volume; and indirect expenditures for local and regional services, materials, and supplies as indicated in Table 4.8.

There would also be indirect impacts to the HHSD that would acquire the property after the closure because the current school facilities currently do not meet the maintenance and storage needs of the district. There has been an increase in athletic program enrollment in the last 10 years, and the additional athletic fields would support existing programs and growing programs. There would be negligible adverse indirect impacts because the proposed reuse would require the expenditure of money from the school district's existing Capital Reserve Fund account. The proposed reuse would be utilized, staffed, and maintained by the school district's existing maintenance and recreational programs.

There would be negligible beneficial indirect impacts to the school district from the reuse. Currently, the school has inadequate storage and maintenance areas, so the district is forced to store major pieces of equipment outside, which deteriorates the equipment requiring it to be repaired or replaced more frequently. By utilizing the OMS, the school would be able to provide better maintenance and storage, allowing the equipment to last longer, cutting costs for repairs and replacement of equipment. There would be negligible beneficial long-term impacts to the HHSD.

4.11 TRANSPORTATION

4.11.1 Affected Environment

4.11.1.1 Roadways and Traffic

The Horsham Memorial USARC can be reached via Easton Road/Pennsylvania State Highway 611 and West Moreland Avenue via West County Line Road (MapQuest 2010). The property is situated on a principal arterial highway (State Highway 611). In 2008, traffic counts on Highway 611 near the Horsham USARC indicate a volume of approximately 33,000 vehicles per day (including both eastbound and westbound lanes (PDOT 2010)). The Willow Grove NAS/JRB is located west of the Horsham Memorial USARC on the west side of Highway 611 (USACE 2007).

4.11.1.2 Installation Transportation

The Horsham Memorial USARC property has no roadways, only driveways and asphalt parking lots. The Horsham Memorial USARC has two parking lots, one for military equipment and one for POVs (USACE 2007).

4.11.1.3 Public Transportation

The Horsham, Pennsylvania area is served primarily by Philadelphia International Airport, located 23 miles from the Horsham Memorial USARC. Trenton Mercer Airport is 17 miles from the property, and Lehigh Valley International Airport, Allentown is 35 miles away. Local bus and nearby commuter rail transportation is provided by Southeastern Pennsylvania Transportation Authority. Amtrak has stations in Philadelphia and in Trenton, New Jersey servicing the Northeast Corridor connecting to New York and Washington D.C. There are several bus, cab, and limousine companies that service the airports and train stations (GHCC 2010). Montgomery County regional trails link county parks and historical sites, as well as greenways, waterways, heritage corridors, and many villages and towns throughout Montgomery County.

4.11.2 Consequences

4.11.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes are anticipated to the existing baseline conditions of transportation. Because the Horsham Memorial USARC would not close and personnel would not be realigned no direct impacts to these resources are anticipated.

Indirect Impacts. No changes are anticipated to the existing baseline conditions of transportation. Because the Horsham Memorial USARC would not close and personnel would not be realigned no indirect impacts to these resources are anticipated.

4.11.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Negligible short-term direct adverse impacts to transportation are anticipated under Alternative 2. A slight increase in traffic may occur on Easton Road/Pennsylvania State Highway 611 and West Moreland Avenue via West County Line Road during the closure of the Horsham Memorial USARC as equipment, furnishings, and personnel are moved out of the facility.

Long-term direct negligible beneficial impacts are anticipated to roadways and traffic under Alternative 2. There would no longer be 10-12 soldiers driving to and from the Horsham Memorial USARC on a daily basis. There would no longer be drill weekends once per month at Horsham Memorial, in which 150 people drive to and from the Horsham Memorial USARC property. However, the same number and frequency of vehicles would be driving to and from Willow Grove NAS/JRB in Horsham. Additionally, a small number of vehicles would visit the Horsham Memorial USARC as the Army provides for maintenance to preserve and protect the facility and equipment until there is a permanent transfer of property.

Indirect Impacts. No indirect impacts are anticipated under Alternative 2. No additional impacts are expected beyond the direct impacts associated with the decrease of military related traffic and future vehicle use at the property.

4.11.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Direct Impacts. Short-term direct negligible adverse impacts are anticipated to roadways and traffic under Alternative 3. Construction vehicles normally have slower acceleration rates and wider turning radii. During demolition of the Horsham Memorial USARC administration building and construction of the athletic field there would be increased congestion on local streets. Long-term direct negligible impacts are anticipated to roadways and traffic.. The property would have one entrance and parking area instead of two. The weekday traffic pattern would change with an increase in bus traffic during rush-hour. Increased traffic would occur in evenings and on weekends for sports and recreational activities. Weekend traffic is expected to be comparable to traffic that would normally occur on drill weekends at the Horsham Memorial USARC.

Indirect Impacts. No indirect impacts are anticipated under Alternative 3 as no additional impacts are expected beyond the direct impacts associated with the future vehicle use at the property.

4.12 UTILITIES

4.12.1 Affected Environment

4.12.1.1 Potable Water Supply

The Willow Grove NAS/JRB provides potable water service to the Horsham Memorial USARC. Based on a review of available historical site and agency records, and interviews with site personnel; neither a water supply well nor a septic system is or was located at the Horsham Memorial USARC property. A search of federal and state water well databases identified one water supply source located approximately 0.125 mile south-southeast and upgradient of the property. The well supplies water to a restaurant, Lee's Hoagie House (USACE 2007).

4.12.1.2 Wastewater System

The Willow Grove NAS/JRB provides sanitary sewer service to the Horsham Memorial USARC property. The primary source of wastewater that is directed to the Willow Grove NAS/JRB sewer system includes non-process wastewater (bathrooms, sinks,

etc.) and vehicle washing runoff. Sanitary sewer lines are connected to the Willow Grove NAS/JRB sewer system. No information was available on whether a septic system existed or was removed (USACE 2007).

4.12.1.3 Storm Water System

Storm water flows to storm drains located in the MEP area and POV parking area. A storm drain also is located in the grassy area south of the administration building and drains west toward State Route 611. The storm drains then flow north, parallel with State Highway 611 (USACE 2007). Current regulations require the proponents of any construction activity that disturbs 1 or more acres of land must file a NPDES permit application for the resulting storm water runoff caused by the construction activity. This includes having a storm wastewater pollution prevention plan.

4.12.1.4 Energy Sources

PECO provides natural gas and electric services to the Horsham Memorial USARC property (USACE 2007). PECO serves 1.6 million electric and 491,000 natural gas customers in southeastern Pennsylvania. PECO is the state's largest utility, operating and maintaining a network with 550 electric substations, 21,000 miles of distribution and transmission lines, 27 natural gas gate stations and 6,600 miles of underground gas mains (PECO 2010). Annual electric and gas usage for the Horsham Memorial USARC in 2008 were 141,120 kilowatt hours and 14,578 hundred cubic feet, respectively.

4.12.1.5 Communications

Comcast and Verizon provide telecommunications services to the Horsham area. All three are large telecommunications providers with extensive regional coverage.

4.12.1.6 Solid Waste

Allied Waste, Ches-Mont Disposal, and United Group Service can provide solid waste services to the Horsham Memorial USARC (HTS 2010).

4.12.2 Consequences

4.12.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions of utilities are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned no direct impacts to these resources are anticipated.

Indirect Impacts. No changes to the existing baseline conditions of utilities are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned no indirect impacts to these resources are anticipated.

4.12.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Short-term direct negligible beneficial impacts are anticipated to utilities due to decreased consumption during the Army's caretaking period. No missions or training would take place at the Horsham Memorial USARC.

Indirect Impacts. No indirect impacts are anticipated to utilities under Alternative 2. All property caretaker utility needs would be within the capacity of current utility providers.

4.12.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Direct Impacts. No direct impacts to utilities are anticipated under Alternative 3. Potential development of a school recreational field and use of the motor vehicle garage would be consistent with other similar development in the area, thereby not substantially changing the utilities demand. The demolition of the main building at the Horsham Memorial USARC would result in an overall decrease in utility consumption at the property. All property reuse utility needs would be within the capacity of current utility providers.

Indirect Impacts. No indirect impacts to utilities are anticipated under Alternative 3. All property reuse utility needs would be within the capacity of current utility providers.

4.13 HAZARDOUS AND TOXIC SUBSTANCES

4.13.1 Affected Environment

Specific environmental statutes and regulations govern hazardous material and hazardous waste management activities at the Horsham Memorial USARC. For the purpose of this analysis, the terms hazardous waste, hazardous materials, and toxic substances include those substances defined as hazardous by Comprehensive Environmental Response, Compensation, and Liability Act, the Resource Conservation and Recovery Act (RCRA), AR 200-1, and Toxic Substances Control Act. In general, they include substances that, because of their quantity, concentration, or physical, chemical, or toxic characteristics, may present moderate danger to public health or welfare or the environment upon release.

4.13.1.1 Uses of Hazardous Materials

Since 1959, the Horsham Memorial USARC has primarily functioned to provide administrative, logistical, and educational support to the assigned Army Reserve units and to Army reserve personnel. Limited maintenance of military vehicles was performed in the OMS (USACE 2007).

Maintenance activities in the OMS building include oil, hydraulic fluid, and antifreeze changes; oil filter replacement; parts cleaning; vehicle washing; engine repair; and brake servicing (USACE 2007).

Vehicle washing operations occurred on the wash rack located on the west side of the OMS. The wash rack consisted of a concrete pad surrounded by a concrete curb. A grate located in the middle of the concrete pad leads to an oil-water separator and then discharged to the property sewer (USACE 2007).

Both friable and non-friable asbestos containing materials have been found in the buildings at the Horsham Memorial USARC. The Environmental Condition of Property (ECOP) Report (USACE 2007) noted that ACM was removed from the boiler room prior to 1995. Asbestos is present in the 9-inch by 9-inch black and white tiles located throughout the first and second floors of the administrative building (USACE 2007).

An indoor firing range located on the first floor of the administrative building was used for proficiency in marksmanship training. Sub-caliber (.22) rifles were used during these drill training exercises. The firing range was decommissioned and cleaned in 2002 and had not been used for several years prior. The floor of the firing range was cleaned using a cleaning solution in conjunction with floor scrubbers. Confirmatory wipe samples were collected following decommissioning activities in 2002. The results indicated that lead concentrations were below 200 micrograms per square foot and the range was deemed safe for reoccupation (USACE 2007). The room is now used for storage.

LBP inspections in 2004 and 2006 found peeling and chipped LBP or lead-containing paint located on walls, doors, door frames, window sills, window frames, ceilings, and radiators in the administration and OMS buildings.

A PCB Management Plan was issued in 2003. This plan noted that a pad-mounted transformer next to the administrative building was identified as containing PCBs. No other electrical or hydraulic lifts that could potential contain PCBS were identified (USACE 2007)

A radon survey was conducted on the property. The results of this survey were listed in the 2007 ECOP Report. Radon levels were below actionable levels set by the USEPA (USACE 2007).

4.13.1.2 Storage and Handling Areas

The 2007 ECOP Report noted that vehicle maintenance products, including solvents paints, acids, antifreeze, and petroleum, oil, and lubricant products were stored in designated storage areas within the OMS. Other hazardous substances were stored in the outdoor hazardous material storage shed located north of the OMS building (USACE 2007).

Various sizes of containers with new and used motor oil, antifreeze, hydraulic oils, grease, brake fluid, fuel filters, and oil filters were stored on a plastic containment pallet inside the OMS. Two containers (used motor oil and cleaning solvent) were noted as being staged directly on the floor. Chemicals noted in the parts cleaning device were Break Through and Skysol (USACE 2007).

A former maintenance pit exists in the northernmost maintenance bay of the OMS. This pit often collected fluids during maintenance activities. No evidence of a release was observed and closure documentation was not available (USACE 2007).

Two USTs (one was a 2,000 gallon tank containing No. 2 heating oil) were historically located on the property. One tank was removed in 1997 and the removal date of the other tank is unknown. There are currently no USTs or ASTs on the property (USACE 2007).

4.13.1.3 Hazardous Waste Disposal

Based on the maintenance activities at the OMS, the Horsham Memorial USARC is considered a RCRA small quantity generator. According to the 2007 ECOP Report, the 99th RSC personnel were not aware of any permitted 90-day storage areas. On-site disposal of hazardous substances has not occurred at the Horsham Memorial USARC.

Waste generated by the OMS was transported and disposed of at the Willow Grove NAS/JRB.

4.13.1.4 Site Contamination and Cleanup

A preliminary assessment screening report was prepared in 1995 by USACE, Baltimore District to assess a debris storage area. This debris pile was used to store hazardous material and contaminated soil and was located within 20 feet of the fence line north of the OMS building. Four soil borings were taken to characterize the soil beneath the debris storage area. Concentrations of total petroleum hydrocarbons-diesel range organics above PADEP Interim Cleanup Standards for Contaminated Soils were detected. Other analytes tested for were VOCs, PCBs, and lead.

Additional soil borings and surface soil samples for VOCs, semi-VOCs, pesticides, PCBs, metals, and herbicides were completed in 1999 and 2001 to further assess surface and subsurface soil along the fence. Results of the soil samples indicate that analytes were below Pennsylvania Act 2 Medium Specific Concentrations. No evidence exists that past site practices have significantly impacted the quality of soil along the fence line between the Horsham Memorial USARC and the Hallowell Elementary School (USACE 2007).

Approximately 40 square feet of petroleum-stained soil on the south side of the OMS was reported in a 1995 site inspection. The staining was not observed during site reconnaissance in 2006; however, no remedial activities have been recorded.

Contaminated soil associated with a 2,000-gallon UST leaking No. 2 fuel oil was remediated and is now closed by the PADEP. In addition, approximately 10 gallons of diesel fuel were spilled on north side of OMS in 1994. The Willow Grove NAS/JRB was notified and contaminated soil was removed.

A leaking UST associated with an off-site retail fuel station (JOT Fuel) is located to the north of the Horsham Memorial USARC property boundary. Monitoring wells closest to the Horsham Memorial USARC historically contained detectable amounts of VOCs and MTBE. According to the 2007 ECOP Report, the last few rounds of groundwater monitoring showed that the amounts in these wells are above detection levels. Since detections of other petroleum related chemicals are present in other monitoring wells on the retail site, PADEP requires additional monitoring (USACE 2007).

4.13.1.5 Special Hazards

No special hazards were identified at the Horsham Memorial USARC in the 2007 ECOP Report (USACE 2007).

4.13.2 Consequences

4.13.2.1 Alternative 1 – No Action Alternative

Direct Impacts. No changes to the existing baseline conditions of hazardous and toxic substance are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned; no direct impacts to this resource are anticipated. There would be no change in the generation and disposal of hazardous and toxic substances.

Indirect Impacts. No changes to the existing baseline conditions of hazardous and toxic substances are anticipated. Because the Horsham Memorial USARC would not close and personnel would not be realigned; no indirect impacts to this resource are anticipated. There would be no change in the generation and disposal of hazardous and toxic substances.

4.13.2.2 Alternative 2 – Caretaker Status Alternative

Direct Impacts. Negligible short-term beneficial direct impacts are expected to hazardous and toxic substances under this alternative. The Army would continue maintenance activities necessary to protect the property and buildings from deterioration. This would include maintaining the interior floors in a manner that preserved the asbestos floor tiles. Any remaining small quantities of hazardous and toxic substances would be disposed of by the Army in accordance with federal, state, local, and DoD requirements after closure of the Horsham Memorial USARC. The removal of these hazardous and toxic substances would result in a negligible short-term beneficial impact.

Indirect Impacts. No indirect impacts are anticipated under this alternative. Continuing maintenance activities and disposal of small quantities of remaining hazardous and toxic substances would be limited to the Horsham Memorial USARC property.

4.13.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Direct Impacts. Minor long-term beneficial and negligible short-term and minor long-term adverse direct impacts would occur through the reuse of the Horsham Memorial USARC property. Under this alternative, the property would be transferred from the Army to the HHSD ‘as is.’ No remedial activities would be performed by the Army prior to the transfer of the property (e.g., removal of asbestos floor tiles, lead abatement). Demolition activities that would require the removal of ACM, LBP, and PCB materials would be managed and disposed of by the HHSD. Disposal activities would be in accordance with federal, state, local, and DoD requirements. Long-term beneficial impacts are anticipated with the proper removal of these materials from the property. Although a release of petroleum products has occurred at the Horsham Memorial USARC, the 2007 ECOP Report determined that all necessary remedial actions to protect human health and the environment have occurred.

There would negligible short-term adverse direct impacts due to the potential for releases and spills that might occur during demolition and construction. Continued operations on the property by the HHSD would result in minor long-term adverse direct impacts due bus maintenance and to the potential of leakage or spill of hazardous materials from vehicle parked in the bus storage area. This includes gasoline, diesel, hydraulic fluid, motor oil, transmission fluid, and antifreeze.

Indirect Impacts. No indirect impacts are anticipated under this alternative since impacts would be limited to the Horsham Memorial USARC property.

4.14 CUMULATIVE EFFECTS

4.14.1 Introduction

The cumulative impact analysis evaluates the incremental effects of implementing any of the alternatives when added to past, present, and reasonably foreseeable future U.S. Army actions at the Horsham Memorial USARC and the actions of other parties in the surrounding area, where applicable. The cumulative impact analysis has been prepared at a level of detail that is reasonable and appropriate to support an informed decision by the U.S. Army in selecting a preferred alternative. The cumulative impact discussion is presented according to each of the implementation alternatives listed.

The key components of the cumulative impact analysis include the following:

- **Cumulative Impact Analysis Area.** The cumulative impact analysis area includes the area that has the potential to be affected by implementation of the proposed action at the Horsham Memorial USARC. This includes the installation and the area immediately proximate to the installation boundary and varies by resource category being considered.
- **Past and Present Actions.** Past and present actions, other than the proposed action, are defined as actions within the cumulative analysis area under consideration that occurred before or during April 2010 (the environmental baseline for this EA). These include past and present actions at the project site and past and present demographic, land use, and development trends in the surrounding area. In most cases, the characteristics and results of these past and present actions are described in the Affected Environment sections under each of the resource categories covered in this EA.
 - The Horsham Memorial USARC is located in Montgomery County, on the west side of Horsham Township, Pennsylvania. The area is a primarily residential area with some commercial businesses situated northeast and south of the USARC property (USACE 2007).
 - The United States Government acquired the 7-acre parcel in 1953 from Edith B. Lippincott and Mary L. Buck, who owned the Property since 1897.
 - The property was open fields used for agricultural purposes in 1938. Development in the area began prior to 1942. It appears that development initially started with construction of the Willow Grove NAS/JRB, followed by other residential and commercial development to the north and east. From 1955 through 1992, there was steadily increasing residential and commercial development of the land surrounding the USARC property (USACE 2007).
 - Residential and commercial development in the area has continued to establish the present conditions of a developed urban mixed use neighborhood (USACE 2007).
- **Reasonably Foreseeable Future Actions.** Reasonably foreseeable future actions are mainly limited to those that have been approved and that can be identified and defined with respect to timeframe and location. Reasonably

foreseeable future actions that have been identified and considered in the analysis of cumulative impacts, both on-USARC and off-USARC are listed below.

- Relocation of units to a new Armed Forces Reserve Center with an organizational maintenance facility at Willow Grove NAS/JRB.
- As an additional part of BRAC 2005, the Willow Grove NAS/JRB will be closing, including the relocation of Navy and Marine Corps Squadrons to McGuire Air Force Base. As part of the closure, the Navy will be disposing of surplus property including the Jacksonville Road and Shenandoah Woods Housing Areas. It is anticipated that the surplus property will be redeveloped under the direction of the Horsham Township Authority which is the recognized LRA for the closure. Impacts for these actions will be considered as part of the Navy's NEPA analysis.
- BRAC 2005 also requires the development of an Air National Guard (ANG) Enclave consisting of the 111th Fighter Wing and the 270th Engineering Installation Squadron at the Willow Grove NAS/JRB site. Impacts for these actions will be considered as part of the ANG's NEPA analysis.
- Submittal of a development application by New Jersey-based Develcom Development Company to construct a bank, four-story hotel and a Car-Mart on the site where the Golf Zone sits at 1020 Easton Road.
- Continued expansion of housing and commercial development in the area surrounding the Horsham Memorial USARC.
- Continuation of present management activities within the surrounding community and the continuation of existing community development trends.
- Continued development along the Interstate system and major arterials in the Horsham area.

4.14.2 Potential cumulative Impacts

4.14.2.1 Alternative 1 – No Action Alternative

Under Alternative 1 it is anticipated that past and present development trends on the installation and surrounding civilian community would continue. Because the BRAC actions are Congressionally mandated actions, the No Action Alternative, maintenance of current condition is not feasible.

4.14.2.2 Alternative 2 – Caretaker Status Alternative

Potential cumulative impacts under Alternative 2 by resource category are as follows:

- **Land Use.** There are no anticipated cumulative impacts because there would be no changes to land use.
- **Aesthetic and Visual Resources.** There would be minor adverse impacts to aesthetics and visual resources under this alternative if there are other vacant

properties in the vicinity of the Horsham Memorial USARC. The cumulative impact may have a short-term adverse impact on property values in the vicinity of the Horsham Memorial USARC until redevelopment of the property occurs.

- **Air Quality.** Following the closure and during implementation of caretaker status, there would be a net decrease in emissions since there would be no operations occurring on site. Therefore, there are no anticipated cumulative impacts.
- **Noise.** There would be a decrease in noise following the closure and implementation of caretaker status. There are no anticipated cumulative impacts.
- **Geology and Soil.** No cumulative impacts would occur under this alternative. After the closure, no operations would occur on site except for routine maintenance. There would be no change from existing conditions; thus, no impacts to geology or soil would be expected.
- **Water Resources.** No cumulative impacts would occur under this alternative. After the closure, no operations would occur on site except for routine maintenance. There would be no change from existing conditions; thus, no impacts to water resources would be expected.
- **Biological Resources.** There are no anticipated cumulative impacts because no biological resources would be modified under caretaker status.
- **Cultural Resources.** During caretaker status, cultural resources would continue to be managed in accordance with Sections 106 and 110 of the NHPA, AR 200-1, and under the current ICRMP for the 99th RSC. There are no anticipated cumulative impacts.
- **Socioeconomics.** Under this alternative, the Horsham Memorial USARC would close and relocate the units in the vicinity of Willow Grove NAS/JRB. Both of the installations are located within the Montgomery County Metropolitan Division; therefore, the impacts on the ROI and regional economy would not differ from baseline conditions. There would be no anticipated cumulative impacts.
- **Transportation.** There would be a decrease in the number of vehicles following the closure and implementation of caretaker status. There are no anticipated cumulative impacts.
- **Utilities.** There are no anticipated cumulative impacts because there would be a decrease in use of utilities from decreased consumption following the closure and implementation of the caretaker status.
- **Hazardous and Toxic Substances.** Following the closure and during implementation of caretaker status, there would be a net decrease in the amount of hazardous waste and toxic substances on site. Therefore, there are no anticipated cumulative impacts.

4.14.2.3 Alternative 3 – Demolish Administration Building, Reuse Organizational Maintenance Shop, and Construct Recreational Fields (Preferred Alternative)

Potential cumulative impacts under Alternative 3 by resource category are as follows:

- **Land Use.** No cumulative impacts to land use are expected. The redevelopment of the golf driving range as a hotel, bank, and car mart is compatible with surrounding land use. Cumulative impacts to land use from this development and the proposed action would not occur.
- **Aesthetic and Visual Resources.** Short-term adverse cumulative impacts to aesthetic and visual resources could occur during construction of the proposed development and proposed action. Construction of the hotel, bank, and car mart in addition to the proposed action could temporarily decrease the appeal of landscapes in the general area. Long-term cumulative effects are not expected, as a change from a golf driving range to a more developed commercial area would not change the aesthetic and visual appeal of the general area. There would also be potential for long-term negligible beneficial cumulative impacts from the Horsham reuse with a decreased impervious surface.
- **Air Quality.** There would be a negligible increase in emissions from the use of construction vehicles and a small increase in personal occupancy vehicles during the reuse of the site. Increased vehicle emissions associated with the increased use of the proposed development would result in long-term adverse cumulative impacts.
- **Noise.** There would be a short-term negligible increase in noise from the use of construction vehicles for the proposed action and proposed development resulting in short-term negative cumulative impacts. Increased vehicle usage at proposed bank, hotel, and car mart and crowds at the proposed athletic field would result in long-term cumulative impacts from the slight increase in noise.
- **Geology and Soil.** Under this alternative, there is potential for minor cumulative impacts to soil due to erosion, removal, and compaction through the implementation of construction and demolition projects under the Proposed Action combined with future development projects in the surrounding communities. These impacts would be short-term and most of the development would take place on previously disturbed areas.
- **Water Resources.** Stormwater runoff from soil disturbance from the Proposed Action combined with soil disturbance from reasonably foreseeable construction projects implemented in the surrounding area could have minor short-term adverse cumulative effects on downstream water resources. Compliance with local stormwater rules and regulations during construction will minimize impacts and result in minor short-term adverse cumulative impacts to water resources in the area.
- **Biological Resources.** Runoff from soil disturbance from the Proposed Action combined with soil disturbance from other construction projects implemented in

the surrounding area could have negligible adverse cumulative effects on downstream aquatic habitat and wetland resources.

- **Cultural Resources.** Because there are no impacts anticipated from implementation of Alternative 3, there are no anticipated cumulative impacts.
- **Socioeconomics.** Negligible beneficial short-term cumulative impacts would be in the form of increased business volume, income, and employment, associated with BRAC construction and activities and future development in the surrounding areas. Horsham Township also benefits from increased sales associated with the recreational reuse and increased tax revenues from future developments in the area.
- **Transportation.** Negligible short-term cumulative impacts can be expected from traffic congestion due to construction equipment entering and leaving the installation construction sites if combined with other construction traffic in adjacent area.
- **Utilities.** There are no anticipated cumulative impacts because the recreational development reuse utility demand would be consistent with other similar development in the area.
- **Hazardous and Toxic Substances.** Construction and redevelopment projects associated with the proposed action and other reasonably foreseeable future actions would be consistent with the current urban setting, consequently no changes to the affected environment are anticipated and no cumulative impacts would be expected to occur.

4.15 BEST MANAGEMENT PRACTICES

As discussed in Sections 4.1 through 4.14 above, no significant adverse or significant beneficial impacts have been identified or are anticipated as a result of implementing any of the Proposed Action alternatives or the No Action Alternative.

Local, state, and federal regulations for noise, air, water, and soil resources will be adhered to during all phases of demolition and construction, as appropriate, to minimize impacts associated with implementing the proposed action.

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SECTION 5 FINDINGS AND CONCLUSIONS

This EA was conducted in accordance with the requirements of NEPA, the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500), and 32 CFR 651 Environmental Analysis of Army Actions. As analyzed and discussed in the EA, direct, indirect, and cumulative impacts of each of the Implementation Alternatives and the No Action Alternative have been considered and no significant impacts (either beneficial or adverse) have been identified. Therefore, issuance of a FNSI is warranted, and preparation of an EIS is not required. Table 5.1 provides a summary of the impacts identified in this analysis.

Therefore, any of the alternatives considered could be implemented. However, the No Action Alternative would not support Congressional requirements under the BRAC laws (Public Laws 101-510 and 107-107); consequently, it has not been selected for implementation.

Alternative 3 is the preferred alternative of the Army and the LRA. This alternative would allow future development in support of the need of the HHSD.

Table 5.1 Impact Summary							
RESOURCE AREA	NO ACTION	Alternative 2			Alternative 3		
		Direct	Indirect	Cumulative	Direct	Indirect	Cumulative
Land Use					□		
Aesthetic and Visual Resources		●		●	○, □		○
Air Quality		□			○	○	○
Noise					○, ●		○
Geology and Soil					●, ■	□	●
Water Resources					□	○, □	●
Biological Resources		□			○, □	○, □	○
Cultural Resources							
Socioeconomics		○	○		□	■, □	□
Transportation		○, □			○		○
Utilities		□					
Hazardous and Toxic Substances		□			○, ■, ●		

□ Beneficial Effect (Negligible) ○ Adverse Effect (Negligible)
 ■ Beneficial Effect (Minor) ● Adverse Effect (Minor)
 ■ Beneficial Effect (Moderate) ● Adverse Effect (Moderate)
 ◆ Beneficial Effect (Significant) ◇ Adverse Effect (Significant)

A blank cell indicates no impact.

SECTION 6 PREPARERS LIST

Personnel involved in the development of this EA include the following:

Name	Education and Experience	Primary Responsibilities
Karen Boulware	B.S. Geology, M.S. Resource Planning. 15 years experience in environmental assessment impact studies and planning.	Senior Environmental Scientist; data collection, analysis, and key participant in preparation of EA text and supporting sections.
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SECTION 8 REFERENCES

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SECTION 9 PERSONS CONSULTED

All information was solicited and collected from Army installation personnel and members of the LRA (City of Horsham) in preparation of this document.

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SECTION 10 ACRONYMS

A		dBA	Decibel A-Weighted Noise Levels
ACHP	Advisory Council on Historic Preservation	dBC	Decibel C-Weighted Noise Levels
ACM	Asbestos Containing Material	DNL	Day-Night Average Sound Level
ADNL	A-Weighted Day-Night Level	DoD	Department of Defense
ANG	Air National Guard	E	
AR	Army Regulation	EA	Environmental Assessment
Army	US Army	ECOP	Environmental Condition of Property
AST	Above Ground Storage Tank	EIFS	Economic Impact Forecast System
B		EIS	Environmental Impact Statement
BLS	Bureau of Labor Statistics	EMT	Emergency Medical Technician
BHP	Bureau for Historic Preservation	EO	Executive Order
BRAC	Base Closure and Realignment	F	
C		FEMA	Federal Emergency Management Agency
CAA	Clean Air Act	FNSI	Finding of No Significant Impact
CDNL	C-Weighted Day-Night Level	FPPA	Farmland Protection Policy
CEQ	Council on Environmental Quality	G	
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act	H	
CFR	Code of Federal Regulations	HABS/HAER	Historic American Building Survey/Historic American Engineering Record
COC	contaminants of concern	HAP	Hazardous Air Pollutants
D			
dB	Decibel		

HHSD	Hatboro Horsham School District	NRCS	Natural Resources Conservation Service
HLRA	Horsham Local Redevelopment Authority	NRHP	National Register of Historic Places
HUD	US Department of Housing and Urban Development	NWI	National Wetlands Inventory
I		NZ	Noise Zones
ICRMP	Integrated Cultural Resources Management Plan	O	
		OMB	Office of Management and Budget
J		OMS	Organizational Maintenance Shop
K			
		P	
L		PADEP	Pennsylvania Department of Environmental Protection
LBP	Lead-Based Paint		
L _{eq}	Noise Level Equivalent	PCB	Polychlorinated biphenyls
LRA	Local Redevelopment Authority	PHMC	Pennsylvania Historic and Museum Commission
M		POV	Privately Owned Vehicles
MEP	Military Equipment Parking	PM _{2.5}	particulate matter equal to or less than 2.5 microns in size
MTBE	methyl-tert butyl ether	PM ₁₀	particulate matter equal to or less than 10 microns in size
N			
NAAQS	National Ambient Air Quality Standards	Q	
NEPA	National Environmental Policy Act	R	
NAS/JRB	Naval Air Station/Joint Reserve Base	RCRA	Resource Conservation and Recovery Act
NHPA	National Historic Preservation Act	ROI	Region of Influence
NO _x	Nitrogen Oxide(s)	RSC	Regional Support Center
NOI	Notice of Interest	RTV	Rational Threshold Value
NPDES	National Pollutant Discharge Elimination System	S	
		SF	square foot/feet

SHPO State Historic Preservation
Officer
SIP State Implementation Plan

T

U

US United States
USACE United States Army Corps
of Engineers
USAR United States Army
Reserves
USARC United States Army
Reserve Center
USC United States Code
USCB United States Census
Bureau
USEPA United States
Environmental Protection
Agency
USFWS United States Fish and
Wildlife Service
UST Underground Storage
Tanks

V

VOC Volatile Organic
Compounds

W

X

Y

Z

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APPENDIX A – AGENCY COORDINATION

A.1 Initial Agency Consultation Letters.....	4
A.2 SHPO - Section 106 Consultation.....	15
A.3 USFWS Consultation.....	97
A.4 Agency and Public Notices.....	101

Public and Agency Comments

As noted in Section 1.3, public participation includes public comment on the Draft Environmental Assessment. All agencies and organizations having a potential interest in the Proposed Action are provided the opportunity to participate in the decision making process.

The Army invites public participation in the NEPA process. Consideration of the views and information provided by all interested persons promotes open communication and enables better decision making. Agencies, organizations, Native American groups, and members of the public having a potential interest in the Proposed Action, including minority, low-income, and disadvantaged persons, are urged to participate in the NEPA process.

Per requirements specified in 40 CFR 1500-1508, the EA was available for public and agency comment for a 30-calendar-day review period (starting with the publication of the NOA) to provide agencies, organizations, and individuals with the opportunity to comment on the EA and draft FNSI. Public notices were published in local newspapers to inform the public that the EA and draft FNSI were available for review. The notices identified a point of contact to obtain more information regarding the NEPA process, identified means of obtaining a copy of the EA and draft FNSI for review, listed public libraries where paper copies of the EA and draft FNSI could be reviewed, and advised the public that an electronic version of the EA and draft FNSI were available for download at the following Web site:

http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

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A.1 Initial Agency Consultation Letters

Appendix A.1 contains the following correspondence associated with the preparation of the Environmental Assessment:

Letter to Natural Resources Conservation Service	May 11, 2010
Letter to U.S. Department of Housing and Urban Development	May 11, 2010
Letter to Pennsylvania Department of Environmental Protection	May 11, 2010
Letter From Department of Environmental Protection	June 09, 2010
Letter to Pennsylvania Fish and Boat Commission	May 11, 2010
Letter to Pennsylvania Game Commission	May 11, 2010



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

May 11, 2010

Mr. David Schaffer, District Conservationist
Natural Resources Conservation Service
1000 East Walnut Street
Suite 704B
Perkasie, PA 18944

Dear Mr. Schaffer:

The United States (US) Army Reserve (USAR), 99th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Horsham Memorial US Army Reserve Center (USARC) in Montgomery County, Pennsylvania, in accordance with the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Pennsylvania. The recommendation includes the closure of the Horsham Memorial USARC in Horsham, Pennsylvania; and relocation of units to the new Armed Forces Reserve Center Willow Grove Naval Air Station joint Reserve Base in Willow Grove, Pennsylvania. The Environmental Assessment (EA) document for this action as required by the *National Environmental Policy Act* (NEPA) focuses on the closure, disposal, and reuse of the Horsham Memorial USARC. The impact of the new facility is being addressed in a separate NEPA document.

Three alternatives are being considered for the Proposed Action and all would occur at the current location of the Horsham Memorial USARC. The Horsham Memorial USARC is located at 936 Easton Road in Horsham Township, Pennsylvania. The site is 7 acres in size and contains two buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

Alternative 1 is a No Action Alternative that will represent baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Horsham Memorial USARC be closed, this is not a feasible alternative.

Alternative 2 is a Caretaker Status Alternative where the Army would secure the property after the military issue has ended to ensure public safety and the security of the remaining government property. This condition should not be a permanent one because Army policy is to dispose of the closed installation. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

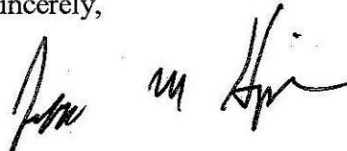
Alternative 3, the preferred alternative of the Army, involves the closure of the Horsham Memorial USARC and subsequent transfer of the property from the Army to another entity for reuse. The primary action evaluated in this EA is disposal of the excess property made available by the legislatively mandated closure. The secondary action is reuse development of the property after ownership is transferred. Under this alternative, the Army would transfer the property to the Hatboro Horsham School District (HHSD) through a public benefit conveyance and HHSD would redevelop the site for as recreational fields and a maintenance facility for school buses. The existing administration building would be demolished and the Organizational Maintenance Shop would be reused.

As part of the early project coordination and NEPA scoping process, we are requesting that federal and state agencies and Native American organizations identify key issues that should be addressed as part of this evaluation. Please provide your comments relative to the following:

- Issues of concern within your regulatory jurisdiction
- Available technical information regarding these issues
- Mitigation or permitting requirements that may be necessary for project implementation.

I would like to thank you in advance for your efforts. We request your comments and concurrence on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Robyn Mock U.S. Army Reserve 99th RSC, at (609) 562-7662 or at Robyn.Mock@usar.army.mil.

Sincerely,



JEFFREY M HRZIC
Chief, Environmental Division

Enclosures:

- Enclosure 1: Site Vicinity Map
- Enclosure 2: Topographic Map
- Enclosure 3: Current Site Plan
- Enclosure 4: Alternative 3 Plan (Preferred Alternative)



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

May 11, 2010

Ms. Brenda LaRoache, Deputy Regional Director
US Department of Housing and Urban Development
Philadelphia Regional Office
100 Penn Square, East
Philadelphia, PA 19107-3380

Dear Mr. Densmore:

The United States (US) Army Reserve (USAR), 99th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Horsham Memorial US Army Reserve Center (USARC) in Montgomery County, Pennsylvania, in accordance with the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Pennsylvania. The recommendation includes the closure of the Horsham Memorial USARC in Horsham, Pennsylvania; and relocation of units to the new Armed Forces Reserve Center Willow Grove Naval Air Station joint Reserve Base in Willow Grove, Pennsylvania. The Environmental Assessment (EA) document for this action as required by the *National Environmental Policy Act* (NEPA) focuses on the closure, disposal, and reuse of the Horsham Memorial USARC. The impact of the new facility is being addressed in a separate NEPA document.

Three alternatives are being considered for the Proposed Action and all would occur at the current location of the Horsham Memorial USARC. The Horsham Memorial USARC is located at 936 Easton Road in Horsham Township, Pennsylvania. The site is 7 acres in size and contains two buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

Alternative 1 is a No Action Alternative that will represent baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Horsham Memorial USARC be closed, this is not a feasible alternative.

Alternative 2 is a Caretaker Status Alternative where the Army would secure the property after the military issue has ended to ensure public safety and the security of the remaining government property. This condition should not be a permanent one because Army policy is to dispose of the closed installation. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

Alternative 3, the preferred alternative of the Army, involves the closure of the Horsham Memorial USARC and subsequent transfer of the property from the Army to another entity for reuse. The primary action evaluated in this EA is disposal of the excess property made available by the legislatively mandated closure. The secondary action is reuse development of the property after ownership is transferred. Under this alternative, the Army would transfer the property to the Hatboro Horsham School District (HHSD) through a public benefit conveyance and HHSD would redevelop the site for as recreational fields and a maintenance facility for school buses. The existing administration building would be demolished and the Organizational Maintenance Shop would be reused.

As part of the early project coordination and NEPA scoping process, we are requesting that federal and state agencies and Native American organizations identify key issues that should be addressed as part of this evaluation. Please provide your comments relative to the following:

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Sincerely,



JEFFREY M HRZIC
Chief, Environmental Division

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

May 11, 2010

Mr. John Hanger, Secretary
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

Dear Mr. Hanger:

The United States (US) Army Reserve (USAR), 99th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Horsham Memorial US Army Reserve Center (USARC) in Montgomery County, Pennsylvania, in accordance with the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Pennsylvania. The recommendation includes the closure of the Horsham Memorial USARC in Horsham, Pennsylvania; and relocation of units to the new Armed Forces Reserve Center Willow Grove Naval Air Station joint Reserve Base in Willow Grove, Pennsylvania. The Environmental Assessment (EA) document for this action as required by the *National Environmental Policy Act* (NEPA) focuses on the closure, disposal, and reuse of the Horsham Memorial USARC. The impact of the new facility is being addressed in a separate NEPA document.

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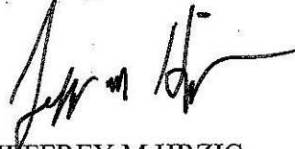
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As part of the early project coordination and NEPA scoping process, we are requesting that federal and state agencies and Native American organizations identify key issues that should be addressed as part of this evaluation. Please provide your comments relative to the following:

- Issues of concern within your regulatory jurisdiction
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- Mitigation or permitting requirements that may be necessary for project implementation.

I would like to thank you in advance for your efforts. We request your comments and concurrence on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Robyn Mock U.S. Army Reserve 99th RSC, at (609) 562-7662 or at Robyn.Mock@usar.army.mil.

Sincerely,



JEFFREY M HRZIC
Chief, Environmental Division

Enclosures:

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- Enclosure 4: Alternative 3 Plan (Preferred Alternative)



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHEAST REGIONAL OFFICE

Received
99th RRC ARIM

JUN 09 2010

June 3, 2010

Mr. Jeffrey M. Hrzic
Chief, Environmental Division
Department of the Army
Headquarters, 99th Regional Support Command
5231 South Scott Plaza
Fort Dix, NJ 08640

Dear Mr. Hrzic:

Thank you for your letter dated May 11, 2010, to Secretary John Hanger regarding the proposed closure, disposal, and reuse of the Horsham Memorial U.S. Army Reserve Center (USARC) at 936 Easton Road in Horsham Township, Montgomery County. Your letter specifically requested the Department of Environmental Protection (Department) identify any key issues that may impact the project coordination and the NEPA scoring process for this project.

At this time, the Department has not identified any issues of significance for this site after reviewing our databases and checking with our individual programs. We are prepared to assist with any action proposed under or by the Base Closure and Realignment Commission.

Thank you for your interest in this matter. I hope this information is helpful. If you have any questions, please contact Mr. John Kennedy, Assistant Regional Director, by e-mail at johkennedy@state.pa.us or by the phone number located in the footer below.

Sincerely,

Joseph A. Feola
Southeast Regional Director

Southeast Regional Office | 2 East Main Street | Norristown, PA 19401-4915

484.250.5940 | Fax 484.250.5943

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DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

May 11, 2010

Mr. John Arway, Executive Director
Pennsylvania Fish and Boat Commission, Headquarters
1601 Elmerton Avenue
PO Box 67000
Harrisburg, PA 17106-7000

Dear Mr. Arway:

The United States (US) Army Reserve (USAR), 99th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Horsham Memorial US Army Reserve Center (USARC) in Montgomery County, Pennsylvania, in accordance with the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Pennsylvania. The recommendation includes the closure of the Horsham Memorial USARC in Horsham, Pennsylvania; and relocation of units to the new Armed Forces Reserve Center Willow Grove Naval Air Station joint Reserve Base in Willow Grove, Pennsylvania. The Environmental Assessment (EA) document for this action as required by the *National Environmental Policy Act* (NEPA) focuses on the closure, disposal, and reuse of the Horsham Memorial USARC. The impact of the new facility is being addressed in a separate NEPA document.

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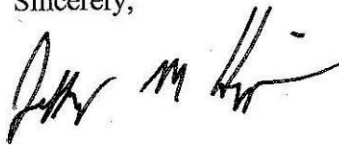
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I would like to thank you in advance for your efforts. We request your comments and concurrence on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Robyn Mock U.S. Army Reserve 99th RSC, at (609) 562-7662 or at Robyn.Mock@usar.army.mil.

Sincerely,



JEFFREY M HRZIC
Chief, Environmental Division

Enclosures:

- Enclosure 1: Site Vicinity Map
- Enclosure 2: Topographic Map
- Enclosure 3: Current Site Plan
- Enclosure 4: Alternative 3 Plan (Preferred Alternative)



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

May 11, 2010

Mr. Carl Roe, Executive Director
Pennsylvania Game Commission
2001 Elmerton Avenue
Harrisburg, PA 17110-9797

Dear Mr. Roe:

The United States (US) Army Reserve (USAR), 99th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Horsham Memorial US Army Reserve Center (USARC) in Montgomery County, Pennsylvania, in accordance with the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Pennsylvania. The recommendation includes the closure of the Horsham Memorial USARC in Horsham, Pennsylvania; and relocation of units to the new Armed Forces Reserve Center Willow Grove Naval Air Station joint Reserve Base in Willow Grove, Pennsylvania. The Environmental Assessment (EA) document for this action as required by the *National Environmental Policy Act* (NEPA) focuses on the closure, disposal, and reuse of the Horsham Memorial USARC. The impact of the new facility is being addressed in a separate NEPA document.

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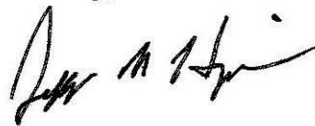
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As part of the early project coordination and NEPA scoping process, we are requesting that federal and state agencies and Native American organizations identify key issues that should be addressed as part of this evaluation. Please provide your comments relative to the following:

- Issues of concern within your regulatory jurisdiction
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- Mitigation or permitting requirements that may be necessary for project implementation.

I would like to thank you in advance for your efforts. We request your comments and concurrence on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Robyn Mock U.S. Army Reserve 99th RSC, at (609) 562-7662 or at Robyn.Mock@usar.army.mil.

Sincerely,



JEFFREY M HRZIC
Chief, Environmental Division

Enclosures:

- Enclosure 1: Site Vicinity Map
- Enclosure 2: Topographic Map
- Enclosure 3: Current Site Plan
- Enclosure 4: Alternative 3 Plan (Preferred Alternative)

A.2 SHPO - Section 106 Consultation

Appendix A.2 contains the following correspondence associated with the preparation of the Environmental Assessment and coordination with the SHPO and Indian Tribes

Letter to Pennsylvania SHPO (Initial Consultation)	June 6, 2010
Letter from Pennsylvania SHPO (Response)	July 8, 2010
Letter to Delaware Nation	June 6, 2010
Letter from Delaware Nation (Response)	August 3, 2010
Letter to Pennsylvania SHPO (Section 106 Review)	August 5, 2010
Letter from Pennsylvania SHPO (Response)	August 27, 2010
Letter to Pennsylvania SHPO (Additional Information)	December 1, 2010
Letter from Pennsylvania SHPO (Not Eligible)	December 22, 2010



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

June 6, 2010

Ms. Jean Cutler, Director
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, Second Floor
400 North Street
Harrisburg, PA 17120-0093

Ms. Cutler:

The United States Army Reserve (USAR), 99th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Horsham Memorial US Army Reserve Center (USARC) in Montgomery County, Pennsylvania, in accordance with the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Pennsylvania. The recommendation includes the closure of the Horsham Memorial USARC in Horsham, Pennsylvania and relocation of units to the new Armed Forces Reserve Center Willow Grove Naval Air Station Joint Reserve Base in Willow Grove, Pennsylvania. The Environmental Assessment (EA) document for this action as required by the *National Environmental Policy Act* (NEPA) focuses on the closure, disposal, and reuse of the Horsham Memorial USARC. The impact of the realignment actions and relocation of units is being addressed in a separate NEPA document.

In following with BRAC Army policy, effects to cultural resources as a result of the proposed BRAC recommendation will be considered in strict accordance with NEPA, as amended (PL 89-6650), Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended in 2006, and its implementing regulation, 36 CFR 800; Archeological and Historic Preservation Act of 1974; Native American Graves Protection and Repatriation Act of 1990; Executive Order 11593; Council on Environmental Quality Regulations (40 CFR 1500-1508); and Environmental Analysis of Army Actions (32 CFR Part 651).

The Horsham Memorial USARC is located at 936 Easton Road in Horsham Township, Pennsylvania (UTM: 40.194602°, -75.136323°; Figures 1 through 5). The project area is 7 acres in size and contains two buildings, the main administration building, consisting of an administrative/classroom block and a drill hall, and a detached organizational maintenance shop (OMS), both constructed in 1959. The remainder of the site is covered in pavement (parking) or landscaped areas.

Three alternatives are being considered for the EA and all would occur at the current location of the Horsham Memorial USARC. Alternative 1 is a No Action Alternative that will represent baseline conditions at the property; no change from the current activities would occur under this alternative. Alternative 2 is a Caretaker Status Alternative where the USAR 99th RSC would secure the property, ensure public safety, implement maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

Alternative 3, the preferred alternative, involves the closure of the Horsham Memorial USARC and subsequent transfer of the property from the USAR 99th RSC to the Hatboro Horsham School District (HHSD) through a public benefit conveyance and HHSD would redevelop the site for use as recreational fields and a maintenance facility for school buses. The existing administration building would be demolished and the OMS would be re-purposed.

The USAR 99th RSC completed an updated Integrated Cultural Resources Management Plan (ICRMP) 2009-2014 in September 2009 which includes information on previous cultural resources investigations and resources at facilities managed by the 99th RSC. One previous cultural resources investigation has been conducted at the Horsham Memorial USARC. In 1995, the KFS Historic Preservation Group of Kise Franks and Straw, Inc. in association with Hunter Research, Inc. prepared the *79th Army Reserve Command (ARCOM) Cultural Resource Management Plan*, on behalf of the U.S. Army Corps of Engineers, Baltimore District. Architectural resources and archaeological site potential at 32 Pennsylvania Army Reserve facilities then managed under the 79th ARCOM were identified and evaluated. The investigation included background research, a site files search at the Pennsylvania Bureau for Historic Preservation, and a pedestrian reconnaissance survey at each facility. None of the buildings at the Horsham facility were more than 50 years old at the time of the survey and therefore were not evaluated for eligibility for the National Register of Historic Places (NRHP). No archaeological sites had been previously identified at the facility at the time of the survey. The Horsham facility was considered to have limited potential for archaeological resources.

Research was also conducted using the online Pennsylvania Cultural Resources Geographic Information System (CRGIS) which indicates that no archaeological sites or NRHP-eligible architectural resources have been identified in the project area.

The Area of Potential Effects (APE) for this project consists of the current boundaries of the Horsham Memorial USAR facility, including the two buildings, paved and landscaped areas on the property (Enclosures 2 and 5).

At this time, in accordance with Section 106 of the NHPA and its implementing regulations, 36 CFR Part 800, USAR, 99th RSC wishes to formally initiate consultation with your office. We anticipate submitting the Draft EA to your office for review and concurrence in mid to late August 2010. The EA will serve as the Determination of Effect for this undertaking in accordance with 36CFR800.8 (c).

The USAR, 99th RSC is aware that Native American and other cultural groups may have concerns related to cultural resources, so consultation will also be conducted with the Delaware Nation.

I thank you in advance for your efforts, and request you direct your comments and questions to Ms. Robyn Mock, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640-5000, Phone: (609)562-7662, Email: Robyn.Mock@usar.army.mil.

Sincerely,



JEFFREY M HRZIC
Chief, Environmental Division

Enclosures:

- Enclosure 1: Site Vicinity Map
- Enclosure 2: Topographic Map
- Enclosure 3: Current Site Plan
- Enclosure 4: Alternative 3 Plan (Preferred Alternative)
- Enclosure 5: Current Site Layout Plan from the Phase I Environmental Condition of Property Report (April 2007)



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 8, 2010

Jeffrey M. Hrzic
Department of the Army
Headquarters, 99th Regional Support Command
5231 South Scott Plaza
Fort Dix, New Jersey 08640-5000

TO EXPEDITE REVIEW USE
BHP REFERENCE NUMBER

Re: File No. ER 1993-1228-091-V
DOD: Proposed Closure, Disposal &
Reuse of Horsham Memorial US Army
Reserve Center, Horsham Twp.
Montgomery Co.

Dear Mr. Hrzic:

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. These requirements include consideration of the project's potential effect upon both historic and archaeological resources.

There is a high probability that prehistoric and historic archaeological resources are located in this project area. In our opinion, the activity described in your proposal should have no effect on such resources. Should the scope of the project be amended to include additional ground disturbing activity this office should be contacted immediately and a Phase I Archaeological Survey may be necessary to locate all potentially significant archaeological resources.

Your request does not include sufficient information. We are unable to proceed with our review for historic structures until the information on the attached form is provided.

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

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology &
Protection

Attachment
DCM/tmw

93-1228-091-V

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION
BUREAU FOR HISTORIC PRESERVATION

INFORMATION REQUEST SHEET

(Revised 4/07)

Please submit checked items for PHMC to proceed with review.

PROJECT INITIATION

A. FUNDING/PERMITTING/LICENSING/APPROVAL PROGRAM

- 1. Contact person for federal/state/local agency, address, phone number.
- 2. Letter from federal agency initiating consultation, or a letter from federal agency authorizing an alternate agency or a consultant to initiate consultation.
- 3. Identify the Federal/State Agency and funding program or permit/license.

B. PROJECT DESCRIPTION

- 1. Narrative description of the project and related actions resulting from the project.
- 2. Proposed boundary of the project's Area of Potential Effect (APE) (remember to consider visual impacts)
- 3. Description and Justification of selection of the Area of Potential Effect
- 4. Architectural plans of existing conditions (as-built or as-found)
- 5. Preliminary architectural drawings or plans (floor plans, elevations, specifications)
- 6. Work write-ups
- 7. Plans and specifications
- 8. Site plans of existing conditions
- 9. Site plans of proposed development

C. PROJECT LOCATION

- 1. U.S.G.S. 7.5 min. series quadrangle with the **PROJECT LOCATION(S) AND LIMITS CLEARLY MARKED** using a colored pen. Please include name of the quadrangle
- 2. U.S.G.S. 7.5 min. series quadrangle with Area of Potential Effect marked (potential area of direct effect can be delineated inside area of indirect effect)
- 3. Street map (for properties in densely populated areas)
- 4. Street map showing location and historic district boundaries (if appropriate)
- 5. Street address of property
- 6. Municipality in which project is located (not mailing address location)

D. PROJECT SIZE (supply as appropriate for project)

- 1. Acreage of project area
- 2. Miles/feet of project and right-of-way width
- 3. Extent and nature of ground disturbing activities (i.e. grading, trenching, foundation excavation)

(over)

E. PHOTOGRAPHS (no Polaroids, or photocopies. Clear, high resolution digital images accepted.)

- 1. Exterior of building(s)/structures in project area
- 2. Interior of building(s) in project area
- 3. Interior of building(s) illustrating the proposed work areas/features
- 4. Buildings, streetscape, setting of features in Area of Potential Effect (APE)
- 5. Views of project site
- 6. Other _____

PUBLIC PARTICIPATION

- 1. Measures which will be/or have been taken to identify consulting parties.
- 2. List of proposed consulting parties.
- 3. Measures which will be/or have been taken to notify and involve the public.

RESOURCE IDENTIFICATION, EVALUATION AND PROJECT EFFECT

A. CULTURAL RESOURCE IDENTIFICATION

- 1. Description of methodology used for identification and sources examined.
- 2. Plan proposed for identification of historical (including historic districts, buildings, structures, objects) and archaeological resources and proposed methodology to be used.
- 3. Pennsylvania Historic Resource Survey form(s) for all properties 50 years or older and potentially eligible for the National Register identified in the APE. (See our website at: www.phmc.state.pa.us click on "Preservation Programs" and then "Forms")
- 4. Historical background/context report/information for historic resources identified.

B. EFFECTS

- 1. How will the project affect building(s) over 50 years old?
- 2. National Register listed/eligible property(s) exists in project area. How will the project affect this historic property(s)?

C. Other: _____



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

June 6, 2010

Kerry Holton, President
Delaware Nation
P.O. Box 825
31064 State Hwy 281
Main Office Building 100
Anadarko, OK 73005

President Holton:

The United States Army Reserve (USAR), 99th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Horsham Memorial US Army Reserve Center (USARC) in Montgomery County, Pennsylvania, in accordance with the Base Closure and Realignment (BRAC) Act of 1990 (Public Law 101-510), as amended.

The Horsham Memorial USARC is located at 936 Easton Road in Horsham Township, Pennsylvania (UTM: 40.194602°, -75.136323°; Figures 1 through 4). The project area is 7 acres in size and contains the main administration building, and a detached organizational maintenance shop (OMS), both constructed in 1959. The remainder of the site is covered in asphalt, for parking, or landscaped areas (Figure 2).

The proposed re-use of the facility will transfer of the property from the USAR 99th RSC to the Hatboro Horsham School District (HHSD) through a public benefit conveyance. The HHSD would redevelop the site for use as recreational fields and a maintenance facility for school buses.

To ensure that any areas of sacred or spiritual significance to Native American groups are considered, we would appreciate your help in identifying any interests or concerns regarding Traditional Cultural Properties, or other traditional resources or properties within the project area, and ask for your response within 30 days of receiving this correspondence.

I thank you in advance for your efforts, and request you direct your comments and questions to Ms. Robyn Mock, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640-5000, Phone: (609)562-7662, Email: Robyn.Mock@usar.army.mil.

Respectfully,

JEFFREY M HRZIC
Chief, Environmental Division

Enclosures:

-
- Enclosure 1: Site Vicinity Map
 - Enclosure 2: Topographic Map
 - Enclosure 3: Current Site Plan
 - Enclosure 4: Alternative 3 Plan (Preferred Alternative)



The Delaware Nation
Cultural Preservation Office
31064 State Highway 281 ~ P.O. Box 825 ~ Anadarko, OK 73005
Phone: 405/247-2448 ~ Fax: 405/247-8905

Library ext. 1196
Museum ext. 1180
NAGPRA ext. 1182
Section 106 ext. 1180

Date: 8-3-10

Company: Dept of The Army
Enviro. Division

TCNS#/County/State: Horsham Memorial US Army Reserve Center
Montgomery County, Pennsylvania

To Whom It May Concern:

The Delaware Nation received a letter regarding the above referenced project(s). The Delaware Nation is committed to protecting sites important to tribal heritage, culture and religion. Furthermore, the tribe is particularly concerned with archaeological sites that may contain human burials, remains, and associated funerary objects.

As described in your correspondence and upon research of our database(s) and files, we find the Lenape people occupied these areas either historically or prehistorically. However, location of the project does not endanger known sites of interest to the Delaware Nation. Please continue with the project as planned. However, should this project inadvertently uncover an archaeological site or object(s) we request that you immediately contact the appropriate state agencies, as well as the Delaware Nation (within 24 hours). Also, we ask that you halt all construction and ground disturbing activities until the tribe and these state agencies are consulted.

Please note the Delaware Nation, the Delaware Tribe of Indians, and the Stockbridge Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these three tribes. We appreciate your cooperation in contacting the Delaware Nation. Should you have questions, feel free to contact our offices at 405/247-8903 or by email: tfrancis@delawarenation.com.

Sincerely,

Tamara Francis
Cultural Preservation Director
The Delaware Nation



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

August 5, 2010

Ms. Jean Cutler, Director
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, Second Floor
400 North Street
Harrisburg, PA 17120-0093

Dear Ms. Cutler,

As stated in a letter to your agency dated June 6, 2010, the Defense Base Realignment and Closure (BRAC) Commission has recommended the closure, disposal, and reuse of the Horsham Memorial United States Army Reserve Center (USARC). To implement this recommendation, the Army proposes the transfer of this property from Government ownership for local reuse and development after closure. The Pennsylvania Environmental Review Submission/Request to Initiate Consultation Form for this project is provided as Enclosure 1 of this correspondence.

The Horsham Memorial USARC complex, located at 936 Easton Road in Horsham Township, Pennsylvania, covers approximately 7 acres, and contains two buildings: the main administration building, consisting of an administrative/classroom block and a drill hall, and a detached organizational maintenance shop (OMS). Both facilities were constructed in 1959. The remainder of the site is covered in pavement (parking) or landscaped areas. The Area of Potential Effects (APE), as defined in 36CFR800.16(d), consists of the current boundaries of the Horsham Memorial USARC, including the two buildings, paved and landscaped areas on the parcel.

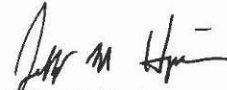
The United States Army Reserve (USAR), 99th Regional Support Command (RSC) has conducted data collection, including archival research, literature review, and photographic documentation, to identify cultural resources in the APE and evaluate their eligibility for listing in the National Register of Historic Places (NRHP). After applying the NRHP criteria for evaluating properties, the USAR has determined that there are no eligible properties within the APE and no historic properties will be affected by the proposed undertaking.

Additional information on the proposed undertaking, the APE, identification efforts and determination of effects are provided in the attached Section 106 Review Summary and associated forms.

In accordance with Section 106 of the National Historic Preservation Act (NHPA), 99th RSC is requesting your concurrence of the Army's determination within 30 days of receipt of this correspondence. This letter and attachments provide the information needed to complete your review.

I thank you in advance for your efforts, and request you direct your comments and questions to Ms. Robyn Mock, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix, NJ 08640-5000, Phone: (609)562-7662, Email: Robyn.Mock@usar.army.mil.

Sincerely,



Jeffrey M. Hrzic
Chief, Environmental Division

Enclosures:

1. Environmental Review Submission Form (Request to Initiate Consultation in Compliance with the State History Code and Section 106 of the National Historic Preservation Act with Map Location, Photos, Project Description Narrative)
2. Section 106 Review Summary

BHP Use Only
ER # 1993-1228-091-V

**Request to Initiate Consultation in Compliance with the State History Code and
Section 106 of the National Historic Preservation Act**

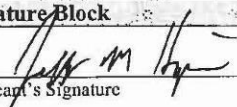
Applicant Information (print neatly, this will be used in the return envelope)			
Applicant Name	U.S. Army Reserve, 99 th Regional Support Command, Directorate of Public Works, Environmental Division		
Street Address	5231 South Scott Plaza		
City	Fort Dix	Phone Number	609-562-7662
State/ZIP	NJ	08640-5000	

Contact Person to Receive Response (if applicable) (print neatly, this will be used in the return envelope)			
Name/Company	Mr. Jeffrey Hrzic, U.S. Army Reserve, 99 th Regional Support Command, Department of Public Works, Environmental Division		
Street Address	As Above		
City		Phone Number	
State/ZIP			

Project Information			
Project Title	Proposed closure, disposal, and reuse of the Horsham Memorial US Army Reserve Center (USARC)		
Project Location and/address	936 Easton Road, Horsham Township, Pennsylvania		
Municipality	Horsham	County Name	Montgomery
If this project was ever reviewed before, include previous ER #			

Project Type (Check all that apply)			
Government Funded/Sponsored or On Government Land?			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Specify Agency and/or Program Name Below			
State Agency:		Local:	
Federal Agency:	US Army Reserves	Other:	
Permits or Approvals Required			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Specify Agency and/or Program Name Below			
Anticipated Permits:			
State Agency:		Program:	
Federal Agency:		Program:	
Agency Office to Receive Response (Check all that apply)			
Army Corps of Engineers: <input type="checkbox"/> Philadelphia <input type="checkbox"/> Baltimore <input type="checkbox"/> Pittsburgh			
DEP Office: <input type="checkbox"/> Central Office <input type="checkbox"/> Regional Office:			
<input type="checkbox"/> District Mining Office: <input type="checkbox"/> Oil & Gas Office:			
<input type="checkbox"/> Other: (provide address)			

BHJP Use Only
ER #

Required Project Information for BHP/SHPO Review	
<input checked="" type="checkbox"/> Total Acres in the property under review:	<u>7</u>
<input checked="" type="checkbox"/> Total acres of earth disturbance for this proposed activity:	<u>7</u>
<input type="checkbox"/> Are there any buildings or structures within the project area?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Approximate age of buildings: 51 years old
<input type="checkbox"/> Project located in or adjacent to a historic district?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unsure
Name of Historic District _____	
Submissions Must Also Include:	
<input checked="" type="checkbox"/> MAP LOCATION: A 7.5 USGS Map showing the project boundary and the Area of Potential Effect (APE). The APE should include indirect effects, such as visual and audible impacts. Federal Projects must provide an explanation of how the APE was determined.	
<input type="checkbox"/> PHOTOS: Photos of all buildings or structures in the APE over 50 years old. If the property is over 50 years old submit a Historic Resource Form with this initial request. The forms are available at http://www.phmc.state.pa.us/bhp/inventories . Photographs of all buildings are provided in the Historic Resource Form (Enclosure 2).	
<input checked="" type="checkbox"/> PROJECT DESCRIPTION NARRATIVE: Provide a detailed project description describing the project, any ground disturbance, any previous land use, and age of all effected buildings in the project area. Attach a site map showing the location of all buildings in the project area.	
<input checked="" type="checkbox"/> I have reviewed all DEP Permit Exemptions listed on the DEP website www.dep.state.pa.us .	
In addition, federal agencies must provide:	
<input checked="" type="checkbox"/> Measures that will be taken to identify consulting parties including Native Americans. Noted in cover letter.	
<input checked="" type="checkbox"/> Measures that will be taken to notify and involve the public. Noted in cover letter.	
The information on this form is needed to determine whether potential historic or archaeological resources are present. Additional historic information or investigation may be requested to determine the significance of the resources or the effects of the project on those resources. <i>Form and attachments must be submitted by mail. Submissions via e-mail will not be accepted.</i>	
Signature Block	
	<u>6 August 2010</u>
Applicant's Signature	Date

Please Print and Mail Completed Form and Required Information to:

PA Historical & Museum Commission
Bureau for Historic Preservation
400 North Street
Commonwealth Keystone Building 2nd Floor
Harrisburg, PA 17120-0093

ER Submission Form Supplement: Project Description Narrative

The project area is 7 acres in size and contains two buildings, the main administration building, consisting of an administrative/classroom block and a drill hall, and a detached organizational maintenance shop (OMS), both constructed in 1959. The remainder of the site is covered in pavement (parking) or landscaped areas.

Three alternatives are being considered for the Environmental Assessment (EA) and all would occur at the current location of the Horsham Memorial USARC. Alternative 1 is a No Action Alternative that will represent baseline conditions at the property; no change from the current activities would occur under this alternative. Alternative 2 is a Caretaker Status Alternative where the USAR 99th RSC would secure the property, ensure public safety, implement maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment. Alternative 3, the preferred alternative, involves the closure of the Horsham Memorial USARC and subsequent transfer of the property from the USAR 99th RSC to the Hatboro Horsham School District (HHSD) through a public benefit conveyance. HHSD would redevelop the site for use as recreational fields and a maintenance facility for school buses. The existing administration building would be demolished and the OMS would be re-purposed.



Legend

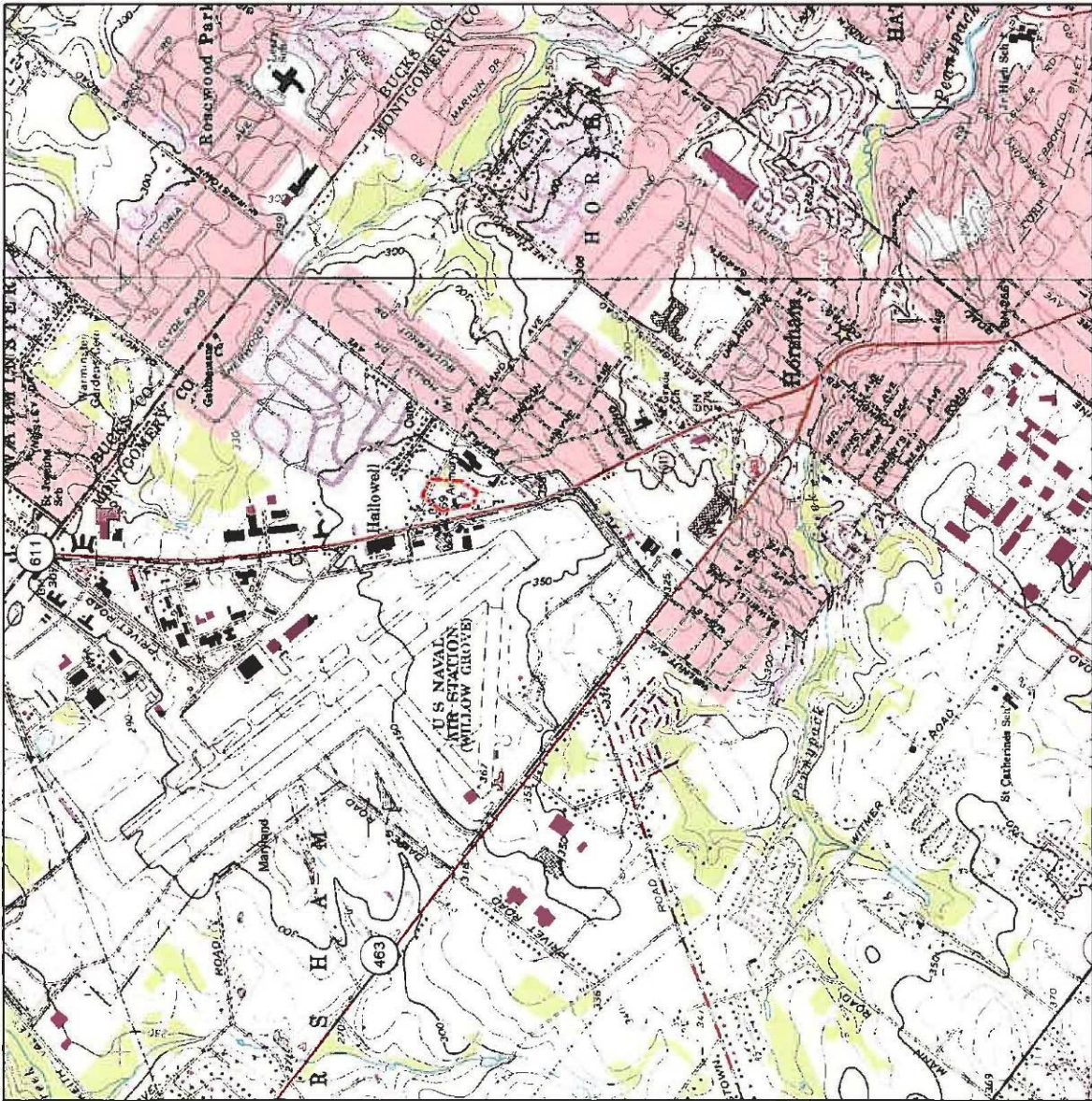
- ☆ City
- Installation Boundary

0 1,500 3,000

Approximate Scale in Feet

Topographic Map:
 1:24,000 - Ambler Quadrangle
 USGS Scan of 1966 Map
 *Revisions shown in purple are
 USGS edits completed in 1983

**Horsham Memorial USARC
 Project Area**



Section 106 Review Summary

Description of Proposed Undertaking

On September 8, 2005, the Defense Base Realignment and Closure (BRAC) Commission recommended closure of the Horsham Memorial United States (US) Army Reserve Center (USARC) in Horsham, Pennsylvania. This recommendation was approved by the President on September 23, 2005, and forwarded to Congress. Congress did not alter any of the BRAC Commission's recommendations, and on November 9, 2005, the recommendations became law.

As documented in an Environmental Assessment (EA), the Army is considering two courses of action, in addition to a No Action alternative, to implement the BRAC requirement: 1) reducing maintenance levels on the complex to caretaker status until it can be transferred out of federal ownership; and 2) transferring the USARC out of federal ownership to the Hatboro Horsham School District for demolition and reuse of facilities. These alternatives are being evaluated in a separate National Environmental Policy Act document.

Area of Potential Effects

The Horsham Memorial USARC complex, located at 936 Easton Road in Horsham Township, Pennsylvania, covers approximately 7 acres and contains two buildings: the main administration building, consisting of an administrative/classroom block and a drill hall, and a detached organizational maintenance shop (OMS). Both facilities were constructed in 1959. The remainder of the site is covered in pavement (parking) or landscaped areas. The Area of Potential Effects (APE), as defined in 36CFR800.16(d), consists of the current boundaries of the Horsham Memorial USARC, including the two buildings, paved and landscaped areas on the parcel.

Previous Efforts to Identify Historic Properties

No archaeological sites have been identified in the APE. In 1995, the KFS Historic Preservation Group of Kise Franks and Straw, Inc. in association with Hunter Research, Inc. assessed archaeological site potential at the Horsham Memorial USARC as part of the preparation of the *79th Army Reserve Command Cultural Resource Management Plan*, the command under which the facility was previously managed. The investigation included background research, a site files search at the Pennsylvania Bureau for Historic Preservation, and a pedestrian reconnaissance survey at each facility. The Horsham facility was considered to have limited potential for archaeological resources due in part to prior disturbance associated with construction and development of the project area. The Archaeological Record of Disturbance Form is provided as Attachment 1 of this packet.

Recent Efforts to Identify Historic Properties

The two buildings in the APE were constructed in 1959 and have not been previously evaluated for NRHP eligibility. In 2008, Hardy Heck, Moore (HHM), Inc. prepared *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* for

Section 106 Review Summary

the Department of Defense Legacy Resource Management Program. A copy of this study is provided on the enclosed compact disk (CD) as Attachment 2 for your files. The study identified and categorized the various property types associated with the historical development of U.S. Army Reserve Centers, concentrating on the post World War II and early Cold War eras, and provides a historic context that can be used to evaluate them for eligibility for listing in the NRHP. Property types associated with the Early Cold War period were further divided into three categories by plan type and named accordingly as the "Compact Plan," the "Sprawling Plan," and the "Vertical Plan." The study further stipulated the character-defining features that must be present for an Army Reserve Center constructed according to standardized plans to retain its integrity and convey its significance as an exemplar of its property type. Examples of these required character-defining features include the original building footprint, original number of stories, original fenestration pattern, and original exterior finish. The document does not evaluate individual Army Reserve Centers; however, the guidelines for evaluation have been followed to evaluate the NRHP eligibility of the Horsham Memorial USARC.

The buildings at the Horsham Memorial USARC are constructed of concrete block covered with brick veneer on concrete foundations. The plan or footprint of the 24,527-square-foot administration building is an asymmetrical T. The main two-story block forms the top portion on the T and faces the street. The main block is connected, via a one-story hyphen, to a rear wing. The rear wing is a double-height space with clerestory lights on the side elevations (Attachment 3: Historic Resource Survey Form [HRSF] Current Photos, Figures 1-7). The main block is used for administrative and classroom space while the rear wing is a drill or assembly hall.

The OMS building is a 3,710-square-foot single-story brick structure situated on the eastern edge of the parcel. The front (main) elevation is accessed by three vehicle service bays with roll-up metal doors (Attachment 3: HRSF Current Photos, Figure 8).

Based on the layout, design, and time period of construction, the Horsham Memorial USARC appears to be based on standardized plans for US Army Reserve Centers categorized in the Historic Context Study as the "Sprawling Plan" type within the Early Cold War property type. These standardized plans were initially developed by the architectural firm of Reisner and Urbahn in 1952, updated in 1953, and last revised by the successor firm of Urbahn, Brayton, and Burrows in 1956, in collaboration with the US Army Corps of Engineers (USACE). The standardized plans most similar to the Horsham Memorial USARC are included as Standard Plans for a '400 Men Expansible Armory without Basement' in Appendix B of the Historic Context study.

Known examples of the Sprawling Plan type were constructed from 1953 through 1964, possibly continuing later, by the Army, at reserve facilities across the country. Because buildings categorized in the Sprawling Plan sub-type are part of a nationwide building program and are common throughout the United States, a strict set of guidelines to examine their physical integrity through the presence of unaltered character-defining features was established in the Historic Context study to identify the most intact and representative examples of this property type.

The Horsham Memorial USARC exhibits a major alteration to the original fenestration pattern with brick infilling of an original window opening and as many as eight unit vent louvers that

Section 106 Review Summary

were part of the original design on the main (front) elevation of the building (Attachment 3: HRSF Current Photos, Figure 9). Although other features at this facility remain unaltered or have been replaced with architecturally compatible materials, the guidelines stipulate that all character-defining features must be retained for the building to be considered eligible for the NRHP. Applying these guidelines for evaluation from the Historic Context study of U.S. Army Reserve Centers, the Horsham Memorial USARC is not considered eligible for listing in the NRHP.

Because an OMS is a support structure for the main Army Reserve center and lacks sufficient historical associations and/or design qualities on its own to meet any of the NRHP Criteria for eligibility, an OMS is not likely to be eligible on its own for inclusion on the NRHP. Furthermore, the historic context study indicates that "if the associated Army Reserve Center lacks significance or integrity to be eligible for the NRHP, the [OMS] likewise is not eligible" (Moore et al. 2008: 189). Because the Horsham Memorial USARC main building is not considered eligible for the NRHP, neither is the associated OMS considered eligible for the NRHP.

Native American Concerns

Native American resources or concerns have not been identified in the project area. Through ongoing consultation related to this project, the Delaware Nation has indicated in writing that the location of the proposed project does not endanger known sites of interest to the Tribe and that the project may proceed; however, the Tribe requests to be contacted immediately should archaeological sites or objects be inadvertently discovered.

Effects to Historic Properties

No NRHP-eligible archaeological or architectural resources have been identified within the APE. No historic properties will be affected by the proposed undertaking.

Attachments:

1. Archaeological Record of Disturbance (7.5' USGS Quadrangle Map delineating APE / Project Area; two (2) supporting photographs with descriptions of view and view direction; and recent aerial photograph showing extent of development in the project area)
2. Electronic copy on CD of *Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers* (Moore et al. 2008)
3. Historic Resource Survey Form (with Narrative Sheets, Current Photos, Photo List, Site Map/Photo Key, Floor Plan, USGS Map)



Record of Disturbance Form

ER# 1993-1228-091-V

DATE 8/9/2010

(submit after initial field view, Phase IA Investigation, or Phase I Investigation)

1. Project Identification:

ER Number 1993-1228-091-V

Project Name &/or Agency Tracking #: Proposed Closure, Disposal and Reuse of Horsham Memorial USARC, Horsham Twp, Montgomery Co.

Agency: US Army Reserves **Applicant:** 99th Regional Support Command

Preparers Name and affiliation: Rachael Manqum, Cultural Resources Specialist, Parsons (contractor for US Army Corps of Engineers in support of US Army Reserves)

Date Prepared: July 20, 2010

Project Area County/Municipality (list all)

County	Municipality
Montgomery	Horsham

2. Project Setting: (check all that apply)

- urban/suburban; rural
 upland; floodplain/terrace (active; stable terrace)

7.5" USGS Quadrangle(s) Name (list all):

Name	Date
Ambler	1966 (revised 1983)

Physiographic Zone(s)(list All. Use DCNR Map 13 compiled by W.D. Sevon, Fourth Edition, 2000.):

Physiographic Zone
Gettysburg-Newark Lowlands Section of the Piedmont Physiographic Province

Project Area Drainage(s), (list all) (Sub-basin and Watershed can be obtained from CRGIS):

Sub-basin	Watershed	Major Stream	Minor Stream
Delaware Bay	Delaware River	Schuylkill River	Pennypack Creek

3. Basic Field Conditions:

(Text fields will expand as needed. Please be complete)

Area of APE / Project Area in hectares: 2.8 Hectares tested: 0

General Description of APE / Project Area: The APE consists of approximately 7 acres (2.8 hectares) of developed land with two permanent structures: (1) a 24,527-square-foot main administration building and (2) a 3,710-square-foot Organizational Maintenance Shop (OMS). The property also has two parking lots, a Military Equipment Parking (MEP) and a Privately Owned

Record of Disturbance Form

ER# _____

DATE 8/9/2010

Vehicle (POV). Most of the site is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land is grassed, with trees located around the parking lots and administration building.

Type of Proposed Project / Impact: The proposed project is for the transfer of the property, future demolition of one of the existing buildings, and removal of most impervious surfaces for redevelopment of the parcel as recreational fields.

Date of field investigation(s): 1995

Description of Field Conditions and Disturbance:

The majority of the parcel was previously developed in 1959 as a US Army Reserve Center. Any grassy or landscaped areas have likely been subject to previous disturbance associated with the initial development of the parcel.

4 Methodology Used to Determine Disturbance: (check all that apply; attach any supporting documents)

- PASS file Research
- Informant Data
- Surface Survey
- Test Units
- Contacted Local Historical Association/Commission/Park/Etc.
- Historic Records/Maps/Photos
- Geomorphological Borings
- Geomorphological Trenches
- SCS Soil Maps
- STPs
- Remote Sensing

Other: Prior archaeological assessment conducted in 1995 by the KFS Historic Preservation Group of Kise Franks and Straw, Inc., in association with Hunter Research, Inc., as part of the 79th Army Reserve Command (ARCOM) Cultural Resource Management Plan.

Professional Geomorphologist was Present or Not Present During Field Investigations

Name: _____ Affiliation: _____

Formal Geomorphological Report Prepared: Yes No

5. Previously Recorded Archaeological Sites within APE / Project Area:

PASS Site Number	Particular disturbance in this area

6. Required Attachments:

- 7.5' USGS Quadrangle Map delineating APE / Project Area
- APE map showing location of any test units &/or orientation of photographs
- At least two (2) supporting photographs with descriptions of view and view direction
- Engineering / Project Plans if prepared
- Geomorphological Report if prepared
- Representative excavation profiles and descriptions

List all other attachments to this Record of Disturbance Form:

Attachment Type

Archaeological Record of Disturbance Form - Photographs



Figure 1. Horsham Memorial USARC, facing Northeast, showing grassy landscaped front lawn.



Figure 2. Horsham Memorial USARC project area, facing southwest showing asphalt paved parking areas





Legend

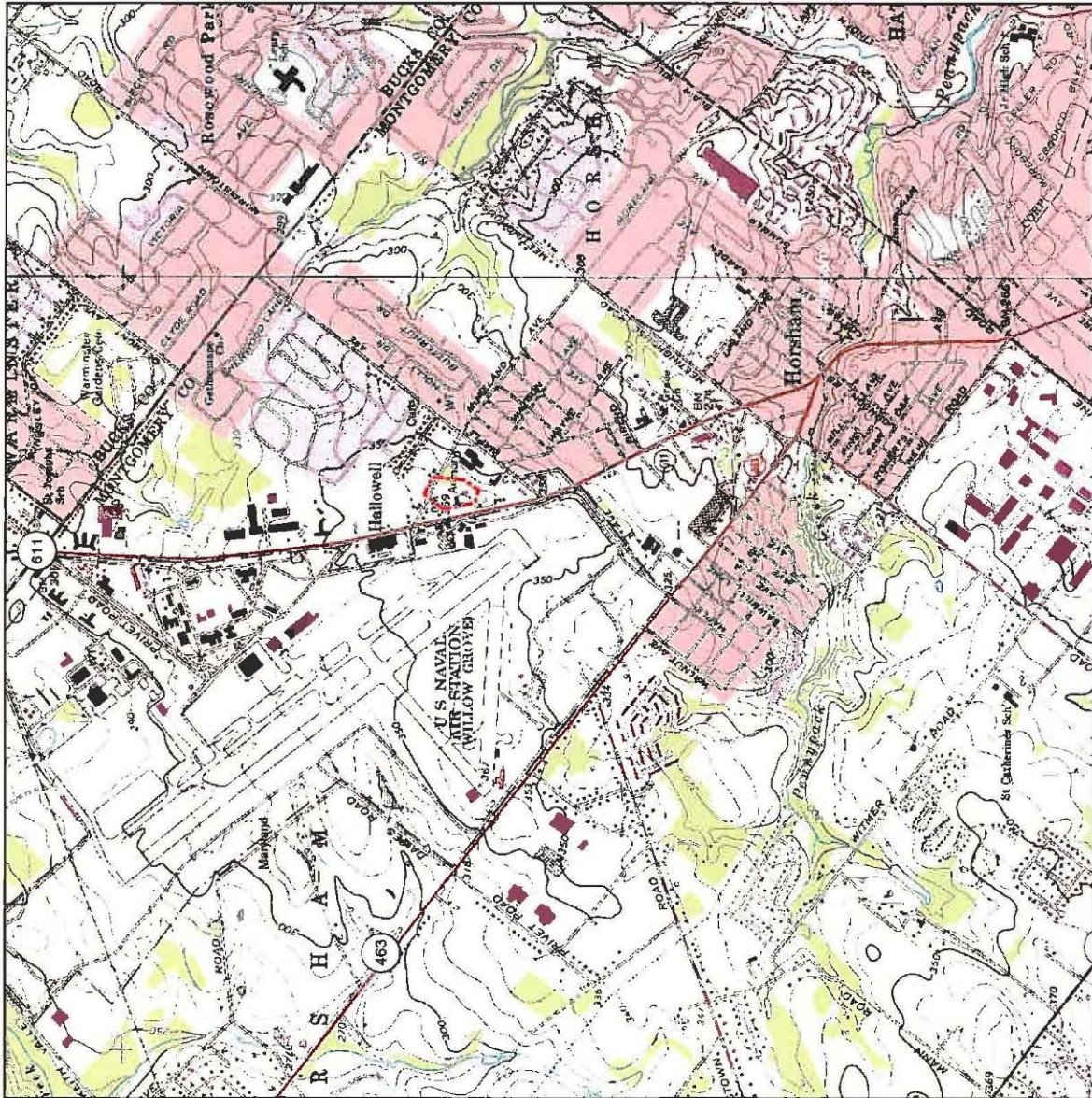
- ☆ City
- Installation Boundary

0 1,500 3,000

Approximate Scale in Feet

Topographic Map:
 1:24,000 - Ambler Quadrangle
 USGS Scan of 1966 Map
 *Revisions shown in purple are
 USGS edits completed in 1983

**Horsham Memorial USAR
 Project Area**



Historic Resource Survey Form
 PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION
 Bureau for Historic Preservation

Key # _____
ER# _____

Name, Location and Ownership (Items 1-6; see Instructions, page 4)

HISTORIC NAME Horsham Memorial United States Army Reserve Center (USARC)

CURRENT/Common Name same

STREET ADDRESS 936 Easton Road ZIP 19044

LOCATION State Highway 611 across from Willow Grove Naval Air Station/Joint Reserve Base

MUNICIPALITY Horsham Twp COUNTY Montgomery

TAX PARCEL #/YEAR Lot 1 Block 16D/1953 USGS QUAD Ambler

OWNERSHIP Private
 Public/Local Public/County Public/State Public/Federal

OWNER NAME/ADDRESS U.S. Army Reserve, 99th RSC/5231 South Scott Plaza, Fort Dix, NJ 08640-5000

CATEGORY OF PROPERTY Building Site Structure Object District

TOTAL NUMBER OF RESOURCES 2

Function (Items 7-8; see Instructions, pages 4-6)

Historic Function	Subcategory	Particular Type
<u>Defense</u>	<u>Military Facility</u>	<u>Army Reserve Center</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
Current Function	Subcategory	Particular Type
<u>Defense</u>	<u>Military Facility</u>	<u>Army Reserve Center</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Architectural/Property Information (Items 9-14; see Instructions, pages 6-7)

ARCHITECTURAL CLASSIFICATION

Modern Movement _____

_____ _____

_____ _____

EXTERIOR MATERIALS and STRUCTURAL SYSTEM

Foundation Concrete _____

Walls Brick _____

Roof Unknown _____

Other Metal glass

Structural System Concrete - general _____

WIDTH _____ (feet) or 27 (# bays) DEPTH _____ (feet) or 2 (# rooms) STORIES/HEIGHT 2

Key # _____
ER# _____

Property Features (Items 15-17; see Instructions, pages 7-8)

Setting Mixed use neighborhood

Ancillary Features

Acreeage 7 (round to nearest tenth)

Historical Information (Items 18-21; see Instructions, page 8)

Year Construction Began 1959 Circa Year Completed 1959 Circa

Date of Major Additions, Alterations _____ Circa _____ Circa _____ Circa

Basis for Dating Documentary Physical

Explain US Army Reserve Real Property Data; field investigation

Cultural/Ethnic Affiliation(s) _____

Associated Individual(s) _____

Associated Event(s) _____

Architect(s) Reisner and Urbahn

Builder(s) US Army

Submission Information (Items 22-23; see Instructions, page 8)

Previous Survey/Determinations _____

Threats None Neglect Public Development Private Development Other

Explain Transfer out of federal government ownership

This submission is related to a non-profit grant application business tax incentive

NHPA/PA History Code Project Review other

Preparer Information (Items 24-30; see Instructions, page 9)

Name & Title Rachael Mangum, Cultural Resources Specialist

Date Prepared July 21, 2010 Project Name Proposed undertaking at Horsham USARC

Organization/Company Parsons

Mailing Address 100 M Street, SE, Washington, DC 20003

Phone 202-775-3461 Email rachael.mangum@parsons.com

Key # _____
ER# _____

National Register Evaluation (Item 31; see Instructions, page 9)
 (To be completed by Survey Director, Agency Consultant, or for Project Reviews ONLY.)

Not Eligible (due to lack of significance and/or lack of integrity)

Eligible Area(s) of Significance _____

Criteria Considerations _____

Period of Significance _____

Contributes to Potential or Eligible District District Name _____

Bibliography (Item 32; cite major references consulted. Attach additional page if needed. See Instructions, page 9.)

Crane, Brian, Susan Bupp, Julie Abell Horn, and Emily Williamson. 2004. U.S. Army Reserve Integrated Cultural Resources Management Plan, Historic Properties Component, 99th Regional Support Command, Pennsylvania. Prepared by Parsons, Inc. Prepared for the USACE, Mobile District and the US Army Reserves.

KFS Historic Preservation Group 1995 79th Army Reserve Command Cultural Resource Management Plan. Prepared for the 79th Army Reserve Command and the U.S. Army Corps of Engineers, Baltimore District. Prepared by KFS Historic Preservation Group, Kise Franks and Straw, Inc., Philadelphia, Pennsylvania in association with Hunter Research, Inc., Trenton, New Jersey.

Moore, David W. Jr., Justin B. Edgington, and Emily T. Payne 2008 Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers. Prepared for the Department of Defense Legacy Resource Management Program, Project Number 06-295. Prepared by Hardy Heck, Moore (HHM) Inc., Austin, Texas.

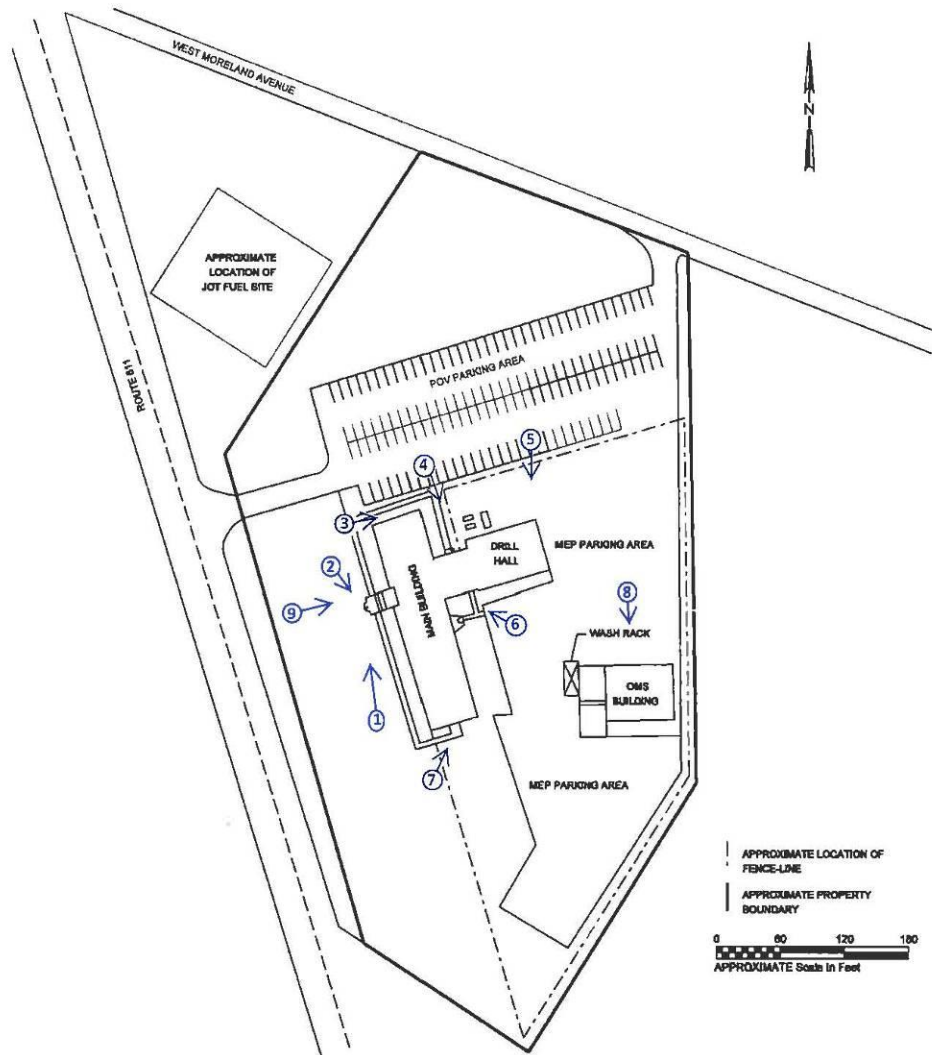
USACE Baltimore 2009 U.S. Army Corps of Engineers (USACE) Baltimore 2009. U.S. Army Reserve 99th Regional Support Command Integrated Cultural Resources Management Plan 2009 – 2014. Prepared by the U.S. Army Corps of Engineers, Baltimore District. Prepared for 99th Regional Support Command, Fort Dix, New Jersey.

Additional Information

The following must be submitted with form. Check the appropriate box as each piece is completed and attach to form with paperclip.

- Narrative Sheets—Description/Integrity and History/Significance (See Instructions, pages 13-14)
- Current Photos (See Instructions, page 10)
- Photo List (See Instructions, page 11)
- Site Map (sketch site map on 8.5x11 page; include North arrow, approximate scale; label all resources, street names, and geographic features; show exterior photo locations; See Instructions, page 11)
- Floor Plan (sketch main building plans on 8.5x11 page; include North arrow, scale bar or length/width dimensions; label rooms; show interior photo locations; See Instructions, page 11)
- USGS Map (submit original, photocopy, or download from TopoZone.com; See Instructions, page 12)

Send Completed Form and Additional Information to:
 National Register Program
 Bureau for Historic Preservation/PHMC
 Keystone Bldg., 2nd Floor
 400 North St.
 Harrisburg, PA 17120-0093



Historic Resource Survey Form – Current Photos

Horsham Memorial USARC Figures 1-9



Figure 1. Main (West) Elevation of the Horsham Memorial USARC, facing Northeast, showing original brick veneer exterior with infilling of original openings.



Figure 2. Main (West) Elevation of the Horsham Memorial USARC, facing Southeast, showing original brick veneer exterior and metal and glass assembly at main entrance

Historic Resource Survey Form – Current Photos



Figure 3. North elevation of the main block of the Horsham Memorial USARC facing east.



Figure 4. North Elevation of the Horsham Memorial USARC facing south, showing rear of the main block, one-story hyphen, and double height rear wing with clerestory lights for the drill/assembly hall facing south

Historic Resource Survey Form – Current Photos



Figure 5. Rear (east) and north elevations of the rear wing (drill/assembly hall), showing the roll up door of the Horsham Memorial USARC, facing southwest



Figure 6. South elevation of the Horsham Memorial USARC, showing rear of the main block, one-story hyphen, and double-height rear wing with clerestory lights for the drill/assembly hall, facing northwest.

Historic Resource Survey Form – Current Photos



Figure 7. South Elevation of the main block of the Horsham Memorial USARC, facing north



Figure 8. Main elevation of the Organizational Maintenance Shop (OMS), facing south, located southeast of the Main building at the Horsham Memorial USARC.

Historic Resource Survey Form – Current Photos

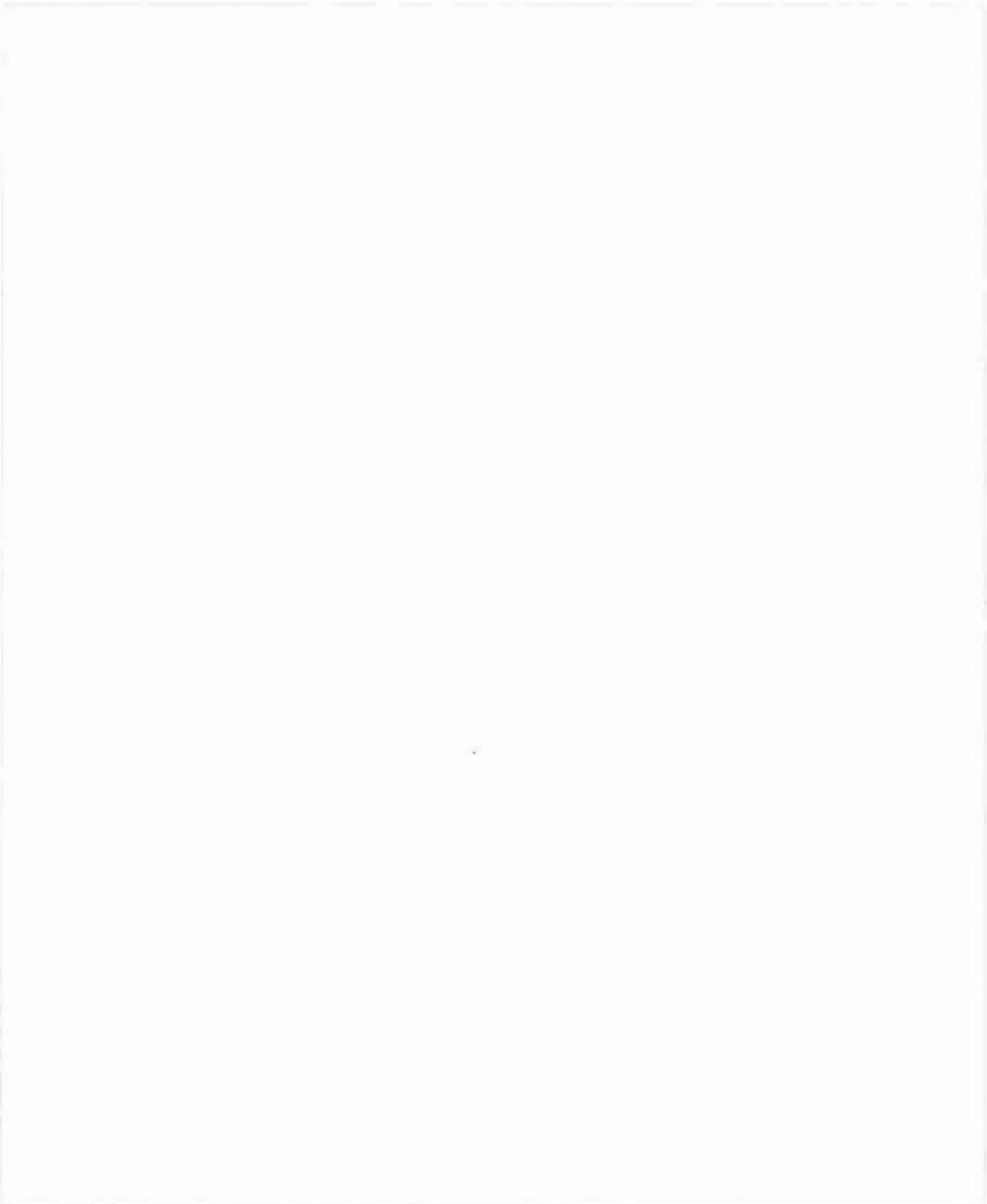


Figure 9. North end of the Main (West) Elevation of the Horsham Memorial USARC, facing East, showing glass and metal assembly at main entrance and brick infilling of former openings for a window and several vents.

Key # _____
ER# _____

Site Plan (Item 34)

See page 11 of the Instructions for more information regarding the site plan. Create a sketch of the property, showing the footprint of all buildings, structures, landscape features, streets, etc. Label all resources and streets. Include a North arrow and a scale bar (note if scale is approximate). This sheet may be used to sketch a plan or another map/plan may be substituted.



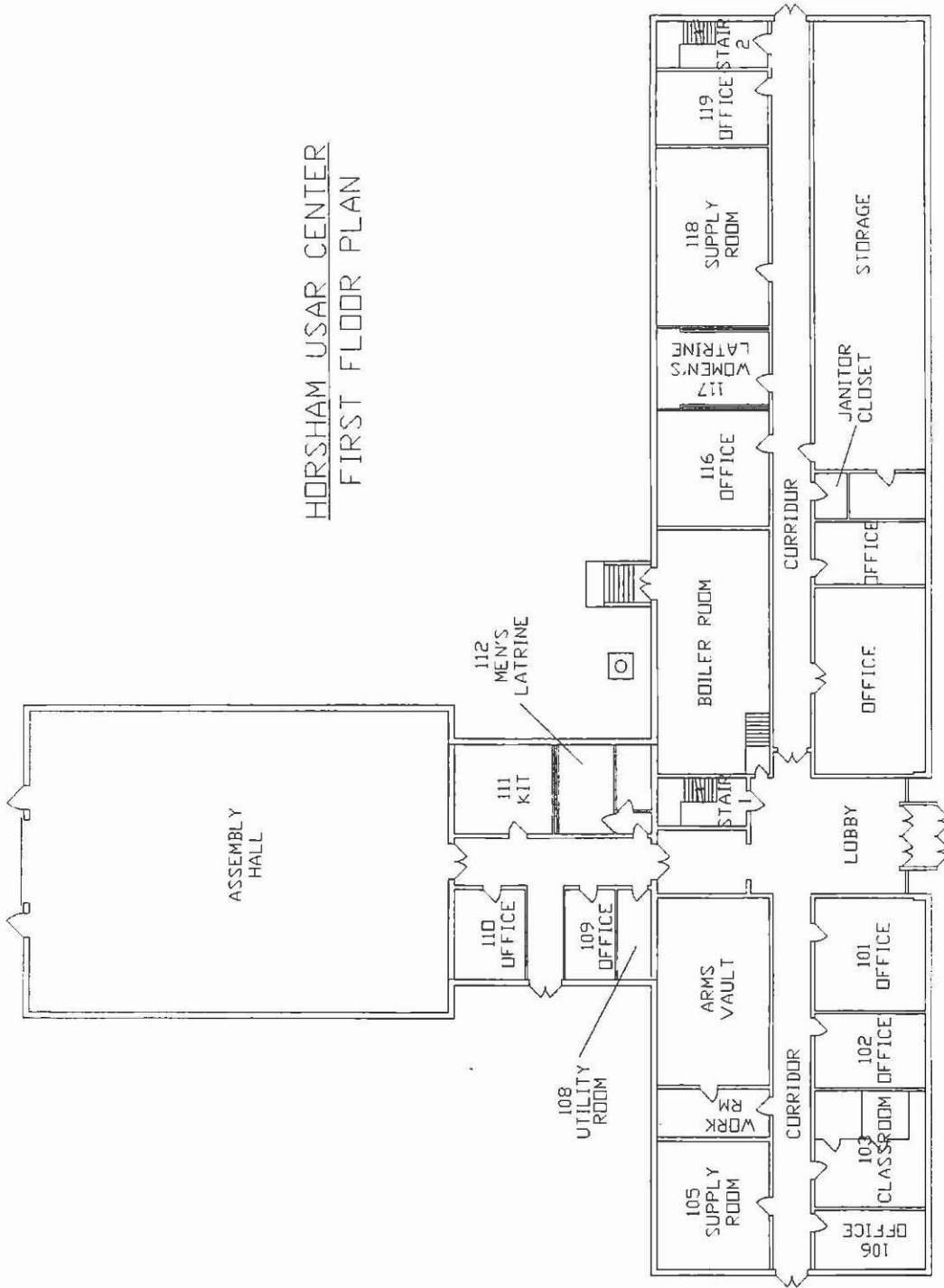
Key # _____
ER# _____

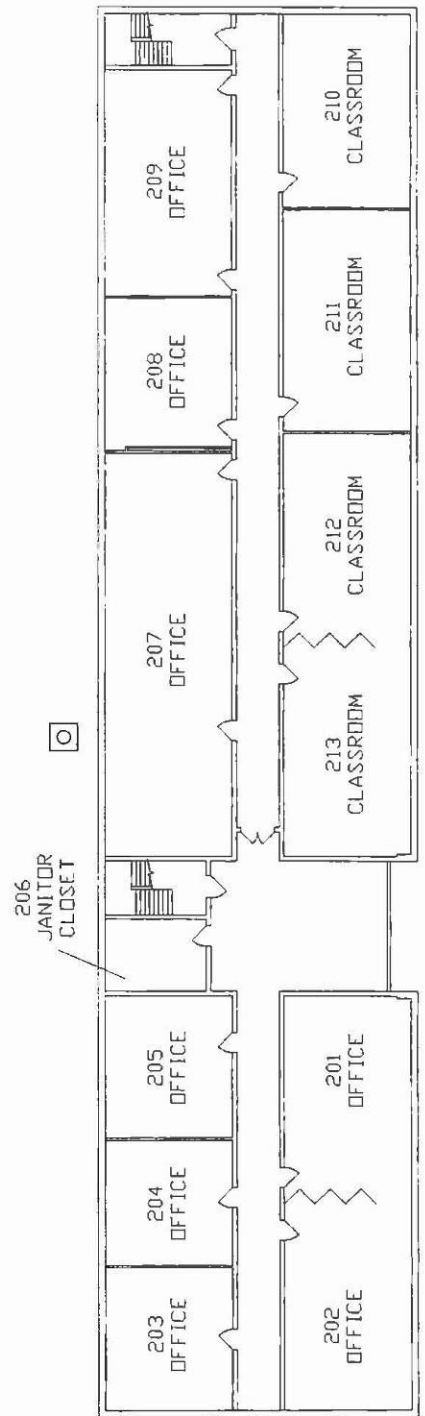
Floor Plan (Item 35)

See page 11 of the Instructions for more information regarding the floor plan. Provide a floor plan for the primary buildings, showing all additions. Label rooms and note important features. Note the date of additions. Include a North arrow and a scale bar (note if scale is approximate) or indicate width/depth dimensions. This sheet may be used to sketch a floor plan or another map/plan may be substituted.



HORSHAM USAR CENTER
FIRST FLOOR PLAN





HORSHAM USAR CENTER
SECOND FLOOR PLAN

Key # _____
ER# _____

Physical Description and Integrity (Item 38)

Provide a current description of the overall setting, landscape, and resources of the property. See page 13 of the Instructions for detailed directions. Continue on additional sheets as needed. Suggested outline for organizing this section:

- Introduction [summarize the property, stating type(s) of resource(s) and function(s)]
- Setting [describe geographic location, streetscapes, natural/man-made landscape features, signage, etc.]
- Exterior materials, style, and features [describe the exterior of main buildings/resources]
- Interior materials, style, and features [describe the interior of main buildings/resources]
- Outbuildings/Landscape [describe briefly additional outbuildings/landscape features found on property, substitute Building Complex Form if preferred; See Instructions, page 18]
- Boundaries [explain how/why boundaries chosen, such as historic legal parcel, visual natural features such as tree lines, alley separating modern construction, etc.]
- Integrity [summarize changes to the property and assess how the changes impact its ability to convey significance]

(Text entered directly into form fields will not permit formatting adjustments, such as spell checking or italicizing. Instead, you may wish to cut-and-paste text from another document into the field below: "unprotect" the document for this section, or prepare the "Physical Description and Integrity" narrative as a separate document.)

The Horsham Memorial USARC is located at 936 Easton Road in Horsham Township, Pennsylvania (UTM: 40.194602°, 75.136323). The project area is 7 acres in size and contains two buildings: the main administration building, consisting of an administrative/classroom block and a drill hall, and a detached organizational maintenance shop (OMS), both constructed in 1959. The remainder of the site is covered in pavement (parking) or landscaped areas.

The two buildings at the Horsham Memorial USARC are constructed of concrete block covered with brick veneer on concrete foundations. The plan or footprint of the 24,527-square-foot administration building is an asymmetrical T. The main two-story block forms the top portion on the T and faces the street. The main block is connected, via a one-story hyphen, to a rear wing. The rear wing is a double-height space with clerestory lights on the side elevations (Historic Resource Survey Form [HRSF] Current Photos: Figures 1-7). The main block is used for administrative and classroom space while the rear wing is a drill or assembly hall.

The OMS building is a 3,710-square-foot single-story brick structure situated on the eastern edge of the parcel. The front (main) elevation is accessed by three vehicle service bays with roll-up metal doors (HRSF Current Photos: Figure 8).

The survey boundaries were based on the Area of Potential Effects (APE), as defined in 36CFR800.16(d), and consist of the current boundaries of the Horsham Memorial USARC, including the two buildings, paved and landscaped areas on the parcel.

The Horsham Memorial USARC appears to be based on standardized plans for US Army Reserve Centers of the "Sprawling Plan" sub-type (see History and Significance Section). Because buildings categorized in the Sprawling Plan sub-type are part of a nationwide building program and are common throughout the United States, a strict set of guidelines to examine their physical integrity through the presence of unaltered character-defining features was established for the evaluation of U.S. Army Reserve Centers to identify the most intact and representative examples of this property type. ALL of the following character-defining features must be present for an Army Reserve Center constructed according to the "Sprawling" standardized plans to retain its integrity and convey its significance as an exemplar of its property type (Moore et al. 2008:173-174):

- Design based on a 1952 or 1953 Reisner and Urbahn standard plan, or a 1956 Urbahn, Brayton, and Burrows Standard Plan;
- Original "sprawling" L-shaped or T-shaped building footprint, or footprint with additions following the original "expansible" plan;
- Original roof form;
- Original fenestration pattern, without infill of original openings or creation of openings onto space that originally functioned as rifle range;
- Original metal and glass entrance assembly;
- Cantilevered canopy, if original;
- Original "masonry units," brick veneer, or historically appropriate stucco veneer on exterior walls;

03/08

PA Historic Resource Survey Form 7

Original doors and windows or compatible replacement doors and windows that meet the Secretary's Standards:

Original configuration of interior corridor and lobby spaces:

Presence of flexible accordion partitions, if original, or opening in wall where accordion partition originally was located;

Open interior assembly/drill space;

Overhead rolling door opening into assembly space;

Vehicular access into interior assembly/drill space;

Historic-age maintenance shop, if original; and

Integrity of setting intact.

Key # _____
ER# _____

Although interior features are not considered character-defining features, their presence may make up for minor alterations to character-defining features on the exterior of the building, on a case by case basis.

The Horsham Memorial USARC exhibits a major alteration to the original fenestration pattern with brick infilling of an original window opening and as many as eight unit vent louvers that were part of the original design on the main (front) elevation of the building (HRSF Current Photos: Figure 9). Although other features at this facility remain unaltered or have been replaced with architecturally compatible materials, the guidelines stipulate that all character-defining features must be retained for the building to be considered eligible for the NRHP. Applying these guidelines, the Horsham Memorial USARC is not considered eligible for listing in the NRHP due to diminished integrity.

Key # _____
ER# _____

History and Significance (Item 39)

Provide an overview of the history of the property and its various resources. Do not substitute deeds, chapters from local history books, or newspaper articles. See page 14 of the Instructions for detailed directions. Continue on additional sheets as needed.

Suggested outline for organizing this section:

- History [Summarize the evolution of the property from origin to present]
- Significance [Explain why the property is important]
- Context and Comparisons [Describe briefly similar properties in the area, and explain how this property compares]

(Text entered directly into form fields will not permit formatting adjustments, such as spell checking or italicizing. Instead, you may wish to cut-and-paste text from another document into the field below; "unprotect" the document for this section, or prepare the "History and Significance" narrative as a separate document.)

The two buildings comprising the Horsham Memorial USARC were constructed in 1959 as part of a nationwide building campaign for U.S. Army Reserve Centers. In 2008, Hardy Heck, Moore (HHM), Inc. prepared Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers for the Department of Defense Legacy Resource Management Program (Moore et al. 2008). The study identified and categorized the various property types associated with the historical development of U.S. Army Reserve Centers, concentrating on the post World War II and early Cold War eras, and provides a historic context that can be used to evaluate them for eligibility for listing in the NRHP. Property types associated with the Early Cold War period, during which the Horsham Memorial USARC was constructed, were further divided into three categories by plan type and named accordingly as the "Compact Plan," the "Sprawling Plan," and the "Vertical Plan."

Based on the layout, design, and time period of construction, the Horsham Memorial USARC appears to be based on standardized plans for US Army Reserve Centers categorized in the Historic Context Study as the "Sprawling Plan" type within the Early Cold War property type. These standardized plans were initially developed by the architectural firm of Reisner and Urbahn in 1952, updated in 1953, and last revised by the successor firm of Urbahn, Brayton, and Burrows in 1956, in collaboration with the US Army Corps of Engineers (USACE). The standardized plans most similar to the Horsham Memorial USARC are included as Standard Plans for a '400 Men Expansible Armory without Basement' in Appendix B of the Historic Context study. Known examples of the Sprawling Plan type were constructed from 1953 through 1964, possibly continuing later, by the Army, at reserve facilities across the country.

The following discussion of significance of this property is excerpted from the Nationwide Historic Context (Moore et al. 2008: 173):

"Army Reserve Centers that fall under the Sprawling Plan subtype may be eligible for listing in the NRHP under Criterion A in the area of military history for their associations with President Eisenhower's "New Look" Program and the National Defense Facilities Act of 1950 (PL 783, 81st Congress). As analyzed in the discussion for the Compact Plan subtypes, these historical factors played important role in the history and development of the building program associated with the Army Reserves during the early and middle 1950s and extant examples of the Sprawling Plan subtype may be significant within that context. Although individual Army Reserve Centers may be eligible for the NRHP under Criterion B for their association with significant individuals, those associations would be applicable at a local level and would have to be researched and documented on an individual, center-by-center basis. At the nationwide level, however, no significant associations under Criterion B have surfaced. Sprawling Plan Army Reserve Centers may also be eligible for inclusion in the NRHP under Criterion C in the area of architecture for their physical attributes and the quality of their design. Architecturally, they are associated with the influence of the Modern Style, which enjoyed widespread popularity among architects in the design of federal buildings in the 1950s. The type also is significant under Criterion C because the expansible and flexible nature of the plans documents the military's vision for a changing Army Reserve Force and increasingly important role that the Reserves filled in the nation's defense and military preparedness. The presence of function-specific technical spaces like communications shops and labs in this subtype is significant as well, because it reflects the military strategy codified in the Reserve Forces Act of 1955, which aimed to tap professional and technical expertise while allowing Reservists the flexibility to participate in the civilian economy. The period of significance for Sprawling Plan Army Reserve Centers dates from ca. 1952 to ca. 1964."

Key # _____
ER# _____

Comparative information on other nationwide U.S. Army Reserve properties constructed during the same period as the Horsham Memorial USARC was excerpted from the Historic Context Study (Moore et al. 2008: 202-203).

"A total of 536 new Army Reserve Centers were funded between 1959 and 1965. About 50 percent of the present-day inventory of Army Reserve Centers was constructed between 1959 and 1969, with higher concentrations of buildings from this era located in the midwestern and western states and lower concentrations in the eastern states. Buildings constructed during this period do not show the same degree of consistency and standardization as buildings constructed from 1950 through 1958. As late as 1964, some Army Reserve Centers were constructed using the preexisting standardized plans designed by Urbahn, Brayton, and Burrows. A preliminary review of extant examples of Army Reserve Centers built from 1959 to 1969 indicates that most have experienced alterations. In many cases, original windows and doors have been replaced with vinyl. Additional outbuildings have been constructed adjacent to original reserve center buildings."

Because these property types are so common, nationwide comparison of examples of the property type in the Historic Context study resulted in the identification of character-defining features to standardize the assessment of integrity for NRHP eligibility of examples of this property type. Additional information on these character-defining features and their affect on overall integrity is included in "Physical Description and Integrity."

The potential significance of an Army Reserve Center is not likely to be situated within a military context at the state or local level because the development of the military mission and infrastructure of the Army Reserve occurred on the national level.

The establishment and operation of Army Reserve Centers are part of a national, federally funded military program that, by its very definition, resulted in the construction of single Reserve Centers in communities throughout the country. Only dense urban settings, such as major metropolitan areas, contained multiple Reserve Centers. The Horsham Memorial USARC is one of at least 29 Army Reserve Centers in Pennsylvania constructed between 1948 and 1960 (Crane et al. 2004). Construction and operation of these USARCs within the state would not have contributed to substantial economic growth within the state. As the centers were designed at a national level, they would not be specifically associated with any individual instrumental in the development of the Army Reserve within Pennsylvania. The designs of these 29 centers are likely to be based on the standardized plans developed for USARCs of this time period (Moore et al. 2008). The Horsham Memorial USARC is one of many in Pennsylvania representative of the Reisner and Urbahn design variations for USARCs. As the design of the Horsham Memorial USARC is based on nationally standardized plans, it does not embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction on the state level. As the design of the Horsham Memorial USARC is very consistent with standardized plans, no modifications to the plans were made to incorporate unique, locally available materials that might indicate influences at the local level. The Horsham Memorial USARC is not considered NRHP-eligible at the state level.

The Horsham Memorial USARC is located adjacent to the Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove which was established as the Naval Air Station, Willow Grove in 1943. The presence of NAS Willow Grove indicates substantial military construction and operations in the area prior to the construction of the USARC. The construction and operation of the USARC in 1959 did not substantially add to the existing military operations in the local community nor did its construction contribute to substantial economic growth or spur planned community development. As the USARCs were designed at a national level, the Horsham Memorial USARC is not specifically associated with any individual instrumental in the development of the Army Reserve in the Horsham area. As the design of the Horsham Memorial USARC is based on nationally standardized plans, it does not embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that

Key # _____
ER# _____

possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction on the local level. As the design of the Horsham Memorial USARC is very consistent with standardized plans, no modifications to the plans were made to incorporate unique, locally available materials that might indicate influences at the local level. The Horsham Memorial USARC is not considered NRHP-eligible at the local level.



Legend

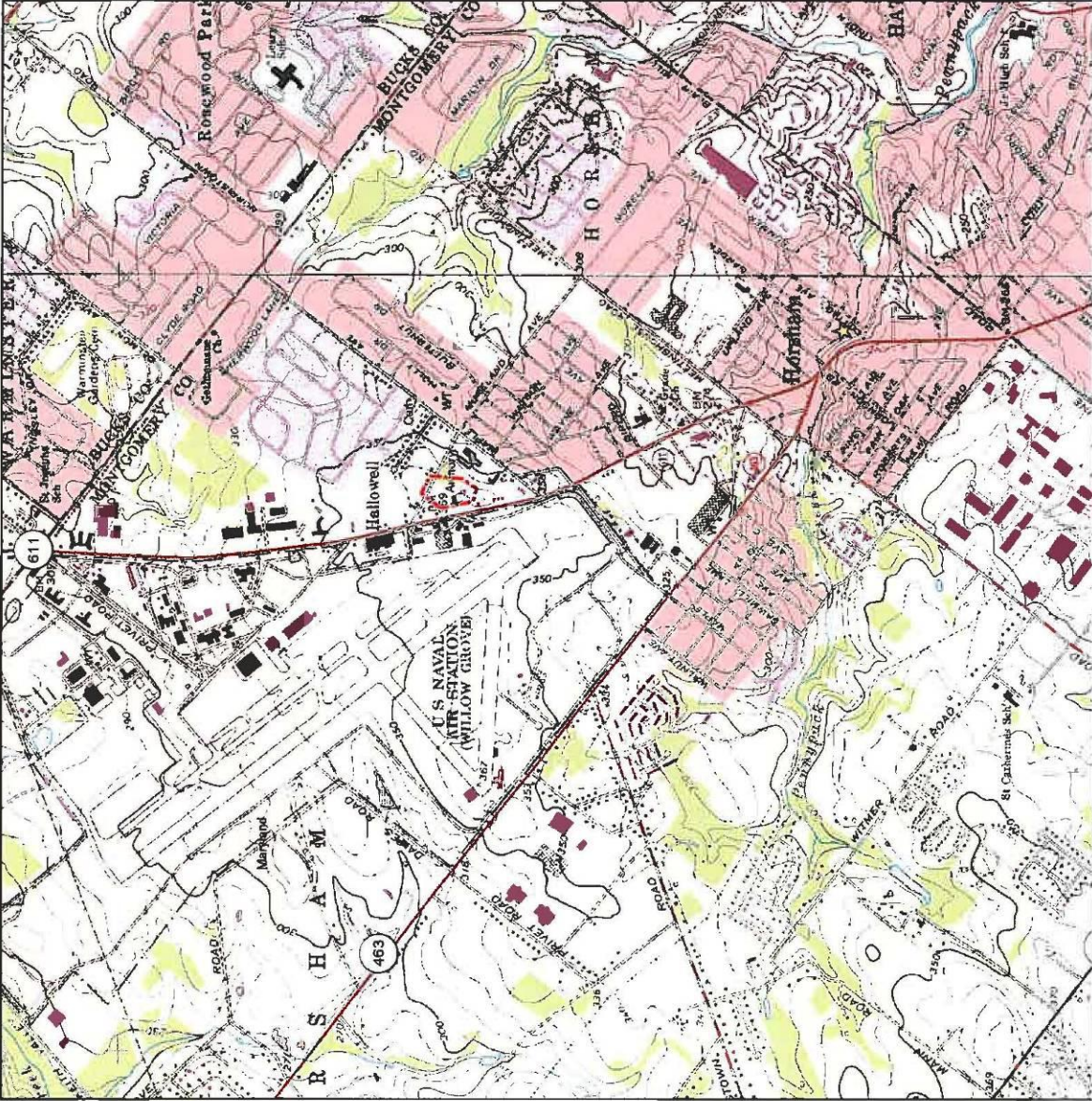
- ☆ City
- Installation Boundary

0 1,500 3,000

Approximate Scale in Feet

Topographic Map:
 1:24,000 - Ambler Quadrangle
 USGS Scan of 1966 Map
 *Revisions shown in purple are
 USGS edits completed in 1983

**Horsham Memorial USARC
Project Area**





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 27, 2010

Jeffrey M. Hrzic, Chief
Environmental Division
99th Regional Support Command, Army
5231 South Scott Plaza
Fort Dix, NJ 08640-5000

TO EXPEDITE REVIEW USE
BHP REFERENCE NUMBER

Re: ER 93-1228-091-W
DOD: Proposed Disposal and Reuse of the Horsham Memorial United States Army Reserve Center (BRAC), 936 Easton Road, Horsham Township, Montgomery County, Pennsylvania

Dear Mr. Hrzic:

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.

Your request does not include sufficient information. We are unable to proceed with our review for historic structures until the information listed below is provided.

- Preparer included a CD of the nationwide context Blueprint for the Citizen Soldier. This document didn't include any specific detail that would permit an evaluation for Criterion A of the National Register of Places. Though the building doesn't retain all of the exterior features the context requires for sprawling plan types, later in the integrity assessment section of the context (pgs 197-199) it says if all examples bear some alterations. There must be comparisons and those with the best overall integrity (even if not retaining all features) could be determined eligible. Also, page 8 of the context document says that a good interior may make up for exterior shortcomings.
- It doesn't appear that the context was fully applied, and the summary needs to be expanded. Based on the context, the center fits neatly into the "sprawling plan" category—it appears to be an exact match of the blueprint in the context. We take specific issue with the statement on page 10 of the context document, that since this USARC is based on nationally standardized plans, it does not embody the distinctive characteristics of a type, period, or method“ It appears to be an

exact execution of the standard plan, and does in fact embody the distinctive characteristics of its type and design. The preparer did not interpreting the context appropriately.

- The selection of a site across from the Willow Grove Naval Air Station Joint Reserve base is especially interesting. Please submit the following details/clarification:
 1. Identify where the other 29 USARCs in PA from this construction period (c.1952-c.1964) are located; specifically for the “sprawling plan” type provide basic info and exterior photos so that integrity may be assessed and compared. Note especially the context’s statements on evaluating character-defining features and comparing similar properties.
 2. Was it typical for USARCs to be sited near pre-existing military facilities? Even if another branch of the military? The placement of this center adjacent to Willow Grove raises interest—did the facilities operate jointly? Provide shared facilities for testing and training? Coordinate shared staff, physical plant, equipment?
 3. What determined the locations chosen for the construction of the USARCs in PA?
 4. Provide more of an exploration for potential Criterion A significance, even at the local level. Is there any information about the specific reserve units that served here that would point to any significance—in new training methods, changing roles/functions of service, unique deployment roles, etc? Was there a specialty that the reservists serving here trained for? From how far of a geographic region did this center pull reservists for service? How many? The joint impact of this USARC and the Willow Grove station on the area raises questions—could there be any possible significance, such as a new venture between the military branches sharing resources and expertise? Security? Did new businesses spring up surrounding these two bases/centers to provide services to the military personnel, civilian support staff, reservists?
 5. The context also suggests that USARCs of the sprawling plan subtype may be eligible for Criterion A in the area of military history for association with the “New Look” program and the National Defense Facilities Act of 1950. Explore that potential for significance, or the potential in association with other acts or aspects of military history.

Page 3
J. Hrzic
Aug. 27, 2010

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

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology &
Protection

DCM/smz



REPLY TO
ATTENTION OF
ARRC-SNJ-PW-E

DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NJ 08640-5000

1 December 2010

Ms. Jean Cutler
Director
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: Proposed Disposal and Reuse of the Horsham Memorial United States Army Reserve Center, 936 Easton Road, Horsham, PA (ER 93-1228-091-W)

Ms. Cutler,

The U.S. Army Reserve, 99th Regional Support Command (RSC) has received your letter dated August 27, 2010, and appreciates your comments on the proposed disposal and reuse of the Horsham U.S. Army Reserve Center (USARC) located in Horsham, PA. In reference to concerns noted in your correspondence, the 99th RSC has conducted additional archival and photographic research to revise Items 38 and 39 of the enclosed Historic Resource Survey Form and evaluate the Horsham USARC's eligibility for listing in the National Register of Historic Places (NRHP).

The Area of Potential Effects (APE) has not changed from our previous submission. After applying the NRHP criteria for evaluating properties, the 99th RSC has determined there are no eligible properties within the APE and no historic properties will be affected by the proposed undertaking.

In accordance with Section 106 of the National Historic Preservation Act, the 99th RSC is requesting your concurrence on our determination within 30 days of receipt of this letter. The enclosed documentation provides the information needed to complete your review. Please submit your response to: Amanda Murphy, 99th RSC DPW, Environmental Division, 5231 South Scott Plaza, Fort Dix NJ 08640-5000 or by email at Amanda.w.murphy@usar.army.mil. If you have any questions, please contact Ms. Murphy at 609-521-8047. We look forward to working cooperatively with you to make this important project successful for all parties involved.

Sincerely,

Jeffrey M. Hrzic
Chief, Environmental Division

Enclosures

Historic Resource Survey Form
 PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION
 Bureau for Historic Preservation

Key # _____
ER# _____

Name, Location and Ownership (Items 1-6; see Instructions, page 4)

HISTORIC NAME Horsham Memorial United States Army Reserve Center (USARC)

CURRENT/Common Name same

STREET ADDRESS 936 Easton Road ZIP 19044

LOCATION State Highway 611 across from Willow Grove Naval Air Station/Joint Reserve Base

MUNICIPALITY Horsham Twp COUNTY Montgomery

TAX PARCEL #/YEAR Lot 1 Block 16D/1953 USGS QUAD Ambler

OWNERSHIP Private
 Public/Local Public/County Public/State Public/Federal

OWNER NAME/ADDRESS U.S. Army Reserve, 99th RSC/5231 South Scott Plaza, Fort Dix, NJ 08640-5000

CATEGORY OF PROPERTY Building Site Structure Object District

TOTAL NUMBER OF RESOURCES 2

Function (Items 7-8; see Instructions, pages 4-6)

Historic Function	Subcategory	Particular Type
<u>Defense</u>	<u>Military Facility</u>	<u>Army Reserve Center</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
Current Function	Subcategory	Particular Type
<u>Defense</u>	<u>Military Facility</u>	<u>Army Reserve Center</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Architectural/Property Information (Items 9-14; see Instructions, pages 6-7)

ARCHITECTURAL CLASSIFICATION

Modern Movement _____

EXTERIOR MATERIALS and STRUCTURAL SYSTEM

Foundation	<u>Concrete</u>	_____
Walls	<u>Brick</u>	_____
Roof	<u>Unknown</u>	_____
Other	<u>Metal</u>	<u>glass</u>
Structural System	<u>Concrete - general</u>	_____

WIDTH _____(feet) or 27 (# bays) DEPTH _____(feet) or 2 (# rooms) STORIES/HEIGHT 2

Key # _____
ER# _____

Photo List (Item 33)

See pages 10-11 of the Instructions for more information regarding photos and the photo list. In addition to this photo list, create a photo key for the site plan and floor plans by placing the photo number in the location the photographer was standing on the appropriate plan. Place a small arrow next to the photo number indicating the direction the camera was pointed. Label individual photos on the reverse side or provide a caption underneath digital photos.

Photographer name Mike Kulik

Date April 14, 2010

Location Negatives/Electronic Images Stored Parsons, Washington DC (available on CD)

Photo #	Photo Subject/Description	Camera Facing
1	Overview of the building layout and asphalt surfaces at the Horsham Memorial USARC	N
2	North elevation of the main block of the Horsham Memorial USARC showing side-gable roof	E
3	North end of the Main (West) Elevation showing glass and metal entrance assembly and brick infilling	E
4	Main (West) Elevation of the Horsham Memorial USARC, showing original brick veneer exterior	NE
5	Main (West) Elevation of the Horsham Memorial USARC, showing metal and glass assembly	SE
6	South Elevation of the main block of the Horsham Memorial USARC	N
7	North Elevation of the USARC, showing rear of the main block, one-story hyphen and rear wing	S
8	Rear (east) and north elevations of the rear wing (drill/assembly hall), showing the roll up door	SW
9	South elevation showing rear of the main block, one-story hyphen, and double-height rear wing	N W
10	Interior of the first story of the main block of the administration building	N
11	Main elevation of the Organizational Maintenance Shop (OMS), located southeast of the main building	S
12	Two of the line of mature trees along State Route 611 (Easton Road) in the grassy area in front.	N

Historic Resource Survey Form – Current Photos

Horsham Memorial USARC Figures 1-12



Figure 1. Overview of the building layout and asphalt surfaces at the Horsham Memorial USARC, facing north (from left: main block of the administration building; center: rear drill/assembly hall wing; and right: OMS)



Figure 2. North elevation of the main block of the Horsham Memorial USARC facing east, showing side-gable roof, walkways, parking and signage.

Historic Resource Survey Form – Current Photos



Figure 3. North end of the Main (West) Elevation of the Horsham Memorial USARC, facing east, showing glass and metal assembly at main entrance, brick infilling of former openings for a window and several vents, signage, and flagpole.



Figure 4. Main (West) Elevation of the Horsham Memorial USARC, facing northeast, showing original brick veneer exterior with infilling of original openings, affixed signage, flagpole, and concrete pad for vehicle display.

Historic Resource Survey Form – Current Photos



Figure 5. Main (West) Elevation of the Horsham Memorial USARC, facing southeast, showing original brick veneer exterior, metal and glass assembly at main entrance, flagpole, and concrete pads for vehicle display.



Figure 6. South Elevation of the main block of the Horsham Memorial USARC, facing north

Historic Resource Survey Form – Current Photos



Figure 7. North Elevation of the Horsham Memorial USARC facing south, showing rear of the main block, one-story hyphen, and double height rear wing with clerestory lights for the drill/assembly hall facing south



Figure 8. Rear (east) and north elevations of the rear wing (drill/assembly hall), showing the roll up door of the Horsham Memorial USARC, facing southwest

Historic Resource Survey Form – Current Photos



Figure 9. South elevation of the Horsham Memorial USARC, showing rear of the main block, one-story hyphen, and double-height rear wing with clerestory lights for the drill/assembly hall, facing northwest.



Figure 10. Interior of the first story of the main block of the administration building at Horsham Memorial USARC.

Historic Resource Survey Form – Current Photos



Figure 11. Main elevation of the Organizational Maintenance Shop (OMS), facing south, located southeast of the Main building at the Horsham Memorial USARC.



Figure 12. Two of the line of mature trees along State Route 611 (Easton Road) in the grassy area in front of the Horsham Memorial USARC.

Site Plan (Item 34)

See page 11 of the Instructions for more information regarding the site plan. Create a sketch of the property, showing the footprint of all buildings, structures, landscape features, streets, etc. Label all resources and streets. Include a North arrow and a scale bar (note if scale is approximate). This sheet may be used to sketch a plan or another map/plan may be substituted.

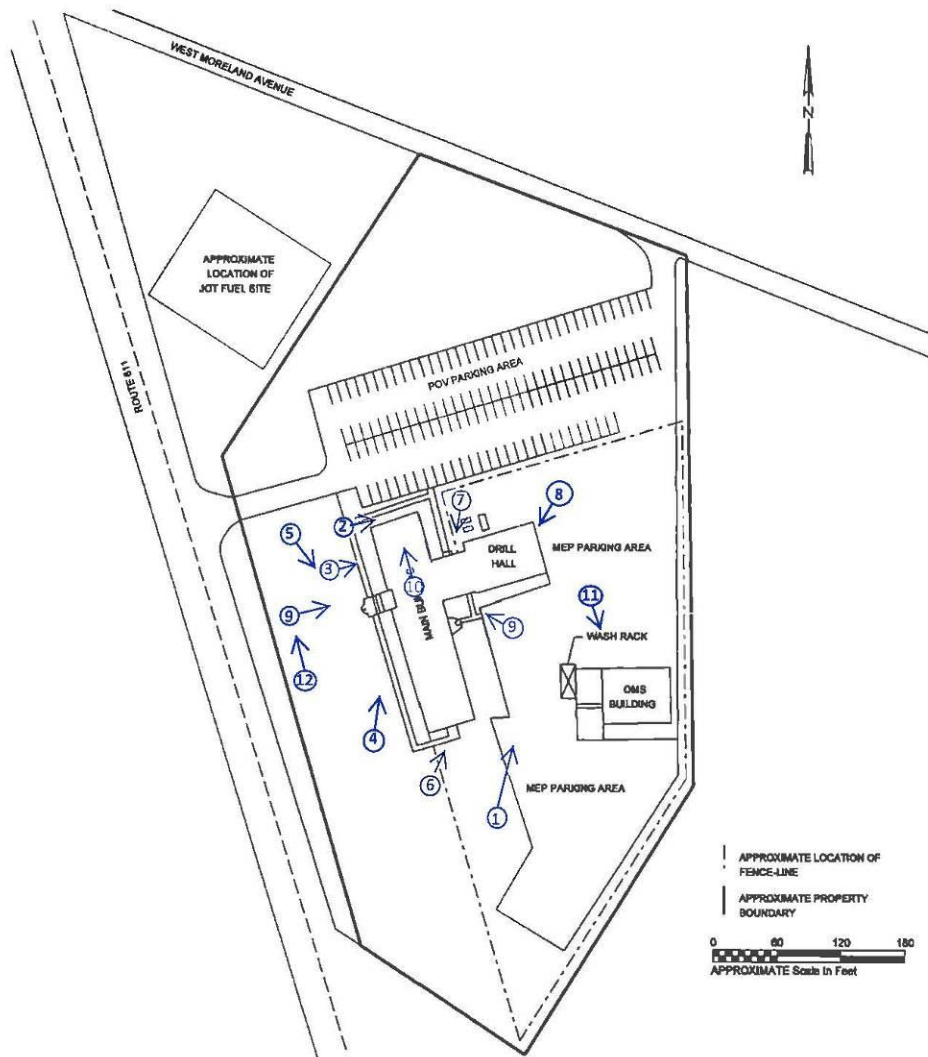
Key # _____
ER# _____



ER# _____	Key # _____
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03/08

PA Historic Resource Survey Form 5



Key # _____
ER# _____

Floor Plan (Item 35)

See page 11 of the Instructions for more information regarding the floor plan. Provide a floor plan for the primary buildings, showing all additions. Label rooms and note important features. Note the date of additions. Include a North arrow and a scale bar (note if scale is approximate) or indicate width/depth dimensions. This sheet may be used to sketch a floor plan or another map/plan may be substituted.



Key # _____
ER# _____

Physical Description and Integrity (Item 38)

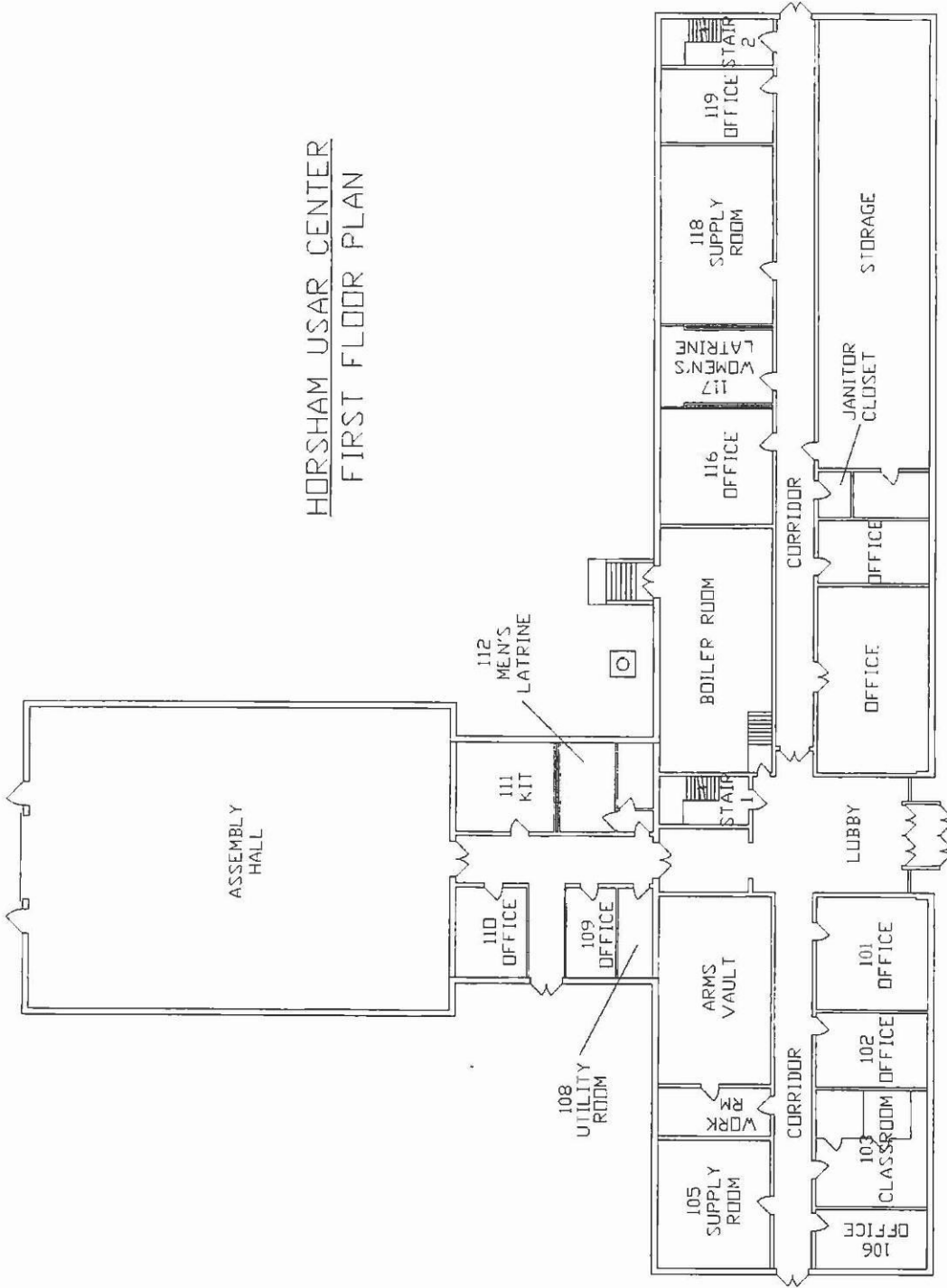
Provide a current description of the overall setting, landscape, and resources of the property. See page 13 of the Instructions for detailed directions. Continue on additional sheets as needed.

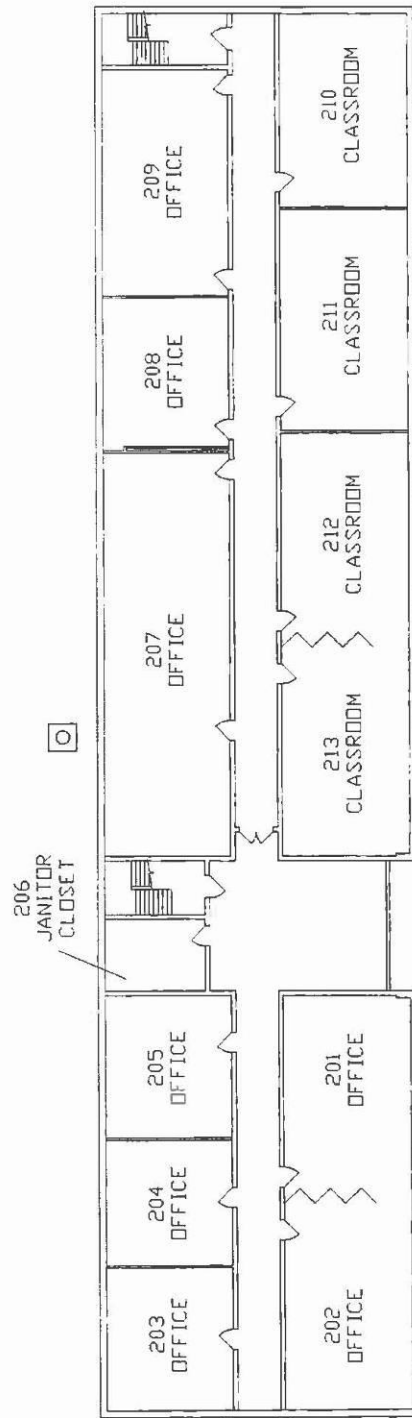
Suggested outline for organizing this section:

- Introduction [summarize the property, stating type(s) of resource(s) and function(s)]
- Setting [describe geographic location, streetscapes, natural/man-made landscape features, signage, etc.]
- Exterior materials, style, and features [describe the exterior of main buildings/resources]
- Interior materials, style, and features [describe the interior of main buildings/resources]
- Outbuildings/Landscape [describe briefly additional outbuildings/landscape features found on property, substitute Building Complex Form if preferred; See Instructions, page 18]
- Boundaries [explain how/why boundaries chosen, such as historic legal parcel, visual natural features such as tree lines, alley separating modern construction, etc.]
- Integrity [summarize changes to the property and assess how the changes impact its ability to convey significance]

(Text entered directly into form fields will not permit formatting adjustments, such as spell checking or italicizing. Instead, you may wish to cut-and-paste text from another document into the field below: "unprotect" the document for this section, or prepare the "Physical Description and Integrity" narrative as a separate document.)

HORSHAM USAR CENTER
FIRST FLOOR PLAN





HORSHAM USAR CENTER
SECOND FLOOR PLAN

Physical Description and Integrity

Physical Description. The Horsham Memorial USARC is located at 936 Easton Road in Horsham Township, Pennsylvania (UTM: 40.194602°, 75.136323). The project area is 7 acres in size and contains two buildings: the main administration building, consisting of an administrative/classroom block and a drill hall, and a detached organizational maintenance shop (OMS), both constructed in 1959 (Historic Resource Survey Form [HRSF] Current Photos: Figure 1). The remainder of the site is covered in pavement (parking) or landscaped areas. The two buildings at the Horsham Memorial USARC are constructed of concrete block covered with brick veneer on concrete foundations.

The plan or footprint of the 24,527-square-foot administration building is an asymmetrical “T.” The main two-story block forms the top portion on the T and faces the street. The main block has a slight pitch side-gable roof (HRSF Current Photos: Figure 2). The first story of the main (west) elevation has 15 bays across the front, including 13 window openings and two double doors in the recessed two-story metal frame and 7x5 plate glass assembly at the main entrance. The southern portion of the first story, with no windows, formerly functioned as an indoor rifle range. One of the 13 window openings on the first story has been filled in with brick (third from the north end) as have as many as eight unit vent louvers located between the first and second stories (HRSF Current Photos: Figure 3). Facility managers indicated that when the rifle range was converted to offices, the openings that had provided ventilation were filled with brick.

The second story is pierced by 26 windows, spaced in line with those across the first level in the northern portion of the building (Historic Resource Survey Form [HRSF] Current Photos: Figures 4-5). The windows are one/one light, brown/black-painted, metal framed with projecting painted metal sills. A set of double doors with a window above occurs on both the north and south elevations of the main block (HRSF Current Photos: Figures 2 and 6)

The main block is connected, via a one-story hyphen, to a rear wing (HRSF Current Photos: Figure 7). The rear wing is a double-height space with four sets of three one-light clerestory windows divided by brick vertical piers on the side elevations (HRSF Current Photos: Figures 7-9). The rear (east) elevation of the rear wing is pierced by a central garage bay with a metal roll up door for vehicular access flanked by two pedestrian access doors (HRSF Current Photos: Figure 8).

The main block was used for administrative and classroom space. The interior of the main block is divided into classrooms, office space, a kitchen area, storage, and a former indoor firing range (converted to office space and storage), arranged along a corridor oriented end to end (north to south) of the building (HRSF Current Photos Figure 10). The main entrance leads into a vestibule and lobby with brick walls. Concrete block walls define the remaining interior spaces. Flooring on the first and second floors of the administrative/classroom block are covered with asbestos-containing 9 inch square black and white tiles. This type of floor tile was commonly manufactured up until the 1980s. The rear wing is a drill or assembly hall that was used for ceremonies, drill practice, and storage. The interior of the rear wing exhibits concrete block walls and scored concrete flooring.

The OMS building is a 3,710-square-foot single-story brick structure with a shed roof situated on the eastern edge of the parcel. The main (north) elevation is accessed by three vehicle service bays with roll-up metal doors (HRSF Current Photos: Figure 11). The rear (south) elevation exhibits three sets of one- light clerestory windows.

In addition to the two buildings, the built environment comprising the Horsham Memorial USARC includes impervious surfaces such as asphalt parking areas, driveways, and concrete walkways and pads, a flagpole, and signage (HRSF Current Photos: Figures 1-5). The remaining land is maintained lawn with grass and a line of mature trees fronting State Route 611 (HRSF Current Photos: Figure 12). The trees are evenly spaced and were planted after 1965 but before 1971 based on historical aerial photographs.

Two concrete pads located in the front lawn extend at 45 degree angles from the flagpole, located just in front of the walkway to the main entrance. The concrete pads were likely installed as mounts for vehicles that would have been publically displayed. A tank was displayed on the pad on the right; no vehicles were displayed on the left pad (HRSF Current Photos: Figure 5).

Three types of signage occur at the Horsham Memorial USARC (HRSF Current Photos: Figure 2-5). To the right (south) of the main entrance on the main (west) elevation, silver-toned metal block letters affixed to the brick veneer read "U.S. Army Reserve." A brown metal sign in the lawn in front of the main elevation reads "Horsham Memorial U.S. Army Reserve Center" with military shields/insignia representing the USAR and the 99th Regional Support Command. In the lawn to the right (west) of the doors at the north elevation, two stacked metal signs are fixed to metal posts; the upper sign reads: "HHC, 2nd Battalion, 228th Aviation Regiment" (Headquarters and Headquarters Company) and the bottom sign reads: "367th Military Police Company (Guard);" each sign displays two shields or insignia, reflecting the units that most recently served out of the Horsham Memorial USARC.

The view from the Horsham Memorial USARC is dominated by an urban landscape. Residential, community, commercial, and industrial properties occur adjacent to the USARC on its northern, southern, and eastern sides. State Route 611 (Easton Road), runs approximately north-south, bounding the western edge of the facility. The Willow Grove Naval Air Station/Joint Reserve Base (NAS/JRB) is located on the west side of Easton Road and five concrete block buildings along the eastern edge of that military installation as well as a portion of the tarmac associated with the runway and hangars are visible from the front of the USARC.

Integrity. The evaluation of integrity for the Horsham Memorial USARC is based on guidance provided in the 2008 *Blueprints for a Citizen Soldier: A Nationwide Historic Context Study of the U.S. Army Reserve Centers* (Historic Context). The standards by which to evaluate integrity vary based on whether the facility's significance is established under Criteria A, B or C. The strictest set of standards for meeting aspects of integrity applies if the facility is significant under Criterion C. Significance under Criteria A and B allow for more flexibility in alterations to original features of the facility.

Significance for USARCs constructed nationwide during the early Cold War era has been established under Criteria A for their association with President Eisenhower's "New Look" Program and the National Defense Facilities Act of 1950 (PL 783, 81st Congress) and C in the

area of architecture for their physical attributes and the quality of their design , as associated with the influence of the Modern Style and because the expansible and flexible nature of the plans documents the military’s vision for a changing Army Reserve Force and increasingly important role that the Reserves filled in the nation’s defense and military preparedness (see History and Significance Section for additional information).

The Horsham Memorial USARC appears to be based on standardized plans for US Army Reserve Centers of the "Sprawling Plan" sub-type (see History and Significance Section, Criterion C). Because buildings categorized in the Sprawling Plan sub-type are part of a nationwide building program and are common throughout the United States, a strict set of guidelines to examine their physical integrity through the presence of unaltered character-defining features was established for the evaluation of USARCs to identify the most intact and representative examples of this property type.

Based on the guidelines in the 2008 Historic Context, character-defining features identified as necessary for eligibility under Criteria A, B or C must be present for an Army Reserve Center constructed according to the "Sprawling" standardized plans to retain its integrity and convey its significance as an exemplar of its property type (Moore et al. 2008:173-174; 179; 197-198). The following table identifies the features that are necessary for a USARC to convey significance under Criteria A, B or C and whether those features are intact at the Horsham Memorial USARC.

Aspect of Integrity	Feature	Necessary under Criteria A and B	Necessary under Criterion C	Intact at Horsham Memorial USARC?
Location	Remains at original location	X	X	Yes
Design				
	Design based on a 1952 or 1953 Reisner and Urbahn standard plan, or a 1956 Urbahn, Brayton, and Burrows Standard Plan	X	X	Yes
	Original “sprawling” L-shaped or T-shaped building footprint, or footprint with additions following the original “expansible” plan (building footprint)	X	X	Yes
	Original number of stories	X	X	Yes
	Original roof form (e.g., flat roof over classroom wing)	X	X	Unknown but retains low pitch on main block and rear wing
	Original fenestration pattern, without infill of original openings or creation of openings onto space that originally functioned as rifle range	X	X	No; 1 window on main elevation has been infilled; other original openings (vents) of

Aspect of Integrity	Feature	Necessary under Criteria A and B	Necessary under Criterion C	Intact at Horsham Memorial USARC?
				space that originally functioned as rifle range have been infilled
	Original metal and glass entrance assembly (architectural finishes at entry)		X	No, replacement omits the projecting vestibule and pattern of frame and glass is different
	Cantilevered canopy, if original	X	X	N/A
	Original "masonry units," brick veneer, or historically appropriate stucco veneer on exterior walls	X	X	Yes
	Original doors and windows or compatible replacement doors and windows that meet the Secretary's Standards	X	X	No, replacements are not compatible
	Original Signage		X	Unknown
(Interior)	Original configuration of interior corridor and lobby spaces	X	X	Corridor and lobby appear intact but information not available on interior modifications
(Interior)	Original wall finishes in lobby and corridors		X	Unknown
(Interior)	Original flooring in lobby and corridors		X	Unknown
(Interior)	Original ceilings in lobby and corridors		X	Unknown
(Interior)	Wood vestibule doors, if original		X	Unknown
(Interior)	Presence of flexible accordion partitions, if original, or opening in wall where accordion partition originally was located		X	Unknown
(Interior)	Double-height open interior assembly/drill space	X	X	Yes
	Overhead rolling door opening at assembly wing/ vehicular access into			Yes

Aspect of Integrity	Feature	Necessary under Criteria A and B	Necessary under Criterion C	Intact at Horsham Memorial USARC?
	interior assembly/drill space			
	Historic-age maintenance shop, if original (original relationship between building and outbuildings)	X	X	Yes
Setting				
	Open space for drills and exercises	X	X	Yes
	Relationship between building and outbuildings remains original	X	X	Yes
	Integrity of viewshed and surrounding setting intact	X	X	Yes
Materials				
	Original "masonry units," brick veneer, or historically appropriate stucco veneer on exterior walls	X	X	Yes
	Original windows or compatible replacement windows that meet the Secretary's Standards	X	X	No, replacements are not compatible
	Original exterior doors or compatible replacement doors that meet the Secretary's Standards		X	No, replacements are not compatible
Association				
	Was constructed for and remains under stewardship of the Army Reserves	X	X	Yes, but scheduled for BRAC and local reuse
Summary				Lacks required physical integrity

Alterations. The Horsham Memorial USARC exhibits alterations to three character-defining features including an alteration to the original fenestration pattern with brick infilling of an original window opening. In addition, as many as eight original openings associated with the former indoor firing range on the first story (vents) have also been infilled.

Additional alterations to character-defining features at this facility include the replacement of what were likely the original windows and the main entrance assembly, based on photographs dated July 30, 1992. The original windows appear to have been unpainted aluminum frame single-pane windows. The original windows on the west (main) and east elevations were 2x3-light awning style windows; the upper four lights were movable and the lower two lights were fixed. Windows on the north and south elevations of the main block and along the clerestory of the rear wing were 3x4 light aluminum framed windows. The main entrance was comprised of a 4x3 plate glass assembled in aluminum framing surrounding a projecting vestibule with two sets of double doors.

Based on the 2008 Historic Context standards for assessing integrity, the fenestration alterations at the Horsham Memorial USARC, the replacement of windows with non-architecturally compatible materials, and the alteration to the main entrance configuration, represent the loss of character-defining elements required for eligibility under Criteria C. Further, the fenestration alterations and replacement of windows also represent the loss of character-defining features required for eligibility under Criteria A and B.

The Historic Context indicates that although interior features are not considered character-defining features, their presence may make up for minor alterations to character-defining features on the exterior of the building, on a case by case basis. Interior features at the Horsham Memorial USARC considered original include the configuration of interior corridor and lobby spaces and double-height open interior in the assembly/drill space; however, information on the originality of other interior features is lacking. Because the Army Reserve command structure under which the Horsham Memorial USARC is managed has changed over the years - from the 79th Army Reserve Command (ARCOM) to the 99th Regional Support Command (RSC) - property managers for the Horsham Memorial USARC no longer have access to information pertaining to previous building alterations. Without plans or records regarding each stage of modifications, it is not possible to discern whether observed features represent original or replacement materials for most of the interior features of the facility including: wall finishes in lobby and corridors (now identified as brick veneer in lobby and vestibule and concrete block through hallways), flooring in lobby and corridors (now identified as asbestos tile flooring), ceilings in lobby and corridor (now drywall), interior wood vestibule doors, and flexible accordion partitions. Because baseline information is not available, a valid comparison of original versus replacement materials is not possible for all interior features; as such, they are not being considered in the assessment of architectural integrity at the Horsham Memorial USARC. Furthermore, changes to three prominent character defining features (the exterior openings, replacement of windows, and the main entrance) have collectively altered the exterior to such an extent that any intact interior features could not substantially contribute to overall physical integrity. For these reasons, the assessment of architectural integrity is based solely on exterior character-defining features. Therefore, because of the alterations to character-defining features on the exterior of the facility, the Horsham Memorial USARC does not retain the required physical integrity to convey its significance under Criteria A, B, or C in accordance with the 2008 Historic Context.

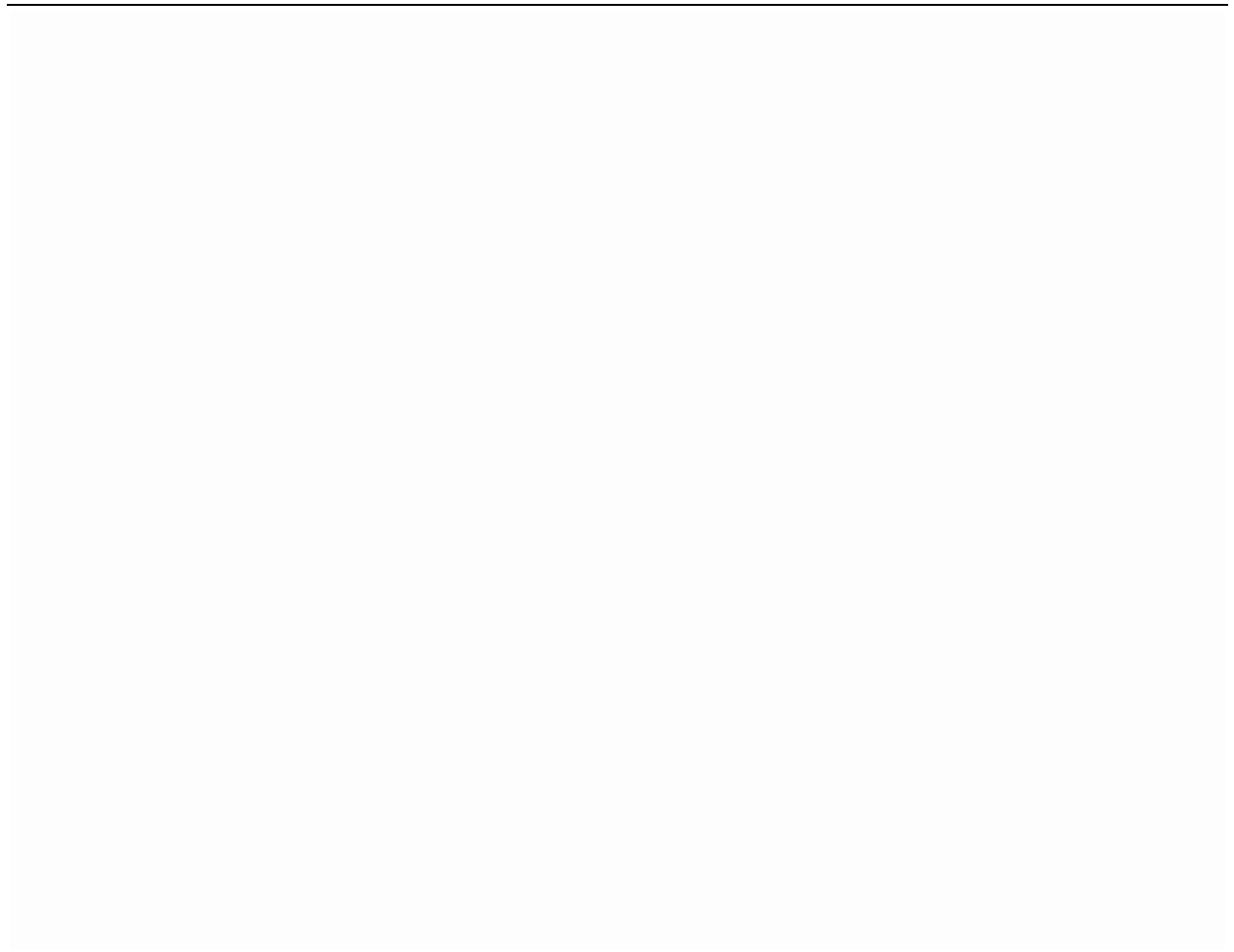
History and Significance (Item 39)

Provide an overview of the history of the property and its various resources. Do not substitute deeds, chapters from local history books, or newspaper articles. See page 14 of the Instructions for detailed directions. Continue on additional sheets as needed. Suggested outline for organizing this section:

- History [Summarize the evolution of the property from origin to present]
- Significance [Explain why the property is important]
- Context and Comparisons [Describe briefly similar properties in the area, and explain how this property compares]

(Text entered directly into form fields will not permit formatting adjustments, such as spell checking or italicizing. Instead, you may wish to cut-and-paste text from another document into the field below: “unprotect” the document for this section, or prepare the “History and Significance” narrative as a separate document.)

Key # _____
ER# _____



History and Significance

Historic Context

The United States Army Reserve (USAR) is a Federal military organization distinct from the full-time professional Regular Army and the state National Guard. The USAR is maintained as a source of personnel to rapidly support Regular Army ranks in the event of conflict. The Reserve is composed of “citizen-soldiers,” civilians committed to a period of duty in exchange for benefits and pay. Reservists meet regularly at Reserve Centers, where Army training staff instructs them in procedure and in the use of equipment. Periodic intensive training occurs at weekend drills and summer camps.

Although the context of the Korean War and Eisenhower administration policies intersected with the construction of the initial wave of Army Reserve Centers, a multi-year construction program had already been set in motion by the passage of the National Defense Facilities Act of 1950. Army Reserve Centers, as opposed to earlier armories, were designed in response to the programmatic needs of the modern Army, and included classrooms and laboratory spaces rather than just space for drills and social activities. Broad policies affecting the strength of the reserves did influence how the Army assessed its need for facilities and where those facilities would be located. Eisenhower’s New Look program also influenced the type of training that would occur in the Army Reserve Centers, which affected the form and function of the buildings.

The form and program of spaces needed for the proposed new Army Reserve Centers responded to the functions that the buildings would serve. Traditionally, armories constructed before World War II had provided arms storage space and a drill hall, and maybe a social club room. Their imposing, high-style architectural design communicated security and social stability. With the emphasis on technology under the New Look program, the proposed new Army Reserve Centers needed to provide space for a wider variety of training- and instructional-related activities. Classrooms, laboratories, and maintenance shops were required in addition to the traditional need for arms storage and drill halls. New Army Reserve Centers would need to function as friendly, approachable representations of the Army in local communities. While traditional armories had used high architectural styles, the new Army Reserve Centers would need to recruit reservists from all walks of life, and therefore their architectural design would need to be accessible, simple, modern, and conservative.

The two buildings comprising the Horsham Memorial USARC were constructed in 1959 as part of a nationwide building campaign for U.S. Army Reserve Centers. In 2008, Hardy Heck, Moore (HHM), Inc. prepared Blueprints for the Citizen Soldier: A Nationwide Historic Context Study of United States Army Reserve Centers for the Department of Defense Legacy Resource Management Program (Moore et al. 2008). The study identified and categorized the various resource types associated with the historical development of U.S. Army Reserve Centers, concentrating on the post World War II and early Cold War eras, and provides a historic context that can be used to evaluate them for eligibility for listing in the NRHP. Resource types associated with the Early Cold War period, during which the Horsham Memorial USARC was constructed, were further divided into three categories by plan type and named accordingly as the “Compact Plan,” the “Sprawling Plan,” and the “Vertical Plan.”

Based on the layout, design, and time period of construction, the Horsham Memorial USARC appears to be based on standardized plans for US Army Reserve Centers categorized in the Historic Context Study as the “Sprawling Plan” type within the Early Cold War property type. These standardized plans were initially developed by the architectural firm of Reisner and Urbahn in 1952, updated in 1953, and last revised by the successor firm of Urbahn, Brayton, and Burrows in 1956, in collaboration with the US Army Corps of Engineers (USACE). The standardized plans most similar to the Horsham Memorial USARC are included as Standard Plans for a ‘400 Men Expansible Armory without Basement’ in Appendix B of the Historic Context study. Known examples of the Sprawling Plan type were constructed from 1953 through 1964, possibly continuing later, by the Army, at reserve facilities across the country.

Significance

The 2008 Historic Context (Moore et al, 2008: 173) establishes broad contexts and specific themes and examples under each of the three Criterion for NRHP eligibility applicable to architectural resources. National, State, and local significance under each Criterion, and theme, as appropriate, are discussed below.

Criterion A (Military)

National Level. “An Army Reserve Center that meets National Register Criterion A in the area of military significance is associated with the role of the Army Reserves in significant military strategies and/or conflicts...The mere association of an Army Reserve Center with the theme of military significance is not enough to meet Criterion A. For example, activities within a particular Reserve Center would need to be shown as significant in military history. Although all Army Reserve Centers are related to the broad development of the Army Reserve, this historic trend is not significant at a national level” (Moore et al, 2008: 140).

The Horsham USARC does not meet Criterion A for military significance. During the Cold War era, the functions performed at this facility and other USARCs nationwide were historically that of routine classroom-based training and vehicle maintenance. The Historic Context study mentions that a USARC may be eligible for Criterion A for military significance if it has a significant association with the development of the Eisenhower Administration’s New Look Program (Moore et al, 2008: 141). This policy envisioned smaller conventional forces, backed up by massive nuclear deterrence. The Horsham USARC was not associated with any nuclear missile sites or nuclear warfare training. The USARC served as the headquarters of the 157th Separate Infantry Brigade until 1995. The 157th’s primary mission during the Cold War was a deployable force in the defense of South Korea.

The Horsham USARC does not have any direct association with significant military strategies or conflicts. The 157th Separate Infantry Brigade only received honors and decorations for their role in conflicts in France during World War II, prior to the establishment of the Horsham USARC. The Horsham USARC was not directly associated with the development of the Organized Reserve Corps. Further, The Horsham USARC constructed outside the period of significance established for association with the military policies proposed by Emory Upton and Elihu Root.

State/Local Level. The Horsham USARC does not meet Criterion A for military significance at a state or local level. The Horsham USARC was established as part of a national federally-funded program that by its very definition resulted in the construction of single Reserve Centers in communities throughout the country. The Historic Context Study notes that the existence of a single Reserve Center in a town, like Horsham, does not qualify it as eligible under Criterion A. Unlike the National Guard, the Army Reserve does not have a local or state mission. Reservists respond only in times of international conflicts. Because of the Army Reserve's mission, USARCs would not have military significance at the state or local level.

The Horsham USARC was constructed across Route 611 (Easton Road) from the Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove which was established as the Naval Air Station, Willow Grove in 1943. The presence of NAS Willow Grove indicates substantial military construction and operations in the area prior to the construction of the USARC. The NAS Willow Grove had a significant impact on the development of the town of Horsham during the World War II and Cold War eras. New housing, small businesses, infrastructure, and schools were all created to respond to the hundreds of NAS Willow Grove employees that came from across the country to Horsham many years prior to the construction of the 400-person Horsham USARC. Today, the NAS JRB is still in operation and has become one of the largest Naval Air Stations in the nation.

As there was already a large full-time military presence in the area for over 15 years prior to the construction of the 400-person Horsham USARC, the USARC did not have a significant impact on military presence in the local community. The Horsham USARC had little association or connection to the NAS Willow Grove. The 79th Army Reserve Command (ARCOM) had an office at the NAS Willow Grove, however the 157th Separate Infantry Brigade headquartered at the Horsham USARC was not in the direct chain of command of the 79th ARCOM. Therefore, the Horsham USARC did not share any facilities for testing, training, physical plant, or equipment, nor share staff and security with the NAS Willow Grove.

The Horsham USARC was built to only accommodate 400 Reservists at a time. The Historic Context Study mentions that locations of USARCs were chosen mainly for their proximity to major highways and roads. The Horsham USARC location is consistent with this trend as it is located on Route 611 (a major thoroughfare through Horsham) and is less than a mile from the Pennsylvania Turnpike. Reservists report to USARCs located near their homes. Reservists would already have been community members of Horsham and the surrounding towns. The Horsham USARC only employed approximately 30 full-time staff members consisting of active and retired Reservists and civilians. Most of the activity at the Horsham USARC consisted of vehicle maintenance and classroom instruction on weekends. No more than a few hundred Reservists would have reported to the Horsham USARC on any given weekend. For these reasons, the activity at the Horsham USARC would not have significantly contributed to the economic growth or planned community development of Horsham since the Reservists were already members of the community.

Criterion A (Politics/Government)

National Level. “An Army Reserve Center might be eligible for the NRHP under Criterion A in this area of significance at the national level if it were the site of organizational meetings that substantially contributed to the development of the Reserve Officer’s Association (ROA)-driven legislation such as the Reserve Officers Personnel Act of 1954 or the Reserve Bill of Rights and Vitalization Act of 1967” (Moore et al, 2008: 141).

The Horsham USARC does not meet Criterion A for an association with politics or government. ROA legislative priorities and policies are handled at the Washington, DC national headquarters and discussed with member representatives of each state at an annual national convention. This national convention is held most often in Washington, DC. The ROA was contacted for the purposes of this determination and there is no evidence to suggest that the Horsham USARC or any other USARC of this size would have played a significant role in the development of the Reserve Officers Personnel Act of 1954 or Reserve Bill of Rights and Vitalization Act of 1967 (ROA, 11/18/2010). No evidence was found to suggest that the Horsham USARC would have served any local government or political role as it was a facility owned and operated by the federal government.

Criterion B

National Level. An Army Reserve Center that meets National Register Criterion B is likely to be significant in the area of military history because of associations with an individual who had a pivotal role in shaping military strategy and decisions. However, it is important to determine not only whether the individual made significant contributions to military history, but also how the Army Reserve Center is linked to the individual and his or her accomplishments. To be eligible for the NRHP under Criterion B in the area of military significance, an Army Reserve Center must be associated with an individual who achieved significance while affiliated with the Army Reserve Center in question. Furthermore, the significance of the individual must also represent a pivotal point within the nationwide historic context of the Army Reserve. (Moore et al. 2008: 142).

No individual who has made contributions to military history on a national level, whose significance represents a pivotal point within the nationwide historic context of the Army Reserve or who achieved significance while affiliated with the Horsham USARC have been identified. Therefore, the Horsham Memorial USARC is not considered significant under Criterion B on a national level.

State Level. For an Army Reserve Center to be eligible under Criterion B at the state level, the associated individual must be instrumental in the development of the Army Reserve within that state. Naming an Army Reserve Center after a significant individual does not necessarily make the USARC eligible for the NRHP under Criterion B. The association between the significant individual and the Army Reserve Center must be demonstrated to be significant; in most cases, it is the single resource most closely associated with the life and accomplishments of the significant individual (Moore et al. 2008: 142).

No individual who was instrumental to the development of the Army Reserve within Pennsylvania has been identified. Therefore, the Horsham Memorial USARC is not considered significant under Criterion B on a state level.

Local Level. For an Army Reserve Center to be eligible under Criterion B at the state or local level, the associated individual must be instrumental in the development of the Army Reserve within that state or community, and a localized historic context must be developed to evaluate significance. Naming an Army Reserve Center after a significant individual does not necessarily make the Army Resource Center eligible for the NRHP under Criterion B. The association between the significant individual and the Army Reserve Center must be demonstrated to be significant; in most cases, it is the single resource most closely associated with the life and accomplishments of the significant individual. (Moore et al. 2008: 142).

No individual who was instrumental to the development of the Army Reserve within Horsham, Pennsylvania has been identified. Therefore, the Horsham Memorial USARC is not considered significant under Criterion B on a local level.

Criterion C

National Level. Sprawling Plan Army Reserve Centers constructed as part of the early Cold War nationwide construction campaign may be eligible for inclusion in the NRHP under Criterion C in the area of architecture for their physical attributes and the quality of their design. Architecturally, they are associated with the influence of the Modern Style, which enjoyed widespread popularity among architects in the design of federal buildings in the 1950s. The type also is significant under Criterion C because the expansible and flexible nature of the plans documents the military's vision for a changing Army Reserve Force and increasingly important role that the Reserves filled in the nation's defense and military preparedness. The presence of function-specific technical spaces like communications shops and labs in this subtype is significant as well, because it reflects the military strategy codified in the Reserve Forces Act of 1955, which aimed to tap professional and technical expertise while allowing Reservists the flexibility to participate in the civilian economy. The period of significance for Sprawling Plan Army Reserve Centers dates from ca. 1952 to ca. 1964.

Comparative information on other nationwide U.S. Army Reserve properties constructed during the same period as the Horsham Memorial USARC was excerpted from the Historic Context Study (Moore et al. 2008: 202-203).

"A total of 536 new Army Reserve Centers were funded between 1959 and 1965. About 50 percent of the present-day inventory of Army Reserve Centers was constructed between 1959 and 1969, with higher concentrations of buildings from this era located in the midwestern and western states and lower concentrations in the eastern states. Buildings constructed during this period do not show the same degree of consistency and standardization as buildings constructed from 1950 through 1958. As late as 1964, some Army Reserve Centers were constructed using the preexisting standardized plans designed by Urbahn, Brayton, and Burrows. A preliminary review of extant examples of Army Reserve Centers built from 1959 to 1969 indicates that most have experienced alterations. In many cases, original windows and doors have been replaced

with vinyl. Additional outbuildings have been constructed adjacent to original reserve center buildings.”

Because these resource types are so common, nationwide comparison of examples of the resource type in the Historic Context study resulted in the identification of character-defining features to standardize the assessment of integrity for NRHP eligibility of examples of this resource type. Additional information on these character-defining features and their affect on overall integrity is included in the “Physical Description and Integrity” section of this form.

The Horsham Memorial USARC is one of 536 USARCs constructed nationwide in the 1950s and 1960s. It is characteristic of the Sprawling Plan standard and represents an example of the nationwide federal building campaign.

State Level. The establishment and operation of Army Reserve Centers are part of a national, federally funded military program that, by its very definition, resulted in the construction of single Reserve Centers in communities throughout the country. Only dense urban settings, such as major metropolitan areas, contained multiple Reserve Centers. The Horsham Memorial USARC is one of at least 43 Army Reserve Centers in Pennsylvania constructed between 1952 and 1964 (Crane et al. 2004). Sixteen of these facilities have a footprint similar to the Horsham Memorial USARC, exhibiting the asymmetrical “T”, consistent with the Sprawling plan sub-type. Of those 16, there are seven for which views of the main elevation are available. Of those seven, four appear very similar to the Horsham Memorial USARC in terms of number of stories, exterior finishes, and fenestration. The other three are somewhat similar but vary in having only one story, window type or pattern, or exterior finish. Preliminary comparative information suggests that other USARCs representative of the same period of construction as the Horsham Memorial USARC and retaining at many of the character-defining features defined in the 2008 Historic Context are extant in Pennsylvania.

The designs of the similar centers are based on the standardized plans developed for nationwide USARCs of this time period (Moore et al. 2008). The Horsham Memorial USARC is one of many in Pennsylvania representative of the Reisner and Urbahn design variations for USARCs. As the design of the Horsham Memorial USARC is very consistent with nationally standardized plans, no modifications to the plans were made to incorporate unique, regionally available materials that might indicate influences at the state level. The Horsham Memorial USARC is not considered architecturally significant under Criterion C at the state level.

Local Level. As the design of the Horsham Memorial USARC is very consistent with nationally standardized plans, no modifications to the plans were made to incorporate unique, locally available materials, design or construction modifications that might indicate influences at the local level. The Horsham Memorial USARC is not considered architecturally significant at the local level.

NRHP Eligibility

The Horsham Memorial USARC appears to be architecturally significant under NRHP Criterion C at the national level as an example of the Sprawling Plan type developed by Reisner and Urbahn as part of a nationwide building campaign for the Army Reserves during the early Cold

War. The facility does not appear to be historically significant under Criterion A in the area of military or politics and government. No associations at the state or local level were identified or considered significant in accordance with the NRHP criteria. Although the facility appears to be architecturally significant under Criterion C, alterations to character-defining features, as defined in the 2008 nationwide Historic Context (Moore et al. 2008) have diminished the overall integrity of the facility to such an extent that it is not eligible for the NRHP.

As established in the 2008 Historic Context (Moore 2008: 173-174; 197-198), the standards used to evaluate physical integrity vary based on whether the facility's significance is established under Criteria A, B or C. Significance under Criteria A and B allow for more flexibility in alterations to original features of the facility. The strictest set of standards for meeting aspects of integrity applies if the facility is significant under Criterion C: ALL of the essential physical features must be intact, so that the building can be understood as an example of a significant architectural form, style, or method of construction (Moore et al 2008:197).

Aspects of physical integrity required to convey the significance of the Horsham Memorial USARC under Criterion C consist of location, exterior and interior design features, setting, materials, and association. As required in the 2008 Historic Context, ALL aspects of physical integrity must be present. Alterations to the fenestration at the Horsham Memorial USARC (brick infilling of an original window opening and as many as eight unit vent louvers that were part of the original design on the main (front) elevation of the building), the replacement of windows with non-architecturally compatible materials, and the alteration to the main entrance configuration represent the loss of character-defining traits. As discussed in the section of this form on physical integrity, interior features are not being considered in the assessment of integrity because it is not possible to determine which features are original or replacements and because changes to three prominent character defining features (the exterior openings, replacement of windows, and the main entrance) have collectively altered the exterior to such an extent that any intact interior features could not substantially contribute to overall physical integrity. Based on a loss of integrity to character-defining features, the Horsham Memorial USARC is not eligible for inclusion in the NRHP.



Legend

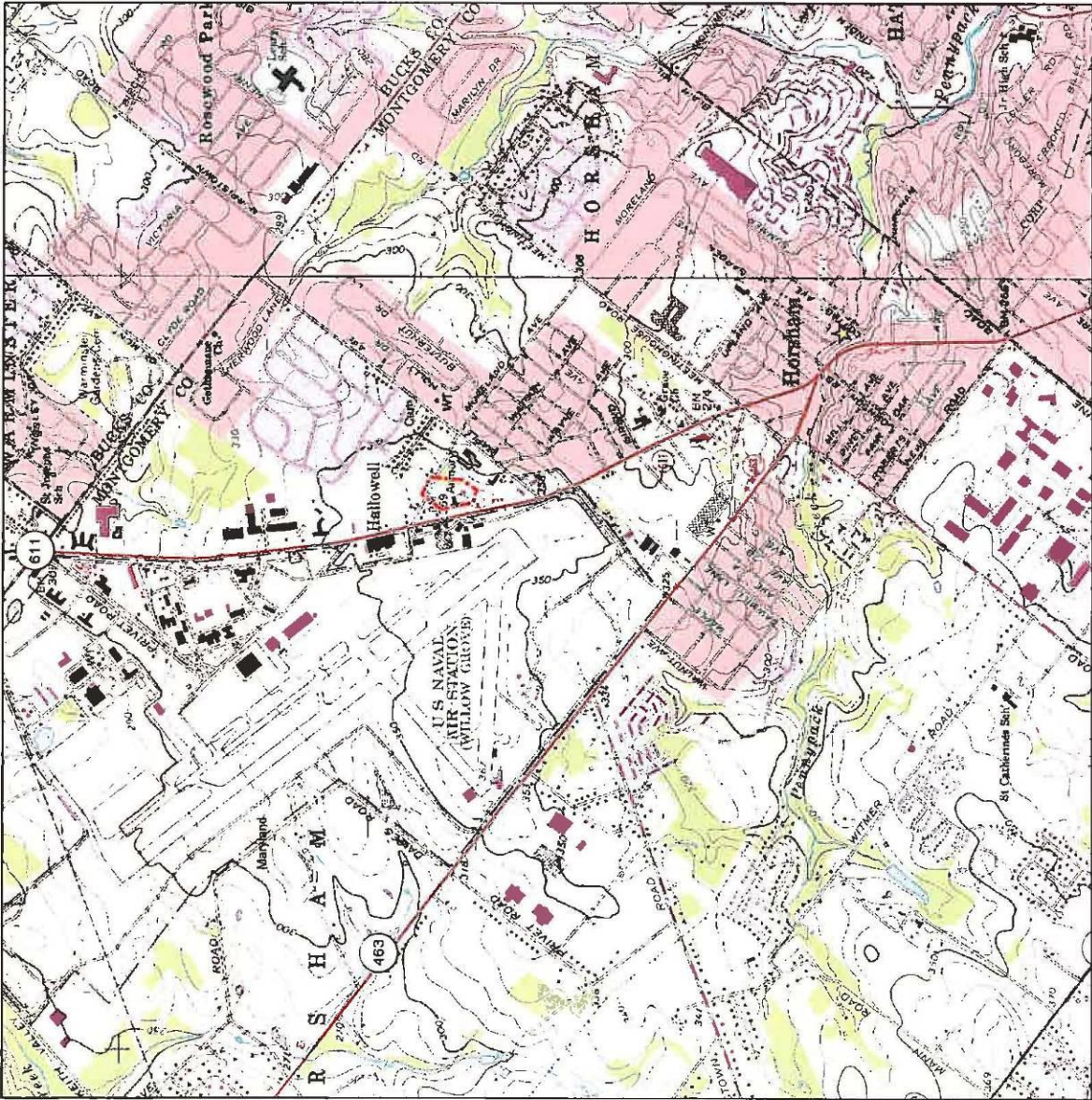
- ☆ City
- Installation Boundary

0 1,500 3,000

Approximate Scale in Feet

Topographic Map:
 1:24,000 - Ambler Quadrangle
 USGS Scan of 1966 Map
 *Revisions shown in purple are
 USGS edits completed in 1983

**Horsham Memorial USARC
 Project Area**





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 22, 2010

Jeffrey M. Hrzic, Chief
Environmental Division,
Headquarters, 99th Regional Support Command, Dept. of the Army
5231 South Scott Plaza
Fort Dix, NJ 08640-5000

TO EXPEDITE REVIEW USE
BHP REFERENCE NUMBER

Re: ER 93-1228-091-Y
DOD: Proposed Disposal and Reuse of the Horsham Memorial United
States Army Reserve Center, 936 Easton Road, Horsham Township,
Montgomery County, Pennsylvania

Dear Mr. Hrzic:

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 while this property may have been architecturally significant under Criterion C for the National Register of Historic Places, it has suffered a loss of integrity of design, materials and workmanship. Therefore, we concur that the property listed below is not eligible for the National Register of Historic Places.

Horsham Memorial United States Reserve Center, Horsham Township,
Montgomery 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



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A.3 USFWS Consultation

Appendix A.3 contains the following correspondence with USFWS associated with the preparation of the Environmental Assessment.

Letter to USFWS

May 11, 2010

Letter from USFWS (Response)

June 17, 2010



DEPARTMENT OF THE ARMY
HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
5231 SOUTH SCOTT PLAZA
FORT DIX, NEW JERSEY 08640-5000

REPLY TO
ATTENTION OF

May 11, 2010

Mr. David Densmore, Supervisor
US Fish and Wildlife Service
Pennsylvania Field Office
315 South Allen Street, Suite 322
State College, PA 16801-4850

Dear Mr. Densmore:

The United States (US) Army Reserve (USAR), 99th Regional Support Command (RSC) is proposing the closure, disposal, and reuse of the Horsham Memorial US Army Reserve Center (USARC) in Montgomery County, Pennsylvania, in accordance with the Base Closure and Realignment (BRAC) Commission. On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at USAR components in Pennsylvania. The recommendation includes the closure of the Horsham Memorial USARC in Horsham, Pennsylvania; and relocation of units to the new Armed Forces Reserve Center Willow Grove Naval Air Station joint Reserve Base in Willow Grove, Pennsylvania. The Environmental Assessment (EA) document for this action as required by the *National Environmental Policy Act* (NEPA) focuses on the closure, disposal, and reuse of the Horsham Memorial USARC. The impact of the new facility is being addressed in a separate NEPA document.

Three alternatives are being considered for the Proposed Action and all would occur at the current location of the Horsham Memorial USARC. The Horsham Memorial USARC is located at 936 Easton Road in Horsham Township, Pennsylvania. The site is 7 acres in size and contains two buildings. The remainder of the site is covered in pavement (parking) or landscaped areas.

Alternative 1 is a No Action Alternative that will represent baseline conditions at the property. No change from the current activities would occur under this alternative. Since BRAC law requires that the Horsham Memorial USARC be closed, this is not a feasible alternative.

Alternative 2 is a Caretaker Status Alternative where the Army would secure the property after the military issue has ended to ensure public safety and the security of the remaining government property. This condition should not be a permanent one because Army policy is to dispose of the closed installation. From the time of operational closure until conveyance of the property, the Army would provide for maintenance procedures to preserve and protect those facilities and items of equipment needed for reuse in an economical manner that facilitates redevelopment.

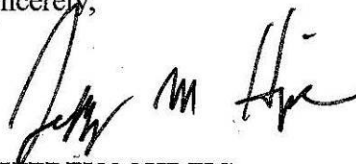
Alternative 3, the preferred alternative of the Army, involves the closure of the Horsham Memorial USARC and subsequent transfer of the property from the Army to another entity for reuse. The primary action evaluated in this EA is disposal of the excess property made available by the legislatively mandated closure. The secondary action is reuse development of the property after ownership is transferred. Under this alternative, the Army would transfer the property to the Hatboro Horsham School District (HHSD) through a public benefit conveyance and HHSD would redevelop the site for as recreational fields and a maintenance facility for school buses. The existing administration building would be demolished and the Organizational Maintenance Shop would be reused.

As part of the early project coordination and NEPA scoping process, we are requesting that federal and state agencies and Native American organizations identify key issues that should be addressed as part of this evaluation. Please provide your comments relative to the following:

- Issues of concern within your regulatory jurisdiction
- Available technical information regarding these issues
- Mitigation or permitting requirements that may be necessary for project implementation.

I would like to thank you in advance for your efforts. We request your comments and concurrence on the proposed undertaking within 30 days of receiving this correspondence. Correspondence and other communication regarding this matter should be directed to Robyn Mock U.S. Army Reserve 99th RSC, at (609) 562-7662 or at Robyn.Mock@usar.army.mil.

Sincerely,



JEFFREY M HRZIC
Chief, Environmental Division

Enclosures:

- Enclosure 1: Site Vicinity Map
- Enclosure 2: Topographic Map
- Enclosure 3: Current Site Plan
- Enclosure 4: Alternative 3 Plan (Preferred Alternative)



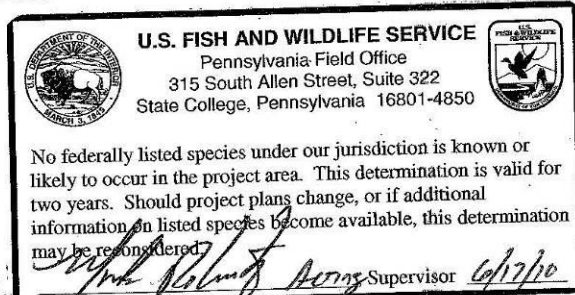
DEPARTMENT OF THE ARMY
 HEADQUARTERS, 99TH REGIONAL SUPPORT COMMAND
 5231 SOUTH SCOTT PLAZA
 FORT DIX, NEW JERSEY 08640-5000

2010-0941
 Lat/Long
 40.20000
 75.2165884

REPLY TO
 ATTENTION OF

May 11, 2010

Mr. David Densmore, Supervisor
 US Fish and Wildlife Service
 Pennsylvania Field Office
 315 South Allen Street, Suite 322
 State College, PA 16801-4850



Dear Mr. Densmore:

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A.4 Agency and Public Notices

Per requirements specified in 32 CFR Part 651.4, a 30-calendar-day review period (starting with the publication of the NOA) was established to provide all agencies, organizations, and individuals with the opportunity to comment on the EA and FNSI. A NOA was published in local and regional newspapers to inform the public that the EA and FNSI were available for review. The newspapers were:

- The Intelligencer
- The Philadelphia Inquirer.

The notices identified a point of contact to obtain more information regarding the NEPA process, identified means of obtaining a copy of the EA and FNSI for review, listed where paper copies of the EA and FNSI could be reviewed, and advised the public that an electronic version of the EA and FNSI were available for download at the following Web site: http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

The EA was available for public review and comment at the following libraries:

- Horsham Township Library, 435 Babylon Road, Horsham, PA 19044;
- Warminster Township Library; 1076 Emma Lane, Warminster, PA 18974.

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APPENDIX B – AIR CONFORMITY APPLICABILITY ANALYSIS

Introduction

A General Air Conformity Applicability Analysis was conducted to determine if increases in air pollution resulting from the Proposed Action analyzed in the Environmental Assessment for BRAC 2005 Recommendations for Closure, Disposal, and Reuse of the Horsham Memorial United States Army Reserve Center, Horsham, Pennsylvania would impact National Ambient Air Quality Standards (NAAQS). The project will occur within a US Environmental Protection Agency (USEPA) designated moderate non-attainment for 8-hour ozone and non-attainment for PM-2.5 for the area and is therefore subject to 40 CFR, Part 93 Federal General Conformity Rule regulations.

The General Conformity Rule (40 CFR 51.850-860 and CFR 93.150-160), requires any federal agency responsible for an action in a non-attainment area to determine that the action is either exempt from the General Conformity Rule's requirements or positively determine that the action conforms to the provisions and objectives of the applicable State Implementation Plan (SIP). Any mitigation deemed necessary as a result of the conclusions reached in the conformity analysis would be implemented and would be integrated into the applicable SIP.

Project Description

The site consists of approximately 7 acres of developed land with two permanent structures:

- 24,527-square-foot main administration building
- 3,710-square-foot Organizational Maintenance Shop (OMS).

The main administration building is an irregularly shaped two-story structure, with a two-story drill hall connected by a one-story enclosed corridor. The building's interior consists of office space, classrooms, kitchen area, storage, former indoor firing range, and drill hall. The OMS is a four bay maintenance garage with heat. The buildings are on concrete foundations and constructed of concrete block walls covered with a brick veneer. The property also has two parking lots: Military Equipment Parking (MEP) and a Privately Owned Vehicle (POV). Most of the site is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and buildings. The remaining land is grassed with trees around the parking lots and administration building. The site is currently unoccupied as the personnel were relocated early in 2009.

Current Ambient Air Quality Considerations

Emissions Evaluation

The primary emission sources for this project will be those associated with demolition activities, with demolition being the predominant emission-generating activity. Cumulative air emissions were calculated for various types of diesel-engine construction vehicles and related equipment.

The project qualifies for the 40CFR 93.153 (c)(x) exemption because the replacement activity will actually have a net decrease in air emissions. The construction activity

associated with this modification will be a temporary negligible increase in air emissions as demonstrated in the calculations below and is included solely to demonstrate its negligible impact. A Regional Significance Review was not conducted as part of this evaluation due to the exemption clause stated above.

Emission Factors

Emission factors (EFs) were obtained from a variety of resources. These include MOBILE6, AP-42, NONROAD 2005, and the South Coast Air Quality Management District Air Quality Handbook. Where feasible, the most conservative EFs were incorporated.

Construction Emissions

Activity	Annual Emissions (TPY)		
	N0x	Ozone	PM-2.5
Building Demolition	0.55	0.22	0.16
<ul style="list-style-type: none"> Assumes 24,527 ft2 of demolition 			

Surface Disturbance

Activity	Annual Emissions (TPY)	
	N0x	Ozone
Site Preparation	0.02	0.00
<ul style="list-style-type: none"> Assumes a 7 acre parcel 		

Vehicle Emissions

Activity	Annual Emissions (TPY)	
	N0x	Ozone
Commuter Traffic	0.64	0.11
<ul style="list-style-type: none"> Assumes 140 additional vehicles @ 15 miles/day 		

Non-Road/Non-Mobile Source Emissions

Activity	Annual Emissions (TPY)	
	N0x	Ozone
Various Equipment Sources	0.03	0.025

Paved Haul Road

Activity	Annual Emissions (TPY)
	PM-2.5
Truck for Hauling	0.03

Summary of Emissions

All Activities Combined	Annual Emissions (TPY)		
	N0x	Ozone	PM-2.5
	1.24	0.36	0.19

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ATTACHMENT 1 – RECORD OF NON-APPLICABILITY

Project Name: Closure and Proposed Reuse of the Horsham Memorial US Army Reserve Center

Project Point of Contact:

Jeffrey M Hrzic

Chief, Environmental Division

Horsham Memorial US Army Reserve Center

Project Dates: Approximately January 2nd, 2011 through December 31st, 2011

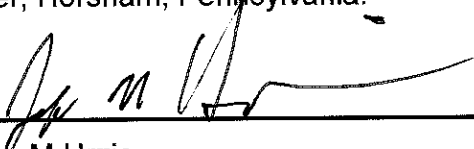
General Conformity under the CAA, Section 176 has been evaluated for the action described above according to the provisions set forth in 40 CFR 93, Subpart B. The General Conformity Rule applies to federal actions occurring in regions designated as being non-attainment for the National Ambient Air Quality Standards (NAAQS) or attainment areas subject to maintenance plans (maintenance area). De minimis threshold levels for applicable NAAQS constituents have been established for federal actions with the potential to have significant air quality impacts. Should a project or related action located in a non-attainment or maintenance area exceed de minimis levels, a general conformity analysis would be required.

The Horsham Memorial US Army Reserve Center is located in Montgomery County, Pennsylvania, which is designated as moderate non-attainment for ozone and non-attainment for PM-2.5. As such, ozone precursor pollutants nitrogen oxides (NOx) and volatile organic compounds (VOCs) also apply. A General Conformity Analysis is not required because total maximum annual direct and indirect emissions from this project have been estimated to be below the de minimis threshold levels. Calculated emissions and their relation to de minimis levels established in 40 CFR 93.153 (b) are presented in the table below.

NAAQS Criteria Pollutant	Applicable Threshold Level (40 CFR 93.153 (b))	Estimated Emission Results (Reported as Tons/Year)	Above/Below Threshold Level
Ozone	50	0.39	Below
NOx	100	2.43	Below
PM-2.5	100	0.19	Below

Montgomery County is in attainment for all other NAAQS criteria pollutants and therefore is not subject to air conformity review.

Supporting documentation and emission estimates can be found in Section 4.4 and Appendix B of the Environmental Assessment for BRAC 2005 Recommendations for Closure, Disposal, and Reuse of the Horsham Memorial United States Army Reserve Center, Horsham, Pennsylvania.



Jeffrey M Hrzc

Chief, Environmental Division

Horsham Memorial US Army Reserve Center

APPENDIX C – EIFS REPORT

The basis of the EIFS analytical capabilities is the calculation of multipliers used to estimate the impacts resulting from BRAC-related changes in local expenditures or employment. The forecast inputs for the EIFS are as follows. It is assumed 60 percent of construction costs reflect materials and supplies; 30 percent for labor, and 10 percent for profit/overhead. The actual construction cost for changes in local expenditures is 60 percent of total project construction divided by the length of project. The change in employment is determined by finding the 30 percent labor number and then dividing by the Bureau of Labor Statistics Wages by area and occupation for construction and extraction workers in the Philadelphia, Pennsylvania Metropolitan Area. The following are the EIFS output data for construction and the Rational Threshold Value (RTV) for the Region of Influence (ROI) of Alternatives 3.

EIFS REPORT

PROJECT NAME

BRAC EA - Horsham, PA Alternative 3

STUDY AREA

42017 Bucks, PA
42029 Chester, PA
42045 Delaware, PA
42091 Montgomery, PA
42101 Philadelphia, PA

FORECAST INPUT

Change In Local Expenditures	\$382,200
Change In Civilian Employment	4
Average Income of Affected Civilian	\$51,850
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	\$0
Percent of Military Living On-post	0

FORECAST OUTPUT

Employment Multiplier	3.95
Income Multiplier	3.95
Sales Volume - Direct	\$452,190
Sales Volume - Induced	\$1,333,961

Sales Volume - Total	\$1,786,151	0%
Income - Direct	\$258,058	
Income - Induced)	\$236,744	
Income - Total(place of work)	\$494,803	0%
Employment - Direct	6	
Employment - Induced	5	
Employment - Total	11	0%
Local Population	0	
Local Off-base Population	0	0%

RTV SUMMARY

	Sales Volume	Income	Employment	Population
Positive RTV	12.75 %	11.15 %	2.7 %	0.93 %
Negative RTV	-5.09 %	-4.7 %	-2.71 %	-0.45 %

APPENDIX D – LEGAL AND REGULATORY FRAMEWORK FOR BRAC CLOSURE, DISPOSAL, AND REUSE PROCESS

On September 8, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended closure of the Horsham Memorial USARC in Horsham, Pennsylvania. These recommendations were approved by the President on September 23, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission's recommendations, and on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

The BRAC Commission made the following recommendations concerning the Horsham Memorial USARC:

*“Close the Reese United States Army Reserve Center in Chester, PA, the United States Army Reserve Organizational Maintenance Shop in Chester, PA, the Germantown Veterans Memorial United States Army Reserve Center in Philadelphia, PA, **the Horsham Memorial United States Army Reserve Center in Horsham, PA**, the 1 LT Ray S. Musselman Memorial United States Army Reserve Center in Norristown, PA, and the North Penn Memorial United States Army Reserve Center in Norristown, PA, and relocate units to a new Armed Forces Reserve Center with an organizational maintenance facility at Willow Grove Joint Reserve Base, PA. The Army shall establish an enclave at Willow Grove Joint Reserve Base, PA, to retain essential facilities to support activities of the Reserve Components.”*

To implement these recommendations, the Army proposes to close the Horsham Memorial USARC.

The law that governs real property disposal is the *Federal Property and Administrative Services Act* of 1949 (40 U.S.C., Sections 471 and following, as amended). This law is implemented by the Federal Property Management Regulations at Title 41 CFR Subpart 101-47. The disposal process is also governed by 32 CFR Part 174 (*Revitalizing Base Closure Communities*) and 32 CFR Part 175 (*Revitalizing Base Closure Communities—Base Closure Community Assistance*), regulations issued by DoD to implement BRAC law, and matters known as the Pryor Amendment and the President's Program to Revitalize Base Closure Communities.

Relevant Statutes and Executive Orders

A decision on how to proceed with the Proposed Action rests on numerous factors such as mission requirements, schedule, availability of funding, and environmental considerations. In addressing environmental considerations, the Army is guided by relevant statutes (and their implementing regulations) and Executive Orders (EO) that establish standards and provide guidance on environmental and natural resources management and planning. These include the Clean Air Act (CAA), Clean Water Act,

Noise Control Act, Endangered Species Act, National Historic Preservation Act, Archaeological Resources Protection Act, Resource Conservation and Recovery Act, and Toxic Substances Control Act. EOs bearing on the Proposed Action include:

- EO 11988 (Floodplain Management)
- EO 11990 (Protection of Wetlands)
- EO 12088 (Federal Compliance with Pollution Control Standards)
- EO 12580 (Superfund Implementation)
- EO 12873 (Federal Acquisition, Recycling, and Waste Prevention)
- EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations)
- EO 13045 (Protection of Children from Environmental Health Risks and Safety Risks)
- EO 13175 (Consultation and Coordination with Indian Tribal Governments)
- EO 13186 (Responsibilities of Federal Agencies to Protect Migratory Birds)
- EO 13423 (Strengthening Federal Environmental, Energy, and Transportation Management)

These authorities are addressed in various sections throughout this EA when relevant to particular environmental resources and conditions. The full texts of the laws, regulations, and EOs are available on the Defense Environmental Network & Information Exchange website at <http://www.denix.osd.mil>.

Other Reuse Regulations and Guidance

DoD's Office of Economic Adjustment published its *Community Guide to Base Reuse* in May 1995. The guide describes the base closure and reuse processes that have been designed to help with local economic recovery and summarizes the many assistance programs administered by DoD and other agencies. DoD published its *DoD Base Reuse Implementation Manual* to serve as a handbook for the successful execution of reuse plans. DoD and the US Department of Housing and Urban Development (HUD) have published guidance (32 CFR Part 175) required by Title XXIX of the National Defense Authorization Act for Fiscal Year 1994. The guidance establishes policy and procedures, assigns responsibilities, and delegates authority to implement the President's Program to Revitalize Base Closure Communities (July 2, 1993), as endorsed through Congressional enactment of the Pryor Amendment.