

**ENVIRONMENTAL ASSESSMENT  
FOR  
APPROVAL OF THE UFC 2-100-01  
COMPLIANT REAL PROPERTY MASTER  
PLAN**

**FOR THE  
CAMP PERRY JOINT TRAINING CENTER  
OTTAWA COUNTY, OHIO**



**Ohio Army National Guard  
Plans and Programming**

NGOH-IMR-PP  
2825 W. Dublin Granville Road  
Columbus, OH 43235-2789

**June 2021**





FINDING OF NO SIGNIFICANT IMPACT (FONSI) FOR  
CAMP PERRY JOINT TRAINING CENTER  
REAL PROPERTY MASTER PLAN ENVIRONMENTAL ASSESSMENT  
OTTAWA COUNTY, OHIO

**Introduction**

The Ohio Army National Guard (OHARNG) prepared an Environmental Assessment (EA) to identify and evaluate potential environmental effects of the approval of the Real Property Master Plan (RPMP) for Camp Perry Joint Training Center (CPJTC). CPJTC is a 640-acre OHARNG military training site located on the shore of Lake Erie in Northwestern Ohio, approximately 5.2 miles west of Port Clinton. The main training areas on CPJTC are small arms ranges and the primary training mission is small arms weapons familiarization and qualification. The RPMP must be consistent with the requirements of Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for RPMP development on Department of Defense (DoD) installations (DoD, November 2018). CPJTC is one of 48 ARNG Training Centers that are required to complete RPMPs. The ARNG is required to prepare EAs for each of its 48 UFC 2-100-01 training areas per the 26 April 2019 HQDA Memorandum entitled "Interim Guidance for National Environmental Policy Act (NEPA) Compliance for Real Property Master Plans (RPMPs)." The EA has been prepared in accordance with the National Environmental Policy Act (NEPA, 42 USC §§ 4321-4370), the Council on Environmental Quality Regulations for Implementing the Procedural Provisions of NEPA (CEQ Regulations, 40 CFR §§ 1500-1508), and *Environmental Analysis of Army Actions* (32 CFR Part 651).

**1. Description of Proposed Action and Alternatives**

Proposed Action - The Proposed Action is the approval of the Camp Perry RPMP consistent with the military use of Camp Perry and the five elements set forth in UFC 2-100-01 (Vision Plan, Installation Development Plan, Installation Planning Standards, Development Program and Plan Summary). The RPMP will inform future planning and programming decisions for real property construction, renovation, maintenance, and repair at Camp Perry over the near-term (within 5 years) and long-term (20+ years) planning horizon. Under the Proposed Action, Camp Perry would approve the UFC 2-100-01 RPMP and implement a comprehensive approach to developing Camp Perry using planning strategies that reinforce capabilities to support the OHARNG's mission, promote quality of life, and enhance sustainability and environmental viability on the installation. By memorandum dated September 25, 2017, the ARNG Installations and Environment Directorate (ARNG G9) determined that this OHARNG plan includes all UFC 2-100-01 RPMP required elements.

**Alternatives Considered**

The OHARNG developed the following screening criteria to evaluate a potential alternative's reasonableness and feasibility related to the project purpose and need. These screening criteria are:

- Fulfills UFC 2-100-01 master planning strategies and requirements (five plan elements)
- Provides appropriate facilities to meet OHARNG's mission
- Provides mechanism for short-term and long-term planning and project programming
- Meets DoD, Army, and ARNG master planning policy

OHARNG developed two alternatives and applied the screening criteria. These alternatives include:

1. Approval of UFC 2-100-01 compliant RPMP (Proposed Action).

2. Not Approving the UFC 2-100-01 compliant RPMP (No Action Alternative). This alternative would include managing Camp Perry under the current planning processes. Without a UFC-compliant RPMP, facility improvements would be constructed, maintained, and/or repaired under the previously approved plans, but the installation's existing planning process would not adequately incorporate current land use controls/restrictions nor be compliant with current DoD Master Planning policy and guidance.

## **2. Environmental Analysis**

Each UFC 2-100-01 plan includes five elements. The EA evaluates the potential environmental, cultural, and socioeconomic effects of the RPMP's analyzed alternatives in accordance with NEPA, CEQ regulations, 32 CFR Part 651, and the 2011 ARNG NEPA Handbook. The EA includes a thorough evaluation of direct, indirect, and cumulative impacts, both temporary and permanent, that could potentially occur because of approval of the Proposed Action. The EA identifies the environmental resources that could be affected by the Proposed Action, and determines the significance of the impacts, if any, to each of these resources. Based on the EA's analysis, the OHARNG determined that the known and potential adverse impacts from the Proposed Action on land use, air quality, noise, geology and soils, water resources, biological resources (including threatened and endangered species), cultural resources (including above and below ground resources), socioeconomics (including Environmental Justice), infrastructure, utilities, and hazardous and toxic materials and wastes would not be significant. The EA informs decision makers and the public of the potential environmental consequences of the Proposed Action and alternatives along with associated Best Management Practices (BMPs) and mitigation, as applicable.

## **3. Mitigation/Best Management Practices (BMPs)**

The Proposed Action is the *approval* of CPJTC's UFC 2-100-01 compliant RPMP. The EA does not address potential adverse environmental impacts from site specific projects planned for CPJTC. For approval of the RPMP, no mitigation measures will be necessary to reduce potential adverse environmental impacts to below significant levels. The OHARNG will implement appropriate Best Management Practices (BMPs) and applicable OHARNG construction guidelines for any proposed actions that may be advanced due to the approval of the UFC 2-100-01 compliant RPMP. Additionally, the OHARNG will obtain all necessary permits and construction site approvals prior to implementation of any projects resulting from the RPMP.

## **4. Regulations**

The Proposed Action will not violate NEPA, the CEQ Regulations, 32 CFR Part 651, or any other Federal, State, or local environmental regulations.

## **5. Commitment to Implementation**

The National Guard Bureau (NGB) and OHARNG affirm their commitment to implement this EA in accordance with NEPA. Implementation is dependent on funding. The OHARNG and the NGB's Army National Guard Installations and Environmental Division will ensure that adequate funds are requested in future years' budgets to achieve the goals and objectives set forth in this EA.

## **6. Public Review and Comment**

Public participation with respect to decision-making on the Proposed Action is guided by 32 CFR Part 651. The EA and the Draft Finding of No Significant Impact (FONSI) were made available to the public for comment for a period of 30 days from 1 October 2021 to 31 October 2021 at the Rupp Public

Library, 310 Madison Street, Port Clinton, Ohio 43452, 419-732-3212. The public comment period along with instructions on how to submit comments was announced in a Notice of Availability (NOA) that was published in a local newspaper, The Beacon, in a display advertisement on 30 September 2021. Throughout the process, the public was able obtain information on the status and progress of the Proposed Action and the EA through the Ohio National Guard Public Affairs Office at (614) 336-4499, [ng.oh.oharng.mbx.pao-buckeye-guard@mail.mil](mailto:ng.oh.oharng.mbx.pao-buckeye-guard@mail.mil) and to submit comments by mail to the address designated in the NOA. The Ohio National Guard Public Affairs Office, and subsequently the OHARNG EA point of contact, were contacted by the Ottawa County Commissioners' Administrative Clerk during the public review period to request an electronic copy of the EA and Draft FONSI. An electronic version of the EA and draft FONSI were provided to the Commissioners by the OHARNG. The OHARNG received written comments from one individual in the form of a letter. There was a total of 33 comments throughout the letter that the OHARNG addressed in a written memorandum for record. Both the public comments and the OHARNG memorandum for record are included in Appendix C of the EA. The final EA and signed FONSI will be available for public review on the above Ohio National Guard Public Affairs Office website and also at the Rupp Public Library.

The OHARNG consulted with agencies for preparation of this EA including the Ohio Department of Natural Resources (ODNR), Ohio Historic Preservation Office (OHPO), Ottawa Regional Planning Commission, Ottawa Soil and Water Conservation District, and United States Fish and Wildlife Service (USFWS). Agency information and comments have been incorporated into the EA.

The OHARNG conducted consultation with Federally recognized Native American tribes as required under the *Annotated DoD Policy on American Indians and Alaska Natives* (dated 27 October 1999), EO 13175, AR 200-1, and guidance the Army Policy Guidance Tribal Consultation (dated June 2014). The OHARNG identified 14 Native American groups as having possible ancestral ties to the CPJTC area. These groups include the Cayuga, Chippewa, Delaware, Kickapoo, Mohawk, Oneida, Onondaga, Ottawa, Potawatomi, Sac & Fox, Seneca, Shawnee, Tuscarora, and Wyandotte. From the 14 identified Native American groups, 46 Federally recognized tribes were invited by letter to consult in January 2018. Certified letters, signed by Major General Mark E. Bartman, OHARNG Adjutant General (TAG), were mailed to the leaders and cultural resources contacts of the 46 tribes. The Forest County Potawatomi requested a copy of the archaeological survey report completed in 2005 to review. After reviewing the report, they have no objections to the proposed projects however request being contacted in the event of an inadvertent discovery. The Red Cliff Tribe responded with an updated point of contact for their Chairman.

## 7. Finding of No Significant Impact

After careful review of the EA, I have concluded that implementation of the Proposed Action, approval of the UFC 2-100-01 compliant RPMP, would not generate controversy or have a significant impact on the quality of the human or natural environment. The FONSI will be signed and the action will be implemented. This analysis fulfills the requirements of NEPA and the CEQ Regulations. An Environmental Impact Statement will not be prepared, and the National Guard Bureau will issue this Finding of No Significant Impact.

03 January 2022

Date

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Anthony Hammett  
Colonel, U.S. Army  
Chief, G-9 Army National Guard



## ENVIRONMENTAL ASSESSMENT ORGANIZATION

This Environmental Assessment (EA) evaluates the potential environmental, socioeconomic, and cultural effects of the proposed approval of the October 2017 Camp Perry Joint Training Center Unified Facility Criteria (UFC) 2-100-01 compliant Real Property Master Plan (RPMP). The RPMP serves as a path to ensure that planning for Camp Perry considers the long-term mission requirements and identifies major development and training projects proposed for execution over the next 20+ years that will further meet the requirements and support the missions of the Ohio Army National Guard (OHARNG).

As required by the National Environmental Policy Act of 1969 (NEPA; 42 USC 4321 *et seq.*), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 CFR 1500-1508), and 32 CFR Part 651 (*Environmental Analysis of Army Actions, Final Rule*), the potential effects of the type of activities associated with the Proposed Action are analyzed. This EA will facilitate the decision process regarding the Proposed Action and its alternatives, and is organized as follows:

### **EXECUTIVE SUMMARY:**

Describes the Proposed Action; summarizes environmental, cultural, and socioeconomic consequences; and compares potential effects associated with the two considered alternatives.

### **SECTION 1.0**

#### **PURPOSE OF AND NEED FOR THE PROPOSED ACTION:**

Summarizes the purpose of and need for the Proposed Action, provides relevant background information, and describes the scope of the EA.

### **SECTION 2.0**

#### **DESCRIPTION OF THE PROPOSED ACTION:**

Describes the Proposed Action and presents alternatives that were considered.

### **SECTION 3.0**

#### **AFFECTED ENVIRONMENT:**

Describes the existing environmental, cultural, and socioeconomic setting.

### **SECTION 4.0**

#### **ENVIRONMENTAL CONSEQUENCES:**

Identifies individual and cumulative potential environmental, cultural, and socioeconomic effects of implementing the Proposed Action and alternatives; and identifies proposed best management practices and mitigation, as appropriate.

### **SECTION 5.0**

#### **COMPARISON OF ALTERNATIVES AND CONCLUSIONS:**

Compares the environmental effects of the considered alternatives and summarizes the significance of individual and expected cumulative effects for these alternatives.

### **SECTION 6.0**

#### **REFERENCES:**

Provides bibliographical information for cited sources.

### **SECTION 7.0**

#### **GLOSSARY:**

Defines terms used in the EA.

**SECTION 8.0**

**LIST OF PREPARERS:**

Identifies document preparers and their areas of expertise.

**SECTION 9.0**

**AGENCIES AND INDIVIDUALS CONSULTED:**

Lists agencies and individuals consulted during preparation of this EA.

**LIST OF TABLES:** Identifies tables included in the EA.

**LIST OF FIGURES:** Identifies figures included in the EA.

**APPENDICES:**

Appendix A – Tribal Coordination

Appendix B – Notice of Availability

Appendix C – Public and Agency Coordination

Appendix D – Land Use Limitations Map

Appendix E – Army National Guard UFC 2-100-01 RPMP Validation Memo

- ✓ **Project Name:** Environmental Assessment for Approval of the UFC 2-100-01 Compliant Real Property Master Plan for Camp Perry Joint Training Center
- ✓ **Funding Source:** 131QDPW
- ✓ **Proponent:** Ohio Army National Guard
- ✓ **Fiscal Year (FY):** FY 19

## ENVIRONMENTAL ASSESSMENT SIGNATURE PAGE

LEAD AGENCY: National Guard Bureau (NGB)  
COOPERATING AGENCIES: None  
TITLE OF PROPOSED ACTION: **APPROVAL OF THE UFC 2-100-01 COMPLIANT CAMP PERRY  
JOINT TRAINING CENTER REAL PROPERTY MASTER PLAN**  
AFFECTED JURISDICTION: Ottawa County, Ohio  
POINT OF CONTACT: Mr. Timothy M. Morgan, State Environmental Supervisor, OHARNG,  
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PROPOSERS: Ohio Army National Guard and National Guard Bureau (NGB)

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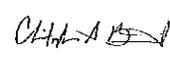
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DOCUMENT DESIGNATION: Environmental Assessment (EA)

ABSTRACT: This Environmental Assessment (EA) evaluates the type of activities associated with the Proposed Action of the OHARNG to approve the October 2017 Camp Perry Joint Training Center UFC 2-100-01 compliant Real Property Master Plan. This EA discusses two alternatives, the Proposed Action Alternative and No Action Alternative. The document includes an evaluation of direct, indirect, and cumulative impacts, both temporary and permanent, that could potentially occur because of approval of the Proposed Action. The EA identifies the environmental resources that could be affected by the type of activities associated with the Proposed Action, and determines the significance of the impacts, if any, to each of these resources. Based on the EA's analysis, the OHARNG determined that the known and potential adverse impacts from the type of activities associated with the Proposed Action on land use, air quality, noise, geology and soils, water resources, biological resources (including threatened and endangered species), cultural resources (including above and below ground resources), socioeconomic (including Environmental Justice), infrastructure, utilities, and hazardous and toxic materials and wastes would not be significant. As such, the EA resulted in a Finding of No Significant Impact and recommends implementation of the Proposed Action Alternative.

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## EXECUTIVE SUMMARY

This Environmental Assessment (EA) has been prepared to identify, document, and address the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action at the Camp Perry Joint Training Center (CPJTC or Camp Perry).

### Proposed Action

The Proposed Action is approving the UFC 2-100-01 compliant Real Property Master Plan (RPMP). As such, the Proposed Action is not the implementation of the RPMP, but rather only the approval of the RPMP. The EA evaluates the potential impacts of the type of actions that may be associated with the Proposed Action. The specific details of individual projects in the plan are unknown at this time. As such, measures required to mitigate significant adverse impacts of the Proposed Action, if any, are also not known. However, the EA does identify a range of Best Management Practices (BMPs) to be implemented to manage potential minor adverse environmental impacts.

### Purpose and Need for Proposed Action

In accordance with the 28 May 2013 Office of Secretary of Defense memorandum concerning Installation Master Planning, ARNG issued a memorandum to the ARNG Construction and Facility Management Officers in December 2015, outlining requirements for the preparation of UFC 2-100-01 compliant RPMPs (hereafter, referred to as "RPMP") for 48 specified training installations by October 1, 2018 (ARNG, 2015). The ARNG is required to prepare EAs for each of its 48 UFC 2-100-01 training areas per the 26 April 2019 HQDA Memorandum entitled "Interim Guidance for National Environmental Policy Act (NEPA) Compliance for Real Property Master Plans (RPMPs)." The OHARNG prepared the Camp Perry RPMP to incorporate the vision of the OHARNG Adjutant General and the facility requirements of all units and organizations assigned to or supported by Camp Perry.

The purpose of the Proposed Action is to consider the long-term mission requirements and identify major development and training projects proposed for execution over the next 20+ years at CPJTC that will further meet the requirements and support the missions of the OHARNG. The Camp Perry RPMP is needed to fulfill the Department of Defense (DoD) Master Planning policy as well as to guide the OHARNG through the development of Camp Perry in a clear, sustainable manner that supports current missions, preserves long-term military capabilities, supports the DoD's mission, and enriches the community it serves. Additionally, the format and standards prescribed by UFC 2-100-01 ensure that OHARNG's installation planning is consistent with other DoD components and uses the latest techniques in planning. By memorandum dated September 25, 2017, the ARNG Installations and Environment Directorate (ARNG-G-9) determined that this OHARNG plan includes all UFC 2-100-01 RPMP required elements. A copy of this memorandum is attached in Appendix E.

The intent and purpose of the Camp Perry real property planning vision is to provide a premier training facility that supports small-arms individual weapons qualification and virtual training by implementing adaptable and sustainable infrastructure for military and community partnerships, while preserving its historical heritage.

## Proposed Action and Alternatives

The Proposed Action at Camp Perry is the approval of a RPMP consistent with the military use of Camp Perry and the goals and objectives established in UFC 2-100-01. The RPMP will inform future planning and programming decisions for real property construction, renovation, maintenance, and repair at Camp Perry over the near-term (within 5 years) and long-term (20-year) planning horizon. In general terms, the OHARNG vision for Camp Perry is to support small-arms individual weapons qualification and virtual training by implementing adaptable and sustainable infrastructure and emerging technology such as the Location of Miss and Hit (LOMAH) system, which uses acoustic sensors to identify hits or misses within a two-meter radius of a target. The vision also includes providing classrooms with updated software and IT infrastructure for realistic training; providing a gym and recreation area for Army Morale, Welfare and Recreation (MWR); improving lakeside cottages; repurposing existing buildings and demolishing substandard ones; implementing aspects of green infrastructure; constructing adaptable facilities that can be used by all customers; improving aesthetics; and developing multi-use space. The RPMP does not identify a list of specific projects that will be implemented, and this EA is not intended to cover implementation of any specific project. The RPMP will inform future planning and programming decisions for real property construction, renovation, maintenance, and repair at Camp Perry over the near-term (within 5 years) and long-term (20+ years) planning horizon.

The Camp Perry RPMP includes the following five main elements:

- a. Vision Plan – includes a statement of the planning vision, planning goals, and planning objectives as well as overall constraints and opportunities map(s), a developable area map, a framework plan for the entire installation, a land pattern matrix if applicable, and a summary future development plan. The constraints include limitations of aging facilities and associated Historic District Management considerations; environmental constraints such as wetlands, the bald eagle nest, and Lake Erie shoreline habitat; and operational constraints resulting from range safety danger zones.
- b. Installation Development Plan – includes Area Development Plans (including detailed constraints and opportunities maps, Regulating Plans, Illustrative Plans, Implementation Plans, capacity analysis, and supporting sketches and renderings), as well as appropriate Network Plans.
- c. Installation Planning Standards – includes building, landscape, and street standards for development at Camp Perry.
- d. Development Program – overall installation strategy for using and investing in real property; includes list of current known projects needed to support installation missions.
- e. Plan Summary – an executive summary of each of the above planning products.

NEPA, its implementing regulations, and the Army's policies for implementing NEPA (32 CFR Part 651) require that all reasonable alternatives be rigorously explored and objectively evaluated. In addition, alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered "reasonable" only if it would meet the requirements of the regulations mentioned above. Reasonable alternatives include those which: 1) are practical or feasible from a technical and economic standpoint; and 2) support the purpose of and need for the Proposed Action.

The OHARNG developed the screening criteria and the alternatives shown in the **Table ES.1** and evaluated the alternatives using these screening criteria to determine if they are reasonable

and feasible. Inclusion of a No Action Alternative is prescribed by the CEQ regulations and serves as a benchmark against which proposed Federal actions are evaluated.

**Table ES.1 Alternatives and Screening Criteria**

Alternative	Fulfills UFC 2-100-01 master planning strategies and requirements	Provides appropriate facilities to meet OHARNG's mission	Provides mechanism for planning and project programming	Fulfills DoD, Army, and ARNG master planning policies	Retained or Dismissed
Approval of the UFC 2-100-01 RPMP (Proposed Action)	Yes	Yes	Yes	Yes	Retained
Not Approving the UFC 2-100-01 RPMP (No Action)	No	No	No	No	Retained

### Affected Environment

CPJTC is located on the south shore of Lake Erie in Ottawa County, Ohio and encompasses approximately 259 hectares (640 acres). The installation is approximately 64 kilometers (40 miles) east of Toledo and about 129 kilometers (80 miles) west of Cleveland. The CPJTC includes both the ARNG and the Air National Guard (ANG). The ANG Rapid Engineer Deployable Heavy Operational Repair Squadron Engineer (RED HORSE) facility is an autonomous enclave that is leased (approximately 10% of the CPJTC land) to the U.S. Air Force and licensed to the ANG. The Ohio ANG enclave at Camp Perry will not be part of the Camp Perry RPMP other than being represented as an area leased to the U.S. Air Force and licensed to the Air Guard. There are a combined 61 military and civilian personnel working at Camp Perry for the ARNG and 27 who work for the ANG.

The entirety of Camp Perry is located within the 100-year special flood hazard area (Zone AE), as identified on the Flood Insurance Rate Map (FIRM) 39123C0120C, effective 18 May 2015. Construction activity in the flood hazard zone requires authorization through ARNG from the Department of the Army and demonstrated compliance with EO 11988 and applicable local ordinances. More details are provided in Sections 3.6.3 and 4.6.4 of this EA.

The Proposed Action was evaluated to determine its potential direct or indirect impact(s) on the physical, environmental, cultural, and socioeconomic resources of the project areas as well as the surrounding vicinity. Technical areas evaluated are listed in **Table ES.2**. The Proposed Action Alternative and No Action Alternative would result in the potential impacts identified throughout **Section 4** of the EA and summarized in **Table ES.2**. The OHARNG will conduct further NEPA analysis at the project implementation stage.

**Table E.2 Alternatives Comparison Matrix**

Technical Resource Area	Proposed Action	No Action Alternative
<p><b>Land Use</b> (see Sections 3.2 and 4.2)</p>	<p>No adverse impacts and long-term beneficial impacts on the efficient and effective use of land at Camp Perry to meet the OHARNG's mission.</p>	<p>No short-term impacts anticipated from implementation of various projects and less-than-significant adverse long-term impacts due to a lack of comprehensive planning for the long-term mission.</p>
<p><b>Air Quality</b> (see Sections 3.3 and 4.3)</p>	<p>Short-term and long-term less-than-significant adverse impacts due to emissions from facility renovations, construction, demolition, and ground-disturbing training exercises. Short-term pollutant emissions would include airborne dust from ground disturbance, combustion byproducts from construction equipment, and vehicle emissions from worker travel during construction. The Proposed Action would not adversely impact the area's compliance with the National Ambient Air Quality Standards (NAAQS).</p>	<p>Short-term and long-term less-than-significant adverse impacts due to less than optimal continued facility operations without the RPMP. The No Action Alternative would not adversely impact the area's compliance with the NAAQS.</p>
<p><b>Noise</b> (see Sections 3.4 and 4.4)</p>	<p>Short- and long-term, less-than-significant adverse impacts to the existing noise environment would occur due to the Proposed Action. Short-term direct impacts would occur during construction, renovation, and demolition. Any increase in noise levels associated with the Proposed Action would be comparable to existing noise levels and unlikely to be heard by nearby residents; therefore, impacts from noise would be less-than-significant.</p>	<p>Less-than-significant adverse short-and long-term noise impacts due to this alternative. Noise levels resulting from construction, renovation and demolition, training, and day-to-day operations (including MOV and aircraft) would not be appreciably different from the existing condition.</p>
<p><b>Geology, Topography, and Soils</b> (see Sections 3.5 and 4.5)</p>	<p>Short-term and long-term less-than-significant adverse impacts to soils due to ground-disturbing activities during construction and training operations. No adverse impacts would result to geology or topography. All activities would comply with applicable regulations.</p>	<p>Short-term and long-term less-than-significant adverse impacts are anticipated to soils under the No Action without the RPMP. In carrying out the mission, training, construction, and facility operations would continue. All activities would comply with applicable regulations.</p>

Technical Resource Area	Proposed Action	No Action Alternative
<b>Water Resources</b> <i>(see Sections 3.6 and 4.6)</i>	Short-term and long-term less-than-significant adverse impacts due to ground-disturbing activities, increase in impervious surfaces, and training operations. Short- and long-term less-than-significant beneficial impacts due to comprehensive stormwater management and Erosion and Sediment Control (E&SC) improvements.	Short- and long-term less-than-significant adverse impacts without RPMP due to continued mission, ground disturbance, training operations and an increase in impervious surfaces.
<b>Biological Resources</b> <i>(see Sections 3.7 and 4.7)</i>	Short-term and long-term less-than-significant adverse impacts due to construction- and training-related habitat disturbance and human presence. Long-term less-than-significant beneficial impacts due to consolidation of development into already developed areas and comprehensive stormwater management.	Short- and long-term less-than-significant adverse impacts without RPMP due to continued mission, ground disturbance, training operations, and an increase in impervious surfaces.
<b>Cultural Resources</b> <i>(see Sections 3.8 and 4.8)</i>	Short- and long-term less-than-significant impact (no effect or no adverse effect) to historic properties.	Short- and long-term less-than-significant impact (no effect or no adverse effect) to historic properties.
<b>Socioeconomics</b> <i>(see Sections 3.9 and 4.9)</i>	Short- and long-term less-than-significant beneficial impacts to the social and economic fabric of the community would be anticipated due to temporary minor increases in economic factors during construction and long-term impacts due to increased employment and facility use.	Short-term less-than-significant beneficial impacts without the RPMP due to the creation of temporary construction jobs and demand for local services and products during construction activities and longer-term less-than-significant benefits due to continuation of the mission.
<b>Environmental Justice (EJ)</b> <i>(see Sections 3.10 and 4.10)</i>	No short- or long-term disproportionately high adverse impacts anticipated as EJ populations are not present.	No short- or long-term disproportionately high adverse impacts to low-income or minority populations anticipated as EJ populations are not present.
<b>Utilities</b> <i>(see Sections 3.11 and 4.11)</i>	Short-term and long-term less-than-significant adverse impacts to utilities. Adequate utility capacity exists to accommodate the increased demand of the Proposed Action without stressing finite capacity of utility service providers.	Short-term and long-term less-than-significant adverse impacts to utilities without RPMP are anticipated. Continued mission does not stress the finite capacity of utility service providers.
<b>Infrastructure (Transportation and Traffic)</b> <i>(see Sections 3.12 and 4.12)</i>	Short- and long-term less-than-significant adverse impacts to infrastructure due to construction, traffic, and an increase in employees and visitors and long-term less-than-significant beneficial impacts due to strategic road improvements.	Short- and long-term less-than-significant adverse impacts to infrastructure without RPMP and continuation of mission including training, construction, facility operations, and lack of comprehensive and strategic road improvements

Technical Resource Area	Proposed Action	No Action Alternative
<b>Hazardous and Toxic Materials/Wastes (HTMW)</b> <i>(see Sections 3.13 and 4.13)</i>	Short-term and long-term less-than-significant adverse impacts due to construction activities and operations. Handling, treatment, and disposal of HTMW must be done in adherence to regulatory requirements.	Short-term and long-term less-than-significant adverse impacts without RPMP due to continued mission, training, construction, and facility operations because of adherence to regulatory requirements dealing with the handling, treatment, and disposal of HTMW.

### Scoping and Public Involvement

The OHARNG consulted with the Ottawa Regional Planning Commission, the Ottawa Soil and Water Conservation District, the Ohio Department of Natural Resources (ODNR), the United States Fish and Wildlife Service (USFWS), and the Ohio State Historic Preservation Office (OHPO). Responses were received from the USFWS and the OHPO. The OHARNG also consulted with 46 Federally recognized Native American tribes as required under Department of Defense Instruction (DoDI) 4710.02 *Department of Defense Interactions with Federally Recognized Tribes*. Responses were received from two tribes, the Forest County Potawatomi and the Red Cliff Tribe, neither of which had objections to the proposed action. Agency and tribal comments have been incorporated into this EA. Copies of relevant correspondence can be found in **Appendices A and C**.

The OHARNG will publish and distribute the EA and draft Finding of No Significant Impact (FONSI) for a 30-day public review and comment period in accordance with §651.14 of 32 CFR Part 651, *Environmental Analysis of Army Actions*. During this period, the public may submit comments on the EA and the draft FONSI. The EA and the draft FONSI can be accessed at the following address:

Rupp Public Library  
310 Madison Street  
Port Clinton, Ohio 43452  
(419) 732-3212

Comments on the EA and the draft FONSI should be submitted during the 30-day comment period via postal mail to:

Mr. Tim Morgan  
Camp Ravenna Environmental Office  
1438 State Route 534 SW  
Newton Falls, OH 44444

**Conclusion:** The evaluation presented within this EA concludes that there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life due to the implementing the Proposed Action. The OHARNG implement standard Best Management Practices (BMPs) specified in this EA to manage potential adverse less-than-significant impacts. Therefore, this EA's analysis determines that an Environmental Impact Statement (EIS) is not necessary to support implementation of the Proposed Action, and that a FONSI is appropriate. The No Action Alternative was not found to satisfy the purpose of and need for the Proposed Action. As such, this EA recommends implementation of the Proposed Action.

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## 1.1 Introduction

The Ohio Army National Guard (OHARNG) prepared a Real Property Master Plan (RPMP) for the Camp Perry Joint Training Center (CPJTC), which is located on the south shore of Lake Erie in Ottawa County, Ohio, and approximately 64 kilometers (40 miles) east of Toledo and about 129 kilometers (80 miles) west of Cleveland (**Figure 1.1**). The RPMP is consistent with the requirements of the Department of Defense's Unified Facilities Criteria (UFC) 2-100-01, *Installation Master Planning*, which provides guidance for RPMP development on DoD installations (DoD, 2012). This latest version of the UFC replaces a version that was last updated in 2009. The new UFC 2-100-1 version includes a focus on energy efficiency and sustainability of the man-made and natural environments through an increased density mixed use transit-oriented development, standardized facility planning, and a commitment to joint operations and joint bases in support of meeting the current missions, preserving long-term military capabilities, supporting the DoD's mission, and enriching the community it serves. This document is required to include an Installation Development Plan (IDP), which is a compilation of individual Area Development Plans (ADPs) prepared for each planning district at CPJTC. As the CPJTC is comprised of only one planning district, the IDP consists of a single ADP.

The OHARNG CPJTC includes both the Army National Guard (ARNG) and the Air National Guard (ANG). The ANG Rapid Engineer Deployable Heavy Operational Repair Squadron Engineer (RED HORSE) facility is an autonomous enclave that is leased (approximately 10% of the CPJTC land) to the Air Force and licensed to the ANG. The Ohio ANG enclave at Camp Perry will not be part of the Camp Perry RPMP other than being represented as an area leased to the U.S. Air Force and licensed to the Air Guard.

In accordance with Federal law and Army Regulations, the OHARNG prepared an Environmental Assessment (EA) to evaluate the potential environmental impacts of approving the UFC 2-100-01 compliant RPMP. The ARNG is required to prepare EAs for each of its 48 UFC 2-100-01 training areas per the 26 April 2019 HQDA Memorandum entitled "Interim Guidance for National Environmental Policy Act (NEPA) Compliance for Real Property Master Plans (RPMPs)." This document describes the purpose and need for the Proposed Action and presents the Proposed Action and alternative actions under consideration. This EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA) [42 United States Code §4321 et seq.]; implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 Code of Federal Regulations (CFR) §§1500–1508; 32 CFR Part 651, *Environmental Analysis of Army Actions*; and the 2011 ARNG NEPA Handbook.

## 1.2 Purpose and Need

### 1.2.1 Purpose of the Project

In accordance with the 28 May 2013 Office of the Secretary of Defense memorandum concerning Installation Master Planning, ARNG issued a memorandum to the ARNG Construction and Facility Management Officers in December 2015, which outlined requirements for the preparation of UFC 2-100-01 compliant RPMPs (hereafter, referred to as "RPMP") for 48 specified training installations by October 1, 2018 (ARNG, 2015). The OHARNG prepared the Camp Perry RPMP to incorporate the vision of the OHARNG Adjutant General and the facility requirements of all units and organizations assigned to or supported by Camp Perry. The purpose of the Proposed Action is to consider the long-term mission requirements and identify the major development and training projects proposed for execution over the next 20+ years, which will further meet the requirements and support the missions of the OHARNG. The vision objectives of the UFC 2-100-01 compliant RPMP would promote efficient land use measures in meeting mission objectives through the optimization of space utilization (flexibility, adaptability,

and reuse), transportation efficiency, clustering of like-use development and segregation on unlike-use development, strategic establishment of functional buffers and open spaces, communications, and security. The Camp Perry real property planning vision is to provide a premier training facility that supports small-arms individual weapons qualification and virtual training by implementing adaptable and sustainable infrastructure for military and community partners, while preserving its historical heritage.

### **1.2.2 Need for the Project**

The Camp Perry RPMP is needed to fulfill the DoD Master Planning policy and guide the OHARNG through the development of Camp Perry in a clear, sustainable manner that supports current missions, preserves long-term military capabilities, supports the DoD's mission, and enriches the community it serves. Additionally, the format and standards prescribed by UFC 2-100-01 ensures that OHARNG's installation planning is consistent with other DoD components and uses the latest techniques in planning. The Proposed Action is also needed to update the existing RPMP that is not in compliance with UFC 2-100-01.

### **1.3 Scope of the EA**

This EA identifies, documents, and evaluates the potential environmental, cultural, and socioeconomic effects of the analyzed alternatives in accordance with NEPA, CEQ regulations, 32 CFR Part 651, and the ARNG NEPA Handbook. It includes a thorough evaluation of direct, indirect, and cumulative impacts, both temporary and permanent, that could occur as a result of implementing the alternatives and informs decision makers and the public of the potential environmental consequences of the type of activities associated with the Proposed Action and alternatives along with associated mitigation.

Under NEPA, the analysis of environmental conditions only addresses those areas, or Region of Influence (ROI), and environmental resources with the potential to be affected by the type of activities associated with the Proposed Action or alternative. Locations and resources with no potential to be affected are not analyzed. The ROI may vary by resource. The Army's NEPA regulation (32 CFR Part 651) calls for the environmental analysis to be proportionate to the nature and scope of the action, the complexity and level of anticipated effects on important resources, and the capacity of Army decisions to influence those effects in a productive, meaningful way from the standpoint of environmental quality.

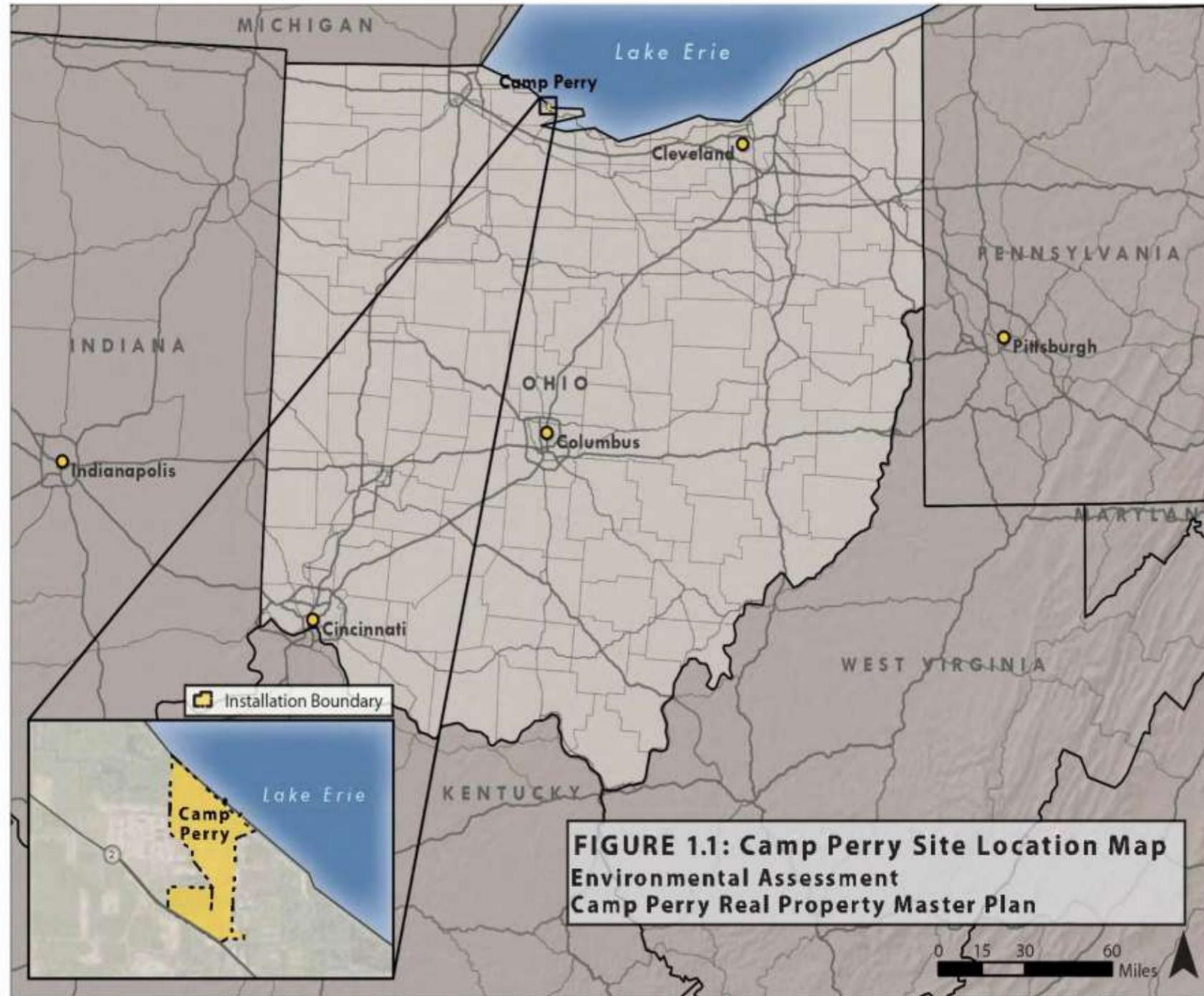
This EA is intended to be an assessment of the approval of the RPMP, the Proposed Action alternative. The OHARNG will conduct appropriate NEPA analysis in coordination with ARNG-Installations and Environment Directorate (ARNG-G-9) for future individual projects at Camp Perry identified in the RPMP at the appropriate time.

The scope of this EA includes an assessment of potential environmental impacts that would be expected with the following alternatives:

1. Approval of the UFC 2-100-01 compliant RPMP (Proposed Action).
2. No Action Alternative. This alternative would include managing the installation under the current May 2009 Training Site Master Plan. Projects would be constructed, maintained, and/or repaired under the previously approved plans, but the installation's planning process would not be compliant with current DoD Master Planning policy and guidance.

**Section 1.0**

**Purpose of and Need for the Proposed Action**



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The RPMP is developed in consideration of environmental constraints mapping (wetlands, floodplains, bald eagle nest, Lake Erie shoreline habitat), various identified development zones, integrated resource management plans, and other documents identified in Section 1.6 of this EA.

#### **1.4 Decision-Making**

Pursuant to DoD Directive 5105.77 (dated 30 Oct 2015), the National Guard Bureau (NGB) is a joint activity of the Department of Defense, which serves as the principal advisor to the U.S. Army on matters involving the ARNG and is responsible for implementing DoD guidance on the structure and strength authorizations of the ARNG.

The NGB is responsible for ensuring that ARNG activities are performed in accordance with applicable law, policies and regulations. As such, the NGB is the lead Federal agency responsible for the preparation of NEPA-compliant documentation on projects for which the OHARNG is the proponent. In that capacity, the NGB is ultimately responsible for environmental analyses and documentation; however, the local responsibility for NEPA document preparation falls upon the OHARNG. For this Proposed Action, NGB, specifically ARNG Installations and Environment Directorate (ARNG-G-9) is the decision maker regarding final approval of the RPMP EA. ARNG-G-9 also approves the RPMP prior to final approval by the OHARNG Adjutant General.

This EA analyzes the potential for significant environmental effects associated with the type of activities associated with the Proposed Action and the No Action Alternative. If the analyses presented in this EA indicate that the Proposed Action would not result in significant environmental or socioeconomic effects, then a FONSI will be prepared and signed by ARNG-G-9. A FONSI briefly presents the reasons why a Proposed Action would not have a significant effect on the human environment and why an Environmental Impact Statement (EIS) would not be necessary. If the analyses presented in this EA indicate that significant environmental effects would result from the type of activities associated with the Proposed Action that cannot be mitigated to insignificance, a Notice of Intent to prepare an EIS would be required or no action would be taken.

#### **1.5 Public and Agency Involvement**

Letters for Interagency/Intergovernmental Coordination of Environmental Planning (IICEP) were sent to the Ottawa Regional Planning Commission, the Ottawa Soil and Water Conservation District, the Department of Natural Resources (ODNR), the United States Fish and Wildlife Service (USFWS), and the Ohio State Historic Preservation Office (OHPO). Responses were received from the USFWS and the OHPO. Agency comments and natural resources information has been used in the environmental assessment process and incorporated into the applicable section of the EA. The above coordination and response letters are located in **Appendix C**.

The OHARNG also consulted with Native American groups identified as having possible ancestral ties to the CPJTC area. Federally recognized Native American tribes were specifically requested to contribute to this EA based on their expressed desire to do so in a previous face to face consultation. Fourteen Native American groups were identified as having possible ancestral ties to the CPJTC area. These groups include the Cayuga, Chippewa, Delaware, Kickapoo, Mohawk, Oneida, Onondaga, Ottawa, Potawatomi, Sac and Fox, Seneca, Shawnee, Tuscarora, and Wyandotte. These groups were identified based on the OHARNG Integrated Cultural Resources Management Plan (ICRMP), consultation, personal correspondence, and

## Purpose of and Need for the Proposed Action

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research by the OHARNG Cultural Resources Manager. From the 14 identified groups, 46 Federally recognized Native American tribes were consulted with by the OHARNG regarding the RPMP at CPJTC. Tribal coordination resulted in two responses. The Forest County Potawatomi requested a copy of the CPJTC archaeological survey report completed in 2005. After reviewing the report, they have no objection to the Proposed Action but did request to be contacted in the event of an inadvertent discovery. The Red Cliff Tribe responded with an updated point of contact for their Chairperson. Tribal coordination letters, responses, and a memorandum for record on Native American Consultation are located in **Appendix A** of the EA.

The OHARNG has working relationships and regularly consults with the OHPO, the USFWS, the ODNR, the U.S. Army Corps of Engineers (USACE), and the Ohio Environmental Protection Agency (EPA) regarding threatened and endangered species, natural resources management, wetlands, and environmental restoration sites. Resources have been addressed throughout the RPMP, specifically within the ADP and Vision Plan environmental constraints figures and analyses and Installation Development Plan. The RPMP has established compliance processes in place when activities are undertaken that may impact a resource. Regular coordination with the USACE provides information regarding updates to regulations applicable to wetland management. Coordination with the USFWS and ODNR is regularly conducted to account for updates on the candidacy, range, and status of species considered rare, threatened, endangered, or of special concern. The most recent correspondence received from USFWS in July 2019 provides guidance regarding avoidance and minimization measures and information regarding species considered rare, threatened, endangered, or of special concern, either known or observed at CPJTC, or which may be in proximity to CPJTC. Because this EA does not evaluate implementation of any specific projects, additional project specific review of potential impacts to the environment will be conducted as projects are programmed for implementation.

Consideration of the views and information from all interested persons promotes open communication and enables better decision making by the OHARNG and NGB. All persons and organizations having potential interest in the Proposed Action, including minority, low income, disadvantaged, and Federally recognized Native American tribes, are urged to participate in the NEPA environmental analysis process. The opportunity for additional agency and public input will be provided during a 30-day public comment period following OHARNG's completion of the Final EA and Draft FONSI. Persons interested in receiving copies of the EA or the FONSI may contact:

Camp Ravenna Environmental Office  
ATTN: Tim Morgan  
1438 State Route 534 SW  
Newton Falls, OH 44444

A Notice of Availability (NOA) will also be published in *The Beacon* (205 SE Catawba Road, Suite G, Port Clinton, Ohio 43452, (419) 732-2154), announcing the availability of the Final EA and draft FONSI. During the public comment period, any comments received by the OHARNG will be addressed and incorporated into the Final EA, if warranted, and in to the FONSI prior to signature by ARNG.

### **1.6 Related NEPA, Environmental, and Other Documents and Processes**

The following Camp Perry planning and environmental documents are related to the Proposed Action and were reviewed during development of the RPMP and the preparation of this EA:

- Phase I Archeological Survey of Camp Perry in Erie Township, Ottawa County, Ohio (2006)

## **SECTION 1.0**

## Purpose of and Need for the Proposed Action

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- Documentation and Evaluation of Buildings at Camp Perry, Erie Township, Ottawa County, Ohio (2008)
- Management Plan, Camp Perry Historic District, Erie Township, Ottawa County, Ohio (2012)
- Draft Final Integrated Cultural Resources Management Plan for Installation of the Ohio Army National Guard (2016-2021)
- Draft Integrated Natural Resources Management Plan (INRMP), Camp Perry Training Site, Ottawa County Ohio (2007)
- Wetlands - Planning Level Survey for the Camp Perry Training Site, Ottawa County, Ohio (2006)
- Vegetation Community Mapping, Camp Perry Training Site, Ottawa County, Ohio (2006)
- Vascular Plant Survey, Camp Perry Training Site, Ottawa County, Ohio (2006)
- Fauna - Planning Level Survey, Camp Perry Training Site, Ottawa County, Ohio (2006)
- Threatened and Endangered Species Planning Level Survey, Camp Perry Training Site, Ottawa County, Ohio (2006)
- United States Department of Interior, Fish and Wildlife Service, Federally Endangered, Threatened, Candidate Species and Species of Concern in Ohio by County (May 2017 and future lists)
- Documentation and Evaluation of Buildings at Camp Perry, Erie Township, Ottawa County, Ohio (2008)
- Training Site Master Plan (TSMP) for Camp Perry Joint Training Center (2011)
- Preliminary Site Investigation Report for Waste Disposal sites at Camp Perry Training Site, Ohio (2004)
- Site Investigation Report, Orphan Dump Site Investigation at Camp Perry Training Site (2007)
- Final Removal Action Completion Report for the Orphan Dump Site, Camp Perry Training Site, Port Clinton, Ohio (2009)
- Wetlands - Planning Level Survey, Camp Perry Training Site, Ottawa County, Ohio (2006)
- Jurisdictional Determination for Department of the Army Application No. LRB-2012-00291 (Camp Perry Training Center Range Complex) (2013)
- Year Five Monitoring and Management Report, Camp Perry Training Site (CPJTC), Wetlands Mitigation Area, Erie Township, Ottawa County, Ohio (2011)
- Phase I Archeological Survey of Camp Perry in Erie Township, Ottawa County, Ohio (2006)
- Statewide Operational Noise Management Program, Ohio Army National Guard (2008)
- Bald Eagle Management Plan, Camp Perry Training Site (2007)
- Coastal Zone Management Plan, Camp Perry, Ottawa County, Ohio (2007)
- Soils - Planning Level Survey, Camp Perry Training Site, Ottawa County, Ohio (2005)

## Purpose of and Need for the Proposed Action

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- Surface Waters – Planning Level Survey, Camp Perry Training Site, Ottawa County, Ohio (2006)
- Topography – Planning Level Survey, Camp Perry Training Site, Ottawa County, Ohio (2005)

### 1.7 Regulatory Framework

The Proposed Action and alternative are subject to the following Federal and State environmental regulations:

- National Environmental Policy Act of 1969 (NEPA), as amended (42 United States Code [U.S.C.] Section 4321–4347)
- Council on Environmental Quality’s (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] §Parts 1500–1508)
- Clean Air Act (CAA), as amended (42 USC §7401 et seq.) CAA Amendments of 1990 Clean Air Act (CWA) of 1972 (33 USC § 1251 et. seq.)
- National Pollutant Discharge Elimination System (40 CFR 122)
- Safe Drinking Water Act (42 USC §300f et seq.)
- Executive Order 11990, Protection of Wetlands
- Executive Order 11988 Floodplain Management
- Endangered Species Act of 1973
- Bald and Golden Eagle Protection Act of 1940 (16 USC 668 et. seq.)
- Migratory Bird Treaty Act, as amended (16 USC §703-712)
- National Historic Preservation Act Section 106
- Executive Order 13175, Consultation and Coordination with Indian Tribal Governments
- Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- Resource Conservation and Recovery Act (RCRA) of 1976
- Federal Facilities Compliance Act (FFCA, PL 102-386) of 1992
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980
- Toxic Substances Control Act (TSCA)
- Section 438 of the Energy Independence and Security Act of 2007 (EISA)
- Coastal Zone Management Act of 1972 (CZMA), as amended (Public Law 111-11, Enacted March 30, 2009)
- Ohio Coastal Zone Management Law (Ohio Revised Code [ORC] Chapter 1506)

## **2.1 Introduction**

The purpose of the Proposed Action is to approve the RPMP for Camp Perry. The RPMP establishes long-term strategies to guide the physical development of Camp Perry over the near-term (within five years) and long-term (20+ years) planning horizon. This section also describes the alternatives analysis process and the screening criteria used to evaluate the alternatives.

## **2.2 Proposed Action**

OHARNG's Proposed Action is the approval of the UFC 2-100-01 compliant RPMP. Although approval of the RPMP does not directly result in any physical activities, it provides a vision for future development and activities with the potential to result in environmental impacts. The Proposed Action consists of approval of the Camp Perry RPMP consistent with the military use of Camp Perry and the goals and objectives established in UFC 2-100-01. However, since the RPMP provides only a vision of potential future actions, this EA includes a broad discussion of environmental effects based on the types of activities proposed within the RPMP and does not discuss specific project effects in detail. Once the details of the potential future projects in the RPMP are known, the OHARNG will conduct site-specific NEPA analysis in coordination with the ARNG-G-9 at the appropriate time.

The general types of activities in the RPMP include technological upgrades to ranges; expansion of training aids, devices, simulators, and simulations (TADSS); upgrades to utilities and information technology infrastructure necessary to support TADSS; repurposing of existing structures where possible and construction of new multi-purpose buildings as needed to support units while onsite training; replacement of old housing units near the conference center; organization and definition of green spaces to help better distribute activity across the site; reconfiguration and expansion of parking areas for multi-use; and drainage improvements on the ranges. In addition, an Armed Forces Readiness Center is slated to be built at Camp Perry in 2024. This is a military construction project and will be evaluated under a separate NEPA analysis.

The RPMP provides only a vision of potential future actions and this EA includes a broad discussion of potential environmental effects that could be associated with activities to implement the vision. The general types of actions required include such things as demolition of old deteriorated structures that are no longer serviceable; infrastructure development and improvement; developing dual-use outdoor spaces; utility improvements; improvements to lakeside cottages and MWR facilities; improved retail spaces and aesthetics; implementing a Historic District Management Plan; and enhancing existing memorials, monuments, and landmarks. As projects are developed and programmed in support of the RPMP, the OHARNG will determine if the projects are covered under an existing NEPA document or categorical exclusion and will conduct site-specific NEPA analysis in coordination with the ARNG-G-9 if adequate NEPA documentation does not already exist.

### **2.2.1 Description of Camp Perry**

Camp Perry is located along the northern edge of Ottawa County. The site is bordered by State Route (SR) 2 to the south, Lake Erie to the north, wetlands to the east, and industrial sites to the west. Camp Perry has approximately 1.83 kilometers (1.14 miles) of lakefront. Overall, Camp Perry is typified by open spaces consisting mainly of small-arms ranges and building complexes arranged around a gridded road network. There is a small forest area located in the southwest corner of the Cantonment Area.

The OHARNG manages and uses approximately 234 hectares (579 acres) of the approximate 259 hectares (640 acres) that make up Camp Perry. The OHARNG leases approximately 10% or 24 hectares (59.5 acres) of the property for use by the 200<sup>th</sup> RED HORSE Squadron. The ARNG portion of the CPJTC property encompasses an approximately 55-hectare (135-acre) Cantonment Area, an approximately 10-hectare (25-acre) woodlot, firing ranges, a clubhouse, conference center, and cottages. The ANG portion of the CPJTC is a separately fenced and gated compound in the southeast corner of the CPJTC property, composed of developed and maintained land (**Figure 2.1**).

The CPJTC site is the main weapons qualification range for the OHARNG. The primary mission of the OHARNG at the CPJTC is to provide facilities and authorized training center management for the conduct of weapons qualification, training exercises, DoD supported marksmanship programs, and the congressionally mandated Civilian Marksmanship Program (CMP) (36 United States Code [USC] §40727). Approximately 22,000 to 25,000 soldiers train at Camp Perry each year.

The CPJTC is also a primary marksmanship training site for law enforcement, including the State Highway Patrol, the Federal Bureau of Investigation (FBI), and local county and city law enforcement agencies. The site is also heavily used by shooting clubs and the general public for shooting competitions. The National Matches Marksmanship Tournament sponsored by the CMP and the National Rifle Association (NRA) has taken place annually (July/August) at the CPJTC since 1907.

The majority of CPJTC consists of firing ranges and a Cantonment Area. Ranges of 300 yards, 600 yards, 800 yards, and 1,000 yards along the Lake Erie shoreline comprise the main weapons qualification range. Other range facilities available at CPJTC include a Known Distance (KD) range, an automated combat pistol qualification range, a Modified Record Fire range, a grenade launcher (M-203) range, a shotgun range, and an automated Multi-Purpose Machine Gun (MPMG) Range (OHARNG, 2008). The ranges in the southwestern portion of the CPJTC property just south of the woodlot are fenced with a locked gate. Other common training includes land navigation, nuclear biological and chemical warfare protection, military vehicle driving, and physical fitness.

### **2.2.2 Camp Perry RPMP**

The RPMP provides the Adjutant General with a strategy to meet the challenges of operating under changing conditions. It provides the Adjutant General with a foundation for managing and developing OHARNG real property, as well as a framework for analyzing and justifying new construction projects and Sustainment, Restoration, and Modernization (SRM) resource allocations. The RPMP will inform future planning and programming decisions for real property construction, renovation, maintenance, and repair at Camp Perry over the near-term (within 5 years) and long-term (20+ years) planning horizon.

The Camp Perry RPMP includes the following elements:

- a. Vision Plan – includes a statement of the planning vision, planning goals, and planning objectives as well as an overall constraints and opportunities map(s), a developable area map, a framework plan for the entire installation, a land pattern matrix if applicable, and a summary future development plan. Constraints include limitations of aging existing facilities and associated Historic District Management considerations; environmental constraints such as wetlands, the bald eagle nest, and Lake Erie shoreline habitat; and operational constraints resulting from range safety danger zones.

- b. Installation Development Plan – includes Area Development Plans (including detailed constraints and opportunities maps, Regulating Plans, Illustrative Plans, Implementation Plans, capacity analysis, and supporting sketches and renderings), as well as appropriate Network Plans.
- c. Installation Planning Standards – includes building, landscape, and street standards and principles for development at Camp Perry.
- d. Development Program – overall installation strategy for using and investing in real property; includes list of current known projects needed to support installation missions.
- e. Plan Summary – an executive summary of each of the above planning products.

The Camp Perry Real Property Planning Vision is to support small-arms individual weapons qualification and virtual training by implementing adaptable and sustainable infrastructure for military and community partners, while preserving its historical heritage. The goals identified in the Real Property Vision include the following:

- Goal 1: Support Small-Arms Individual Weapons Qualifications and Virtual Training by sustaining ranges in accordance with regulatory specifications and improving and developing facilities that support evolving virtual training technologies.
- Goal 2: Implement Adaptable Infrastructure by constructing multi-purpose reconfigurable structures to maximize flexibility for current and future requirements and by developing and improving utilities, roads, information technology, and lands to allow for future growth and change.
- Goal 3: Implement Sustainable Infrastructure by constructing and providing facilities, renewable energy resources, roads, and information technology that require minimal maintenance and are durable and built for the long-term. Land use should be managed to be environmentally compliant and manage and meet the customer training needs to ensure current and future use.
- Goal 4: Enable Military and Community Partnerships by providing modern, multi-use facilities, and a culture that fosters relationships to increase utilization and resources.
- Goal 5: Preserve Historical Heritage by incorporating historic preservation requirements into all aspects of real property management.

The RPMP does not identify a list of specific projects that will be implemented, and this EA is not intended to cover implementation of any specific project. The RPMP will inform future planning and programming decisions for real property construction, renovation, maintenance, and repair at Camp Perry over the near-term (within five years) and long-term (20+ years) planning horizon.

A variety of opportunities were examined with a Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis within the ADP and Real Property Vision Plan. The RPMP primarily includes improvements to the central Cantonment Area and ranges at the northern end of post. Improvements are intended to allow Camp Perry to achieve more within limited space through renovations and strategic construction of new facilities. Potential projects include constructing range operations and control area (ROCA) facilities, mission command center, TADSS facilities,

basic officer quarters (BOQs), and multi-use facilities with adaptable floor plans. Renovations to existing facilities will house support functions such as the troop medical center (TMC), gym, and weapons cleaning facility. Range enhancements will allow for additional flexibility in the types of weapons training that can be conducted. The addition of wireless internet (Wi-Fi) will expand the ability to integrate new and advanced technology for range and simulation training. In addition, infrastructure improvements for drainage and sidewalks are identified in the RPMP as well construction of a new entry control point (ECP). Guest housing (cottages) near the conference center along the shore of Lake Erie and vendor space will also be improved. If fully implemented, the RPMP will result in the demolition of approximately 71,500 square feet and new construction of approximately 125,000 square feet. The RPMP includes maintenance, development, and land use consistent with the historic district. It does not include any new development or additional land use of Lake Erie or the lake shoreline habitat, which is within a major migratory bird route.

Short range, five to 10 year, projects focus on range improvements, TADSS, training, technology, security, and minor construction and renovation projects. Potential specific activities include demolition of facilities in poor condition, constructing a TADSS facility, constructing ROCA facilities, renovating an existing building into a gym, renovating an existing building into a weapons cleaning facility, providing Wi-Fi, improving/replacing sidewalks, replacing lakeside cottages, and constructing an entry control point. Longer range potential projects include additional demolition, expanding parking, constructing multi-use facilities, renovating the field maintenance shop (FMS), expanding the clubhouse/conference center, constructing BOQs, constructing a museum and relocating the World War II (WWII) hutment display, and constructing a mission command center. A new Armed Forces Readiness Center is also slated for construction in 2024 at Camp Perry. This is a MILCON project and will be evaluated under a separate NEPA analysis (**Figure 2.1**). More detailed information regarding the history and goals at Camp Perry are available in the Real Property Vision Plan.

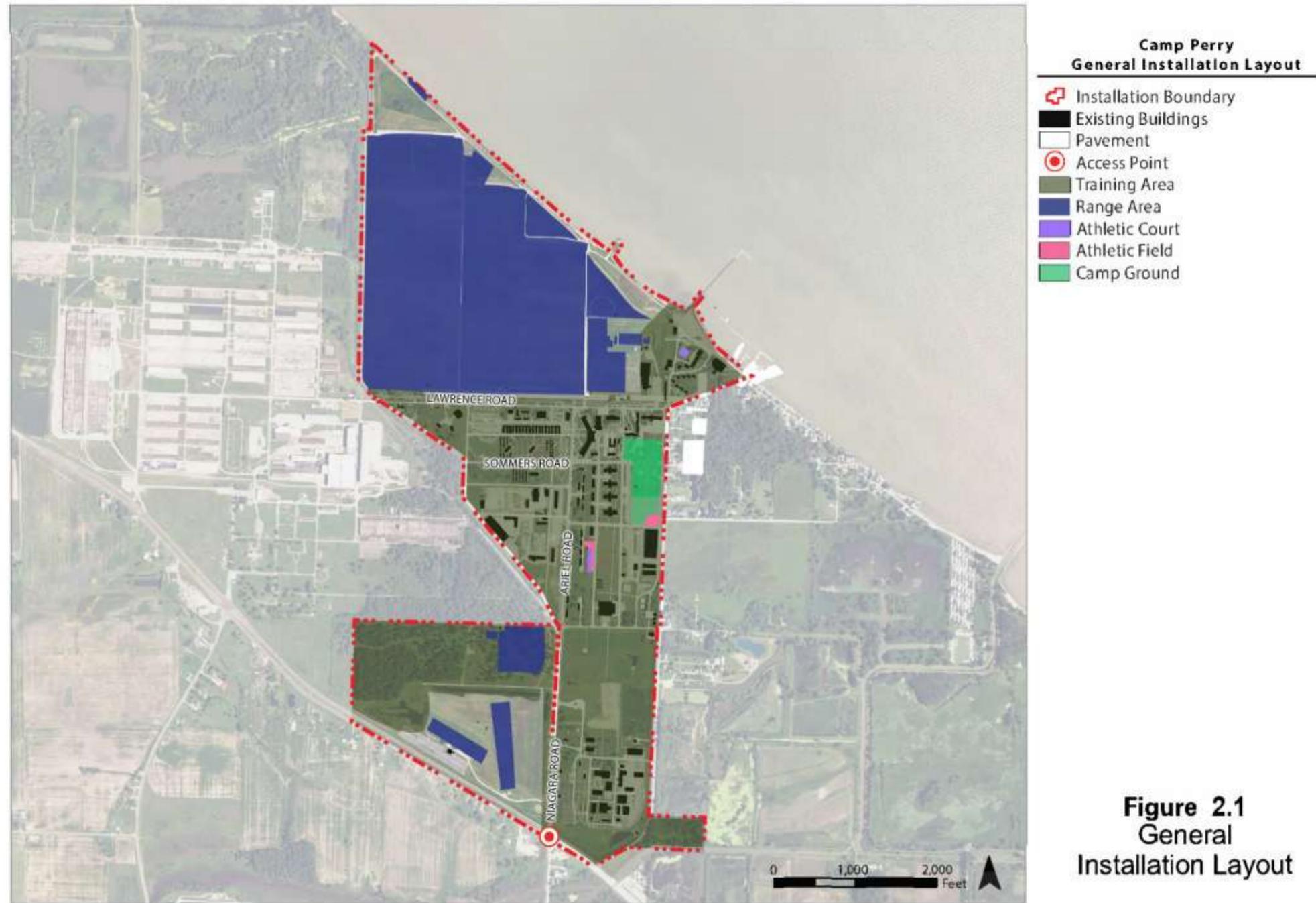
### **2.2.3 Types of Activities in the RPMP with Potential to Affect the Environment**

The general types of activities associated with the RPMP Vision Plan, ADP, and Development Plan include development and improvement of facilities and infrastructure to support the OHARNG mission. This would include repurposing or demolishing buildings, creating dual-purpose outdoor spaces, reconfiguring parking lots, implementing green infrastructure and low-maintenance building design, and improving utilities.

For NEPA analysis, the actions described in **Table 2.1** are included to provide examples of the types of activities included within the RPMP. Once the details of these and other projects identified in the RPMP are officially programmed and funded, the OHARNG will conduct site-specific NEPA analysis in coordination with the ARNG-G-9 at the appropriate time.

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**Figure 2.1**  
General  
Installation Layout

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**Table 2.1 Types of Activities in the RPMP with Potential to Affect the Environment**

Camp Perry Mission Use or Planning Goal	Description of RPMP Measures	Resulting Actions that May Affect the Environment
Installation and Troop Support Facilities (New Buildings)	<ul style="list-style-type: none"> <li>• Maintenance / storage and Wash Rack facilities</li> <li>• Centralized Dining Facilities Administration Center (DFAC) and Range Operations and Control Area (ROCA) facilities</li> <li>• Training Aids, Devises, Simulators, and Simulations (TADSS), Unit Training Equipment Site (UTES), and Engagement Skills Trainer (EST)</li> <li>• Point Project completion with demolition of Cottages</li> <li>• Museum, multi-use facility, and bath house</li> <li>• Headquarters / Administrative facilities</li> <li>• Mission Control Center and Pads including Battalion Headquarters and Command Post Exercise War Fighters</li> <li>• Basic Officer Quarters</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance</li> <li>• Vegetation clearing</li> <li>• Earth moving / filling</li> <li>• Addition of Impervious surfaces</li> <li>• Temporary increase of construction-related greenhouse gas (GHG) emissions</li> <li>• Energy efficiency</li> <li>• Changes to area viewsheds and Historic District</li> <li>• Solid waste generation &amp; disposal</li> <li>• Construction / development in new areas</li> </ul>
Demolish / Repurpose Facilities	<ul style="list-style-type: none"> <li>• Demolition of unsupported and buildings in poor-condition including cottages and old Hutments</li> <li>• Renovate and insulate motel structures</li> <li>• Rehabilitation of existing buildings capable of being re-purposed</li> <li>• Relocate facilities / operations as necessary</li> </ul>	<ul style="list-style-type: none"> <li>• Generation and disposal of solid and residual wastes</li> <li>• Generation and disposal of hazardous waste and special waste (lead/PCB paint and asbestos)</li> <li>• Temporary ground disturbances earth moving / filling</li> <li>• Reduced impervious surfaces</li> <li>• Changes to area viewsheds and Historic District</li> <li>• Temporary increase of construction-related GHG emissions</li> </ul>
Recreation Improvements	<ul style="list-style-type: none"> <li>• Morale, Recreation &amp; Welfare (MWR) facilities</li> <li>• Expand RV park</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance due to construction</li> <li>• Vegetation clearing</li> <li>• Earth moving / filling</li> <li>• Addition of Impervious surfaces</li> <li>• Temporary increase of construction-related GHG emissions</li> <li>• Changes to area viewsheds and Historic District</li> </ul>

Camp Perry Mission Use or Planning Goal	Description of RPMP Measures	Resulting Actions that May Affect the Environment
Transportation / Logistics	<ul style="list-style-type: none"> <li>• Improve pedestrian access and facilities along select roads</li> <li>• Widen and select roads and improve accessibility for deliveries</li> <li>• Improve Entry Control Points with pull-off areas, guard shack, and barriers</li> <li>• Expand parking</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance</li> <li>• Addition of Impervious surfaces</li> <li>• Increase of construction-related GHG emissions</li> <li>• Changes to area viewsheds and Historic District</li> <li>• Change in traffic patterns &amp; accessibility</li> <li>• Land use</li> </ul>
Utility Development	<ul style="list-style-type: none"> <li>• Upgrade lighting along select roads consistent with historic setting</li> <li>• Upgrade facility Wi-fi service</li> <li>• Infrastructure upgrades</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance</li> <li>• Vegetation clearing</li> <li>• Addition of Impervious surfaces</li> <li>• Increase of construction-related GHG emissions</li> <li>• Changes to area viewsheds and Historic District</li> <li>• Land use</li> <li>• Energy efficiency</li> </ul>

## 2.3 Alternatives Considered

This section summarizes the alternatives development process and screening criteria; alternatives evaluated; alternatives eliminated from further analysis; and provides an alternatives impact comparison matrix. NEPA, its implementing regulations, and the Army's policies for implementing NEPA (32 CFR Part 651) require that all reasonable alternatives be rigorously explored and objectively evaluated. In addition, alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered "reasonable" only if it would meet the requirements of the regulations mentioned above. Reasonable alternatives include those that: (1) are practical or feasible from a technical and economic standpoint; and (2) support the purpose of and need for the Proposed Action.

"Unreasonable" alternatives would not support the purpose of and need for the Proposed Action. The No Action Alternative would not meet the purpose and need. However, DoD's planning requirements and guidance requires the No Action Alternative be advanced and serve as a benchmark against which the effects of the type of activities associated with the Proposed Action can be evaluated.

### 2.3.1 Alternatives Development (Screening Criteria)

The OHARNG developed the following screening criteria to evaluate a potential alternative's reasonableness and feasibility related to the project purpose and need. These screening criteria are presented in **Table 2.2** and include:

- Fulfills UFC 2-100-01 master planning strategies and requirements
- Provides appropriate facilities to meet OHARNG's mission

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- Provides mechanism for short-term and long-term planning and project programming
- Meets DoD, Army, and ARNG master planning policy

OHARNG developed alternatives and evaluated them using these screening criteria to determine if they are reasonable and feasible. Alternatives that meet the screening criteria are carried forward for further evaluation. Alternatives that do not meet the screening criteria are dismissed from further evaluation.

Two alternatives were developed and analyzed against the screening criteria. These alternatives include:

1. Approval of UFC 2-100-01 compliant RPMP (Proposed Action).
2. Not Approving the UFC 2-100-01 compliant RPMP (No Action Alternative). This alternative would include managing Camp Perry under the current planning processes. Without a UFC-compliant RPMP, facility improvements would be constructed, maintained, and/or repaired under the previously approved plans, but the installation's existing planning process would not adequately incorporate current land use controls/restrictions nor be compliant with current DoD Master Planning policy and guidance.

Evaluation of these alternatives against the screening criteria is included in **Table 2.2**.

**Table 2.2 Alternatives Development and Screening Criteria**

Alternative	Fulfills UFC 2-100-01 master planning strategies and requirements	Provides appropriate facilities to meet OHARNG's mission	Provides mechanism for planning and project programming	Fulfills DoD, Army, and ARNG master planning policies	Retained or Dismissed
Approval of the UFC 2-100-01 RPMP (Proposed Action)	Yes	Yes	Yes	Yes	Retained
Not Approving the UFC 2-100-01 RPMP (No Action)	No	No	No	No	Retained

### 2.3.2 Evaluated Alternatives

#### 2.3.2.1 Approval of the UFC 2-100-01 RPMP (Proposed Action)

Under the Proposed Action, Camp Perry would approve the UFC 2-100-01 RPMP and implement a comprehensive approach to developing Camp Perry using planning strategies that reinforce capabilities to support the ARNG's mission, promote quality of life, and enhance sustainability and environmental viability on the installation (**Figures 2.2, 2.3, 2.4, and 2.5**).

**2.3.2.2 No Action Alternative**

The No Action Alternative would rely on the continued installation planning without an approved, UFC 2-100-01 compliant RPMP. Inclusion of a No Action Alternative is prescribed by the CEQ regulations and serves as a benchmark against which proposed Federal actions are evaluated.

**2.3.3 Alternatives Impacts Comparison Matrix**

**Table 2.3** provides a concise summary and comparison of potential impacts under each Alternative.

**Table 2.3 Alternatives Comparison Matrix**

<b>Technical Resource Area</b>	<b>Proposed Action</b>	<b>No Action Alternative</b>
<b>Land Use</b> (see Sections 3.2 and 4.2)	No adverse impacts and long-term beneficial impacts on the efficient and effective use of land at Camp Perry to meet the OHARNG's mission.	No short-term impacts anticipated from implementation of various projects and less-than-significant adverse long-term impacts due to a lack of comprehensive planning for the long-term mission.
<b>Air Quality</b> (see Sections 3.3 and 4.3)	Short-term and long-term less-than-significant adverse impacts due to emissions from facility renovations, construction, demolition, and ground-disturbing training exercises. Short-term pollutant emissions would include airborne dust from ground disturbance, combustion byproducts from construction equipment, and vehicle emissions from worker travel during construction. The Proposed Action would not adversely impact the area's compliance with the NAAQS.	Short-term and long-term less-than-significant adverse impacts due to less than optimal continued facility operations without the RPMP. The No Action Alternative would not adversely impact the area's compliance with the NAAQS.
<b>Noise</b> (see Sections 3.4 and 4.4)	Short- and long-term, less-than-significant adverse impacts to the existing noise environment would occur due to the Proposed Action. Short-term direct impacts would occur during construction, renovation, and demolition. Any increase in noise levels associated with the Proposed Action would be comparable to existing noise levels and unlikely to be heard by nearby residents; therefore, impacts from noise would be less-than-significant.	Less-than-significant adverse short-and long-term noise impacts due to this alternative. Noise levels resulting from construction, renovation and demolition, training, and day-to-day operations (including MOV and aircraft) would not be appreciably different from the existing condition.
<b>Geology, Topography, and Soils</b> (see Sections 3.5)	Short-term and long-term less-than-significant adverse impacts to soils due to ground-disturbing activities during construction and training operations. No	Short-term and long-term less-than-significant adverse impacts are anticipated under the No Action without the RPMP. In carrying out the mission, training,

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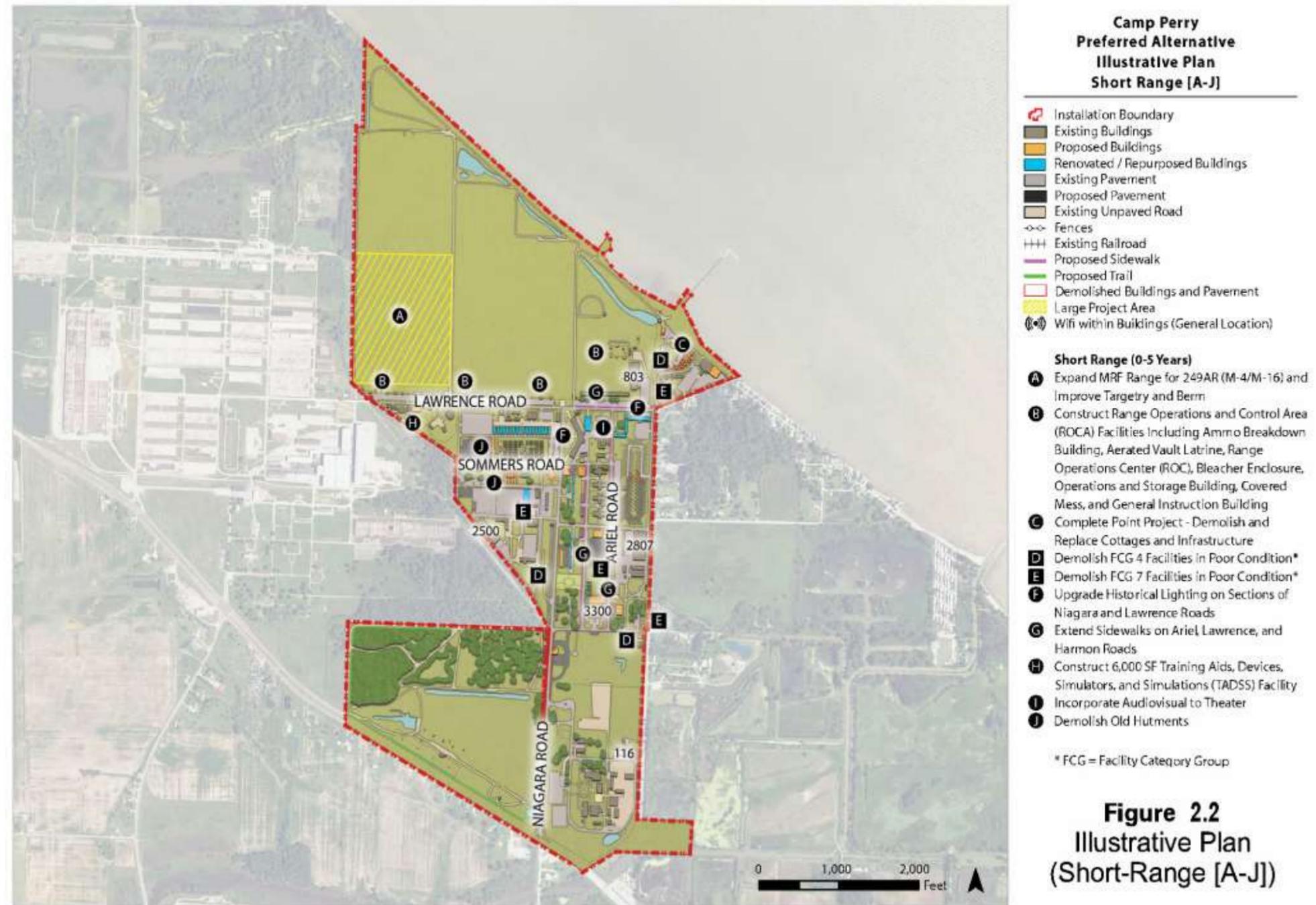
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Technical Resource Area	Proposed Action	No Action Alternative
<i>and 4.5)</i>	adverse impacts would result to geology or topography. All activities would comply with applicable regulations.	construction, and facility operations would continue. All activities would comply with applicable regulations.
<b>Water Resources</b> <i>(see Sections 3.6 and 4.6)</i>	Short-term and long-term less-than-significant adverse impacts due to ground-disturbing activities, increase in impervious surfaces, and training operations. Short- and long-term less-than-significant beneficial impacts due to comprehensive stormwater management and E&SC improvements.	Short- and long-term less-than-significant adverse impacts without RPMP due to continued mission, ground disturbance, training operations and an increase in impervious surfaces.
<b>Biological Resources</b> <i>(see Sections 3.7 and 4.7)</i>	Short-term and long-term less-than-significant adverse impacts due to construction- and training-related habitat disturbance and human presence. Long-term less-than-significant beneficial impacts due to consolidation of development into already developed areas and comprehensive stormwater management.	Short- and long-term less-than-significant adverse impacts without RPMP due to continued mission, ground disturbance, training operations, and an increase in impervious surfaces.
<b>Cultural Resources</b> <i>(see Sections 3.8 and 4.8)</i>	Short- and long-term less-than-significant impact (no effect or no adverse effect) to historic properties.	Short- and long-term less-than-significant impact (no effect or no adverse effect) to historic properties.
<b>Socioeconomics</b> <i>(see Sections 3.9 and 4.9)</i>	Short- and long-term less-than-significant beneficial impacts to the social and economic fabric of the community would be anticipated due to temporary minor increases in economic factors during construction and long-term impacts due to increased employment and facility use.	Short-term less-than-significant beneficial impacts without the RPMP due to the creation of temporary construction jobs and demand for local services and products during construction activities and longer-term less-than-significant benefits due to continuation of the mission.
<b>Environmental Justice</b> <i>(see Sections 3.10 and 4.10)</i>	No short- or long-term disproportionately high adverse impacts anticipated as EJ populations are not present.	No short- or long-term disproportionately high adverse impacts to low-income or minority populations anticipated as EJ populations are not present.
<b>Utilities</b> <i>(see Sections 3.11 and 4.11)</i>	Short-term and long-term less-than-significant adverse impacts to utilities. Adequate utility capacity exists to accommodate the increased demand of the Proposed Action without stressing finite capacity of utility service providers.	Short-term and long-term less-than-significant adverse impacts to utilities are anticipated without the RPMP. Continued mission does not stress the finite capacity of utility service providers.

Technical Resource Area	Proposed Action	No Action Alternative
<b>Infrastructure (Transportation and Traffic)</b> <i>(see Sections 3.12 and 4.12)</i>	Short- and long-term less-than-significant adverse impacts to infrastructure due to construction, traffic, and an increase in employees and visitors and long-term less-than-significant beneficial impacts due to strategic road improvements.	Short- and long-term less-than-significant adverse impacts to infrastructure without RPMP and continuation of mission including training, construction, facility operations, and lack of comprehensive and strategic road improvements.
<b>Hazardous and Toxic Materials/Wastes</b> <i>(see Sections 3.13 and 4.13)</i>	Short-term and long-term less-than-significant adverse impacts due to construction activities and operations. Handling, treatment, and disposal of HTMW must be done in adherence to regulatory requirements.	Short-term and long-term less-than-significant adverse impacts without RPMP due to continued mission, training, construction, and facility operations because of adherence to regulatory requirements dealing with the handling, treatment, and disposal of HTMW.

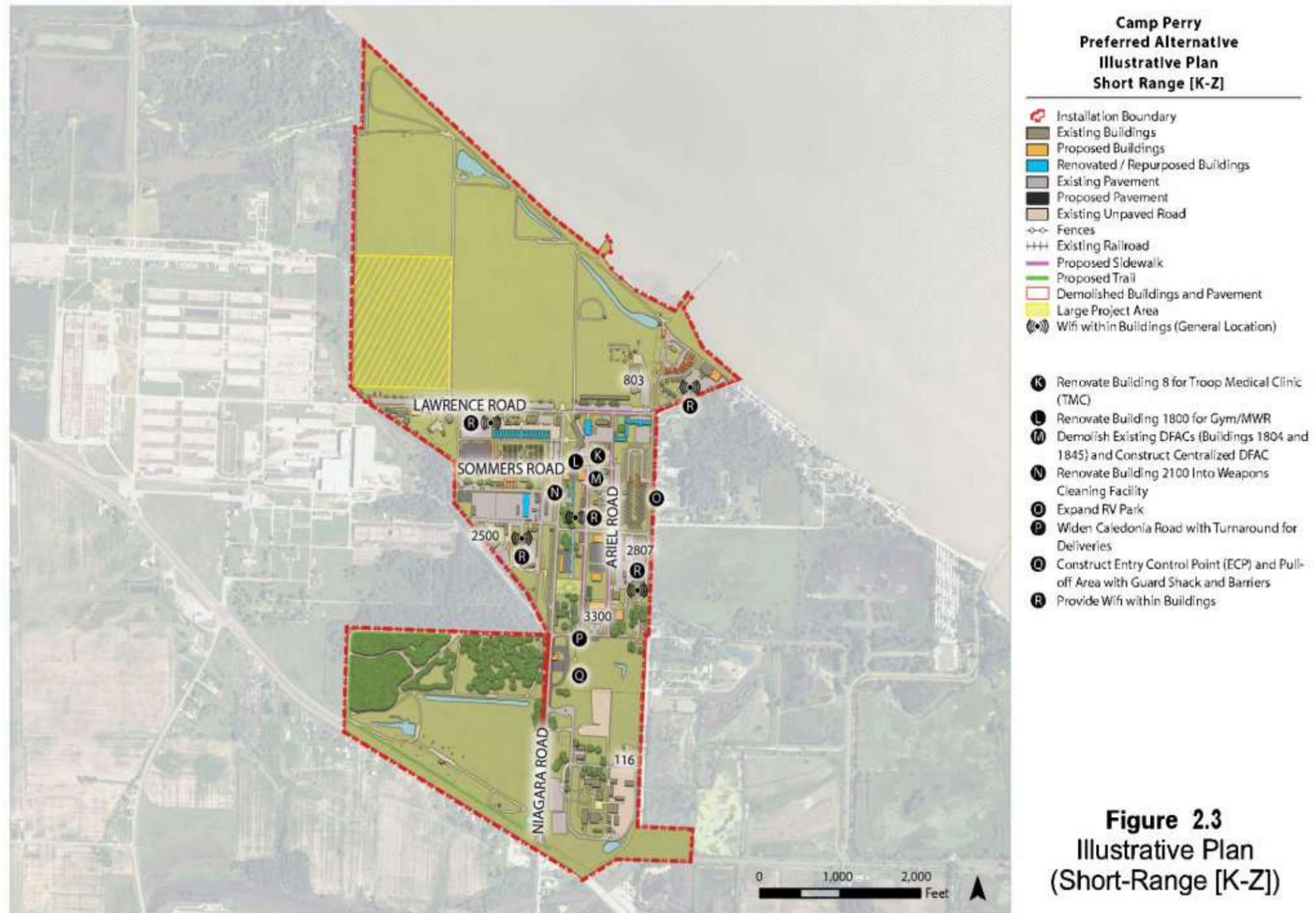
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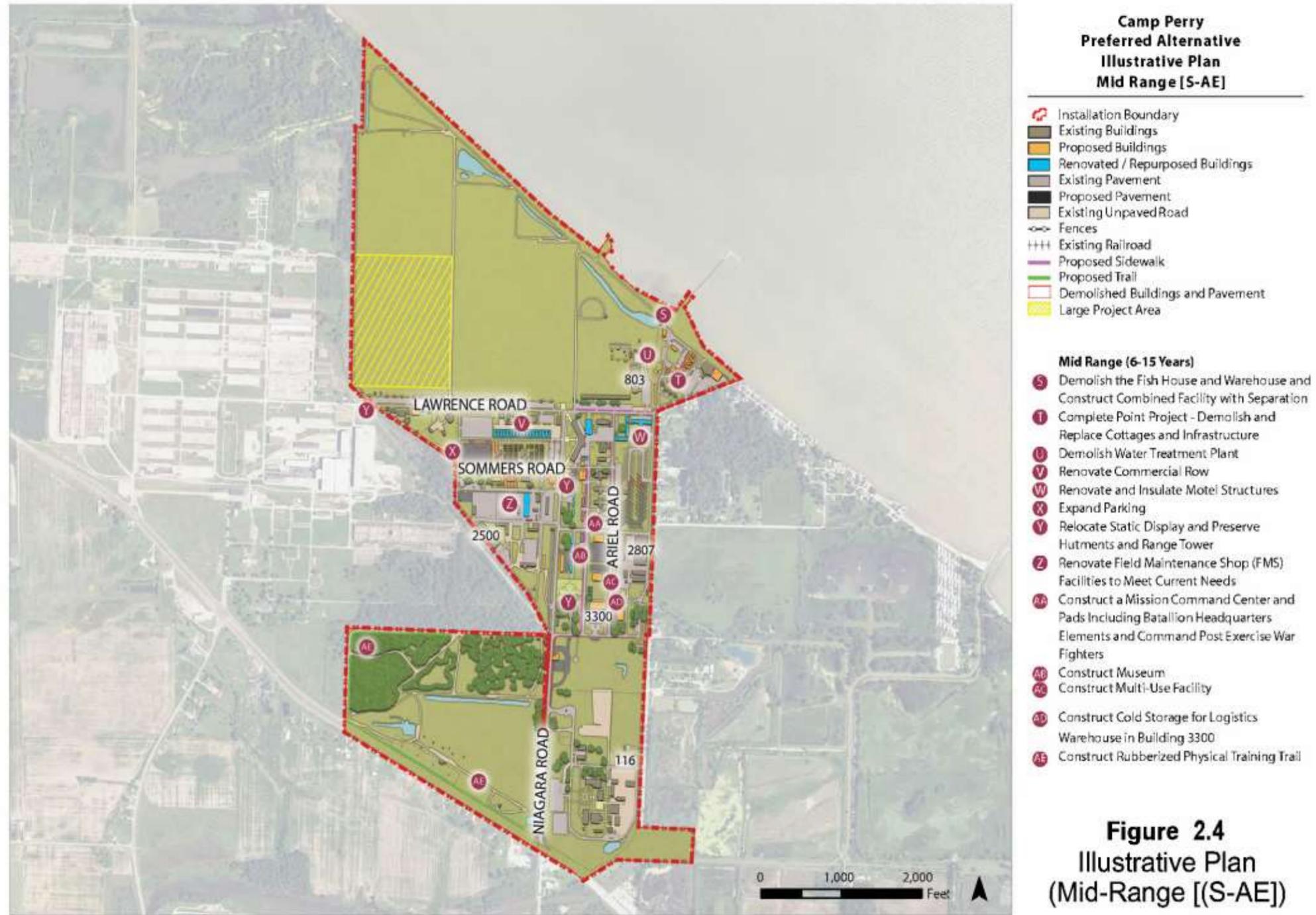
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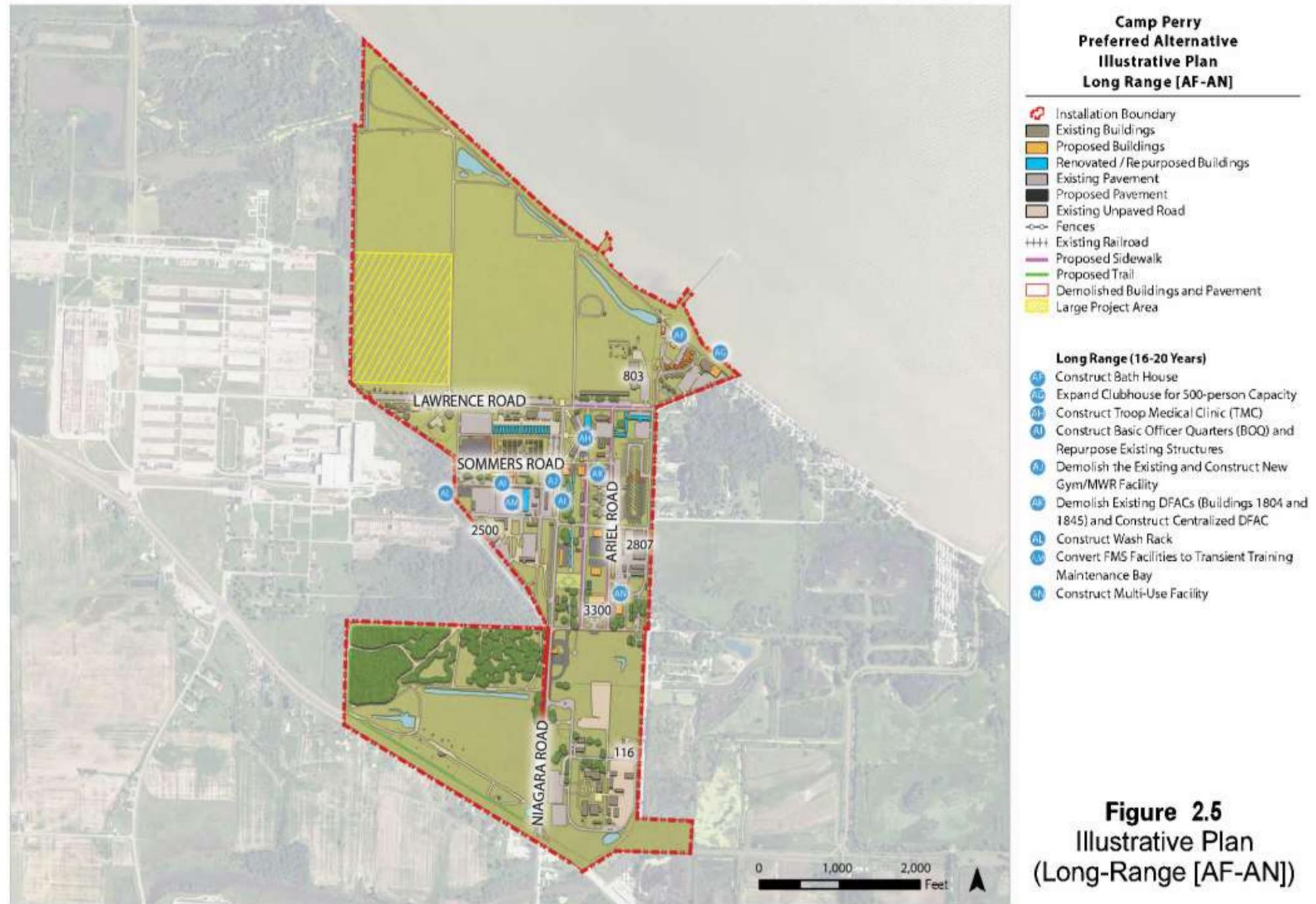
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### 3.1 Introduction

This section of the EA specifically describes baseline conditions within the CPJTC with emphasis on those resources potentially impacted by the type of activities associated with the Proposed Action and No Action Alternative. Section 4, Environmental Consequences, identifies potential direct, indirect, and cumulative effects of the identified project alternatives on each of the issue areas presented in this section. This information is also available for review in the RPMP ADP and Vision Plan.

### 3.2 Land Use and Cover

Camp Perry was established in response to American naval gunnery and marksmanship skill deficiency during the Spanish-American War of 1898 which prompted Federal funding to state militias for marksmanship instruction camps and practice rifle matches in 1903. The CPJTC property was acquired with these funds. Most of the property was drained and filled during construction and an extensive drainage and pumping system was installed. This extensive drainage system consists of a separate storm sewer system for the collection of runoff. The drainage system consists primarily of open channels with outlets to Lake Erie and Lacarpe Creek (OHARNG, 1998).

As stated in the CPJTC Real Property Vision Plan, in September 1907, the first National Matches were held at CPJTC. During World War I (WWI), it was used as a training center for officers and marksmanship instructors. During WWII, it was a reception center for new recruits. The property was federalized during WWII because it was used to house Italian and German prisoners of war (POWs). The POWs provided labor within a 50-mile radius of the camp to farms and industries. Following the war, the War Department classified the CPJTC land as surplus land, and the land reverted to state control (OHARNG, 2007).

Currently, the majority of CPJTC consists of firing ranges and a Cantonment Area. The OHARNG portion of the CPJTC property encompasses an approximately 54-hectare (135-acre) Cantonment Area, an approximately 10-hectare (25-acre) woodlot, firing ranges, a clubhouse and convention center, cottages, a pier, and approximately 3.7 km (2.3 miles) of Lake Erie shoreline. The OHANG portion of the CPJTC is a separately fenced and gated compound in the southeast corner of the CPJTC property, composed of 24 hectares (59.5 acres) of developed and maintained land. Existing land use categories within the CPJTC include approximately 23 hectares (58.0 acres) of community use, 25 hectares (61.7 acres) of troop use, 10.6 hectares (26.6 acres) of industrial, 3.8 hectares (9.5 acres) of professional/institutional, 141 hectares (353.1 acres) of ranges and training areas, 4.4 hectares (11.0 acres) of residential, and 24 hectares (59.5 acres) of OHANG property (see **Figure 2.1**).

The CPJTC lies between the adjacent land uses of the Navarre and Darby Units of the Ottawa National Wildlife Refuge (ONWR), which are also located along the Lake Erie coastline. The 236-hectare (591-acre) Navarre Unit, managed by the USFWS, is approximately 4.8 km (3 miles) northwest of CPJTC, and is the site of the Davis-Besse nuclear power plant (Department of Energy [DOE], 2004). The 208-hectare (520-acre) Darby Unit of the ONWR is approximately 1 mile southeast of the CPJTC and is composed of several managed marshes (USFWS, 2000). Both wildlife refuges consist of extensive marshland.

Camp Perry is immediately east of and abuts the former Erie Army Depot (EAD). The EAD was an artillery and air-defense artillery proving ground facility from 1918 to 1965. Approximately 96,000 acres of Lake Erie were used as the impact area (USACE, 2010). The EAD was closed in 1967. The site was designated as a Defense Environmental Restoration Program – Formerly Used Defense Site (FUDS) in the early 2000s and the USACE has completed a few removal

actions to clear ordnance items from shoreline areas. The property ownership was transferred to the Community Improvement Corporation of Ottawa County and has since been subdivided and transferred to several private parties who operate businesses on the property. The property is approximately 100-hectare (250-acre) and known as the Erie Industrial Park (originally 480 hectares [1,200 acres]). The former EAD Lake Erie impact area is still active and used by Camp Perry and private industry. There are also three non-FUDS Munitions Response Sites (MRSs) associated with past artillery testing activities in the Lake Erie impact area. These sites include West Sister Island, which is offshore and was a target area for munitions testing, and two Lake Erie shoreline areas. ARNG and the USACE are managing the environmental restoration of these MRSs.

SR 2 forms the southern boundary of the CPJTC, with low-density rural development, Lacarpe Creek, and the Ottawa County Landfill on the opposite side. Lacarpe Creek flows eastward south of SR 2, winding to the north and crossing under SR 2 near North Camp Perry East Road and eventually emptying into Lake Erie approximately 1.6 km (1 mile) east of CPJTC. The Ottawa County Landfill generates a significant amount of truck traffic, and significant odor during certain weather conditions. Modest single-family homes are located immediately east of the CPJTC, between the CPJTC and the Darby Unit of the ONWR. The western CPJTC boundary borders marsh habitat near the shoreline.

### **3.3 Air Quality and Climate**

#### **3.3.1 Air Quality**

The ambient air quality in an area can be characterized in terms of whether it complies with the primary and secondary NAAQS. The CAA, as amended, requires the U.S. Environmental Protection Agency (USEPA) to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for six principal pollutants, called “criteria pollutants” (as listed under Section 108 of the CAA): carbon monoxide (CO); lead (Pb); nitrogen oxides (NO<sub>x</sub>); ozone (O<sub>3</sub>); particulate matter (PM), divided into two size classes of 1) aerodynamic size less than or equal to 10 micrometers (PM<sub>10</sub>), and 2) aerodynamic size less than or equal to 2.5 micrometers (PM<sub>2.5</sub>); and sulfur dioxide (SO<sub>2</sub>) (**Table 3.1**).

Areas are designated by the USEPA as “attainment,” “nonattainment,” “maintenance,” or “unclassified” with respect to the NAAQS. Regions in compliance with the standards are designated as “attainment” areas. Air quality within Ottawa County is “in attainment” for all NAAQS criteria pollutants (USEPA, 2012). As Ottawa County is in attainment with all NAAQS, the procedural requirements of the General Conformity Provision of the CAA do not apply to the Proposed Action and no Conformity Determination is required.

In the State of Ohio, the Ohio Environmental Protection Agency (OEPA) is the responsible agency for monitoring air quality and assessing compliance with the NAAQS for each of the criteria pollutants.

CPJTC contains one 125-kilowatt natural gas-powered emergency generator that is permitted to operate by the permit-by-rule provisions of Ohio Administrative Code 3745-31-03(A)(4)(b). There are no other State-permitted air emissions sources.

**Table 3.1 National and Ohio Ambient Air Quality Standards**

Criteria Pollutant	Averaging Period	Primary Limit (Health Based) ( $\mu\text{g}/\text{m}^3$ )	Secondary Limit (Welfare Based) ( $\mu\text{g}/\text{m}^3$ )	NAAQS Basis
CO	1-Hour	40,000	---	High-2 <sup>nd</sup> -High – Not to be exceeded (NTBE) more than once per year
CO	8-Hour	10,000	---	High-2 <sup>nd</sup> -High - NTBE more than once per year
NO <sub>x</sub>	1-Hour	188	---	98 <sup>th</sup> percentile 3-Year average per receptor
NO <sub>x</sub>	Annual	100	100	High-1 <sup>st</sup> -High
PM <sub>10</sub>	24-Hour	150	150	24-hour average NTBE more than once every 3 years
PM <sub>2.5</sub>	24-Hour	35	35	98 <sup>th</sup> percentile 3-year average
PM <sub>2.5</sub>	Annual	12	15	High-1 <sup>st</sup> -High Ave – Ann at mean averaged over 3-years Secondary is an annual mean
SO <sub>2</sub>	1-Hour	196	---	99 <sup>th</sup> percentile 3-year average
SO <sub>2</sub>	3-Hour	--	1,300	NTBE more than once per year
SO <sub>2</sub>	24-Hour	365	---	NTBE more than once per year
SO <sub>2</sub>	Annual	80	---	NTBE
Ozone	1-hour	244	244	NTBE more than three times in 3 years
Ozone	8-hour	147	147	High-4 <sup>th</sup> -High – 3-Year Average
Pb	Quarterly	0.15	0.15	Maximum 3-month rolling average
<i>Note: Ohio adheres to standards set by the National Air Quality Standards (NAAQS) for all six principal pollutants.</i>				
<i>Source: USEPA, 2014c; OEPA, 2014c; ug/m<sup>3</sup>=micrograms per cubic meter.</i>				

The State of Ohio adheres to the NAAQS standards for all six principal pollutants. According to the USEPA (USEPA, 2020), Ottawa County, Ohio is in full attainment for all applicable NAAQS pollutants. As such, the procedural requirements of the General Conformity Rule are currently not in effect for the type of activities associated with the Proposed Action and the cities and townships in Ottawa County are considered in attainment for all criteria air pollutants.

Greenhouse gases are gases that trap heat in the atmosphere, thereby contributing to the greenhouse effect and climate change. Many GHGs occur naturally in the atmosphere, but human activities such as the burning of fossil fuels also release GHGs. The primary GHGs are carbon dioxide, methane, nitrous oxide, and fluorinated gases (USEPA, 2018).

To address potential effects of climate change, Executive Order (EO) 13834 directs the Federal government to enhance the resiliency of its infrastructure and operations. While EO 13834 does not require a formal planning process for evaluating and managing climate change, Federal agencies are nonetheless directly involved in addressing climate resilience and adapting to its implications across their services, programs, and assets (FedCenter, 2018). For example, DoD

identifies climate change as a national security concern and reduced its GHG emissions by approximately 12% between FY08 and FY15 (DOE, 2016).

This EA evaluates GHG emissions as a category of air emissions and considers the potential climate change effects of the Proposed Action. It does not, however, attempt to measure the actual incremental impacts of GHG emissions generated by the Proposed Action as criteria to determine significance in accordance with NEPA are not yet agreed upon or established and activities that would generate GHG are not well defined or implemented as part of the proposed action.

### **3.3.2 Climate**

CRJTC has a temperate climate with average daily temperatures ranging from 27 degrees Fahrenheit to 71 degrees Fahrenheit. The average annual precipitation is 33.3 inches with June receiving more rainfall than any other month, at 3.6 inches. The area receives about 17 inches of snow per year (INRMP, 2007).

### **3.4 Noise**

Noise is generally defined as unwanted sound. It can be any sound that is undesirable because it interferes with communications or other human activities, is intense enough to affect hearing, or is otherwise annoying. Noise may be intermittent or continuous, steady, or impulsive. Human response to noise varies, depending on the type of the noise, distance from the noise source, sensitivity, and time of day.

Land use guidelines identified by the Federal Interagency Committee on Urban Noise (FICUN) are used to determine compatible levels of noise exposure for land use planning and control (FICUN, 1980). Chapter 14 of Army Regulation (AR) 200-1 implements Federal regulations associated with environmental noise from Department of the Army (DA) activities. The decibel (dB) is the accepted unit of measurement for noise level, and it uses a logarithmic scale. The A-scale decibel (dBA) is an adjusted dB that corresponds to the range of normal human hearing. One of the metrics used by the DA to quantify the noise environment at DA installations is peak sound level (dBP), which is the maximum instantaneous sound level of an event. The dBP is neither weighted nor time integrated and is used to further define noise zones. Another metric used in defining noise zones is the Day-Night Average Sound Level (ADNL). The ADNL represents sound levels measured by totaling and averaging levels during a 24-hour period. People are usually more sensitive to sound levels at night based on low background sound levels; therefore, a 10 dB "penalty" is added to operations occurring between the hours of 10:00 PM and 7:00 AM. Thus, one nighttime sound event is equivalent to 10 daytime events of the same level.

The USEPA and other Federal agencies consider outdoor, 24-hour, energy-averaged noise levels exceeding 55 dBA to be unacceptable for noise-sensitive receptors (e.g., residences, day cares, hospitals). The Occupational Safety and Health Administration (OSHA) regulates noise impacts on workers with limits to ensure that workers are not exposed to an 8-hour, time weighted average of 90 dBA or noise levels. There are no countywide or local ordinances specifically for noise.

The United States Army Center for Health Promotion and Preventive Medicine (USACHPPM) developed a Statewide Operational Noise Management Plan (SONMP) in 2008 for OHARNG facilities including CPJTC. The SONMP is intended to prevent potential training restrictions due to public complaints about noise problems through land use planning and other means of noise mitigation. Elements of the SONMP include noise assessment, complaint management, and

noise abatement procedures. The SONMP provides a methodology for analyzing exposure to noise hazards associated with military operations and provides land use guidelines for achieving compatibility between the CPJTC and the surrounding communities. The SONMP recommends land uses around OHARNG installations which will: (a) protect citizens from noise and other hazards; and (b) protect the public's investment in these training facilities (USACHPPM, 2008).

An Installation Compatibility Use Zone (ICUZ) Study (OHARNG, 2016) was prepared by the Operational Noise Division, Army Public Health Center for OHARNG installations including Camp Perry. The ICUZ study quantifies the noise environment from military training sources and recommends the most appropriate uses of noise-impacted areas.

Training is integral to the mission of the OHARNG at the CPJTC, and the OHARNG is involved in activities that are required for the combat readiness of the personnel involved. Examples of anticipated noise producing activities at the CPJTC include general light vehicle use, construction activities, firing of small arms up through 0.5 caliber machine guns, helicopters, general troop training, and use of authorized personally owned vehicles (USACHPPM, 2008). The main weapons qualification range complex is comprised of a 300-yard, 600-yard, 800-yard, and 1,000-yard range that lie adjacent to one another and two lanes of multi-purpose machine gun ranges, 16 lanes of modified record fire, and ten lanes of combat pistol qualification. Civilian rifle teams and local and Federal law enforcement agencies also use the ranges. The National Matches marksmanship tournament sponsored by the CMP takes place annually at CPJTC.

The predominant sources of ambient noise at the CPJTC are small arms. USACHPPM developed noise contours for the existing small caliber ranges using the Small Arms Range Noise Assessment Model (SARNAM). SARNAM is a computerized tool that enables calculation and display of noise contours for small arms ranges. Noise contours show predicted noise levels near the CPJTC to provide guidance on land use for those areas. The CPJTC installation does not have permanent housing for personnel (e.g., barracks) and, therefore, on-post noise measurement levels (NMLs) were deemed unnecessary. Army Regulation (AR) 200-1 lists housing, schools, and medical facilities as examples of noise-sensitive land uses. There are no noise sensitive receptors currently on Camp Perry. Regulation guidelines state for land use planning purposes, noise-sensitive land uses are acceptable within the Noise Zone I (military operations may result in audible noise which may even be judged as loud on occasion), generally not compatible in Noise Zone II (military operations result in noise that is compatible with non-noise sensitive land use such as industry, manufacturing, transportation and agriculture), and in Noise Zone III (where noise sensitive receptors are not recommended or compatible). Army Regulation 200-1 offers land use recommendations, which if adopted both on and off the installation, would facilitate future development that is unaffected by military noise. The guidelines cannot alter existing noise-sensitive land uses within the Noise Zones, but they can be used to see where further noise-sensitive development should be discouraged. These guidelines are applied throughout the ICUZ study as individual training and/or testing operations are analyzed.

Both the Noise Zone II and Noise Zone III extend beyond the boundary of the training site. However, no noise complaints have been recorded for CPJTC. This is likely attributed to the relatively small number of residences in the area and the existing background noise from SR 2. In addition, Zone II contours only extend to areas when the louder 0.50 caliber weapons are fired. Noise levels are much lower when the more common weapon types are fired on the ranges (i.e., M16 or pistols). USACHPPM also assessed the potential noise complaint risk for artillery, ground burst, and grenade simulation activities. The risk would be low under average weather conditions beyond a 1,650 feet radius of the activity, and under unfavorable conditions this radius would extend to 2,650 feet (USACHPPM, 2008). Five noise sensitive receptors

(residences) are located about 500 feet to the south of Camp Perry and within Zone III. Zone II extends beyond Camp Perry in all directions with scattered residences (noise sensitive receptors) being within Zone II to the south and east of Camp Perry. Therefore, levels at noise-sensitive receptors near CPJTC would be dependent upon where in the property the activity takes place and the meteorological conditions at the time.

While no aircraft are stationed at CPJTC, helicopters do utilize the open field area south of the Cantonment Area a few times a month. Aircraft operations are not frequent enough to generate noise contours. To minimize noise impacts, the OHARNG utilizes ingress/egress route locations designated to avoid residential areas and to minimize noise impacts (USACHPPM, 2008). Information regarding noise areas, mitigation, and noise contours can also be found in the RPMP ADP and the Operational Constraints figure within the RPMP ADP.

### **3.5 Geology, Topography, and Soils**

Information gathered for the RPMP ADP and Vision Plan Vicinity Map regarding geologic, topographic, and soil conditions surrounding Camp Ravenna indicates that CPJTC is in the Maumee Lake Plains of Ottawa County, Ohio within the northern portion of the Central Lowland Physiographic Province. The Maumee Lake Plains physiographic region consists of a flat-lying ice age basin with beach ridges, bars, dunes, deltas, and clay flats, which comprised the former Black Swamp. The overall topography of this region is between 174-244 m (570-800 feet) above mean sea level (amsl) (Brockman, 1998).

The area has extremely flat, gently sloping topography that is easily waterlogged. Surface and/or subsurface drainage systems are needed to accommodate farming and land development. The CPJTC is surrounded by an abundance of water bodies, including Lake Erie, Portage River, Lacarpe Creek, and several marsh areas. The majority of the CPJTC land was filled and a subsurface stormwater drainage system was installed during construction. The most significant topographic features are the earthen berms on the ranges. Drainage primarily flows toward Lake Erie in the northern portion of the site, and toward Lacarpe Creek in the southern portion of the site. The surrounding area does not have notable geographical features beyond Lake Erie, nor does it have notable seismic activity. There are no documented unique geologic features at CPJTC (OHRANG, 2007).

Soils information for CPJTC is available through the US Department of Agriculture's (USDA) Natural Resource Conservation Service (NRCS). Approximately 96% of the CPJTC is composed of Nappanee (NpA) silty clay loam, Toledo (Tp) silty clay, and Udorthent (Ud) (disturbed or Urban) soils. Udorthents soils are found in the Cantonment Area and in the northeast corner of the property where the cabins reside, which represent the more developed portions of the installation (**Figure 3.1**). The Nappanee soil is a somewhat poorly drained soil and the Toledo silty clay is very poorly drained and listed as a hydric soil. These soils are limited by their poor drainage, wetness, and high-water table. The Ud soil has low permeability, rapid surface run off, and high erosion potential.

Prime farmland relates to soils that have the optimal combination of physical and chemical characteristics for producing food, feed, forage, fiber and/or oilseed crops. The NRCS identifies the Nappanee silty clay loam and the Toledo silty clay loam soils as prime farmland when tilled and drained (USDA NRCS). There are no agricultural fields at Camp Perry and these soils are not adequately tilled and drained for agricultural production; therefore, they do not qualify as prime farmland soils.

**3.6 Water Resources**

Surface water features within CPJTC include ponds, floodplains, wetlands, and Lake Erie. These features are illustrated on **Figure 3.2** and may also be found within the Environmental Constraints figure and SWOT analysis of the RPMP ADP and Vision Plan.

**3.6.1 Surface Waters**

CPJTC is located within the Cedar-Portage watershed. The CPJTC is surrounded by an abundance of water bodies. Lake Erie forms the entire northern CPJTC border. The Portage River is the largest waterbody in the area excluding Lake Erie. Its mouth is in Port Clinton approximately 6.4 km (4 miles) east of the CPJTC. Due to the area being swampland historically, artificial drainage is necessary to avoid limitations such as ponding and flooding. A subsurface stormwater drainage system was installed at the CPJTC in the early 1900's and upgraded and maintained over the years. The northern range complex storm water drainage system is composed of catch basins, buried stormwater drainage pipes, open ditches, and open stormwater ponds with an outlet to Lake Erie. The southern portion of CPJTC is drained by a couple man-made stormwater ponds, underground drainage pipes, and open roadside ditches to Lacarpe Creek.

Surface waters on the CPJTC include nine stormwater ponds that cover approximately 2.9 hectares (7.2 acres) or 0.1% of the installation and approximately 2.0 km (1.24 miles) of Lake Erie shoreline. There are no streams on the CPJTC property. Surface drainage is entirely by the man-made range drainage system and roadside ditches. The eastern 228 m (750 feet) of shoreline is designated as a Coastal Erosion Area.

**3.6.2 Lake Erie Coastal Zone**

There is 422 kilometers (262 miles) of Lake Erie shoreline in Ohio. The Lake Erie shoreline provides valuable wildlife habitat and tremendous natural, aesthetic, and economic benefits for its residents and visitors. The Camp Perry property includes approximately 1.99 kilometers (1.24 miles) of Lake Erie shoreline, and therefore shares in these resources and benefits.

The shoreline within the Camp Perry property boundaries is armored with a rubble mound dike/seawall. In addition, four sheet pile groins, a pier, and a rubble mound groin trap sand are located along the eastern 853 meters (2,800 feet) of CPJTS. There is a small maintained beach area near the conference center and more natural habitat with a narrow vegetation free zone at the water's edge that graduates into a shrub dominated habitat further from the water along most of the shoreline.

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Section 3.0

Affected Environment

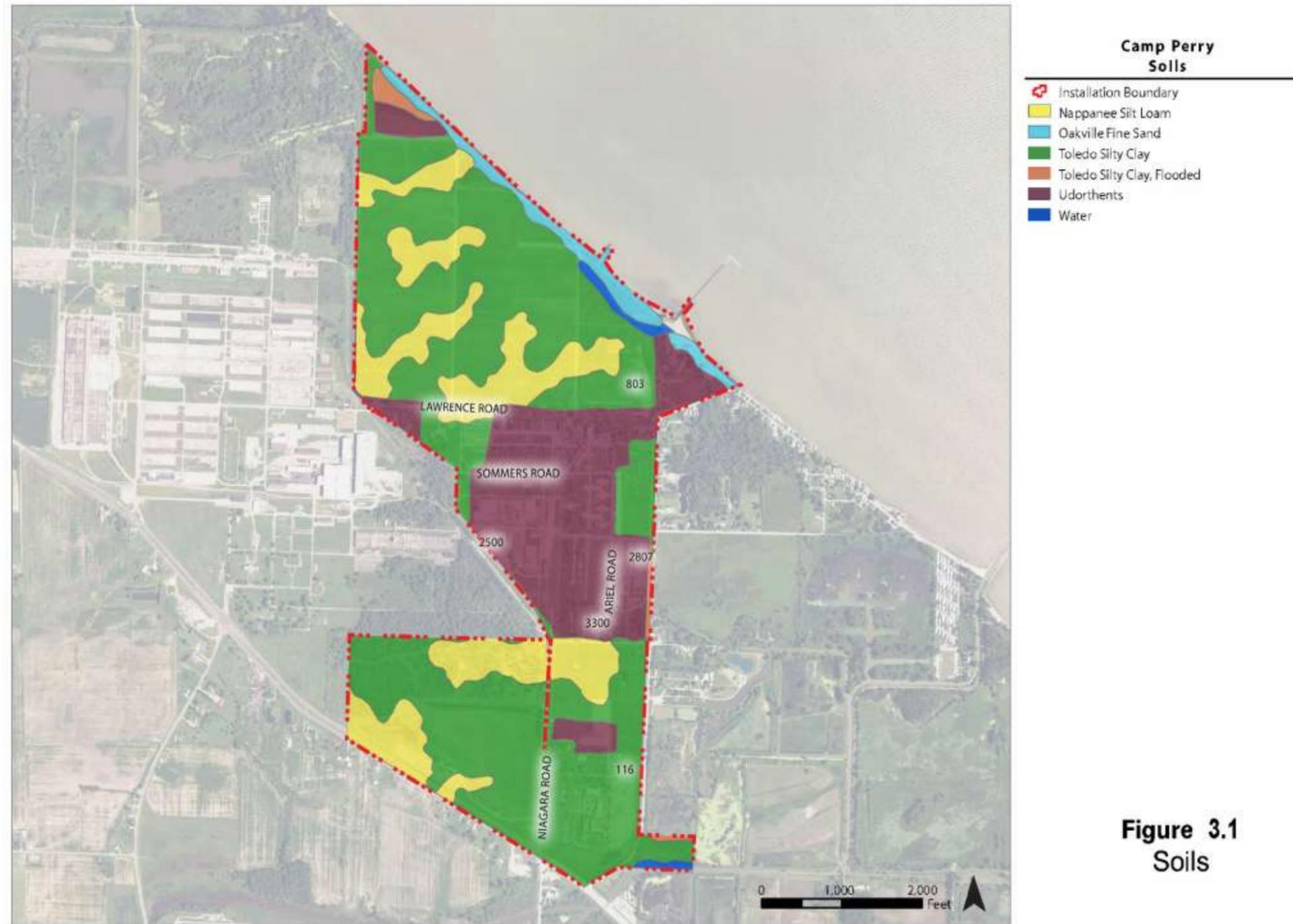
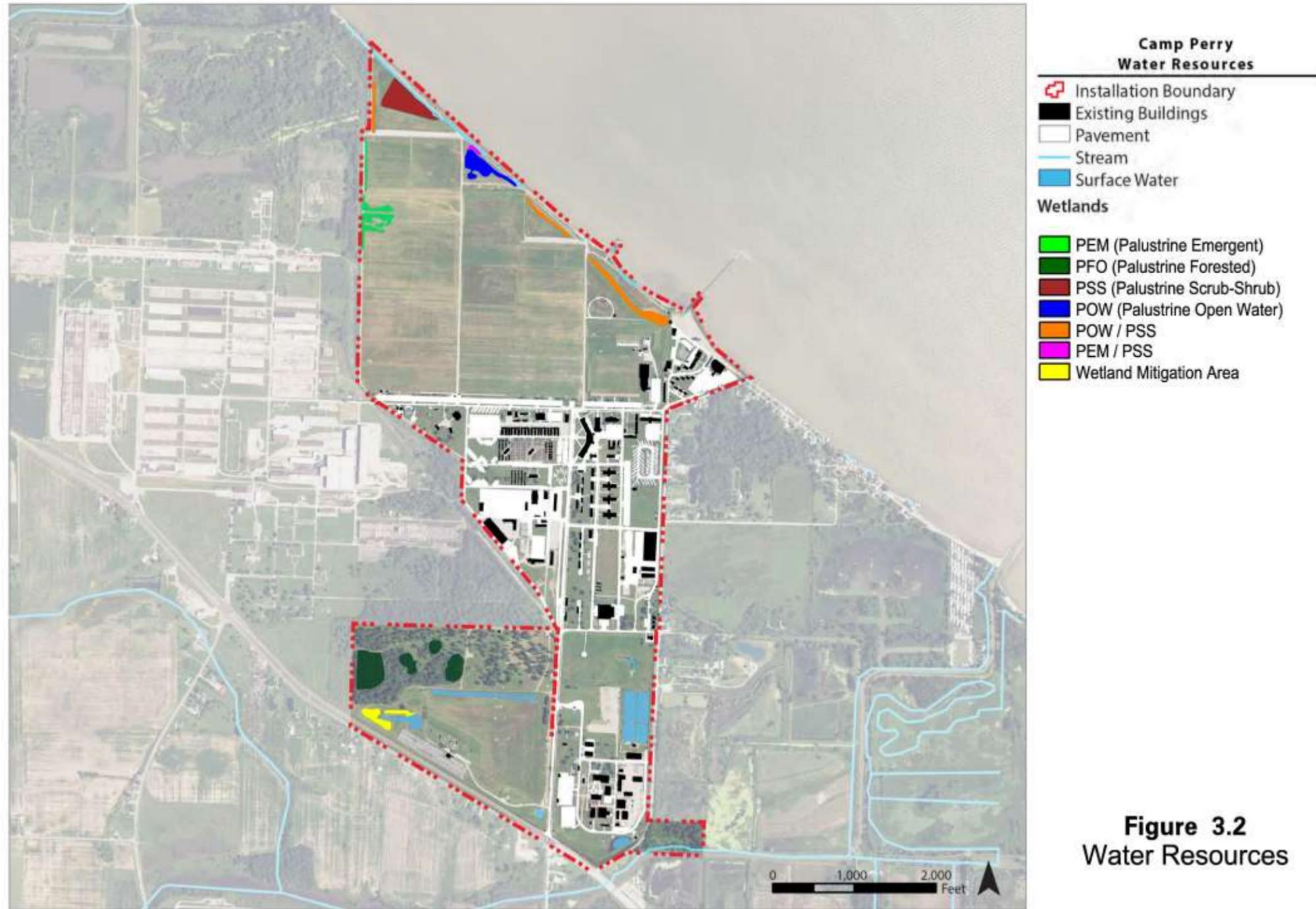


Figure 3.1  
Soils

**Section 3.0**

**Affected Environment**



**Figure 3.2**  
Water Resources

Activities within the Lake Erie shoreline are regulated by the Coastal Zone Management Act of 1972, the Ohio Coastal Management Act of 1988, and subsequent Ohio Coastal Zone Management Law (Ohio Revised Code, Chapter 1506). The Ohio Coastal Management Program (OCMP) was Federally approved in 1997. The ODNR Office of Coastal Management oversees implementation of the OCMP. The goal of the OCMP is to preserve, protect, develop, restore, and enhance Lake Erie resources; to manage coastal activities that affect them; and to foster the resources' sustainable use. The ODNR also administers the Submerged Lands Lease program, issues Coastal Erosion Area and Shore Structure permits, coordinates Ohio's Coastal Nonpoint Pollution Control, and conducts consistency reviews for activities conducted within the coastal management zone.

In 2007, the OHARNG developed a Camp Perry Coastal Zone Management Plan that summarizes the requirements and provides guidance for regulatory compliance whenever activity is done within the Lake Erie shoreline. The primary management strategies of this plan are to coordinate with the ODNR prior to any construction activities along the shoreline (obtain a consistency determination); maintain and increase native vegetation on the shoreline; not remove sand and gravel from the shoreline; and avoid construction of buildings or parking areas directly on the beach.

The OCMP is designed to support the goals of the RPMP Vision Plan and ADP and would specifically support goals to implement adaptable and sustainable infrastructure and enable military and community partnerships. The OCMP is provided in **Appendix E**.

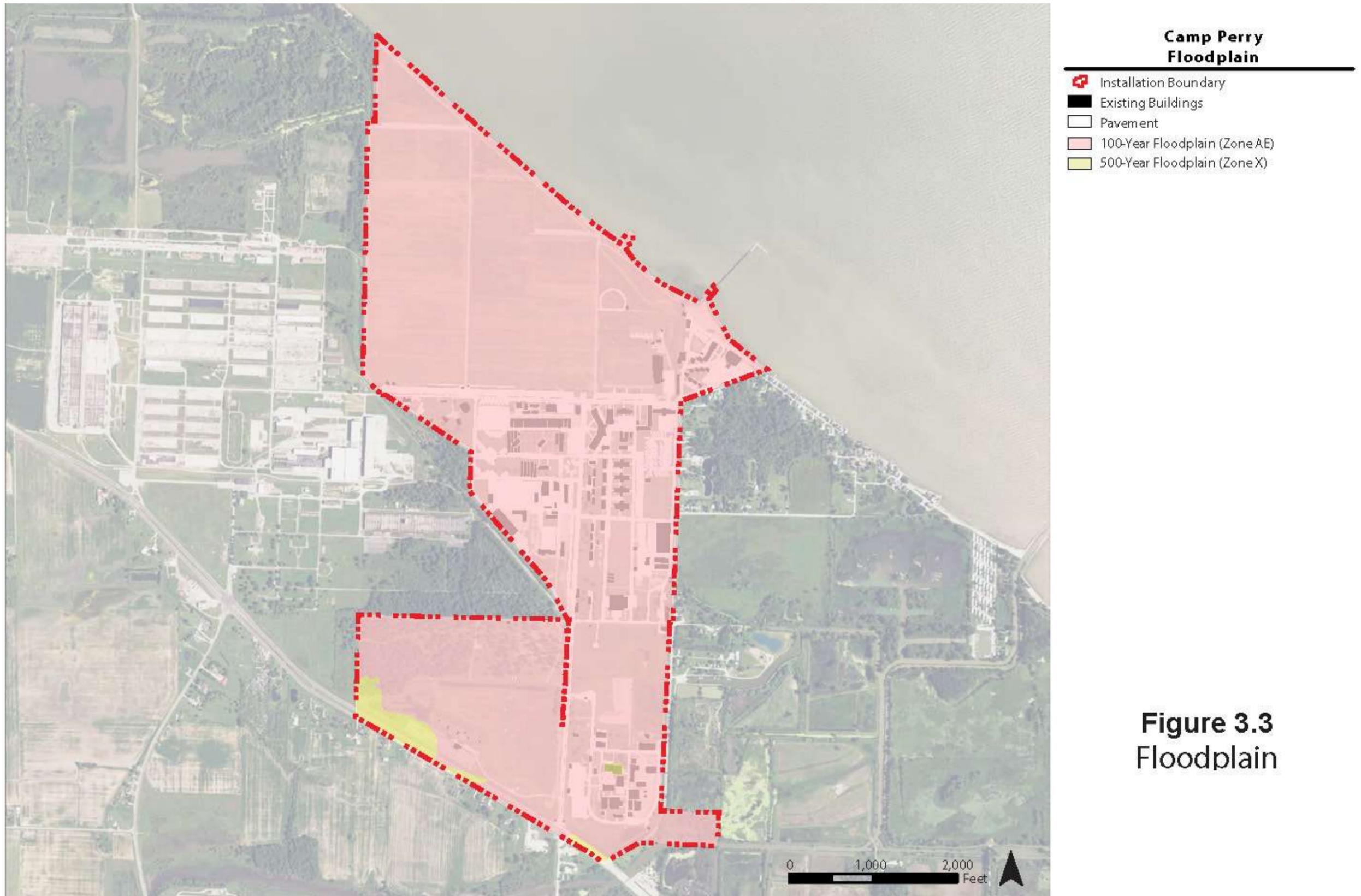
### **3.6.3 Floodplains**

Floodplains are generally low areas adjacent to streams, rivers, or lakes prone to flooding. The Federal Emergency Management Agency (FEMA) identifies flood-prone areas on FIRMs. FIRMs are primarily based on historic, meteorological, hydrologic, and hydraulic data. Open space conditions, flood control works, and development are also considered in creating FIRMs. Base flood areas, or the 100-year floodplain, are delineated on FIRMs. An area within the 100-year floodplain has a 1% chance of flooding each year or a 26% chance of flooding over a 30-year period. Prior to May 2015, only a small portion of Camp Perry along the shore of Lake Erie was designated within the 100-year floodplain. Currently, the entirety of Camp Perry is located within the 100-year special flood hazard area (Zone AE), as identified on the FIRM 39123C0120C, effective 18 May 2015 (**Figure 3.3**).

EO 11988 Floodplain Management requires agencies to assess the effects that their actions may have on floodplains and to consider alternatives to avoid adverse effects and incompatible development on floodplains. When construction is proposed within a floodplain, the EO identifies an eight-step process that must be followed before construction can commence. Among other things the process includes early public involvement, identifying and evaluating practicable alternatives to locating in the floodplain, identifying impacts of the proposed action, and if impacts cannot be avoided, developing measures to minimize the impacts and protect the floodplain, as appropriate. If a construction project requires an EA, the EO 11988 process can be incorporated into the NEPA process.

The National Flood Insurance Program (NFIP) was created by the National Flood Insurance Act of 1968. This program was solely administered by FEMA until it was amended to include the Floodplain Protection Act (FPA) in 1973. The FPA revised the NFIP regulations to allow communities to administer their own floodplain management programs, so long as the criteria specified within the NFIP are met or exceeded.

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**Figure 3.3**  
Floodplain

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One of several places the FPA revision is reflected is in Chapter 1501 of the Ohio Administrative Code (OAC). OAC 1501:22-1-03 requires counties and municipalities, which are not participating in the NFIP but contain coastal flood hazard areas, to regulate development within coastal flood hazard areas with a plan that meets or exceeds the standards identified in OAC 1501:22-1-04. OAC 1501:22-1-03 also requires counties and municipalities participating in the NFIP to comply with the floodplain management criteria set forth in the NFIP regulations found in Part 60 of Title 44 of the Code of Federal Regulations.

Ottawa County participates in the NFIP and has adopted its own floodplain management plan under Flood Damage Reduction Resolution #12-14. Ottawa County exercises local authority over construction activities within a floodplain and requires a permit to build within the floodplain. This permit, issued by Ottawa County, identifies specific NFIP compliant design requirements for structures built in floodplains that must be incorporated into the design pursuant to 44 CFR 60.1.d, and is required prior to construction at Camp Perry. This permit identifies specific NFIP, OAC, and Flood Damage Reduction Resolution #12-14 compliant requirements for structures built in floodplains that must be incorporated into the design. In addition to the floodplain, portions of Camp Perry are within the Lake Erie coastal zone management area and activities within this area must be consistent with the Lake Erie Coastal Zone Management Plan (CZMP). The Ohio DNR is responsible for reviewing activities within the coastal zone and making consistency determinations (Coastal Zone Management Act of 1972 and Ohio Coastal Management Law [Ohio Revised Code Chapter 1506]). A coastal zone management plan consistency determination may or may not be needed for construction at Camp Perry, depending upon the project location.

Prior to executing construction within a known floodplain, authorization through ARNG from the Department of Army (DA), Office of the Assistant Secretary of the Army, Installations, Energy and Environment is required. A floodplain waiver packet containing documentation to demonstrate compliance with the eight step process outlined in EO 11988 and local permitting and CZMP requirements must be submitted to ARNG for review and forwarding to the DA. Construction can commence in the floodplain once authorization from the DA is obtained.

A floodplain waiver packet is not required for approval of the Camp Perry UFC 2-100-01 compliant RPMP because approval of the plan does not involve any construction activity within a floodplain. Subsequent construction activity at Camp Perry will require a local permit, a CZMP consistency determination if within the coastal zone management area, and ARNG and DA authorization.

#### **3.6.4 Wetlands**

State and Federal laws and regulations have been implemented to protect waters of the State, including wetlands. The Clean Water Act (CWA) is the primary law protecting US waters. Section 404 of the CWA (33 USC 1344) prevents the discharge of dredged or fill material into waters of the US without a permit from the USACE.

Generally, whenever a Section 404 permit is required, a Section 401 Water Quality Certification (WQC) issued by the State of Ohio is also required. Wetlands are defined by the USACE and the USEPA as:

Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

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Executive Order 11990, *Protection of Wetlands*, requires Federal agencies to act to minimize the destruction, loss or degradation of wetlands, and to conserve and enhance the beneficial values of wetlands.

Camp Perry is located in what once was part of the Great Black Swamp, which was a large 65-kilometer-wide (40-mile-wide) and 193-kilometer-long (120-mile-long) wetland that stretched from current day Sandusky, Ohio to Fort Wayne, Indiana. It was created by the last glacial retreat approximately 20,000 years ago. Only 5% of the Great Black Swamp remains today. Much of Camp Perry was drained and/or filled when it was first constructed in the early 1900s. The ranges are drained by buried drainage pipes to a series of connected ponds at the north end of the ranges. Water is drained to the ponds and then pumped into Lake Erie to keep the ranges dry.

To initially identify the size, type, and location of surface waters of the State and wetlands, a wetland planning level survey for the CPJTC was conducted in 2005 (AMEC, 2006). Wetlands were classified as palustrine forested (PFO) and palustrine emergent (PEM). Wetlands identified south of Lawrence Road from the planning level survey primarily occur within the woodlot. A jurisdictional delineation was then conducted in April 2011 and again on June 28, 2012, for the area north of Lawrence Road and west of Scorpion Road within the CPJTC (i.e., range area). The April 2011 delineation identified three additional jurisdictional features in the northern portion of the CPJTC, which included approximately 4.5 hectares (11.3 acres) of open water (ponds and waste water treatment lagoons), 2.3 hectares (5.8 acres) of PFO wetlands, and 1.8 hectare (4.6 acres) of PEM wetlands. Lake Erie, a lacustrine wetland habitat with 6,540 feet of shoreline, borders Camp Perry to the north. The June 2012 jurisdictional delineation confirmed the boundaries of 11 wetlands including PEM, palustrine scrub/shrub (PSS), and palustrine open water (POW) resources (**Figure 3.2**). Further surveys would be conducted, as needed, at the project implementation stage in the future.

Wetlands were classified using the Cowardin Classification of Wetlands and Deepwater Habitat of the US (1979) system (**Table 3.2**).

**Table 3.2 Cowardin Wetland Classification**

Cowardin Wetland Classification	Abbreviation	Description
Lacustrine	L	Lacustrine (L) includes wetlands and deepwater habitats situated in topographic depressions or a dammed river channel that lack trees, shrubs and persistent emergent with greater than 30% areal coverage, and with a total area that exceeds 20 acres.
Palustrine	P	Palustrine (P) includes inland, nontidal wetlands, tidal areas where salinity from ocean-derived salts is less than 0.5%, and wetlands which lack vegetation, but exhibit four key characteristics.
Palustrine Emergent Wetland	PEM	Emergent wetland (EM), vegetation is characterized by erect, rooted, herbaceous hydrophytes, excluding mosses and lichens.
Palustrine Forested Wetland	PFO	Forested wetland (FO), vegetation is dominated by forest tree species (with diameter-at-breast-height of 4" or greater) but also possess an understory of young trees and/or shrubs, and a sparse herbaceous layer
Palustrine Open Water	POW	Open Water (OW), deeper, perennially flooded areas within wetlands and shallow lakes and rivers with unknown substrate.
Palustrine Scrub/Shrub Wetland	PSS	Scrub-Shrub (SS), woody vegetation that is characterized as true shrubs, young trees and/or trees and shrubs that are small or stunted due to environmental conditions and are generally less than 20 feet in height.

The OHARNG has one USACE wetland fill permit at CPJTC that was obtained to construct a road on Viale Range in support of training mission at Camp Perry. The permit resulted in the designation/construction and setting aside of one wetland mitigation area consisting of two wetlands (Wetland A [0.12 hectares (0.29 acres)] and Wetland B [0.34 hectares (0.83 acres)]) and an open water area of 0.03 hectares (0.07 acres). The total acreage of onsite wetland mitigation site is 0.77 hectares (1.9 acres) including 7.6 meter (25-foot) upland buffer (**Table 3.3**). The wetland mitigation area must be protected and remain a wetland in perpetuity. The wetland mitigation site is included on **Figure 3.2** and is illustrated on the Land Use Limitations Map in **Appendix D**.

**Table 3.3 Camp Perry Wetland Mitigation Site**

Permit Number	Permit Date	Mitigation Description
USACE Application No. 2006-00119(0), Nationwide Permit No. (14) as Published in the Federal Register, Volume 67, No. 10, on Tuesday January 15, 2002	15 Feb. 2006	Authorization to fill 0.35 acres of wetland under NWP #14 to construct a road on Viale Range.  Mitigation: Construction of the 0.86 acres began in 2006. Due to poor performance and failure to meet the mitigation goals another 0.294 acres was constructed in November 2008. Total constructed wetland acreage is 1.124 acres and the total mitigation acreage with the 25' buffer is 1.9 acres. The mitigation developed poorly and with extensive invasive species. The USACE expressed verbal acceptance.

### 3.6.5 Groundwater

Groundwater in this region is supplied by two aquifer systems: a surficial unconsolidated aquifer and the deeper Silurian-Devonian aquifer. Neither aquifer is designated a sole source aquifer by the USEPA. In Ottawa County, the surficial aquifer lies within approximately 8 to 15 meters (25 to 50 feet) below the ground surface level (Burgess & Niple, undated). Well yields within the CPJTC are between 25 to 100 gallons per minute in the uppermost bedrock aquifers and less than 5 gallons per minute in the unconsolidated aquifer (ODNR, 2000).

Groundwater in the surficial aquifer is typically hard with high iron concentration. Within freshwater portions of the Silurian-Devonian aquifer, the water is hard and typically has large concentrations of dissolved solids, iron, and sulfate that exceed the secondary maximum contaminant levels established by the USEPA. The surficial aquifer replenishes this aquifer (Lloyd & Lyke, 1995).

Groundwater sampling was attempted during a preliminary site investigation of two waste disposal sites at the CPJTC. Site 1 was located along the Lake Erie shoreline. No visible contamination was observed and monitoring with a photoionization detector (PID) did not indicate the presence of contaminants. No groundwater was encountered in the 13 borings, ranging in depths of 4 to 30 feet below the ground surface (Science Applications International Corporation [SAIC], 2004). Site 2 was in the southwestern portion of Camp Perry and groundwater was sampled in association with landfill clean-up operation. Groundwater was detected at less than 5 feet below the ground surface. Samples were analyzed for general water quality parameters, volatile organics (VOCs), semi-volatile organics (SVOCs), and target analyte list (TAL) metals. Benzene (0.006 milligrams per liter) and toluene (0.0031 milligrams per liter) were detected and are site related. Benzene was slightly above the National Primary Drinking Water Standards Maximum Contaminant Level (0.005 milligrams per liter). Seventeen SVOCs were detected that were mostly polycyclic aromatic hydrocarbons (PAHs). PAHs are commonly associated with used oils, tars, asphalt, and ash. All SVOCs were detected at low levels (0.61 to 23 micrograms per liter). Groundwater samples were relatively turbid with high levels of total metals and low levels of dissolved metals in the samples (SAIC, 2004). Site 2 was delineated and cleaned up. Further discussion of Hazardous and Toxic Material/Wastes can be found in Section 3.13.

## 3.7 Biological Resources

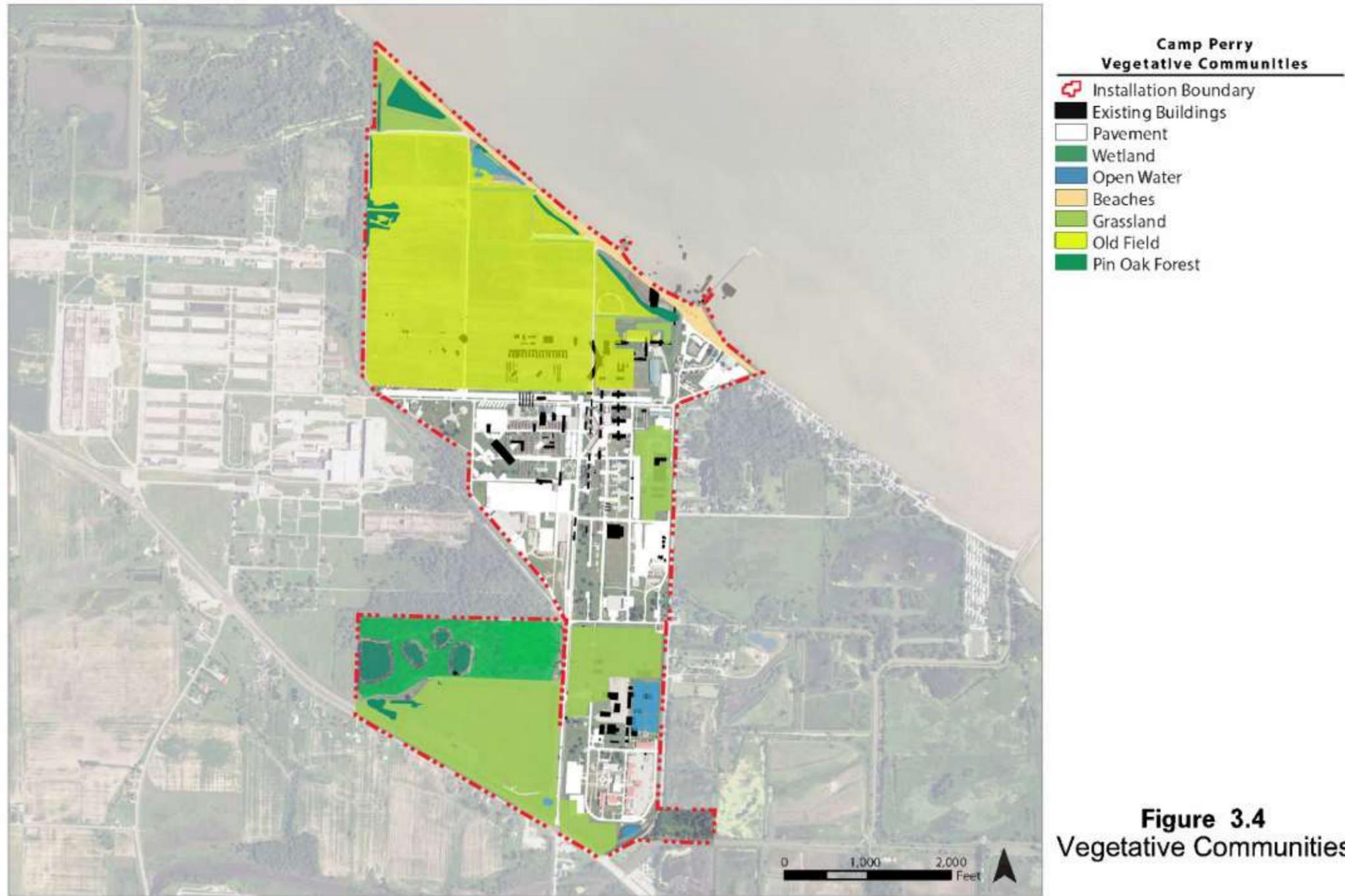
The CPJTC is not required to have an Integrated Natural Resource Management Plan (INRMP), but biological planning level surveys were conducted and a draft INRMP was developed in 2007 (OHARNG, 2007). This section provides an overview of the findings and data in the INRMP and natural resources planning level surveys for CPJTC. An overview and SWOT analysis of environmental constraints can also be found within the RPMP ADP and Vision Plan. Biological resources include flora, fauna, and terrestrial and aquatic habitats. Existing and site-specific information on flora and fauna species and habitat types at CPJTC was reviewed.

### 3.7.1 Vegetation

Natural vegetation communities at Camp Perry include Pin Oak Forested Wetlands, Emergent Wetland, Old-field, and Beach. These areas comprise approximately 25 hectares (63 acres), or 11%, of the CPJTC. Approximately 124 hectares (310 acres), or 54%, of CPJTC consist of open water and maintained grasslands and range areas. The remaining land (approximately 35%) at the CPJTC is not dominated by vegetation and includes areas previously developed or disturbed through the emplacement of structures, roads, and other development (**Figure 3.4**).

Section 3.0

Affected Environment



**Figure 3.4**  
Vegetative Communities

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During the 2006 vascular plant survey, 297 species were observed on CPJTC. Approximately 61% of these species were native. Of the non-native species, 17 were listed on the Ohio invasive species list. Of greatest concern is the invasion of purple loosestrife (*Lythrum salicaria*) and common reed (*Phragmites australis*) into the largest wetland in the northwestern corner of the property. Two state potentially-threatened species were observed along the Lake Erie shoreline at CPJTC: seaside-spurge (*Euphorbia polygonifolia*) and sea rocket (*Cakile edentula*). No species from the Federal noxious species list were found at CPJTC (BHE, 2006b).

### 3.7.2 Fish and Wildlife

The CPJTC is in a region containing an abundance of waterbodies including Lake Erie. The southern shore of Lake Erie near the CPJTC and its associated wetland systems provide essential habitat to waterfowl, stop over and resting sites for neotropical migratory birds, shorebirds, passerines, and raptors. Lake Erie marshes in the area include the ONWR, Metzger and Magee Marsh State Wildlife Areas, Crane Creek State Park, and various privately-owned wetland areas (USFWS, 2000).

A faunal planning level survey was conducted on CPJTC during the spring, summer, and fall of 2005. A total of 14 species of mammals, ten species of amphibians and reptiles, 29 species of Odonata (an order of insects encompassing dragonflies and damselflies), 11 species of fish, and 114 avian species were observed at CPJTC. Of the avian species, 62 summered and nested or attempted to nest at CPJTC (BHE, 2006c).

Northwestern Ohio calls itself “the warbler capital of the world” due to remarkably high migratory activity of songbirds, but also sparrows, shorebirds, and waterfowl. This led to the establishment of an annual spring festival titled “The Biggest Week in American Birding” (Birding in Ohio, 2018). Camp Perry is within this migratory area, especially its lakeside frontage.

A total of 114 bird species were observed at the CPJTC. Of these, 62 summered and nested or attempted to nest on the installation. Numerous migrant birds also use the CPJTC as a stopover on their way to and from breeding areas. CPJTC is located adjacent to the Ottawa National Wildlife Refuge, which is known for its high diversity of birds, particularly during spring migration. The ONWR Complex, which also includes the Cedar Point and West Sister Island National Wildlife Refuges, lists 273 species of birds as regular visitors and another 49 species as “accidentals” (USFWS, 2000). Long-distance migrant shorebirds were observed during both spring and fall migrations. Highly notable was the unexpected sighting of a Hudsonian godwit (*Limosa haemastica*) in 2005. Herring gulls (*Larus argentatus*) nested in the rocky areas along the northern perimeter of the installation. Also notable was the summer occurrence of the Eurasian gull species, lesser black-backed gull (*Larus fuscus*). This species is a regular winter visitor to Lake Erie, but summer occurrences are rare. The aquatic habitats on CPJTC provide foraging sites for a variety of waders and waterfowl.

Bat mist net and acoustic surveys were conducted by the ANG at Camp Perry during the summer of 2011. Surveys were conducted 7-8 June 2011 and 25-26 August 2011 within the woodlot on the CPJTC and immediately to the east of CPJTC. One northern long-eared bat (*Myotis septentrionalis*), one big brown bat (*Eptesicus fuscus*), 11 Eastern red bats (*Lasiurus borealis*), and three little brown bats (*Myotis lucifugus*) were captured. Although no evening bats (*Nycticeius humeralis*) were captured, they were recorded acoustically within the area. Neither the northern long-eared bat, nor the Indiana bat (*Myotis sodalis*) were recorded acoustically during the surveys.

**3.7.3 Threatened and Endangered Species**

**3.7.3.1 Federally-listed Species and Species of Concern**

According to the USFWS, the species listed in **Table 3.4** are Federally listed and have ranges that include all or a portion of Camp Perry. Of the listed species, four have been observed at CPJTC, the northern long eared bat, Kirtland’s warbler (*Setophaga kirtlandii*), rufa red knot (*Calidris canutus rufa*), and piping plover (*Charadrius melodus*).

The Camp Perry woodlot and adjacent areas are suitable summer, roost, and foraging habitat for both the Indiana bat and northern long-eared bat. No suitable bat winter habitat, such as caves or rock outcroppings, is located at Camp Perry. One northern long-eared bat was captured during the 2011 mist net and acoustic surveys at Camp Perry. The Indiana bat has never been captured at Camp Perry and neither species has been recorded during acoustic surveying.

The Kirtland’s warbler, rufa red knot, and piping plover have each been documented using the lake shore as a stopover location during migration, but do not nest at Camp Perry due to lack of appropriate habitat. No other listed threatened or endangered species or the Lake Erie water snake have been observed at Camp Perry.

**Table 3.4 Federally-Listed Species with Ranges that Include CPJTC**

Common Name	Scientific Name	Federal Status
Bald eagle	<i>Haliaeetus leucocephalus</i>	Species of concern
Indiana bat	<i>Myotis sodalis</i>	Endangered
Northern long-eared bat	<i>Myotis septentrionalis</i>	Threatened
Piping plover	<i>Charadrius melodus</i>	Endangered
Kirtland's warbler*	<i>Setophaga kirtlandii</i>	Endangered
Rufa red knot	<i>Calidris canutus rufa</i>	Threatened
Eastern massasauga	<i>Sistrurus catenatus</i>	Threatened
Eastern prairie fringed orchid	<i>Platanthera leucophaea</i>	Threatened
Lakeside daisy	<i>Hymenoxys herbacea</i>	Threatened
Lake Erie water snake	<i>Nerodia sipedon insularum</i>	Species of concern

Source: USFWS (2018) \*Note: Kirtland’s warbler was delisted in October 2019 and is now in recovery.

The USFWS delisted the bald eagle (*Haliaeetus leucocephalus*) from the Endangered Species Act in 2007; however, it is still protected by the Bald and Golden Eagle Protection Act. A bald eagle pair has resided in the CPJTC woodlot since 1995. The nest remains, and the eagles are very tolerant of noise (for example, the nest is right next to a shooting range) and vehicle activity.

It is normal operating procedure to conduct Endangered Species Act (ESA) Section 7 reviews and coordinate with the USFWS on projects throughout the year. The OHARNG will conduct project specific Section 7 reviews and consult with USFWS as RPMP related projects are developed and implemented. Once project-specific details are known, CPJTC will conduct further site-specific analysis, including any additional surveys for Federally listed species, if

needed. CPJTC will also consult with USFWS, as needed, once projects are proposed for implementation.

**3.7.3.2 State-listed Species Present at Camp Perry**

**Table 3.5** lists all 14 current Ohio State-listed species which have been officially documented as present at Camp Perry. This listed was updated on 21 February 2019 using the most current Ohio rare species list provided by the ODNR. The 14 State-listed species which were observed during previous installation-wide surveys includes four bats, eight birds, one plant, and one snake. Though still nesting in the woodlot at Camp Perry, the bald eagle is no longer among the species included due to its successful recovery and wide abundance. As noted above, in 2007, the bald eagle was removed from the Endangered Species Act even though it remains protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act.

**Table 3.5 State-Listed Species Present at Camp Perry**

Common Name	Scientific Name	State Status
Northern long-eared bat	<i>Myotis septentrionalis</i>	Threatened
Big brown bat	<i>Eptesicus fuscus</i>	Species of Concern
Eastern red bat	<i>Lasiurus borealis</i>	Species of Concern
Little brown bat	<i>Myotis lucifugus</i>	Species of Concern
Bobolink	<i>Dolichonyx oryzivorus</i>	Species of Concern
Cattle egret	<i>Bubulcus ibis</i>	Endangered
Dark-eyed junco	<i>Junco hyemalis</i>	Special Interest
Golden-crowned kinglet	<i>Regulus satrapa</i>	Special Interest
Great egret	<i>Ardea albo</i>	Species of Concern
Common tern	<i>Sterna hirundo</i>	Endangered
Yellow-bellied sapsucker	<i>Sphyrapicus varius</i>	Special Interest
Red-headed woodpecker	<i>Melanerpes erythrocephalus</i>	Species of Concern
Seaside spurge	<i>Euphorbia polygonifolia</i>	Potentially Threatened
Melanistic eastern garter snake	<i>Thamnophis sirtalis sirtalis</i>	Species of Concern
Source: CPJTC INRMP (2007) & CPJTC Bat Survey (2011)		

**3.8 Cultural Resources**

Cultural resources are historic properties as defined by the National Historic Preservation Act (NHPA) at 54 USC 300101 et seq.; cultural items as defined by the Native American Graves Protection and Repatriation Act (NAGPRA); archaeological resources as defined by the Archaeological Resources Protection Act (ARPA); sacred sites as defined by EO 13007 to which access is afforded under the American Indian Religious Freedom Act (AIRFA); and collections and associated records as defined by 36 CFR 79. NEPA requires consideration of “important historic, cultural, and natural aspects of our natural heritage.” Consideration of cultural resources under NEPA includes the necessity to independently comply with the applicable procedures and requirements of other Federal and State laws, regulations, EOs, presidential memoranda, and ARNG guidance.

Section 106 (54 USC §306108) of the NHPA requires that for any Federal undertaking, prior to the approval of the expenditure of any Federal funds on that undertaking, the effect of the undertaking on any district, site, building, structure or object that is included in or eligible for inclusion in the National Register of Historic Places (NRHP) must be considered. Compliance under Section 106 of the NHPA requires consultation with the State Historic Preservation Office (SHPO), local governments, associated Federal agencies, Federally-recognized Native American tribes, and the interested public, as appropriate (see **Appendix A** for consultation letters).

The Department of Defense Instruction 4710.02 *DoD Interactions with Federally Recognized Tribes* (DoDI 4710.02) provides guidance for interacting and working with Federally recognized American Indian and Alaska Native governments or tribes. This Instruction implements Annotated DoD American Indian and Alaska Native Policy (27 Oct 99), which governs compliance with EO 13175 (Consultation and Coordination with Indian Tribal Governments) and Presidential Memoranda for Heads of Executive Departments and Agencies on Government-to-Government Relations with Native American Tribal Governments (29 April 1994). The DoD policy outlines DoD trust obligations, communication procedures with tribes on a government-to-government basis, consultation protocols, and actions to recognize and respect the significance tribes ascribe to certain natural resources and properties of traditional cultural or religious importance. The policy requires consultation with Federally recognized tribes for proposed activities that could significantly affect tribal resources or interests.

Department of Defense Instruction 4715.16 regarding Cultural Resources Management and Army Regulation (AR) 200-1 *Environmental Protection and Enhancement* require installations to develop an Integrated Cultural Resources Management Plan for Installations of the Ohio National Guard as an internal compliance and management tool that integrates the entirety of the cultural resources program with ongoing mission activities. The ICRMP is an internal ARNG compliance and management plan that integrates the entirety of the State's cultural resources program requirements with ongoing mission activities. It also allows for ready identification of potential conflicts between the OHARNG mission and cultural resources and identifies compliance actions necessary to maintain the availability of mission-essential properties and acreage. The ICRMP is reviewed annually and updated every 5 years as needed (OHARNG, 2018).

According to the Updated Integrated Cultural Resources Management Plan (ICRMP) for Installations of the Ohio Army National Guard (fiscal years 2018 – 2022), CPJTC has had extensive cultural resources surveys and evaluations completed in 1993, 2000, 2008, 2011, and 2016. The entirety of Camp Perry has been surveyed for archaeological resources and all structures 50 years and older have been evaluated. Additional structures will be evaluated in the future as they reach 50 years of age (**Figure 3.5**).

The affected environment for cultural resources is identified through the determination of the area of potential effect (APE). The APE is defined by 36 CFR Part 800.16 as the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of a historic property, if any such properties exist. For purposes of the CPJTC RPMP the entire facility is the APE.

### **3.8.1 Historic Properties**

The Camp Perry Historic District is eligible for the NRHP under Criteria A (the area has contributed to the major pattern of American history) and C (the characteristics of the buildings have great artistic value or are the work of a master) for its significance in several discrete areas of military history from 1906 to 1946. An intensive-level architectural survey and evaluation of

structures 40 years and older was conducted at CPJTC resulting in the recommendation that CPJTC is eligible for listing in the NRHP as a historic district.

Contributing elements within the district include nine individual structures, four sites (firing ranges), and corridors along Niagara and Lawrence roads comprised of brick lamp posts, street trees, and railroad tracks. The nine structures include Building #1 – Administration Building (OTT-00918–04), Building #2 – Hough Auditorium (OTT-00917–04), Building #3 – Post Exchange (OTT-01066–04), Building #492 – Water Treatment Plant (OTT-00960–04), Building #1003 – Post Chapel (OTT-01078–04), Building #2009 – Quartermaster Storehouse (OTT-00946–04), Building #2513 – Post Warehouse (OTT-01086–04), Building #5023 – West Gatehouse (OTT-00937-04), Building #5024 – East Gatehouse (OTT-00936-04), and corridors along Niagara and Lawrence Roads comprised of brick lamp posts, street trees, and along Niagara, railroad tracks. (**Figure 3.5**).

In addition to the above-mentioned contributing elements, a block of nine WWII-era hutments is being preserved. Preservation of this block of hutments are part of the mitigation measures identified in a *Memorandum of Agreement Among the National Guard Bureau, the Ohio Army National Guard, and The Ohio Historic Preservation Office for the Camp Perry Barracks Construction Project, 2009*. The hutment numbers are KK2, KK3, KK4, LL2, LL3, LL4, MM2, MM3, and MM4. The RPMP Installation Planning Standards state that the preservation of historically and culturally significant structures adds to the Installation's character and provides a sense of heritage. Additional information regarding historic and culturally significant structures is available in the RPMP ADP, Development Plan, Installation Planning Standards, and Vision Plan.

### **3.8.2 Archaeological Resources**

A Phase I archaeological survey was completed in 2005 at CPJTC that encompassed the entire facility. Two archaeological sites were identified during the survey containing late 19<sup>th</sup> to mid-20<sup>th</sup> century building foundations. Neither of these sites are eligible for the NRHP and no further archaeological work is recommended at Camp Perry (OHPO serial number 1001678). There are no known sacred sites and/or traditional cultural properties, which may be part of a larger cultural landscape. There are also no known cemeteries at Camp Perry.

#### ***Native American Consultation***

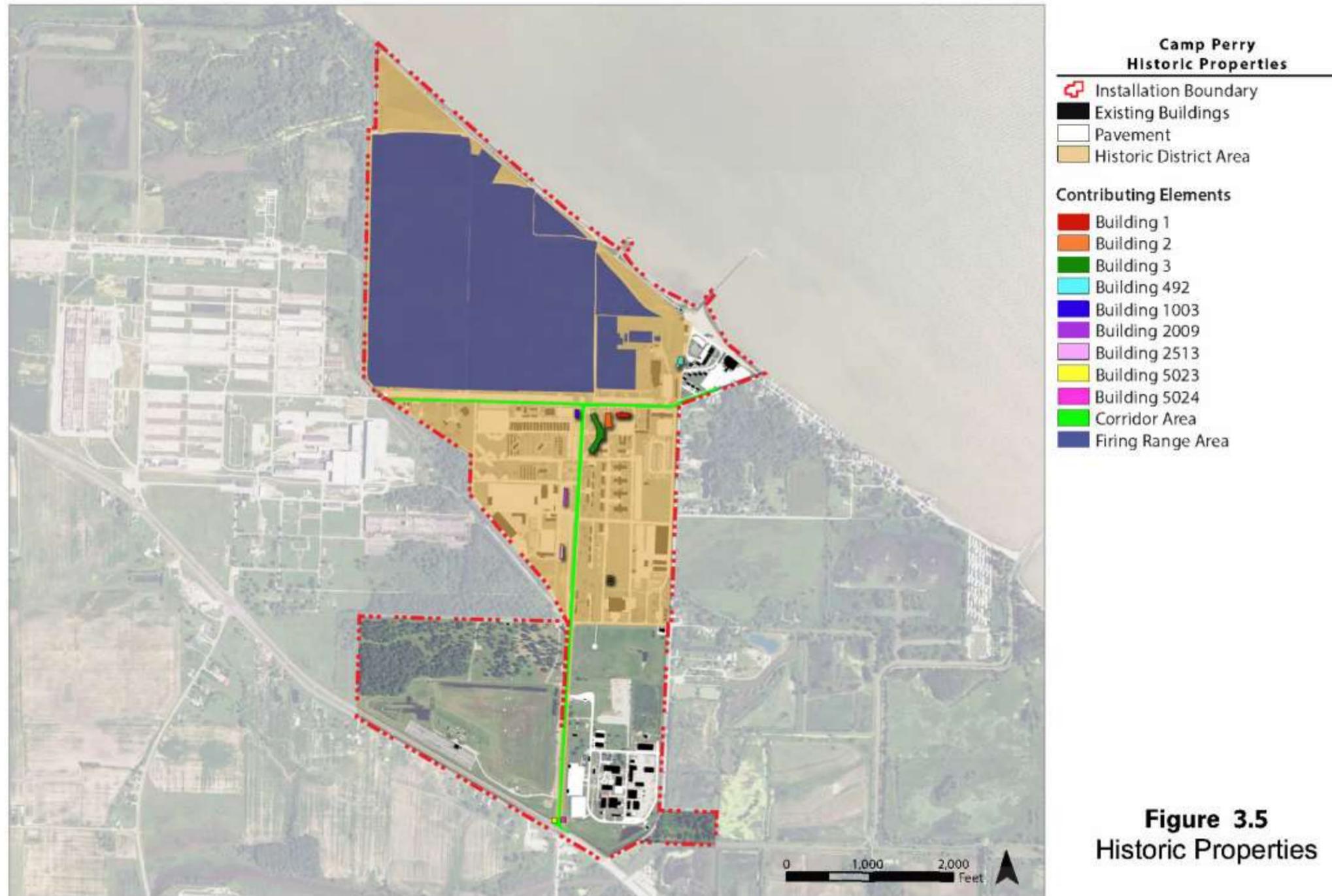
Fourteen Native American groups were identified as having possible ancestral ties to the CPJTC area. These groups include the Cayuga, Chippewa, Delaware, Kickapoo, Mohawk, Oneida, Onondaga, Ottawa, Potawatomi, Sac & Fox, Seneca, Shawnee, Tuscarora, and Wyandotte. These groups were identified based on the OHARNG ICRMP, consultation, personal correspondence, and research by the OHARNG Cultural Resources Manager. From the 14 identified groups, 46 Federally recognized Native American tribes were consulted with by the OHARNG regarding the RPMP at CPJTC.

The consultation was conducted as required under (DoD) Instruction 4710.02, which implements Annotated DoD American Indian and Alaska Native Policy, AR 200-1; NEPA; the NHPA; and the Native American Graves Protection and Repatriation Act (NAGPRA). Tribes were invited to participate in the EA and NHPA Section 106 process as Sovereign Nations per EO 13175. Consultation letters were sent on January 4, 2018. A list of the tribes invited to consult is provided in **Appendix A**. All correspondence was conducted by certified letters. A Memorandum for Record (MFR) on Native American Consultation regarding the RPMP EA for CPJTC summarizes the consultation efforts by the OHARNG (**Appendix A**). Tribal coordination resulted in two responses. The Forest County Potawatomi requested a copy of the CPJTC

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**Section 3.0**

**Affected Environment**



**Figure 3.5**  
Historic Properties

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archaeological survey report completed in 2005. After reviewing the report, they have no objection to the Proposed Action but did request to be contacted in the event of an inadvertent discovery. The Red Cliff Tribe responded with an updated point of contact for their Chairperson.

Although there are no known properties that Federally recognized tribes attach religious or cultural significance to at CPJTC, the OHARNG will follow *Procedures for Inadvertent Discovery of Cultural Materials at Camp Perry Joint Training Center* in the event of an inadvertent discovery of human remains or funerary items during any future projects or training events.

Once future project-specific details are known, the OHARNG will consult with the SHPO on potential effects to historic resources, as needed.

### **3.9 Socioeconomics**

Socioeconomics describes a community by examining its social and economic characteristics. Several demographic variables are analyzed to characterize the community, including population size, the means and amount of employment, and income creation. In addition, socioeconomics analyzes the fiscal condition of local government and the allocation of the assets of the community, such as its schools, housing, public services, and healthcare facilities. Data used in preparing this section was collected from the 1990, 2000, 2010, and 2017 U.S. Census and Ohio Department of Job and Family Services (ODJFS).

The State of Ohio and Ottawa County increased in population by approximately 1.6% and 1.1%, respectively, between 2000 and 2010 while the U.S. increased in population by 9.7%. However, the City of Port Clinton's population decreased by 5.5% between 2000 (6,391) and 2010 (6,056). The CPJTC is located 3.2 kilometers (2 miles) west of Port Clinton, Ohio.

The labor force in 2010 was 21,581 in Ottawa County and 3,166 in the City of Port Clinton. The top five industry types in the region are: (1) manufacturing (18.6%); (2) educational, health, and social services (16.9%); (3) art, entertainment, recreation, accommodation, and food service (16.1%); (4) retail trade (11.4%); and construction (7.7%). These industries employ 70.7% of the civilian labor force in the Port Clinton area.

Per capita and median household income statistics from the 2010 U.S. Census indicate that Ottawa County is slightly higher than the state average, while the City of Port Clinton is lower than both the County and State. Poverty levels are similar between the County and City and are both lower than the State. The U.S. unemployment rate in February 2012 was 8.7%. Ottawa County had an unemployment rate of 14.3%, which is the 3rd highest in Ohio (88 counties total). The overall state unemployment rate is 8.5%. Owner occupancy rates and median home values in Ottawa County are slightly higher than the State of Ohio or Port Clinton. However, approximately 35.2% of the housing units in the County are unoccupied in comparison with 10.9% in the State and 24.0% in the City of Port Clinton.

Several primary education facilities are located within 6.4 to 8 kilometers (4 to 5 miles) of the CPJTC in the town of Port Clinton. Schools in the vicinity include one high school, one middle school, two elementary schools, and one private school. Seven universities are located within 80 kilometers (50 miles) of the CPJTC.

Commercial shops and services are available in the City of Port Clinton, located 7.5 kilometers (4.7 miles) to the east of Camp Perry. Commercial areas within the vicinity of the CPJTC are located along SR 2 and Lake Erie. Most of the area in the near vicinity of the CPJTC is devoted to marinas, campgrounds, and recreational activities. Lake Erie forms the entire northern CPJTC border. Recreational uses are important to the State and regional economy, and the

Lake Erie walleye fishery is known worldwide. Lake Erie's waters are also used for shipping, manufacturing, and power production.

Along the southern edge of Lake Erie lies the Ottawa National Wildlife Refuge Complex in Fremont, Ohio. The ONWR has been designated as a site of regional significance in the Western Hemisphere Shorebird Reserve Network and was voted as one of the top places to observe birds. The ONWR provides a place for the public to hike, fish, hunt, and observe wildlife.

The Ohio State Highway Patrol is the primary law enforcement agency; however, based on a mutual aid agreement the County Sheriff and the Port Clinton, authorities can also provide law enforcement. Erie Township Volunteer Fire Department provides fire and emergency medical services based on a 15-year agreement. The CPJTC staff conducts occasional patrols, observing on-site activities, and notifies the appropriate Federal, State, or local law enforcement agency when enforcement services are needed.

The H.B. Magruder Memorial Hospital located approximately 8 kilometers (5 miles) east in Port Clinton is the nearest hospital for residents and OHARNG personnel. Other hospitals within 24 kilometers (15 miles) of the CPJTC include the Firelands Regional Medical Center-Main Campus and Firelands Regional Medical Center-South Campus in Sandusky, Ohio and Memorial Hospital in Fremont, Ohio.

### **3.10 Environmental Justice**

Consistent with Executive Order 12898 (February 11, 1994), environmental justice reviews involve identification of offsite environmental impacts, their geographic locations, minority and low-income populations that may be affected, community health, the significance of such effects, and whether they are disproportionately high and adverse compared to the population within the geographic area. Demographic information on ethnicity, race, and economic status is provided in this section as the baseline against which potential environmental justice effects could be identified and analyzed. This approach is consistent with the USEPA objectives concerning environmental justice, which include "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies" (USEPA, 2012).

The Council on Environmental Quality defines minority populations in affected areas as "either a) the minority population of the affected area exceeds 50% or b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis" (CEQ, 1997). A minority population also exists "if there is more than one minority group present at the minority stated thresholds" (CEQ, 1997). The Census Bureau defines a "poverty area" as a census tract (or another appropriate geographic census area) where 20% or more of the residents have incomes below the poverty threshold, and an "extreme poverty area" as one with 40% or more below the poverty level.

The Census Bureau defines a "poverty area" as a census tract (or another appropriate geographic census area) where 20% or more of the residents have incomes below the poverty threshold, and an "extreme poverty area" as one with 40% or more below the poverty level. The potential for low-income and minority population groups near CPJTC was evaluated based on screening level information available from public resources such as the Census and the USEPA's EJView environmental justice online database and associated tools. In 2017, Port Clinton's poverty rate was 16.8% and Ottawa County's poverty rate was 10.8%. The State of

Ohio's poverty rate was 14.9%. The percentage of minority populations of the United States, Ohio, Ottawa County, Port Clinton, and within a 1.6-km (10-mile) radius of CPJTC are 25.6%, 19.3%, 4.0%, 14.0%, and 5.0%, respectively. Neither Port Clinton nor Ottawa County meets the definition of a poverty area nor is there an indication of minority populations near CPJTC (U.S. Census Bureau, 2017).

No minority or low-income population groups were identified, both on an aggregate and individual level, within the CPJTC vicinity. Additionally, no known subsistence level hunting, fishing, or trapping occurs at CPJTC. The absence of minority or low-income populations, and the general absence of children from an active military training site further reduces the potential for impacts.

### **3.11 Utilities**

The infrastructure systems addressed in this analysis include the utilities (water, wastewater, solid waste, electrical and natural gas or other fuel sources, and communication services). Information regarding utilities and infrastructure systems is also available in the RPMP ADP, Development Plan, Installation Planning Standards, Plan Summary, and Vision Plan.

The CPJTC obtains its potable water supply from the Ottawa County water system. The CPJTC is connected to the Port Clinton sanitary sewer system. Browning, Ferris Inc. provides solid waste disposal. Columbia Gas and Ohio Edison provide gas and electric, respectively. The OHARNG is in the process of upgrading the electrical and water distribution systems and have installed a solar photovoltaic field just north of SR 2. Verizon supplies telecommunication services. The telecommunications system was upgraded in 1998 with a new phone switch, new wiring, and the installation of fiber optic cable to select buildings. Wi-Fi is limited to a few buildings at Camp Perry and expansion is needed to better support TADSS. There are no capacity issues with any utilities.

### **3.12 Infrastructure (Transportation and Traffic)**

Access to the site is relatively poor because most roads near the CPJTC are narrow county roads, except for some portions of SR 2. SR 2 and County Road 171 border the southern and eastern portions of the CPJTC, respectively.

Traffic circulation along the narrow two-lane roads within the CPJTC property is adequate to very good during most of the year. Niagara Road is the main paved roadway into the CPJTC and runs north-south through the center of the property. Lawrence Road is the main paved road that runs east-west within the ARNG property. Gravel roadbeds exist throughout the main weapons qualification range on the northern end of the property. Dirt trails exist within and outside the woodlot area. All major roads within the ARNG facility are paved.

The closest airport is the Erie-Ottawa International Airport at Carl R. Keller Field, Ohio, approximately 14 kilometers (8 miles) east of CPJTC. While no aircraft are stationed at CPJTC, helicopters do utilize the open field area south of the Cantonment Area a few times a month.

A railroad track runs through the center of the CPJTC to the west of Niagara Road. A Lakeshore and Michigan Southern (LS&MS) freight station was, but is no longer, located inside the CPJTC facility. Information regarding infrastructure networks is also available in the RPMP ADP, Development Plan, Installation Planning Standards, Plan Summary, and Vision Plan.

**3.13 Hazardous and Toxic Materials/Wastes**

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (through either physical or chemical reactions) to human health or the environment. Regulated hazardous substances and petroleum products are identified through many Federal laws and regulations. The most comprehensive list is contained in 40 CFR 302, and identifies quantities of these substances that, when released to the environment, require notification to a Federal government agency. Hazardous wastes, defined in 40 CFR 261.3, are considered hazardous substances. Generally, hazardous wastes are discarded materials (solids or liquids) not otherwise excluded by 40 CFR 261.4 that exhibit a hazardous characteristic (e.g., ignitable, corrosive, reactive, or toxic), or are specifically identified within 40 CFR 261. Petroleum products are specifically exempted from 40 CFR 302, but some are also generally considered hazardous substances due to their physical characteristics (especially fuel products), and their ability to impair natural resources. Once waste materials are identified as being hazardous the waste must be managed in accordance with 40 CFR Parts 262 – 264. These standards outline the requirements for storage, transport, disposal, and associated manifesting for differing types of waste (USEPA, 2015d). Army installations also address environmental issues in their own regulatory document (AR 200-1).

The OHARNG maintains a statewide Integrated Pest Management Plan (IPMP) (OHARNG, 2005), Hazardous Materials & Waste Management Plan (HMWMP) (OHARNG, 2016), Pollution Prevention (P2) Plan, and a CPJTC Spill Prevention, Control, and Countermeasure Plan (SPCCP) (OHARNG, 2017). The IPMP Plan describes the OHARNG pest management requirements, outlines the resources necessary for surveillance and control, and describes the administrative, safety, and environmental requirements of the program. The HMWMP is required by AR 200-1 to ensure compliance with applicable military, Federal, State and local rules and regulations pertaining to HTMW. The purpose of the P2 Plan is to prevent, whenever possible, releases of pollutants to the land, air, and water by means of source reduction or elimination. The purpose of the SPCCP is to identify potential spill sources and specify inspection requirements, spill prevention practices, and spill response requirements in the event of a release.

Hazardous waste at Camp Perry is managed by Facilities Maintenance Shop #17 (FMS#17). FMS#17 is classified as a Conditionally Exempt Small Quantity Generator, generating fewer than 220 pounds of hazardous waste per month. Hazardous waste is managed in accordance with the OHARNG HMWMP. Diesel fuel accounts for most of the hazardous material used at the CPJTC, followed by other petroleum, oil, and lubricant products. Most of the hazardous waste consists of fluorescent light bulbs, aerosol cans, batteries, filters, and paint. Used oil, antifreeze, lead acid batteries, and off-spec fuel are recycled. A laundered rag service is used. No bulk solvents are used.

The paint used on some of the buildings at Camp Perry may contain lead and possibly polychlorinated biphenyls (PCBs). Fluorescent bulbs in these buildings, if removed, would be classified as universal waste (a type of hazardous waste). Old fluorescent light ballasts may contain PCBs. Asbestos-containing materials (ACM), including but not limited to, transite siding, asbestos roof shingles, floor tiles, and window glazing are likely present due to the age of some of the structures at Camp Perry.

The USEPA Radon Zone for Ottawa County is Zone 2. The average indoor radon level of Zone 2 is between 2 and 4 pico-Curies per liter (pCi/L). Radon testing is typically recommended prior to any building construction in Zone 2 areas.

There is no Installation Restoration Program or Military Munitions Response Program at Camp Perry. There was an investigation of two suspected waste disposal sites in 2006. One site (Site #2, the Orphan Dump Site) was confirmed and subsequently in 2007-2008 ACM and other building debris waste and associated chemical contamination were excavated and properly disposed of offsite. The Orphan Dump Site was over excavated to ensure all material was removed and the site suitable to support military training. Due to the presence of a small piece of transite in one of the confirmation samples, there is a requirement for an asbestos abatement specialist to be on site if any digging is done at the Orphan Dump Site. See Section 3.6.4 for a description of groundwater associated with these sites. All known underground storage tanks (USTs) have been removed from the site (OHARNG, 1998).

There are three Military Munitions Response Program sites near Camp Perry that are identified as Joint Force Headquarters OHARNG sites in the OHARNG Installation Action Plan. These sites are managed by the USACE and Army National Guard Bureau. All three sites are associated with past munitions operations at the former Erie Army Depot, which abuts Camp Perry to the west. Large caliber munitions were fired into Lake Erie and onto West Sister Island in the early to mid-1900. Historic munitions periodically wash ashore and are on the island. The Munitions Response Sites include the nearby non-residential shoreline, the residential shoreline, and West Sister Island. The OHARNG and Camp Perry have no role in the cleanup other than providing access to the Camp Perry portion of the Lake Erie shoreline and facilitating onsite meetings for those managing the cleanup as requested. The cleanup and MRSs have not negatively impacted the OHARNG mission. Information regarding hazardous materials, infrastructure systems, and environmental restoration is also available in the RPMP ADP, Development Plan, and Vision Plan.

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### 4.1 Introduction

This section evaluates the potential environmental, cultural, and socioeconomic effects of the alternatives in accordance with NEPA, CEQ regulations, 32 CFR Part 651, and the 2011 Army National Guard NEPA Handbook. It identifies the direct, indirect, and cumulative impacts, both short-term and long-term, of the Proposed Action and No Action Alternative on each of the resource areas described in the EA's Affected Environment section and informs decision makers and the public on potential environmental consequences.

Under NEPA, the analysis of environmental conditions only addresses those areas, or Region of Influence (ROI), and environmental resources with the potential to be affected by the Proposed Action or alternative. Locations and resources with no potential to be affected are not analyzed. The ROI may vary by resource. The Army's NEPA regulation (32 CFR Part 651) calls for the environmental analysis to be proportionate to the nature and scope of the action, the complexity and level of anticipated effects on important resources, and the capacity of Army decisions to influence those effects in a productive, meaningful way from the standpoint of environmental quality.

This section also provides information on BMPs and proposed mitigation measures for each resource area, if appropriate. Per the 2011 Army National Guard NEPA Handbook, BMPs are "practical, economical, and effective management or control practices that reduce or prevent pollution or other adverse effects to environmental resources." They are not project specific and are intended to manage *minor* adverse effects. The NEPA Handbook defines mitigation measures as "project-specific, unique requirements designed and implemented to lower potentially significant adverse impacts."

### 4.2 Land Use

The significance of land use impacts is based on whether the type of actions associated with the Proposed Action conflict with established land uses in the area, disrupts or divides established land use configurations, represents a substantial change in existing land uses, or are inconsistent with adopted land use plans. Information regarding land use can also be found within the RPMP ADP, Development Program, Installation Planning Standards, and Vision Plan.

#### 4.2.1 Proposed Action Alternative

This RPMP provides the Adjutant General with a strategy to meet the challenges of operating under changing conditions. Development of the RPMP was a collaborative effort between the OHARNG leadership, training community, facilities management, range operations, and the environmental office. Development and land use will be consistent with existing land use. Under the Proposed Action, there would be no adverse impacts to land use within or near Camp Perry. The Proposed Action would result in long-term beneficial impacts on the efficient and effective use of land at Camp Perry to meet the OHARNG's mission. Under-utilized structures or those determined to be in poor condition would be demolished or repurposed for more efficient and effective land use. Furthermore, the construction of new buildings, training facilities, MWR facilities, and infrastructure will be centered on existing or similar land use to the extent practicable. The Proposed Action would be consistent with established land uses in the area, would not disrupt or divide established land use configurations, represent a substantial change in existing land uses, be inconsistent with adopted land use plans, and adhere to building standards established in the Installation Planning Standards element of the RPMP. The RPMP is based on the unique current conditions, mission capabilities, land use capabilities, and

mission needs at Camp Perry. During planning and design for each of the elements and actions within the RPMP, the OHARNG would follow the Area Development Plans; Installation Planning Standards; and land use capabilities and limitations associated with the IRP, operational ranges, existing training venues, cultural resources, natural resources, noise, and other applicable land use capabilities and limitations as discussed in Planning Goals 2 and 3 of the ADP and RPMP Vision Plan.

By following the guidelines and plans developed as part of the RPMP, land use at Camp Perry would:

- Be compatible with existing land use by maintaining current land use where possible and preserving historical heritage through collaboration with the SHPO. Improvements to Camp Perry will be thoughtfully designed to repurpose land for similar usage, while anticipating future needs and preserving land for future development as discussed in the ADP, Installation Planning Standards, and Vision Plan.
- Allow for more efficient use of currently developed areas by repurposing under-utilized areas, demolishing or renovating deficient buildings, reconfiguring or expanding multi-use facilities, and improving overall site design as identified in Planning Goals 2 and 3 of the ADP and Vision Plan.
- Allow for efficient development of new infrastructure and facilities by considering future needs and designing the most effective utilization of space as identified in Planning Goals 2, 3, and 5 of the ADP and Vision Plan. Spatial considerations may include aligning new utilities and infrastructure along existing rights-of-way when possible and reconfiguration of access routes.
- Improve capability to accomplish mission-essential training by implementing new technologies, expanding current TADSS, expanding utilities and Information Technology (IT), and implementing adaptable infrastructure as identified in Planning Goals 1, 2, and 3 of the ADP and Vision Plan.
- Be consistent with the OHARNG's environmental goals and objectives and the management strategies for energy conservation by involving the OHARNG Energy and Environmental office early in the planning process so that innovative energy strategies can be identified and implemented as appropriate, environmental regulatory requirements can be identified, and environmental impacts identified and negative impacts avoided and minimized as identified in the ADP, Installation Planning Standards, and Vision Plan.
- Not result in impacts to any land uses outside of Camp Perry by keeping noise at current levels and not imposing additional SDZ restrictions on adjacent properties or Lake Erie and follow installation standards for development identified in the ADP, Installation Planning Standards, and Vision Plan.
- Result in direct, long-term beneficial impacts to the ability of Camp Perry to efficiently and effectively carry out the OHARNG mission by consolidating the use and function of facilities, conserving space for future use, and creating opportunities for growth and adaptability to reach the Planning Goals identified within the ADP and Vision Plan.

#### **4.2.2 No Action Alternative**

There would be no short-term impacts and less-than-significant adverse impacts to the long-term use of land at Camp Perry under the No Action Alternative. Changes in land use and

planning for the use of installation resources and facilities would continue without the benefit of an approved RPMP. Actions would be implemented without comprehensive considerations for long-term mission requirements that would identify major development and training projects. While the OHARNG would ensure that mission requirements would be met over the long-term, planning may not be optimized or conducted in a manner that maximizes the efficient and effective use of Camp Perry while meeting mission requirements.

### 4.2.3 Best Management Practices and Mitigation

No BMPs would be needed to manage potential adverse, less-than-significant impacts to land use.

No mitigation measures would be necessary to reduce potential significant adverse effects to land use to below significant levels.

## 4.3 Air Quality

The significance of air quality impacts is based on whether a proposed action will generate air emissions in conformity with Federal, State, and local air quality regulations. As discussed in Section 3.3, the Camp Perry area is considered in attainment for all criteria air pollutants. **Table 3.1** presents the primary and secondary limits of criteria pollutants. Exceedance of these air quality standards is considered an impact. As CPJTC is in an air quality attainment area for criteria air quality pollutants, a Proposed Action-specific Conformity Determination related to the action's potential future construction implementation is not required.

### 4.3.1 Proposed Action Alternative

Air emissions generated from future projects set forth in the Proposed Action (RPMP) would have short- and long-term, less-than-significant adverse impacts to existing air quality near Camp Perry. Implementation of the Camp Perry RPMP would involve improvement of existing facilities, demolition of some deficient or underutilized facilities, and construction of adaptable new facilities. The Proposed Action does not include introduction of any major sources of air emissions. New facilities could result in the introduction of additional small boilers and backup generators, which are low-emitting sources of air pollution installed and operated under permit-by-rule (PBR) provisions. The addition of a few low-emitting sources would not cause an exceedance of the NAAQS and would occur in an area currently in attainment with the NAAQS for all criteria pollutants. Since the activities of the Proposed Action would occur in an attainment area, a General Conformity Applicability Analysis is not required.

Direct impacts to air quality would include short-term air emissions from facility renovations, construction, demolition, and ground-disturbing training exercises. Short-term pollutant emissions would include airborne dust from ground disturbance, combustion byproducts from construction equipment, and vehicle emissions from worker travel during construction. Due to the temporary nature and amount of short-term emissions, there would be no adverse impact on the area's compliance with the NAAQS from these activities. An increase in the capacity and ability to provide ARNG training at Camp Perry would result in long-term pollutant emissions associated with ground and aviation exercises from military vehicles and aircraft operations. Implementation of the actions in the RPMP would also result in increased vehicle emissions associated with an increase in the number of employees and visitors at Camp Perry compared to existing conditions, and intermittent use of a backup generators during emergency operations and periodic generator operational test runs. Air quality impacts from these mobile sources are expected to be negligible.

The OHARNG initially considered all potentially relevant environmental resource areas for analysis in this EA. In compliance with NEPA, CEQ, and 32 CFR Part 651 guidelines, the EA's discussion of the Affected Environment at Camp Perry focuses only on those resource areas potentially subject to impacts, and those with potentially significant environmental issues. The RPMP EA should focus on resources and issues of concern identified during initial analysis and on differences in effects between the Proposed Action and the Alternatives. Areas with no discernible concerns or known effects, are not included in the EA's analysis. Per the Army issued policy *Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in Army National Environmental Policy Act Reviews* (2021), the OHARNG is required to address Greenhouse Gas/Climate Change and Social Cost for its proposed Federal actions. However, in this RPMP EA full analysis was eliminated because neither the implementation of the RPMP (the Proposed Action) nor its Alternatives would change or add to GHG/CC and Social Cost conditions at Camp Perry. When OHARNG proposes specific RPMP projects at Camp Perry in the future the NEPA analysis for those proposed actions would include the appropriate GHG analysis at that time.

The number of soldiers who train at Camp Perry annually are anticipated to remain between 22,000 and 25,000. The number of full-time employees is expected to remain the same at 100 until the new Readiness Center is built, which will add nine new full-time employees. The Readiness Center will house three companies, so weekend human activity may increase by up to 250 personnel (one company on site per weekend). The Proposed Action could have effects on air quality due to an increase in human activity. However, the Proposed Action is not anticipated to contravene air quality regulations including source-specific emission limits, permitting and licensing agreements, air quality standards (Federal, State and local), expose sensitive populations or receptors to pollutants, or any other applicable regulations or standards including GHG guidance and potential related regulations.

#### **4.3.2 No Action Alternative**

Air emissions generated from the No Action Alternative would have short- and long-term, less-than-significant adverse impacts to existing air quality near Camp Perry. The No Action Alternative would not cause an exceedance of the NAAQS and would occur in an area currently in attainment with the NAAQS for all criteria pollutants. However, under this alternative, installation facilities and practices related to air quality would continue without the benefit of an approved RPMP. Planning may not be optimized or conducted in a manner that maximizes the efficient, effective, and sustainable development patterns including transportation, efficient building design, and solar applications.

#### **4.3.3 Best Management Practices and Mitigation**

To manage the potential for adverse air quality impacts under either alternative, the OHARNG would continue to implement the following standard BMPs, as applicable:

- Use appropriate dust suppression methods during on-site activities, and if necessary, during dry weather training activities. (Available methods include application of water [fresh water only], soil stabilizers, or vegetation; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-moving or disturbance activities during high wind conditions.)
- Require a reduced speed for equipment on unpaved surfaces compared to paved surfaces.

- Use electricity from established power sources and renewable sources rather than generators whenever possible.
- Use low volatile organic compound architectural materials, supplies, and equipment.
- Repair and service equipment to prevent excess emissions.
- Minimize idling and operating times of heavy equipment and military vehicles to reduce air quality impacts generated by diesel-powered engines.
- Clean excess soil from heavy equipment and trucks leaving the work zone to prevent off-site transport onto roads within and outside of Camp Perry.
- Cover trucks transporting materials off-site.
- Use non-road diesel engines that are required by Federal law to use ultra-low diesel sulfur fuel, thus limiting the amount of SO<sub>2</sub> emissions
- Minimize the tracking of mud and dirt onto asphalt roadway surfaces by placing stone at construction area entrances.

These measures would continue to be implemented through the Contracting Office, project management personnel, and the training site management staff with technical assistance from the Environmental and Energy Office.

No mitigation measures will be necessary to reduce any significant adverse air quality impacts to below significant levels.

#### **4.4 Noise**

The potential for noise-related significant adverse impacts can occur as a result of changes in the type and location of noise due to changes in operations of a current noise source or the introduction of new noise sources, changes in noise levels due to construction activities, changes in public opinion due to proposed changes in noise especially for training projects involving the use of weapons, and due to off-site effects including nearby sensitive receptors. The principle noise sources at CPJTC are small arms weapons firing and to a lesser degree rotary-wing aircraft operations. Both Noise Zone II and Noise Zone III from the small arms ranges extend beyond the boundary of the training site. However, no noise complaints have been recorded for CPJTC. Artillery, ground burst, and grenade simulators are seldom used at Camp Perry. Potential noise complaint risk for these items depends upon the location they are used but is considered to be low under average weather conditions beyond a 1,650 foot radius of the activity, and under unfavorable conditions this radius would extend to 2,650 feet (USACHPPM, 2008). Five noise sensitive receptors (residences) are located about 500 feet to the south of Camp Perry and within Zone III. Zone II extends beyond Camp Perry in all directions with scattered residences (noise sensitive receptors) within Zone II to the south and east of Camp Perry.

Based on the assessment of potential noise complaint risk for small arms, the weapons ranges are fixed so noise generation will come from fixed firing positions, mostly near the lake shooting toward the lake. The complaint risk would be low under average weather conditions beyond a 503-meter (1,650-foot) radius of the activity, and under unfavorable conditions this radius would extend to 808 meters (2,650 feet) (USACHPPM, 2008). Therefore, levels at noise-sensitive receptors near CPJTC would be dependent upon meteorological conditions at the time. Additional information regarding current noise levels, goals, and concerns are available in the RPMP ADP, Development Program, Installation Planning Standards, and Vision Plan.

**4.4.1 Proposed Action Alternative**

Noise generated from activities associated with the Proposed Action would have short- and long-term, less-than-significant adverse impacts to the existing noise environment. Short-term direct impacts would occur during potential future construction, renovation, and demolition. Long-term, impacts on noise levels may occur from new building and facility operations, which would typically include HVAC systems, training operations (including use of ranges, pyrotechnics, military vehicles, equipment, and helicopters), backup generators, and vehicle traffic around the post. Small arms weapons are routinely fired on ranges located along the shore of Lake Erie and in the southwestern portion of CPJTC. Along with military personnel, civilian rifle teams and local and federal law enforcement agencies also use the ranges, and the National Matches marksmanship tournament sponsored by the Civilian Marksmanship Program takes place annually at CPJTC. Contours for Noise Zone III for the ranges in the southwestern portion of CPJTC extend slightly beyond the southern CPJTC boundary across State Route 2 and slightly across the northern boundary onto the adjacent Erie Ordinance Works industrial property. The Noise Zone III contours for the ranges along Lake Erie extend north over Lake Erie and west onto the Erie Ordinance Works industrial property. Noise Zone II extends further out from both locations in all directions outside of the CPJTC boundary encompassing scattered homes, Lake Erie, and large areas of undeveloped marshland along the Lake Erie shore. The CPJTC ranges have been operational since the early 1900's and are fixture in the community and noise complaints are very seldom received. CPJTC does implement the OHARNG noise management program to include notification of range firing to the local community and a noise complaint process. In addition, CPJTC coordinates with the USACE and US Coast Guard and patrols Lake Erie to ensure no boating or other activities take place in the surface danger zone over Lake Erie during range fire.

The Proposed Action does not include significant changes in operations of a current noise source or the introduction of new noise sources, or more than short-term changes in noise levels due to construction activities. Noise generated from the Proposed Action will be from the same or similar sources as current activity on Camp Perry. Noise sources for current operations have been evaluated and the OHARNG manages noise sources in accordance with the OHARNG Noise Management Plan (OHARNG, 2008a) and the OHARNG Installation Compatible Use Zone Study (OHARNG, 2016b). The Proposed Action does not involve creating new noise sources outside the purview of these plans and noise will continue to be managed in accordance with the plans. The frequency of training site and range usage is expected to remain the same and the Zone II and Zone III noise contours are not anticipated to change; therefore, impacts from noise would be less-than-significant.

The SONMP provides a methodology for analyzing exposure to noise hazards associated with military operations and provides land use guidelines for achieving compatibility between the CPJTC and the surrounding communities. The SONMP is intended to prevent potential training restrictions due to public complaints about noise through land use planning and other means of noise mitigation. Elements of the SONMP include noise assessment, complaint management, and noise abatement procedures. The SONMP recommends land uses around OHARNG installations which will: (a) protect citizens from noise and other hazards; and (b) protect the public's investment in these training facilities (USACHPPM, 2008). To prevent incompatibilities between military operations and civilian land use from reaching a significant level, the Army must take reasonable steps to protect the community from training noise, and it must work with local governments and land owners to make sure that adjoining lands are developed in ways

suitable with the noise environment. Of concern are areas within the aforementioned Noise Zones I, II and III, as well as areas outside Noise Zones that may occasionally be subjected to noise levels that the local community may find objectionable. Noise Zones should be reviewed a minimum of every five years and updated if necessary, to incorporate any pertinent operational changes that are needed. The ARNG-G-9 usually puts out an annual inquiry to all states asking if any require an updated noise evaluation. The OHARNG Environmental Office uses this opportunity to coordinate with the training sites to see if any changes to noise generation have been made or are planned. The last formal noise evaluation was conducted in 2016 as a result of this process (OHARNG Installation Compatible Use Zone, 2016).

#### **4.4.2 No Action Alternative**

Under the No Action Alternative, noise impacts of the OHARNG's continuation to carry out their mission at Camp Perry without the RPMP would be a short- and long-term less-than-significant noise impact. Noise associated with ongoing activities would occur, including short-and long-term increases in noise levels during construction, renovation and demolition, training, and day-to-day operations including military vehicles and aircraft but would not be appreciably different from the existing condition. Any increase in noise levels associated with the Proposed Action would be comparable to existing noise levels and unlikely to be heard by nearby residents; therefore, impacts from noise would be less-than-significant.

#### **4.4.3 Best Management Practices and Mitigation**

Under either alternative, the OHARNG would continue to manage noise impacts by implementing the following BMPs:

- Construction activities would take place during normal business hours to the maximum extent practicable.
- Equipment and machinery would meet all local, State, and Federal noise regulations.
- The OHARNG and construction contractors would comply with the OHARNG Noise Management Plan.
- Equipment would be operated per manufacturer's recommendations, and noise-generating heavy equipment would be shut down when not needed.
- No work would occur on Federal holidays or Sundays to the maximum extent practicable.
- Personnel exposed to noise levels exceeding OSHA limits from heavy equipment during construction would be required to wear appropriate hearing protection and practice safety BMPs in accordance with OSHA regulations.

No mitigation measures would be necessary to reduce any significant adverse noise impacts to below significant levels.

### **4.5 Geology, Topography, and Soils**

Ground disturbing activities at Camp Perry are subject to the requirements of the OEPA General National Pollution Discharge Eliminations Systems (NPDES) Permit for Stormwater Discharges Associated with Construction Activity, local and county regulations, and stormwater management requirements of the Energy Independence and Security Act (EISA) of 2007. Impact significance would be determined based on compliance with these regulatory requirements. Non-compliance would be determined by a significant adverse effect, while

compliance may be a less-than-significant adverse effect. Information regarding geologic, topographic, and soil conditions surrounding Camp Perry can be found in the RPMP ADP, Installation Planning Standards, and Vision Plan.

#### **4.5.1 Proposed Action Alternative**

The Proposed Action would result in short- and long-term less-than-significant adverse impacts to soil resources and no impact to geologic resources and the topography of Camp Perry. The Proposed Action is expected to result in temporary soil disturbance caused by potential future construction, demolition, maintenance, and training activities. Areas disturbed during demolition, development, and/or maintenance activities would be managed to prevent off-site soil erosion and graded and stabilized with vegetation upon completion of construction/maintenance. Areas disturbed by training would be minor since off-road maneuver is not done at Camp Perry. Any such disturbance would be repaired and vegetated upon completion of training. Since soil develops over time, any disturbance and repair would modify the soil profile and require time for soil forming processes to restore a natural profile. This is considered a less-than-significant long-term impact because soil disturbance would be very limited in size and primarily in locations where the soil has already been disturbed by fill in the early 1990s and construction and training activities since that time. Since Camp Perry is very level, there are no plans to move earth, conduct excavations, or modify topography. All construction activities as well as facility operations would comply with applicable regulations and implement the “Low Impact Development” approach identified in the RPMP’s Landscape Standards and Principles section of the Installation Planning Standards.

#### **4.5.2 No Action Alternative**

Short-term and long-term less-than-significant adverse impacts are anticipated under the No Action Alternative due to the OHARNG’s continuation of their mission including training, construction, (demolition and renovation), and facility operations. All construction activities as well as facility operations would comply with applicable regulations. No contraventions of permit or regulatory requirements are anticipated due to the No Action Alternative.

#### **4.5.3 Best Management Practices and Mitigation**

The OHARNG would obtain Ohio EPA Construction Stormwater NPDES permits and prepare site-specific E&SC Plans for all ground-disturbing activities under both the Proposed Action and No Action Alternative. The E&SC Plan would include standard BMPs such as specific guidelines and engineering controls to address anticipated erosion and resulting sedimentation and practices to stabilize soil. BMP measures would include, but not be limited to, the following:

- Installing and monitoring erosion-prevention BMPs such as mulching bare soil, covering and/or seeding stockpiled soil, and planting and maintaining soil-stabilizing vegetation on denuded areas after temporary disturbances during construction and when construction is complete, using native species for final seeding to the extent practicable.
- Installing and monitoring sediment control BMPs such as silt fences, sedimentation basins, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures.
- Retaining vegetative cover to the maximum extent possible.
- Ensure all appropriate OHARNG staff members at Camp Perry are trained in spill prevention and response.

- Minimizing soil damage as much as possible by matching training activities to soil capabilities when possible.

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

## **4.6 Water Resources**

The significance threshold for impacts to water resources would occur if the alternative exceeded applicable drinking water standards for potable water sources, surface water designated use criteria, adversely impacted quality and quantity of ground water resources including sole source aquifers, stressed existing water supply resources (surface and groundwater), or jeopardized aquatic habitats including threatened and endangered species habitat. Water resources at Camp Perry include the shore of Lake Erie, ponds, floodplains, wetlands, and groundwater. Information regarding water resources can also be found within the RPMP ADP, Development Program, Installation Planning Standards, and Vision Plan, and the Environmental Constraints figure and SWOT analysis found within the RPMP ADP and Vision Plan.

### **4.6.1 Proposed Action Alternative**

#### **4.6.2 Surface Water**

The Proposed Action would result in the potential for direct and indirect short- and long-term, less-than-significant adverse impacts to water resources.

#### ***Surface Waters including Wetlands, and Lake Erie Coastal Management Zone***

Direct and indirect adverse impacts to surface water resources from the Proposed Action could result from erosion and runoff associated with potential future ground-disturbing activities such as maintenance, new construction, and training exercises using military vehicles or heavy equipment. There is the potential for short- and long-term less-than-significant impacts to wetlands. The OHARNG would avoid work in wetlands to the maximum extent practicable. For any work that would occur in wetlands, the OHARNG would determine the extent of impacts and would comply with an applicable USACE Nationwide Permit and/or Ohio EPA General Isolated Wetland Permit or obtain a CWA Section 404 permit from the USACE and a CWA Section 401 Water Quality Certification and isolated wetland permit from the Ohio EPA, as needed, and would comply with applicable mitigation requirements. No impacts are anticipated to the wetland mitigation area from either alternative because this area is restricted.

Direct impacts to the Lake Erie Coastal Management Zone are not anticipated because the Lake Erie shoreline is designated as a sensitive area in the RPMP. As such, no development is identified for this area, and activities within this area are regulated and must be consistent with the CZMA and OCMP. There is low potential for indirect short- and long-term less-than-significant impacts from nearby activities as mentioned above. Prior to conducting any activities within the coastal management zone, the OHARNG would coordinate with the ODNR to obtain a consistency determination. All activities would be planned and designed to be consistent with the CZMA and the OCMP.

Most ponds on Camp Perry would not be affected by potential development because the RPMP will result in wise development and land use that will protect ponds. There will be short-term less-than-significant adverse impacts and long-term less-than-significant beneficial impacts on

the storm water detention ponds due to pond dredging and earthen dike maintenance to maintain and improve these areas.

Short- and long-term less-than-significant adverse impacts to water resources (surface waters and groundwater) are possible from inadvertent releases of contaminants, such as fuel and other petroleum products during potential future construction, renovation, demolition, and training. However, such incidents would be managed for prevention and would be responded to and remediated.

### ***Stormwater Management***

The amount of impervious surface at Camp Perry would not be expected to significantly increase under the Proposed Action because it is already highly developed with facilities, roads, and parking lots. Any impacts would be short- and long-term less-than-significant adverse impacts because the OHARNG would implement sediment and erosion controls during construction, and would put post-construction stormwater management controls in place in accordance with Section 438 of the Energy Independence and Security Act and applicable requirements of the Ohio EPA construction stormwater permit. Maintenance and new construction of the stormwater management system would have long-term beneficial impacts on the control, volume and quality of stormwater runoff at Camp Perry and off-site. Compliance with these water quantity and quality requirements would minimize impacts and there would be less-than-significant adverse impacts on water quantity and quality to existing systems and downstream properties.

### **4.6.3 Groundwater**

Under the Proposed Action, less-than-significant short- and long-term adverse impacts to groundwater would be anticipated. Where groundwater occurs near the surface, it may be encountered during construction. The OHARNG would implement avoidance and minimization measures such as dewatering, as needed during construction, to minimize impacts on groundwater. The increase in impervious surface from construction of new buildings and infrastructure would have a negligible impact on infiltration and groundwater recharge. Because Camp Perry obtains its potable water from Ottawa County and the sewer service from the Port Clinton, no new groundwater wells would be required to support any increase in facilities or personnel.

### **4.6.4 Floodplains**

Approval of the UFC 2-100-01 compliant RPMP will have no impact on floodplains. Implementation of actions identified within the Proposed Action, may result in less-than-significant short- and long-term adverse impacts to floodplains. All of Camp Perry is in flood Zone AE, areas at elevations below that of the 100-year flood elevation that are generally subject to flooding with a 1% probability in any given year.

The Proposed Action would involve maintaining facility and new construction within flood Zone AE. Construction activities conducted within the floodplain would be evaluated and implemented in accordance with the eight-step process identified in EO 11988. New construction within floodplains would only occur after obtaining a DA waiver and a building permit to build in a floodplain issued by Ottawa County. New structures would be designed and built in accordance with applicable standards for construction within the 100-year floodplain. Additionally, if OHARNG proposes a project in the Camp Perry coastal zone, OHARNG would obtain a CZMP consistency determination from the Ohio DNR for activities that are within the Lake Erie coastal zone management area. The Proposed Action is not anticipated to pose a significant risk to

public health or safety or pose a significant adverse impact on natural and beneficial floodplain values.

#### **4.6.5 No Action Alternative**

The No Action Alternative has the potential to result in short- and long-term less-than-significant adverse impacts to water resources without the RPMP. Under the No Action Alternative, the OHARNG would continue to carry out their mission at Camp Perry without the RPMP. Impacts to water resources would be like those under the Proposed Action, but without long-term and comprehensive planning for development there is the potential for slightly more significant long-term impacts.

#### **4.6.6 Best Management Practices and Mitigation**

The OHARNG will continue to implement the following standard BMPs to manage impacts on water resources.

- Install and maintain construction BMPs for erosion-prevention and sediment control such as mulching and/or revegetating bare soil, covering and/or seeding stockpiled soil, silt fences, sedimentation basins, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures.
- When dewatering, ensure the water is free of pollutants and discharge in a vegetated upland area through a filter bag.
- Conduct wetland delineations as part of the planning and design process for new projects and training area development so wetlands and other regulated waters can be identified and avoided to the maximum extent practicable.
- Retain riparian buffers and existing vegetation to the maximum extent practicable.
- Ensure compliance with SPCCP and ensure all appropriate OHARNG and DoD staff members at Camp Perry are trained in spill prevention and response.
- Ensure compliance with Section 438 of the EISA and other applicable regulations including the installation and maintenance of permanent post construction stormwater management controls (water quality controls) in project design and development, using vegetated and “green” BMPs (such as bio-retention swales, constructed wetlands, and grass filter strips) to the extent practicable.
- Limit off-road vehicle training to times of year when the soil is best suited to support it and/or in areas with appropriate stormwater controls.
- Maintain signage postings around the wetland mitigation area. Wetland mitigation area is identified in the RPMP and designated as protected area not available for development.
- Manage to maintain vegetative cover to ensure soil stability.

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

### **4.7 Biological Resources**

The threshold of significance for biological resources impacts would be exceeded if the alternative would jeopardize the continued existence of any Federally listed threatened or endangered species or result in destruction of critical habitat; decrease the available habitat for commonly found species to the extent that the species could no longer exist in the area;

eliminate a sensitive habitat such as breeding areas, habitats of local significance, or rare or state-designated significant natural communities needed for the survival of a species; or substantially degrade or minimize habitat. Additional Information regarding biological resources at Camp Ravenna can be found in the RPMP ADP and Vision Plan.

#### **4.7.1 Proposed Action Alternative**

Under the Proposed Action, short-term and long-term, direct and indirect less-than-significant adverse impacts to biological resources due to construction- and training-related habitat disturbance and human presence would be anticipated. Long-term less-than-significant beneficial impacts due to consolidation of development into already developed areas and comprehensive stormwater management would be anticipated.

##### **4.7.1.1 Habitat and Wildlife**

Under the Proposed Action, there would be short- and long-term less-than-significant adverse impacts on habitat and wildlife from potential future construction of facilities, infrastructure, facilities and grounds maintenance, and other development and training activities. Direct impacts would occur due to the removal of vegetation (maintained lawn and incidental lawn shade trees), such as during clearing and site grading. Most of Camp Perry is developed and regularly mowed lawn with little habitat value. The habitats with the most diversity and value are the 25-acre woodlot and the lake shore. The Proposed Action does not call for development or modification of these habitat areas, which will help minimize any adverse impacts to wildlife.

Temporary indirect adverse impacts on wildlife would include disturbance from construction noise and increased human presence during construction or other activities. The OHARNG would minimize the footprint of vegetation removal to the maximum extent practicable to minimize adverse impacts. Areas not targeted for development would be retained in their natural condition to the extent possible. It is unlikely that aquatic wildlife would be adversely impacted due the use of BMPs to prevent sediment transport into surface water systems during ground-disturbing activities. Adverse impacts could happen to aquatic wildlife if petroleum products from construction equipment or military vehicles were spilled and work their way into an aquatic habitat. Any such impacts would be short-term because the release would be stopped, and the site remediated.

Following construction, no long-term direct impacts to wildlife due to facility operations are anticipated. Long-term less-than-significant indirect adverse impacts on wildlife could occur from additional traffic, noise, lighting, and human presence compared to existing conditions. These impacts would be negligible because they would not be significantly different from the existing human presence and level of activities at Camp Perry.

There is a possibility that on Camp Perry invasive plants could be present or could become established and could require abatement actions. Implementation of BMPs to reduce or eliminate the colonization or introduction of invasive plants would be included as part of construction plans; therefore, potential impacts from invasive species would be minimized.

Objectives identified in the UFC 2-100-01 compliant RPMP vision would promote efficient land use measures by optimizing space utilization to meet mission objectives; allow for flexibility, adaptability, and reuse of land; improve transportation efficiency; cluster like-use developments and segregate unlike-use developments; and strategically establish functional buffers and open spaces, communications, and security. These objectives would result in long-term beneficial impacts on vegetation and wildlife by consolidating activities and development into already-developed areas, designating open space, dredging and maintenance of the range stormwater

management system, and improvements in the stormwater management system and resultant water quality and aquatic habitat improvements.

#### **4.7.1.2 *Threatened and Endangered Species***

Potential future activities identified in the RPMP may result in modified patterns of human activity, increased construction related ground and water disturbances, and periodic changes to noise on the site. This could result in indirect disturbance of threatened and endangered species' use of the area as a habitat. However, sensitive biological areas are not anticipated to be affected by the Proposed Action because planning, development, and training would be conducted in a manner that is sustainable and minimizes and avoids impacts and quality habitat areas (woodlot and the lake shore) are not identified for modification, development, or increased use. Because the Proposed Action is approval of the Camp Perry RPMP and does not contain specific project details, it is not possible to fully evaluate impacts on rare species and their habitats and do an ESA Section 7 determination at this time. The OHARNG will conduct ESA Section 7 evaluations and consult with the USFWS at a future date as RPMP project-specific details are known. OHARNG will also continue to partner with both the USFWS and the ODNR to proactively manage natural resources at Camp Perry as much as possible.

#### **4.7.2 No Action Alternative**

Under the No Action Alternative, the OHARNG would continue to carry out their mission at Camp Perry without the RPMP. Construction, demolition, and renovation projects, training activities, and day-to-day operations would continue under the No Action Alternative. Land disturbance and human activity would occur, resulting in short- and long-term impacts like those described under the Proposed Action. Planning will not likely be conducted in a comprehensive manner considering long-term use and effects on biological resources. Minimizing vegetation removal, following time-of-year restrictions, as appropriate, implementing BMPs, and conducting required ESA Section 7 consultation with the USFWS would ensure less-than-significant adverse impacts.

#### **4.7.3 Best Management Practices and Mitigation**

The OHARNG would continue to implement the following BMPs under either alternative:

- The OHARNG will ensure compliance with the Endangered Species Act, Migratory Bird Treaty Act, and Bald and Golden Eagle Protection Act.
- Project plans would preserve as much existing vegetation as possible while maintaining project missions.
- Establish native vegetation communities as much as possible on new construction sites and disturbed areas to support wildlife use and retard invasive species establishment.
- Coordinate maintenance activities and construction projects with the Environmental Office/Natural Resources Manager.
- Minimize the use of pesticides near surface water features, and implement integrated pest management strategies where practicable, following the OHARNG Integrated Pest Management Program.
- Avoid, to the extent practicable, activities that impact the Lake Erie shoreline and beach habitat.

- Avoid clearing vegetation used by nesting migratory birds when eggs or non-fledged young are in the nest.
- When bald eagles are present and nesting, restrict access and use of the woodlot from 01 January to 01 July.
- Avoid activities that may degrade or damage the woodland habitat.
- When a bald eagle is spotted on any range while the range is in use, call a cease fire until the bald eagle has left the vicinity.

No mitigation measures are required at this time. The OHARNG would comply with all regulatory requirements as specified by the USFWS through project-specific Section 7 consultation.

#### **4.8 Cultural Resources**

Actions that may have the potential to adversely affect the historic properties located at CPJTC include physical and/or visual disturbance of the historic district or structures. A primary consideration for long-term planning in the RPMP includes avoiding adverse effects to historic properties. The OHARNG manages the Camp Perry historic district in coordination with the OHPO. A significant impact would be determined through consultation with the OHPO resulting in an “adverse effect” determination. Other determinations such as “no historic properties affected” or “no adverse effect” would be a less-than-significant impact.

An intensive-level architectural survey and evaluation of structures 40 years and older was conducted at CPJTC in 2015 resulting in the recommendation that CPJTC is eligible for listing in the NRHP as a historic district. The CPJTC Historic District contains nine individual structures, four sites (firing ranges), and corridors along Niagara and Lawrence roads comprised of brick lamp posts, street trees, and railroad tracks. In addition, a block of nine WWII-era hutments is being preserved.

The entirety of Camp Perry was surveyed for archaeological resources in 2005. Two archaeological sites were identified during the survey containing late 19<sup>th</sup> to mid-20<sup>th</sup> century building foundations. Neither of these sites are eligible for the NRHP and no further archaeological work is recommended at Camp Perry (OHPO serial number 1001678).

A Memorandum of Agreement (MOA) has been developed regarding the preservation of the block of nine WWII-era hutments as part of the mitigation measures identified in a *Memorandum of Agreement Among the National Guard Bureau, the Ohio Army National Guard, and The Ohio Historic Preservation Office (OHPO) for the Camp Perry Barracks Construction Project, 2009*. Discussions are currently underway between the OHARNG and the OHPO to finalize and implement the hutment mitigation plan in 2021. The RPMP Installation Planning Standards state that the preservation of historically and culturally significant structures adds to the installation’s character and provides a sense of heritage. Additional information regarding historic and culturally significant resources is available in the RPMP ADP, Development Plan, Installation Planning Standards, and Vision Plan.

The OHARNG will follow the Section 106 review process as projects are developed as a result of the RPMP. To avoid and minimize any potential for adverse effects to the Camp Perry historic district or individual contributing resources, the OHARNG will continue to follow existing cultural resources program management guidelines in the 2018 ICRMP and consult with the OHPO. Additional impacts to NRHP-eligible historic structures may require development of an additional

MOA or a Memorandum of Understanding (MOU) in consultation with the OHPO to resolve adverse effects.

#### **4.8.1 Proposed Action Alternative**

The Proposed Action is anticipated to result in a “no effect” or “no adverse effect” upon historic properties under Section 106 of the NHPA and a short- and long-term less-than-significant impact. The minimum resource eligibility criteria is 50 years of age. Additional investigations of above ground resources become necessary as time advances due to additional potential resources meeting the minimum age criteria and contributing to the Camp Perry historic district. OHARNG would consult with OHPO on the potential effect of individual action resulting from both alternatives. Based on previous archaeological surveys conducted at Camp Perry, no resources potentially eligible for the NRHP were identified and therefore no archaeological impacts are anticipated.

#### **4.8.2 No Action Alternative**

Like the Proposed Action, the No Action Alternative is anticipated to result in a “no effect” or “no adverse effect” upon Camp Perry historic district and a short- and long-term less-than-significant impact is anticipated as individual projects would follow the Section 106 of the NHPA process. Under the No Action Alternative, the OHARNG would continue to carry out their mission at Camp Perry without the RPMP. The OHARNG would continue to follow guidance in the ICRMP and continue compliance with the NHPA. Consultation would continue with the OHPO regarding possible adverse effects to historic resources.

#### **4.8.3 Best Management Practices and Mitigation**

The OHARNG would implement all BMPs and guidelines specified in the ICRMP and in accordance with the NHPA. Consultation with the OHPO will continue in the future as planned projects and activities are implemented and have the potential to impact historic properties at Camp Perry. The list below is a summary of the minimum requirements:

- The OHARNG follows an Inadvertent Discovery Policy that requires ground disturbance to stop if any unknown item is encountered.
- Include the OHARNG Cultural Resources Manager in the planning of construction and training area development projects.

Mitigation measures would not be required if projects are situated to avoid historic properties. However, if historic properties cannot be avoided, Section 106 consultation would be initiated with the OHPO to determine mitigation measures. As necessary, Federally-recognized tribes would also be consulted regarding impacts to historic properties.

#### **4.9 Socioeconomics**

Socioeconomics describes a community by examining its social and economic characteristics. Several demographic variables are analyzed to characterize the community, including population size, the means and amount of employment, income creation, fiscal condition of local government, whether an Environmental Justice area (i.e., poverty areas and/or minority populations) is present, and the allocation of the assets of the community, such as its schools, housing, public services, and healthcare facilities.

Generally, impact significance is determined by the magnitude of the project's effect (both positively and negatively) on these demographic variables such as local tax base, employment, available housing, residential and commercial displacements, wages, and community facilities and services. Impacts could arise if a large workforce is relocated to a region that has limited availability of housing or inadequate community facilities and services or through the degradation in the desirability of the area for residential or commercial use and thereby potentially effecting the local tax base.

#### **4.9.1 Proposed Action Alternative**

Under the Proposed Action, short- and long-term less-than-significant beneficial impacts to the social and economic fabric of the community would be anticipated. The Proposed Action would not result in changes to the population growth or demographic in the surrounding communities of Camp Perry. The current full-time employees who work at Camp Perry are mostly Federal and State employees. The Proposed Action may result in increased employment opportunities for Federal and State workers associated with the potential increase in training at Camp Perry. New facilities could provide a few employment opportunities for residents in the surrounding region. The number of jobs added would be small. Long-term, there would be indirect benefits to local businesses from spending by employees and visitors to Camp Perry. Likewise, the local tax base would benefit from increased commerce; however, the increase would be less-than-significant.

Potential future construction activities would result in short-term benefits to the local economy by providing employment opportunities for local construction workers and through the possible use of local construction materials and supplies. The presence of construction workers at Camp Perry during business hours may also result in short-term benefits to local stores and businesses for purchases. Due to the intermittent and finite nature of the construction projects, there would be no long-term beneficial impacts to the civilian construction labor force or to the local economy.

Short-term, construction activities would result in additional traffic on local roads; long-term, an increase in employee, visitor, and delivery vehicles would also result in additional traffic on local roads compared to existing conditions. The additional traffic, both short- and long-term, would be negligible and would not adversely affect community facilities and services including the ability of emergency vehicles to access nearby areas. The Proposed Action would not create a need for new or increased fire, police protection, or medical services beyond the current capability of the local community, nor would it decrease public service capacities to jeopardize public safety.

Construction activities could result in a less-than-significant adverse effect to construction worker safety and protection of children, who are periodically on post to access the beach or participate in public events. Contractors would be required to establish and maintain safety programs. All contractors performing construction activities would be responsible for complying with DoD and OSHA safety regulations and are required to conduct construction activities in a manner that does not pose any undue risk to workers or personnel. Activities involved in the Proposed Action are not anticipated to pose an unacceptable or unnecessary safety risk to Camp Perry personnel or the public. No public schools or day-care centers are located within or immediately surrounding Camp Perry. Additionally, neither Port Clinton nor Ottawa County meets the definition of a poverty area nor is there an indication of minority populations near CPJTC (U.S. Census Bureau, 2017). The same precautions taken for public health and safety discussed above, along with implementation of a variety of measures to avoid and minimize

impacts from HTMW, to improve traffic flow, minimize noise and air emissions, etc. would result in the protection of children.

#### **4.9.2 No Action Alternative**

Under the No Action Alternative, there would be less-than-significant short- and long-term adverse impacts. The OHARNG would continue to carry out its mission at Camp Perry without the RPMP. There would be negligible, if any, changes to the current social and economic environment near Camp Perry because of ongoing facility improvements, training, and operations at the installation. The OHARNG would continue to implement health and safety measures for the protection of workers, employees, the public, and children. There would be no impacts on population, demographics, public and occupational health and safety, or the protection of children.

#### **4.9.3 Best Management Practices and Mitigation**

No BMPs would be needed to manage potential adverse, less-than-significant socioeconomic impacts.

No mitigation measures would be necessary to reduce any significant adverse socioeconomic impacts to below significant levels.

### **4.10 Environmental Justice**

A significant EJ impact would require that minority and/or low-income populations would bare a disproportionately high adverse effect due to the project, an impact that would not be shared by non-EJ populations. Adverse effects would include the displacement of properties, change in accessibility, loss of employment and wages, threats to health (such as from increases in unacceptable noise levels, degradation of air quality, or increase exposure to environmental risks), loss of access to community facilities and services, and loss of access to cultural amenities including religious centers and ethnic markets serving the EJ communities.

#### **4.10.1 Proposed Action Alternative**

The Census Bureau defines a “poverty area” as a census tract (or another appropriate geographic census area) where 20% or more of the residents have incomes below the poverty threshold, and an “extreme poverty area” as one with 40% or more below the poverty level. In 2017, Port Clinton’s poverty rate was 16.8% and Ottawa County’s poverty rate was 10.8%. The State of Ohio’s poverty rate was 14.9%. The percentage of minority populations of the United States, Ohio, Ottawa County, Port Clinton, and within a 1.6-km (10-mile) radius of CPJTC are 25.6%, 19.3%, 4.0%, 14.0%, and 5.0%, respectively. Neither Port Clinton nor Ottawa County meets the definition of a poverty area nor is there an indication of minority populations near CPJTC (U.S. Census Bureau, 2017).

Because of this evaluation, no minority or low-income population groups were identified within the CPJTC vicinity. Additionally, no known subsistence level hunting, fishing, or trapping occurs at CPJTC. The absence of major minority or low-income populations, and the general absence of children from an active military training site further reduces the potential for impacts.

Under the Proposed Action, there would be no short- or long-term adverse impacts to EJ populations as no minority or low-income population groups were identified, on an aggregate or individual level, in the Camp Perry vicinity. Additionally, no known subsistence level hunting, fishing, or trapping occurs at Camp Perry.

**4.10.2 No Action Alternative**

Like the Proposed Action, there would be no short- or long-term adverse impacts to EJ populations under the No Action Alternative as no minority or low-income population groups were identified in the Camp Perry vicinity.

**4.10.3 Best Management Practices and Mitigation**

No BMPs would be needed to manage potential adverse, less-than-significant impacts to EJ populations.

No mitigation measures would be necessary to reduce potential significant adverse effects to EJ populations to below significant levels.

**4.11 Utilities**

The significance of potential impacts to utilities is most often related to the existing capacity of the existing utilities providers to accommodate the Proposed Action demand including the capacity of commercial water, water supply wells, wastewater and sewer services, solid waste collection and disposal services, energy (electrical power and natural gas or other heat fuel alternatives), and communications services. A significant impact would occur due to the project's exacerbation of existing rapid local or regional growth trend resulting competition for limited utility capacities, a trend of rising utility costs, stress on the political environment to meet the rising demand, and of the installation's need for regional utilities. Additional Information regarding utilities and infrastructure systems is available in the RPMP ADP, Development Plan, Installation Planning Standards, Plan Summary, and Vision Plan.

**4.11.1 Proposed Action Alternative**

Short- and long-term less-than-significant adverse impacts are anticipated to utilities due to the Proposed Action. It is anticipated that the Proposed Action will require increased demand on existing utilities serving Camp Perry including commercial water, wastewater and sewer services, solid waste collection and disposal services, energy (electrical power and natural gas or other heat fuel alternatives), and communications services. While no capacity issues have been identified with any utilities, CPJTC has installed a solar photovoltaic field just north of SR 2 for supplemental power and will expand Wi-Fi capabilities to better support TADSS and fulfill Planning Goals 1, 2, and 3 of the ADP, Vision Plan, and Installation Planning Standards.

The area served by the various utility providers is not experiencing trends in rapid growth, increasing demands on utilities, or inflating utility costs. The Proposed Action would not stress energy efficiency, sustainability of man-made and natural environments, increased density mixed use transit-oriented development, standardized facility planning, and commitment to joint operations and joint use facilities, and therefore minimizes the need for expanded capacity of existing utilities.

**4.11.2 No Action Alternative**

Short- and long-term less-than-significant adverse impacts are anticipated to utilities due to the No Action Alternative without the RPMP. Camp Perry's demand on existing utilities would continue to increase over time in support of ongoing facility improvements, training, and operations at the installation. Planning is not likely to be conducted in a comprehensive manner considering long-term use minimization of utility demands.

**4.11.3 Best Management Practices and Mitigation**

No BMPs would be needed to manage potential adverse, less-than-significant impacts to utilities.

No mitigation measures would be necessary to reduce potential adverse effects to utilities to below significant levels.

**4.12 Infrastructure**

The significance of potential impacts to the infrastructure of Camp Perry and surrounding areas is related to the existing condition and capacity of the existing transportation network (including surface transportation and airport traffic) and its ability to accommodate increases in the type of traffic volumes and types of vehicular traffic anticipated. A significant impact may occur in situations where local and regional transportation increases are anticipated due to projected rapid local or regional growth trends, which may result in traffic congestion and the need for investments in transportation infrastructure to increase capacity. If realized, a response to those growing demands may include the evaluation of, and need for, construction of new roadways, airport runway expansions, and roadway widening projects.

**4.12.1 Proposed Action Alternative**

Short- and long-term less-than-significant adverse impacts are anticipated to the infrastructure of Camp Perry and surrounding communities due to potential minor increases in traffic under the Proposed Action. The project area is not experiencing rapid growth and the existing transportation network (including roadways, railroads, and airports) can accommodate existing and projected traffic volumes and vehicular mix. Current Ohio Department of Transportation (ODOT) projects identified within the vicinity are minor including mostly bridge deck replacements and roadway resurfacing. The Proposed Action would result in increases in traffic volumes and a change in vehicular mix involving an increase in construction truck traffic. However, these increases in traffic volumes and changes in vehicular mix would be minor and would not impose undue burden on the existing local and regional transportation network. The Proposed Action does call for improvements to Camp Perry's internal road network, so it better supports OHARNG activities. These improvements, when implemented, will offset some of the anticipated adverse impacts.

**4.12.2 No Action Alternative**

Short- and long-term less-than-significant adverse impacts are anticipated to infrastructure due to the No Action Alternative without the RPMP. Camp Perry's generation of traffic would continue to minimally increase over time in support of ongoing facility improvements, training, and operations at the installation. Planning is not likely be conducted in a comprehensive manner considering long-term infrastructure efficiencies. Increases in traffic volumes would be minor and not stress the existing local and regional transportation network.

**4.12.3 Best Management Practices and Mitigation**

No BMPs would be needed to manage potential adverse, less-than-significant impacts to infrastructure.

No mitigation measures would be necessary to reduce potential significant adverse effects to infrastructure to below significant levels.

### **4.13 Hazardous and Toxic Materials/Wastes (HTMW)**

Activities at Camp Perry involve the storage, generation and treatment of HTMW including the maintenance of facilities and vehicles, weapons cleaning, handling of unused or contaminated materials, wash rack oil water separator maintenance, and spill clean-up. A significant impact may occur due an uncontrolled release of HTMW into the environmental effecting environmental media (water, air, or ground water) to the extent that the use of the property would be curtailed, or a regulatory limit is violated. Releases to the air could result in the regional air quality not meeting attainment criteria. Release to surface waters could result in lethal conditions to aquatic life or the water not meeting designated use standards. Release to groundwater could result in widespread contamination of groundwater aquifers that provide potable water to surrounding areas. Additional information regarding hazardous materials, infrastructure systems, and environmental restoration is available in the RPMP ADP, Development Plan, and Vision Plan.

#### **4.13.1 Proposed Action Alternative**

Short- and long-term less-than-significant adverse impacts are anticipated related to HTMW generation, storage, treatment and disposal activities at Camp Perry. Short-term direct impacts could occur from the use of solvents, lubricants, hydraulic fluid, oil, antifreeze, etc. Existing structures that may potentially be renovated or demolished under the Proposed Action may contain lead-based paint, ACM, fluorescent light fixtures, PCBs, or other material requiring special handling and/or disposal procedures. Several materials would be prohibited from use in future construction projects, including materials containing asbestos, urea formaldehyde, PCBs, CFCs, and lead (e.g., as a component of finishing products such as rust-proofing and interior/exterior paints and coatings). Long-term, heavy equipment, military vehicle and helicopters, military training, and operational activities such as the use and storage of gasoline, diesel, and pesticides would involve handling, storage, and disposal of HTMW.

Even without major release events, multiple minor release/spill events could have potential adverse impacts to the environment. Releases could potentially lead to soil, surface water, and/or groundwater contamination that would require some form of remediation. However, Camp Perry manages hazardous materials and hazardous waste through the implementation of several installation management plans including the OHARNG HMWMP and the Camp Perry SPCCP. The HMWMP and SPCCP address hazardous materials management to protect human health and the environment. The HMWMP addresses handling, storage, and general management of hazardous materials and hazardous waste, whereas the SPCCP addresses potential spills or releases of oil or hazardous substances. The generation, handling, and disposal of hazardous and toxic materials and waste would be consistent with applicable regulations.

Implementation of the Proposed Action would not affect the OHARNG's hazardous materials storage and handling procedures, hazardous waste disposal processes, or pesticide management program. The OHARNG would implement protection measures such as secondary containment as needed. All appropriate handling, storage, and disposal procedures would be implemented during construction and day-to-day operations. Waste generated during any construction or demolition projects would be recycled or disposed of at a local landfill per applicable local, State, and Federal regulations. With implementation of safety measures, plans, and regulations, less-than-significant adverse impacts from hazardous material and wastes are expected to human health or the environment due to the Proposed Action.

**4.13.2 No Action Alternative**

Like the Proposed Action, the No Action Alternative would be expected to have short- and long-term less-than-significant adverse impacts related to HTMW generation, storage, treatment and disposal activities without the RPMP. Camp Perry's HTMW-related activities would continue in support of ongoing facility improvements, training, and operations at the installation and compliance with applicable regulations would be required. Planning is not likely to be conducted in a comprehensive manner resulting in the potential for inefficiencies in HTMW management.

**4.13.3 Best Management Practices and Mitigation**

Adverse impacts would be controlled through BMPs and ongoing practices in place to ensure regulatory compliance. HTMW-related BMPs to be adhered to may include, but are not limited to, the following.

- Comply with the OHARNG HMWMP for the proper management, storage, and disposal of hazardous waste.
- Comply with the Camp Perry SPCCP for spill prevention, response, and cleanup.
- Require contractors working on post to comply with applicable waste management and spill prevention and response regulation.

No mitigation measures would be necessary to reduce any significant adverse environmental impact to below significant levels.

**4.14 Summary of Best Management Practices (BMP)**

The impact analysis presented above is based on the type of activities associated with the Proposed Action and No Action Alternative such as temporary ground disturbance, vegetation clearing, change in area of impervious surfaces, construction noise, generation of solid waste due to demolition, temporary increase of construction-related GHG, and the like. There are no mitigation measures required to reduce potential adverse impacts to less-than-significant levels. Presented below is a summary of BMPs identified in this EA that will reduce or prevent pollution or other adverse effects to environmental resources.

- Best Management Practices will be proactively incorporated within the proposed actions to control adverse impacts and eliminate the need for mitigation. Due to this, no mitigation would be necessary to reduce any significant adverse environmental impacts to below significant levels for the following resource disciplines:
  - Land Use
    - Socioeconomics
    - Environmental Justice
    - Utilities
    - Infrastructure
  - Air Quality
    - Use appropriate dust suppression methods during on-site activities, and if necessary, during dry weather training activities. (Available methods include application of water [fresh water only], soil stabilizers, or vegetation; use of

- enclosures, covers, silt fences, or wheel washers; and suspension of earth-moving or disturbance activities during high wind conditions.)
- Require a reduced speed for equipment on unpaved surfaces compared to paved surfaces.
  - Use electricity from established power sources and renewable sources rather than generators whenever possible.
  - Use low volatile organic compound architectural materials, supplies, and equipment.
  - Repair and service equipment to prevent excess emissions.
  - Minimize idling and operating times of heavy equipment and MOV to reduce air quality impacts generated by diesel-powered engines.
  - Clean excess soil from heavy equipment and trucks leaving the work zone to prevent off-site transport onto roads within and outside of Camp Perry.
  - Cover all trucks transporting materials off-site.
  - Use non-road diesel engines that are required by Federal law to use ultra-low diesel sulfur fuel, thus limiting the amount of SO<sub>2</sub> emissions.
  - Minimize the tracking of mud and dirt onto asphalt roadway surfaces by placing stone at construction area entrances.
- Noise
    - Construction activities would take place during normal business hours to the maximum extent practicable.
    - Equipment and machinery would meet all local, State, and Federal noise regulations.
    - The OHARNG and construction contractors would comply with the Ohio Noise Management Plan.
    - Equipment would be operated per manufacturer's recommendations, and noise-generating heavy equipment would be shut down when not needed.
    - No work would occur on Federal holidays or Sundays to the maximum extent practicable.
    - Personnel exposed to noise levels exceeding OSHA limits from heavy equipment during construction would be required to wear appropriate hearing protection and practice safety BMPs in accordance with OSHA regulations.
  - Geology, Topography, and Soils
    - Installing and monitoring erosion-prevention BMPs such as mulching bare soil, covering and/or seeding stockpiled soil, and planting and maintaining soil-stabilizing vegetation on denuded areas after temporary disturbances during construction and when construction is complete, using native species for final seeding to the extent practicable.
    - Installing and monitoring sediment control BMPs such as silt fences, sedimentation basins, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures.

- Retaining vegetative cover to the maximum extent possible.
- Ensure all appropriate OHARNG and DoD staff members at Camp Perry are trained in spill prevention and response.
- Minimizing soil damage as much as possible by matching training activities to soil capabilities when possible.
- Water Resources
  - Install and maintain construction BMPs for erosion-prevention and sediment control such as mulching and/or revegetating bare soil, covering and/or seeding stockpiled soil, silt fences, sedimentation basins, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures.
  - When dewatering, we ensure the water is free of pollutants and discharge in a vegetated upland area through a filter bag.
  - Conduct wetland delineations as part of the planning and design process for new projects and training area development so wetlands and other regulated waters can be identified and avoided to the maximum extent practicable.
  - Retain riparian buffers and existing vegetation to the maximum extent practicable.
  - Ensure compliance with the SPCCP and ensure all appropriate OHARNG and DoD staff members at Camp Perry are trained in spill prevention and response.
  - Ensure compliance with Section 438 of the EISA and other applicable regulations including the installation and maintenance of permanent stormwater management controls in all future project design and development, using vegetated and “green” BMPs (such as bio-retention swales, constructed wetlands, and grass filter strips) to the extent practicable.
  - Limit off-road vehicle training to times of year when the soil is best suited to support it and/or in areas with appropriate stormwater controls.
  - Maintain signage postings around wetland mitigation area. Wetland mitigation area is identified in the RPMP and designated as protected area not available for development.
  - Manage to maintain vegetative cover to ensure soil stability.
- Biological Resources
  - The OHARNG will ensure compliance with the Endangered Species Act, Migratory Bird Treaty Act, and Bald and Golden Eagle Protection Act.
  - Project plans would preserve as much existing vegetation as possible while maintaining project missions.
  - Establish native vegetation communities as much as possible on new construction sites and disturbed areas to support wildlife use and retard invasive species establishment.
  - Coordinate maintenance activities and construction projects with the Environmental Office/Natural Resources Manager.

- Minimize the use of pesticides near surface water features, and implement integrated pest management strategies where practicable, following the OHARNG Integrated Pest Management Program.
- Avoid, to the extent practicable, activities that impact the Lake Erie shoreline and beach habitat.
- Avoid clearing vegetation used by nesting migratory birds when eggs or non-fledged young are in the nest.
- When bald eagles are present and nesting, restrict access and use of the woodlot from 01 January to 01 July.
- Avoid activities that may degrade or damage the woodland habitat.
- When a bald eagle is spotted on any range while the range is in use, call a cease fire until the bald eagle has left the vicinity.
- Cultural Resources
  - The OHARNG follows an Inadvertent Discovery Policy that requires ground disturbance to stop if any unknown item is encountered.
  - Include the OHARNG Cultural Resources Manager in the planning of construction and training area development projects.
- Hazardous and Toxic Materials/Wastes (HTMW)
  - Comply with the OHARNG HMWMP for the proper management, storage, and disposal of hazardous waste.
  - Comply with the Camp Perry SPCCP for spill prevention, response, and cleanup.
  - Require contractors working on post to comply with applicable waste management and spill prevention and response regulation.

#### **4.15 Cumulative Impacts**

As defined by CEQ Regulations (40 CFR §1508.7), cumulative impacts are those that “result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions, without regard to the agency (Federal or non-Federal) or individual who undertakes such other actions.” Cumulative impact analysis captures the impacts that result from the Proposed Action in combination with the impacts of other actions in the Proposed Action’s ROI.

NEPA requires the analysis of cumulative environmental impacts of the Proposed Action on resources that may often be manifested only at the cumulative level, such as traffic congestion, air quality, noise, biological resources, cultural resources, socioeconomic conditions, utility system capacities, and others.

Past, present, and reasonably foreseeable actions in the immediate vicinity of Camp Perry include the following:

- Transportation infrastructure improvements (roadway resurfacing and drainage updates, bridge rehabilitation and replacements, Americans with Disability Act [ADA] compliance updates, and transit service improvements).

- Waterfront dredging and shoreline protection, and improvements to waterfront parks.
- Private development including the expansion of the Lake Erie Business Park 5.2 miles away, in Port Clinton, involving 116 acres supported by public development incentives such as Enterprise Zone, Foreign Trade Zone, and Community Reinvestment Area grants.

Notable past, present, and reasonably foreseeable actions within Camp Perry include the following:

- Weapons qualification on ranges
- Military vehicle maintenance
- Civilian Marksmanship National Matches
- Building maintenance/repair and new construction.

As an active military installation, Camp Perry undergoes changes in mission and training requirements in response to defense policies, current threats, and tactical and technological advances. Therefore, new construction, facility improvements, infrastructure upgrades, and ongoing maintenance and repairs are required on a continual basis to meet the mission under both the Proposed Action and the No Action Alternative. Additional information regarding potential impacts associated with the Proposed Action and No Action Alternative is available within the five elements of the RPMP: the ADP, Development Program, Plan Summary, Installation Planning Standards, and Vision Plan.

### 4.15.1 Cumulative Impact of the Proposed Action

The Proposed Action would result in the impacts described by resource areas in Section 4. Since this EA evaluated impacts of all actions and activities at Camp Perry combined over the next 20+ years (approving the RPMP), only the resources that have the potential for short-term and/or long-term adverse impacts when combined with actions outside of Camp Perry are included in this analysis. As land use and Environmental Justice would not be affected by the Proposed Action, they are not further considered in this cumulative impact analysis.

**Air Quality:** The increase in air pollutant emissions from cumulative construction activities (fugitive dust and construction equipment/vehicle emissions) would not significantly impact regional air quality, and impacts would be short-term. Activities and operations at Camp Perry, such as operation of generators and HVAC, ground disturbing activities resulting in fugitive dust, and basic maintenance activities that involve use of equipment/vehicles, would result in pollutant emissions. When combined with emissions in the areas surrounding Camp Perry the result would be short-term and negligible and would not be expected to cumulatively adversely affect air quality.

**Noise:** Potential noise impacts associated with activities in the RPMP would be a negligible short-term adverse effect to noise sensitive receptors near Camp Perry. Activities outside of Camp Perry would not likely be noticeable in the immediate construction site vicinity. The acoustic environment at and near Camp Perry is expected to remain relatively unchanged from existing conditions under the Proposed Action. Activities outside Camp Perry, such as mowing, military aircraft, HVAC units, vehicles, heavy equipment associated with construction would add to the negligible noise associated with the Proposed Action. Most noises associated with the Proposed Action would be short-term and would comply with BMPs and any local noise ordinances to minimize impacts on residences close to Camp Perry. Additionally, potential future projects in the RPMP would occur at different times and be spaced out across the

installation so that multiple projects, and therefore multiple noise sources, would not typically occur simultaneously and thereby reduce the potential for short-term adverse cumulative impacts from increased noise levels.

**Water Resources:** Development outside Camp Perry would increase the amount of impervious surface in the area, resulting in an increase in the amount of surface runoff and a potential decrease in groundwater recharge. All development would be required to comply with local, county and State requirements to control increased stormwater runoff through implementation of E&SC and stormwater management BMPs. Adherence to these requirements would minimize degradation of local water quality, would control the quantity of water leaving a site both short-term (during construction) and long-term, and would minimize the potential for adverse cumulative impacts. All construction projects, whether private or government, would be required to comply with applicable E&SC and stormwater regulations.

The development areas outside of Camp Perry would be required to comply with the CWA and State regulatory requirements for direct and indirect impacts on wetlands. If there would be a potential for impacts on wetlands, permits would be obtained prior to construction and mitigation would be implemented as necessary to minimize and mitigate any adverse impacts. When combined with the Proposed Action, there would be short-term and long-term adverse impacts on water resources from increased runoff. With implementation of wetland avoidance and minimization measures and mitigation, as needed, adverse cumulative impacts are expected to be less-than-significant.

**Biological Resources:** All Federal funded projects are required to comply with the Section 7 of the ESA to ensure that the proposed action does not jeopardize continued populations or critical habitats of protected species either through direct consultation with the USFWS or via conditions of required permits such as under the CWA. Additionally, actions not involving Federal funds but requiring Federal approvals (permits and/or consistency determinations) are required to comply with the ESA. Potential for impacts to threatened and endangered species identified during the regulatory review process would be required to implement, as necessary, measures to minimize and mitigate any adverse impacts. Any of the typical projects outside of Camp Perry, when combined with the Proposed Action, would result in short-term and long-term adverse impacts on biological resources from loss of habitat and human disturbance. With implementation of avoidance and minimization measures and mitigation, as needed, adverse cumulative impacts are expected to be less-than-significant.

**Socioeconomics:** The Proposed Action would not trigger additional development in the local area or impact area schools, permanent housing, or the overall population. The Proposed Action would result in short-term and long-term beneficial impacts on the local economy primarily from the creation of jobs and expenditures at local businesses, which, in combination would result in short- and long-term beneficial cumulative impacts. However, adverse and beneficial cumulative impacts would be negligible and thus less-than-significant.

**Utilities:** The Proposed Action will require increased demand on existing utilities serving Camp Perry including commercial water, wastewater and sewer services, solid waste collection and disposal services, energy (electrical power and natural gas or other heat fuel alternatives), and communications services. However, adequate capacity exists to meet the anticipated demands of Camp Perry. The area served by the various utility providers is not experiencing trends in rapid growth, increasing demands on utilities, or inflating utility costs. Cumulative impacts to utilities are anticipated to be short- and long-term less-than-significant.

**Infrastructure:** Access and traffic are likely to be affected during various construction projects and during the improvements at Camp Perry. However, the OHARNG would implement

mitigation measures such as appropriate signage and safety measures for construction areas and any lane closures. Construction projects are likely to occur at different times and be spaced out across Camp Perry so that multiple projects would not occur in the same location simultaneously, thus reducing the potential for short-term adverse impacts from changes in access and an increase of construction-related vehicles on public roads. When added to changes to access and traffic from projects occurring outside of Camp Perry, adverse cumulative impacts to transportation infrastructure are anticipated to be short-term and less-than-significant.

**Hazardous and Toxic Materials/Wastes:** The region of influence includes the installation and facilities located outside the installation that are approved for disposal of HTMW. No significant impacts relative to HTMW are expected from implementation of the Proposed Action. There would be no increased risk to human health due to direct exposure associated with storage, use, handling, or disposal; and the Proposed Action would not substantially increase the risk of environmental contamination; or violate Federal, State, DoD, or local regulations. Furthermore, it is anticipated that disposal facilities would continue to accept HTMW. With implementation of HTMW management plans and adherence to regulations including spill prevention and cleanup, there would be less-than-significant adverse cumulative impacts.

**Conclusion:** Implementation of the Proposed Action would result in less-than-significant adverse cumulative impacts on all the resource areas evaluated in this EA. The Proposed Action would not noticeably contribute to ongoing changes to the physical and environmental conditions. Adverse impacts would be avoided and/or minimized through implementation of standard BMPs and project-specific mitigation measures, as necessary, as described throughout Section 4. Information regarding cumulative impacts associated with the Proposed Action and No Action Alternative is also found within the five elements of the RPMP.

### 4.15.2 Cumulative Impacts of the No Action Alternative

Under the No Action Alternative, the OHARNG would not implement the Camp Perry RPMP. Operations and activities at Camp Perry would continue and projects would be planned on an individual basis or with short-term planning considerations. There would be adverse and beneficial impacts on resources at Camp Perry, as noted throughout the No Action Alternative impacts discussions in Section 4. However, when combined with other past, present and reasonably foreseeable actions, any adverse or beneficial cumulative impacts would be negligible. The OHARNG would continue to comply with Federal and State regulatory requirements such as those required by the CWA, CAA, ESA, NHPA, CERCLA, and RCRA.

### 4.15.3 Inter-relationship of Cumulative Impacts

The rural environment surrounding Camp Perry is not experiencing heavy development pressures and related incremental and cumulative loss of socioeconomic, cultural, and environmental resources. The OHARNG's Proposed Action, to implement the RPMP, would not result in significant impacts to socioeconomic, cultural, or natural resources. Any adverse or beneficial impacts attributable to the Proposed Action or the No Action Alternative on the environment would be negligible when considered with the other activities occurring around or within Camp Perry.

Implementation of effective environmental, cultural, and natural resources BMPs would minimize or eliminate potential cumulative degradation of the natural environment at Camp Perry and its surrounding area. Coordination between the OHARNG and local, State, tribal, and

Federal planning and regulatory authorities would serve to minimize any potential future adverse impacts.

**5.1 Comparison of Alternatives and Conclusions**

The Proposed Action would address the project’s purpose and need to fulfill DoD Master Planning policy as well as to guide the OHARNG through the development of Camp Perry in a clear, sustainable manner that supports current missions, preserves long-term military capabilities, supports the DoD’s mission, and enriches the community it serves. The vision objectives of the UFC 2-100-01 compliant RPMP would promote efficient land use development and transportation system, sustainable building and landscape design, increased density mixed use development, and energy efficient building design including solar applications.

**5.2 Comparison of the Environmental Consequences of the Alternatives**

The OHARNG has evaluated the potential physical, environmental, cultural, and socioeconomic impacts of the Proposed Action as described in Section 2.2. The OHARNG also evaluated the No Action Alternative. A comparison of the environmental consequences of these alternatives is provided in **Table 5.1**.

**Table 5.1 Alternatives Comparison Matrix**

<b>Technical Resource Area</b>	<b>Proposed Action</b>	<b>No Action Alternative</b>
<b>Land Use</b> <i>(see Sections 3.2 and 4.2)</i>	No adverse impacts and long-term beneficial impacts on the efficient and effective use of land at Camp Perry to meet the OHARNG’s mission.	No short-term impacts are anticipated from implementation of various projects and less-than-significant adverse long-term impacts due to a lack of comprehensive planning for the long-term mission.
<b>Air Quality</b> <i>(see Sections 3.3 and 4.3)</i>	Short-term and long-term less-than-significant adverse impacts due to emissions from facility renovations, construction, demolition, and ground-disturbing training exercises. Short-term pollutant emissions would include airborne dust from ground disturbance, combustion byproducts from construction equipment, and vehicle emissions from worker travel during construction. The Proposed Action would not adversely impact the area’s compliance with the NAAQS.	Short- and long-term less-than-significant adverse impacts due to less than optimal continued facility operations without the RPMP. The No Action Alternative would not adversely impact the area’s compliance with the NAAQS.
<b>Noise</b> <i>(see Sections 3.4 and 4.4)</i>	Short- and long-term, less-than-significant adverse impacts to the existing noise environment would occur due to the Proposed Action. Short-term direct impacts would occur during construction, renovation, and demolition. Any increase in noise levels associated with the Proposed Action would be comparable to existing noise levels and unlikely to be heard by nearby residents; therefore, impacts from noise would be less-than-significant.	Less-than-significant adverse short-and long-term noise impacts due to this alternative. Noise levels resulting from construction, renovation and demolition, training, and day-to-day operations (including MOV and aircraft) would not be appreciably different from the existing condition.

<b>Technical Resource Area</b>	<b>Proposed Action</b>	<b>No Action Alternative</b>
<b>Geology, Topography, and Soils</b> <i>(see Sections 3.5 and 4.5)</i>	Short-term and long-term less-than-significant adverse impacts to soils due to ground-disturbing activities during construction and training operations. No adverse impacts would result to geology or topography. All activities would comply with applicable regulations.	Short- and long-term less-than-significant adverse impacts are anticipated under the No Action Alternative without the RPMP. In carrying out the mission, training, construction, and facility operations would continue. All activities would comply with applicable regulations.
<b>Water Resources</b> <i>(see Sections 3.6 and 4.6)</i>	Short-term and long-term less-than-significant adverse impacts due to ground-disturbing activities, increase in impervious surfaces, and training operations. Short- and long-term less-than-significant beneficial impacts due to comprehensive stormwater management, E&SC improvements.	Short- and long-term less-than-significant adverse impacts without RPMP due to continued mission, ground disturbance, training operations, and an increase in impervious surfaces.
<b>Biological Resources</b> <i>(see Sections 3.7 and 4.7)</i>	Short-term and long-term less-than-significant adverse impacts due to construction- and training-related habitat disturbance and human presence. Long-term less-than-significant beneficial impacts due to consolidation of development into already developed areas and comprehensive stormwater management.	Short- and long-term less-than-significant adverse impacts without RPMP due to continued mission, ground disturbance, training operations, and an increase in impervious surfaces.
<b>Cultural Resources</b> <i>(see Sections 3.8 and 4.8)</i>	Short- and long-term less-than-significant impact (no effect or no adverse effect) to historic properties.	Short- and long-term less-than-significant impact (no effect or no adverse effect) to historic properties.
<b>Socioeconomics</b> <i>(see Sections 3.9 and 4.9)</i>	Short- and long-term less-than-significant beneficial impacts to the social and economic fabric of the community would be anticipated due to temporary minor increases in economic factors during construction and long-term impacts due to increased employment and facility use.	Short-term less-than-significant beneficial impacts without the RPMP due to the creation of temporary construction jobs and demand for local services and products during construction activities and longer-term less-than-significant benefits due to continuation of the mission.
<b>Environmental Justice</b> <i>(see Sections 3.10 and 4.10)</i>	No short- or long-term disproportionately high adverse impacts anticipated as EJ populations are not present.	No short- or long-term disproportionately high adverse impacts to low-income or minority populations anticipated as EJ populations are not present.

## SECTION 5.0

## Comparison of Alternatives and Conclusions

Technical Resource Area	Proposed Action	No Action Alternative
<b>Utilities</b> <i>(see Sections 3.11 and 4.11)</i>	Short-term and long-term less-than-significant adverse impacts to utilities. Adequate utility capacity exists to accommodate the increased demand of the Proposed Action without stressing finite capacity of utility service providers.	Short- and long-term less-than-significant adverse impacts to utilities without RPMP. Continued mission does not stress the finite capacity of utility service providers.
<b>Infrastructure (Transportation and Traffic)</b> <i>(see Sections 3.12 and 4.12)</i>	Short- and long-term less-than-significant adverse impacts to infrastructure due to construction, traffic, and an increase in employees and visitors, and long-term less-than-significant beneficial impacts due to strategic road improvements	Short- and long-term less-than-significant adverse impacts to infrastructure without RPMP and continuation of mission including training, construction, facility operations, and lack of comprehensive and strategic road improvements.
<b>Hazardous and Toxic Materials/Wastes</b> <i>(see Sections 3.13 and 4.13)</i>	Short-term and long-term less-than-significant adverse impacts due to construction activities and operations. Handling, treatment, and disposal of HTMW must be done in adherence to regulatory requirements.	Short- and long-term less-than-significant adverse impacts without RPMP due to continued mission, training, construction and facility operations because of adherence to regulatory requirements dealing with the handling, treatment, and disposal of HTMW.

### 5.3 Conclusions

The analysis in this EA supports the conclusion that there would be no significant adverse impacts, either individually or cumulatively, to the local environment or quality of life as a result of the Proposed Action, providing standard BMPs specified in this EA are implemented. Therefore, an EIS is not necessary to support the decision-making process and a FONSI is appropriate. The OHARNG has determined that the Proposed Action would fulfill DoD Master Planning policy as well as guide the OHARNG through the development of Camp Perry in a clear, sustainable manner that supports current missions, preserves long-term military capabilities, supports the DoD's mission, and enriches the community it serves. Information, planning, and analysis supporting these conclusions is also available within the five elements of the RPMP: the ADP, Development Program, Plan Summary, Installation Planning Standards, and Vision Plan.

The No Action Alternative would not satisfy the purpose of and need for the Proposed Action. As such, this EA recommends implementation of the Proposed Action.

The OHARNG will review this NEPA-compliant analysis periodically, in consultation with ARNG-G-9, to ensure no substantial changes have occurred to environmental resources or regulatory requirements since the completion of this EA. If important changes have occurred, the OHARNG will prepare an updated NEPA analysis (e.g., a Supplemental EA or tiered Categorical Exclusion). This original EA would be used as the foundation for the updated analysis and supplemental NEPA analyses would focus only on those issues that have changed. The OHARNG would conduct appropriate NEPA analysis in coordination with ARNG-G-9 for future Camp Perry projects identified in the RPMP at the appropriate time.

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AMSL	Above Mean Sea Level	CFR	Code of Federal Regulations
ACHP	Advisory Council on Historic Preservation	CO	Carbon Monoxide
AC/RC	Active Component/Reserve Component	COA	Course of Action
ADA	Americans with Disabilities Act	COB	Civilians on the Battlefield
AGL	Above Ground Level	COC	Contaminants of Concern
AHPA	Archaeological and Historic Preservation Act	CORRACTS	RCRA Corrective Action Site
AIRFA	American Indian Religious Freedom Act	CPJTC	Camp Perry Joint Training Center
AMEC	AMEC Earth & Environmental, Inc.	CTC	Combat Training Center
ANG	Air National Guard	CWA	Clean Water Act of 1977
AOC	Areas of Concern	DA	Department of the Army
AR	Army Regulation	dB	Decibels
ARFORGEN	Army Force Generation	dba	A-weighted decibels
ARNG	Army National Guard	dbc	C-weighted decibels
ARNG-G-9	Installations and Environmental Directorate	dBp	Peak decibels
ARPA	Archeological Resources Protection Act	DFAC	Dining Facility Administration Center
AST	Aboveground Storage Tank	DNL	Average Day-Night Sound Level
BE	Biological Evaluation	DoD	Department of Defense
bgs	below ground surface	DoDI	Department of Defense Instruction
BMP	Best Management Practice	EA	Environmental Assessment
CAA	Clean Air Act	EDR	Environmental Database Resources, Inc.
CAAA	Clean Air Act Amendments of 1990	EIS	Environmental Impact Statement
CEQ	Council on Environmental Quality	EO	Executive Order
CERCLA	Comprehensive Environmental, Response, Compensation, and Liability Act	E&S	Erosion and Sedimentation
CFA	Controlled Firing Area	ESA	Endangered Species Act of 1973
		EST	Engagement Skills Trainer
		FEMA	Federal Emergency Management Agency
		FICON	Federal Interagency Committee on Noise

FICUN	Federal Interagency Committee on Urban Noise	Mgal	Million gallons
FNSI	Finding of No Significant Impact	mg/kg	milligram per kilogram
ft	feet	MMRP	Military Munitions Response Program
FWA	Fish and Wildlife Area	MOA	Military Operating Area
FWPCA	Federal Water Pollution Control Act of 1972	MOV	Military-owned Vehicles
HAP	Hazardous Air Pollutant	MRS	Munitions Response Site
HEMTT	Heavy Expanded Mobility Tactical Truck	MSL	Mean Sea Level
HTMW	Hazardous and Toxic Materials and Wastes	MWR	Morale, Welfare, and Recreation
ICUZ	Installation Compatibility Use Zone Study	NAAQS	National Ambient Air Quality Standards
IDT	Inactive Duty Training	NAGPRA	Native American Graves Protection and Repatriation Act
IICEP	Intergovernmental Coordination for Environmental Planning	NEPA	National Environmental Policy Act of 1969
ICRMP	Integrated Cultural Resources Management Plan	NFRAP	No Further Remedial Action Planned
INM	Integrated Noise Model	NGB	National Guard Bureau
IONMP	Installation Operational Noise Management Plan	NHPA	National Historic Preservation Act
INRMP	Integrated Natural Resources Management Plan	NLEB	Northern long-eared bat
IRP	Installation Restoration Program	NOV	Notice of Violation
JD	Jurisdictional Determination	NO <sub>2</sub>	Nitrogen Dioxide
Ldn	Day-night Level	NO <sub>x</sub>	Nitrogen Oxides
LUC	Land Use Control	NPDES	National Pollutant Discharge Elimination System
LURS	Land Use Requirements Study	NPL	National Priorities List
LUST	Leaking Underground Storage Tanks	NRCS	Natural Resources Conservation Service
MACT	Maximum Achievable Control Technology	NRHP	National Register of Historic Places
MFR	Memorandum for Record	NTBE	Not To Be Exceeded
		NWI	National Wetlands Inventory
		ODJFS	Ohio Department of Job and Family Services

## SECTION 7.0

OEPA	Ohio Environmental Protection Agency	SDWA	Safe Drinking Water Act of 1974
OHARNG	Ohio Army National Guard	SO <sub>2</sub>	Sulfur Dioxide
OHPO	Ohio Historic Preservation Office	SO <sub>x</sub>	Sulfur Oxides
OSHA	Occupational Safety and Health Administration	SOP	Standard Operating Procedures
OSD	Office of the Secretary of Defense	SPCCP	Spill Prevention, Control, and Countermeasure Plan
O <sub>3</sub>	Ozone	SVOC	Semi-volatile Organics
PAHs	Polynuclear Aromatic Hydrocarbons	TA	Training Area
Pb	Lead	TADSS	Training Aids, Devised, Simulators, and Simulations
PCBs	Polychlorinated biphenyls	TAL	Target Analyte List
PGP	Power Generation Platform	TASS	Total Army School System
PID	Photoionization Detector	TC	Training Circular
PM	Particulate Matter	TCLP	Toxicity Characteristic Leaching Procedure
POL	Petroleum, Oil, Lubricant	TNM	Traffic Noise Model
POV	Privately Owned Vehicle	TPH	Total Petroleum Hydrocarbons
PPA	Pollution Prevention Act of 1990	TRPH	Total Recoverable Petroleum Hydrocarbons
RAATS	RCRA Administrative Action Tracking System	USC	United States Code
RCRA	Resource Conservation and Recovery Act	USDA	U.S. Department of Agriculture
RCRIS-TSD	RCRA Corrective Actions with associated Treatment, Storage, or Disposal	USEPA	U.S. Environmental Protection Agency
ROCA	Range Operations and Control Area	USFWS	U.S. Fish and Wildlife Service
ROI	Region of Influence	USGS	U.S. Geological Survey
SIAP	Standard Instrument Approach Procedures	USTs	Underground Storage Tanks
SARA	Superfund Amendments and Reauthorization Act of 1986	UTES	Unit Training Equipment Site
		UXO	Unexploded Ordinance
		VOCs	Volatile Organic Compounds

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## **SECTION 8.0**

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## SECTION 9.0

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315 Madison Street  
Room 107  
Port Clinton, Ohio 43452

Ottawa Soil and Water Conservation District  
240 W. Lake Street  
Suite B  
Oak Harbor, Ohio 43449

Dan Everson  
U.S. Fish and Wildlife Service  
Ohio Ecological Services Field Office  
4625 Morse Road, Suite 104  
Columbus, Ohio 43230

Federally Recognized Indian Nations Contacted		
Federally Recognized Nation	POC	Title
Absentee-Shawnee Tribe	Scott Miller	Governor
Absentee-Shawnee Tribe	Henrietta Ellis	THPO
Bad River Band of the Lake Superior Tribe of Chippewas	Donald Moore, Sr.	Chairman
Bad River Band of the Lake Superior Tribe of Chippewas	Edith Leoso	THPO
Bay Mills Indian Community of Michigan	Jeffrey D. Parker	President
Bay Mills Indian Community of Michigan	Paula Carrick	THPO
Cayuga Nation of Indians	William Jacobs	Chief
Cayuga Nation of Indians	Clint Halftown	Cultural Representative
Chippewa-Cree Business Committee	John Houle	Chairman
Chippewa-Cree Business Committee	Janice Meyers	NAGPRA Representative
Citizen Potawatomi Nation	John Barrett	Chairman
Citizen Potawatomi Nation	Jeremy Finch	Cultural Dept. Director

<b>Federally Recognized Indian Nations Contacted</b>		
<b>Federally Recognized Nation</b>	<b>POC</b>	<b>Title</b>
Delaware Nation	Clifford Peacock	President
Delaware Nation	Nekole Alligood	Cultural Preservation Director
Eastern Shawnee Tribe of Oklahoma	Glenna Wallace	Chief
Eastern Shawnee Tribe of Oklahoma	Robin Dushane	Cultural Preservation Director
Fond du Lac Band of Lake Superior Chippewa	Karen R. Diver	Chairwoman
Fond du Lac Band of Lake Superior Chippewa	Leroy DeFoe	THPO
Forest County Potawatomi Community of Wisconsin	Philip Shopodock	Chairman
Forest County Potawatomi Community of Wisconsin	Melissa Cook	NAGPRA Representative
Grand Portage Band of Chippewa	Norman DesChampe	Chairman
Grand Portage Band of Chippewa	Victoria Raske	THPO
Grand Traverse Band of Ottawa & Chippewa Indians of Michigan	Derek Bailey	Chairman
Grand Traverse Band of Ottawa & Chippewa Indians of Michigan	Pearly Broome	Cultural Program Director
Hannahville Indian Community of Michigan	Kenneth Meshigaud	Chairperson
Hannahville Indian Community of Michigan	Earl Meshigaud	Cultural Director
Keweenaw Bay Indian Community	Chris Swartz	President
Keweenaw Bay Indian Community	Christopher Chosa	THPO
Kickapoo Tribe in Kansas	Arlan Whitebird	Chairman
Kickapoo Tribe in Kansas	Nellie Cadue	NAGPRA Director
Lac Courte Oreilles Band of Ojibwe	Louis Taylor	Chairman
Lac Courte Oreilles Band of Ojibwe	Jerry Smith	THPO
Lac du Flambeau Band of Lake Superior Chippewa Indians of Wisconsin	Carl Edwards	President
Lac du Flambeau Band of Lake Superior Chippewa Indians of Wisconsin	Melinda Young	THPO
Lac Vieux Desert Band of Lake Superior Chippewa	James Williams, Jr.	Chariman
Lac Vieux Desert Band of Lake Superior Chippewa	Giiwegiizhigookway Martin	THPO
Little River Band of Ottawa	Larry Romanelli	Ogema
Little River Band of Ottawa	Jonnie Sann II	Historic Preservation Director

**SECTION 9.0****Agencies and Individuals Consulted**

<b>Federally Recognized Indian Nations Contacted</b>		
<b>Federally Recognized Nation</b>	<b>POC</b>	<b>Title</b>
Little Traverse Bay Band of Odawa	Frank Ettawageshik	Chairman
Little Traverse Bay Band of Odawa	Wesley Andrews	NAGPRA Representative
Match-e-be-nash-she-wish Band of Pottawatomi	David K. Sprague	Chairperson
Match-e-be-nash-she-wish Band of Pottawatomi	Ed Pigeon	Cultural Coordinator
Mille Lacs Band of Ojibwe	Melanie Benjamin	Chief Executive
Mille Lacs Band of Ojibwe	Natalie Weyaus	THPO
Minnesota Chippewa Tribe (Executive Committee)	Peter Defoe	President
Minnesota Chippewa Tribe (Executive Committee)	Travis Annette	NAGPRA Representative
Nottawaseppi Huron Band of Potawatomi	Homer Mandoka	Chairman
Nottawaseppi Huron Band of Potawatomi	Beth Moody	Cultural Historic Preservation Office Manager
Oneida Indian Nation	Raymond Halbritter	Chief Executive Officer
Oneida Indian Nation	Jesse Bergevin	Historic Resource Specialist
Oneida Nation of Wisconsin	Richard Hill	Chairman
Oneida Nation of Wisconsin	Corina Williams	THPO
Onondaga Nation	Irving Powless, Jr.	Chief
Onondaga Nation	Tony Gonyea	THPO
Ottawa Tribe of Oklahoma	Charles Todd	Chief
Ottawa Tribe of Oklahoma	Rhonda Dixon	THPO
Pokagon Band of Potawatomi Indians	John Miller	Chairman
Pokagon Band of Potawatomi Indians	Tom Topash	Cultural Representative
Prairie Band of Potawatomi Nation	Steve Ortiz	Chairman
Prairie Band of Potawatomi Nation	Linda Yazzie	Admin. Asst. for the Tribal Chair
Red Cliff Band of Lake Superior Chippewa	Rose Gurnoe-Soulier	Chairperson
Red Cliff Band of Lake Superior Chippewa	Larry Balber	THPO
Red Lake Band of Chippewa	Floyd Jordain	Chairman
Red Lake Band of Chippewa	Jody Beaulieu	NAGPRA Director
Sac & Fox Nation, Oklahoma	George Thurman	Principal Chief
Sac & Fox Nation, Oklahoma	Sandra Kaye Massey	NAGPRA Coordinator

<b>Federally Recognized Indian Nations Contacted</b>		
<b>Federally Recognized Nation</b>	<b>POC</b>	<b>Title</b>
Saginaw Chippewa Indian Tribe of Michigan	Fred Cantu, Jr.	Chief
Saginaw Chippewa Indian Tribe of Michigan	William Johnson	Historic Preservation Coordinator
Sault Ste. Marie Tribe of Chippewa	Darwin McCoy	Chairman
Sault Ste. Marie Tribe of Chippewa	Cecil Pavlat	NAGPRA Representative
Seneca Nation of Indians	Barry Snyder	President
Seneca Nation of Indians	Lauren Waldinger	Tribal Archaeologist
Seneca-Cayuga Tribe of Oklahoma	LeRoy Howard	Chief
Seneca-Cayuga Tribe of Oklahoma	Paul Barton	THPO
Shawnee Tribe	Ron Sparkman	Chairman
Shawnee Tribe	Nick Smith	Asst. Director, Historic Preservation Office
Sokaogon Chippewa Band of Lake Superior Chippewa	Arlyn Ackley	Chairman
Sokaogon Chippewa Band of Lake Superior Chippewa	Vernadine Longtail	THPO
St. Croix Chippewa Indians of Wisconsin	David Merrill	President
St. Croix Chippewa Indians of Wisconsin	Wanda McFaggen	THPO
St. Regis Mohawk Tribe	James Ransom	Chief
St. Regis Mohawk Tribe	Arnold Printup	THPO
Tonawanda Band of Seneca Nation	Roger Hill	Chief
Tonawanda Band of Seneca Nation	Darwin Hill	Tribal Clerk
Turtle Mountain Band of Chippewa	David Brien	Chairman
Turtle Mountain Band of Chippewa	Brady Grant	THPO
Tuscarora Nation	Stuart Patterson	Chief
Tuscarora Nation	Richard Hill	Standing Committee Chairperson
White Earth Reservation Business Committee	Erma Vizenor	Chairperson
White Earth Reservation Business Committee	Douglas Hodges	NAGPRA Director
Wyandotte Nation	Leaford Bearskin	Chief
Wyandotte Nation	Sherri Clemons	Tribal Heritage Director

**APPENDIX A**

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*Tribal Coordination*





**STATE OF OHIO  
ADJUTANT GENERAL'S DEPARTMENT  
2825 West Dublin Granville Road  
Columbus, Ohio 43235-2789**

January 4, 2018

Office of  
The Adjutant General

POC, Title  
Federally Recognized Nation  
Street Address  
City, State Zip

Dear Salutation: -

The Ohio Army National Guard (OHARNG) is preparing an Environmental Assessment (EA) for approval of the Real Property Master Plan (RPMP) for Camp Perry Joint Training Center (Camp Perry) in Ottawa County. The RPMP will be consistent with the requirements of the Department of Defense's (DoD) Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for RPMP development on DoD installations (DoD, 2012). This new UFC version replaces a version that was last updated in 1986. The new UFC 2-100-01 version includes a focus on energy efficiency and sustainability of the man-made and natural environments through an increased density mixed use transit-oriented development, standardized facility planning, and a commitment to joint operations and joint bases in support of meeting the current missions, preserving long-term military capabilities, supporting the DoD's mission, and enriching the community it serves.

The OHARNG has been instructed by the National Guard Bureau to identify the proposed action as "approval of the UFC 2-100-01 compliant RPMP" and not to assess the environmental impacts of projects identified in the RPMP. Projects will undergo the appropriate level of National Environmental Policy Act (NEPA) review as they are programmed and funded. The EA is being completed this way because the RPMP is a long-term, big picture planning document. It does not provide the project specific detail needed to conduct project level NEPA analysis nor does it reflect funding availability to actually implement projects. The RPMP is a living, visionary planning document that will be used to guide the long-term development and use of Camp Perry to support the mission of the OHARNG.

Camp Perry is a 640 acre OHARNG training site on the south shore of Lake Erie, approximately 30 miles east of Toledo (see attached map). The facility is located on state land, however; it has a mixture of state and federally supported buildings. Camp Perry was established in 1906 to support OHARNG training and has been used continuously ever since. The primary mission of Camp Perry is to support weapons qualification on the various ranges located at the training site. In addition to serving as a military training site, Camp Perry hosts the National Rifle Matches annually, has served

as an induction center for incoming draftees for World War II, and was used as a Prisoner of War camp during WWII.

The OHARNG developed an initial Camp Perry Training Site Master Plan in 2011. Since this time the OHARNG has implemented projects to improve ranges and facilities and created a few new training venues on the property. Training requirements continually change as do the associated facility needs to support the current and future OHARNG training requirements. The RPMP identifies the OHARNG vision, capital investment strategy, planning standards, and area development plans for Camp Perry.

In compliance with Sections 106 and 110 of the National Historic Preservation Act (NHPA), the OHARNG has undertaken several historic property identification and evaluation efforts at Camp Perry. Those efforts have resulted in the identification of historic properties including the Camp Perry Historic District with 14 contributing elements. In addition, a Phase I Archaeological Survey was conducted at Camp Perry in 2005 that encompassed the entire facility. Two archaeological sites were identified during the survey containing late 19th to mid-20th century building foundations. Neither of these sites is eligible for the National Register of Historic Places and no further work is recommended.

If you believe the Camp Perry area has religious or cultural importance, we invite you to join us as a consulting party in accordance with 36 CFR Part 800.2, EO 13175, and DoD Native American and Alaskan Native Policy as we develop this EA. Additionally, please let us know if you would like further information regarding previous cultural resources surveys at Camp Perry. Please contact my cultural resources manager, Ms. Kimberly Ludt, at (614) 336-6569 or by e-mail at [kimberly.s.ludt.nfg@mail.mil](mailto:kimberly.s.ludt.nfg@mail.mil). A copy of this letter has also been sent to your Cultural Resources Manager for review and comment. Ms. Ludt, in coordination with her counterpart in your Nation, can outline areas of concern and provide you with further information. With your advice and assistance, we hope to maintain an ongoing cooperative relationship between your Nation and the Ohio Army National Guard.

If you would like to confer with the senior leadership of the OHARNG, please contact Major Steven Vicario, my liaison and technical point of contact for this endeavor, at the address above, by telephone at 614-336-7095 or by e-mail at [steven.m.vicario.mil@mail.mil](mailto:steven.m.vicario.mil@mail.mil).

Sincerely,



Mark E. Bartman  
Major General  
The Adjutant General

<b>Federally Recognized Indian Nations Contacted</b>		
<b>Federally Recognized Nation</b>	<b>POC</b>	<b>Title</b>
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Cayuga Nation of Indians	Clint Halftown	Cultural Representative
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Lac Vieux Desert Band of Lake Superior Chippewa	Giiwegiizhigookway Martin	THPO
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Nottawaseppi Huron Band of Potawatomi	Beth Moody	Cultural Historic Preservation Office Manager
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Oneida Indian Nation	Jesse Bergevin	Historic Resource Specialist
Oneida Nation of Wisconsin	Richard Hill	Chairman
Oneida Nation of Wisconsin	Corina Williams	THPO
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Ottawa Tribe of Oklahoma	Rhonda Dixon	THPO
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Pokagon Band of Potawatomi Indians	Tom Topash	Cultural Representative
Prarie Band of Potawatomi Nation	Steve Ortiz	Chairman
Prarie Band of Potawatomi Nation	Linda Yazzie	Admin. Asst. for the Tribal Chair
Red Cliff Band of Lake Superior Chippewa	Rose Gurnoe-Soulier	Chairperson
Red Cliff Band of Lake Superior Chippewa	Larry Balber	THPO
Red Lake Band of Chippewa	Floyd Jordain	Chairman
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Sac & Fox Nation, Oklahoma	George Thurman	Principal Chief

<b>Federally Recognized Indian Nations Contacted</b>		
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Saginaw Chippewa Indian Tribe of Michigan	Fred Cantu, Jr.	Chief
Saginaw Chippewa Indian Tribe of Michigan	William Johnson	Historic Preservation Coordinator
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Sault Ste. Marie Tribe of Chippewa	Cecil Pavlat	NAGPRA Representative
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Seneca Nation of Indians	Lauren Waldinger	Tribal Archaeologist
Seneca-Cayuga Tribe of Oklahoma	LeRoy Howard	Chief
Seneca-Cayuga Tribe of Oklahoma	Paul Barton	THPO
Shawnee Tribe	Ron Sparkman	Chairman
Shawnee Tribe	Nick Smith	Asst. Director, Historic Preservation Office
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Tonawanda Band of Seneca Nation	Darwin Hill	Tribal Clerk
Turtle Mountain Band of Chippewa	David Brien	Chairman
Turtle Mountain Band of Chippewa	Brady Grant	THPO
Tuscarora Nation	Stuart Patterson	Chief
Tuscarora Nation	Richard Hill	Standing Committee Chairperson
White Earth Reservation Business Committee	Erma Vizenor	Chairperson
White Earth Reservation Business Committee	Douglas Hodges	NAGPRA Director
Wyandotte Nation	Leaford Bearskin	Chief
Wyandotte Nation	Sherri Clemons	Tribal Heritage Director

**From:** [Ludt, Kimberly S NFG NG OHARNG \(US\)](#)  
**To:** "[Julie Gordon](#)"  
**Subject:** RE: Change of Chairperson for Red Cliff  
**Date:** Monday, January 29, 2018 12:11:00 PM

---

Julie,

Thank you for the update.

Kim

Kimberly S. Ludt  
Cultural Resources Manager  
Ohio Army National Guard  
614-336-6569

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

From: Julie Gordon [<mailto:julie.gordon@redcliff-nsn.gov>]  
Sent: Friday, January 26, 2018 12:19 PM  
To: Ludt, Kimberly S NFG NG OHARNG (US) <[kimberly.s.ludt.nfg@mail.mil](mailto:kimberly.s.ludt.nfg@mail.mil)>  
Cc: Vicario, Steven M MAJ USARMY NG OHARNG (US) <[steven.m.vicario.mil@mail.mil](mailto:steven.m.vicario.mil@mail.mil)>  
Subject: [Non-DoD Source] Change of Chairperson for Red Cliff

Hello,

We received some correspondence from one of your offices addressed to an old Chairperson. It was addressed to Rose Soulier, our new Chairman is Richard Peterson. He was elected this past July and he holds a 2 year term. Our Chairperson can change every 2 years so I would recommend that someone call and check to see if you have the current information for letters to our Chairperson. If you would please pass this information to anyone that may send letters to our Chairperson that would be greatly appreciated. Thank you for your attention to this.

Julie Gordon  
Red Cliff Tribe  
Receptionist

**From:** Michael LaRonge  
**To:** [Ludt, Kimberly S NFG NG OHARNG \(US\)](#); [Vicario, Steven M MAJ USARMY NG OHARNG \(US\)](#)  
**Subject:** [Non-DoD Source] RE: Archaeological Survey at Camp Perry in Ottawa County, Ohio  
**Date:** Thursday, March 1, 2018 9:16:11 AM

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Re: Ohio Army National Guard Real Property Master Plan for Camp Perry Joint Training Center, Ottawa County, Ohio.

Dear Major General Bartman,

Pursuant to consultation under Section 106 of the National Historic Preservation Act (1966 as amended) the Forest County Potawatomi as a Federally Recognized Native American Tribe reserves the right to comment on Federal undertakings, as defined under the act. Thank you for your participation in the process.

This message is in regard to the above referenced project. Based on the Phase I Archaeological report you provided which included a detailed history of the project area the Tribal Historic Preservation Office, on behalf of the Forest County Potawatomi Community, would like to concur with the reports finding of no effect on historic properties with the following condition.

In the event that human remains or Native American archaeological materials are exposed during regular operation of the training facility the Forest County Potawatomi Community asks to be included as an interested Native American Tribe, per the facilities Inadvertent Discovery Procedure. This includes consultation on treatment, handling, and disposition of the find prior to removal.

Your interest in protecting cultural and historic properties is appreciated. If you have any questions or concerns, please contact me at 715-478-7354, or email me at [Michael.Laronge@FCPotawatomi-nsn.gov](mailto:Michael.Laronge@FCPotawatomi-nsn.gov).

Respectfully,

Michael LaRonge  
Tribal Historic Preservation Officer  
Natural Resources Department  
Forest County Potawatomi Community  
5320 Wensaut Lane  
P.O. Box 340  
Crandon, Wisconsin 54520  
Phone: 715-478-7354  
Fax: 715-478-7225  
Email: [Michael.LaRonge@FCPotawatomi-nsn.gov](mailto:Michael.LaRonge@FCPotawatomi-nsn.gov)

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

From: Ludt, Kimberly S NFG NG OHARNG (US) [<mailto:kimberly.s.ludt.nfg@mail.mil>]  
Sent: Wednesday, February 28, 2018 12:20 PM  
To: Michael LaRonge  
Subject: Archaeological Survey at Camp Perry in Ottawa County, Ohio

Mike,

Thank you again for your response regarding the Camp Perry Real Property Master Plan Environmental Assessment. As discussed on the phone, I will send you an electronic copy of the archaeological survey that was completed at Camp Perry in 2005. It will be sent via the Army Safe File Exchange Site and you will receive an invitation to download it. If you have any problems downloading the file, let me know.

You will find that the archaeological report provides a good land use history to include the Great Black Swamp (see Figure 8) that I mentioned. The area around current day Camp Perry and extending southwest from Lake Erie into Indiana were part of an large swamp. In the mid-1800s efforts started to drain portions of the wetland to enable settlements and farming. From that time on, efforts continued with draining and fill to dry out the area. In 1907 Camp Perry was first established and it has been in use as a military training site and rifle range since then.

I have also attached a copy of our Standard Operating Procedures for Inadvertent Discoveries at Camp Perry.

Please do not hesitate to contact me if you have any additional questions.

Thanks.

Kim

Kimberly S. Ludt  
Cultural Resources Manager  
Ohio Army National Guard  
614-336-6569

**STATE OF OHIO  
ADJUTANT GENERAL'S DEPARTMENT  
2825 West Dublin Granville Road  
Columbus, Ohio 43235-2789**

NGOH-IMR-ENV

2 March 2018

**MEMORANDUM FOR RECORD**

**SUBJECT:** Native American Consultation regarding Real Property Master Plan Environmental Assessment for Camp Perry Joint Training Center

1. The Ohio Army National Guard (OHARNG), is preparing an Environmental Assessment (EA) for the approval of the Real Property Master Plan (RPMP) for Camp Perry Joint Training Center (CPJTC) located in Ottawa County, Ohio. The RPMP will be consistent with the requirements of the Department of Defense's (DoD) Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for RPMP development on DoD installations (DoD, 2012). This new UFC version replaces a version that was last updated in 1986. The new UFC 2-100-1 version includes a focus on energy efficiency and sustainability of the man-made and natural environments through an increased density mixed use transit-oriented development, standardized facility planning, and a commitment to joint operations and joint bases in support of meeting the current missions, preserving long-term military capabilities, supporting the DoD's mission, and enriching the community it serves.
2. In compliance with Sections 106 and 110 of the National Historic Preservation Act (NHPA), the OHARNG has undertaken several historic property identification and evaluation efforts at CPJTC. Those efforts have resulted in the identification of historic properties including the Camp Perry Historic District with 14 contributing elements. In addition, a Phase I Archaeological Survey was previously conducted at CPJTC in 2005 that encompassed the entire facility. Two archaeological sites were identified during the survey containing late 19<sup>th</sup> to mid-20<sup>th</sup> century building foundations. Neither of these sites is eligible for the National Register of Historic Places and no further work is recommended.
3. The OHARNG considered the Annotated DoD Policy on American Indians and Alaska Natives (27 October 1999), EO 13175, AR 200-1 and guidance in DA PAM 200-4, Appendix F, while developing the EA for this undertaking. Fourteen Native American groups have been identified as having possible ancestral ties to the CPJTC area. These groups include the Cayuga, Chippewa, Delaware, Kickapoo, Mohawk, Oneida, Onondaga, Ottawa, Potawatomi, Sac & Fox, Seneca, Shawnee, Tuscarora, and Wyandotte. These groups were identified based on tribal consultation, personal correspondence with Native Americans, and research by the OHARNG cultural resources manager.
4. From the 14 identified Native American groups, 46 federally recognized tribes were invited by letter to consult in January 2018. Certified letters, signed by Major General Mark E. Bartman, OHARNG Adjutant General (TAG), were mailed to the leaders and cultural resources contacts of 46

tribes. The Forest County Potawatomi requested a copy of the archaeological survey report completed in 2005 to review. After reviewing the report, they have no objections to the proposed projects however request being contacted in the event of an inadvertent discovery. The Red Cliff Tribe responded with an updated point of contact for their Chairman.

5. The OHARNG has established a good working relationship with tribes that have interest in OHARNG owned properties. Consultation with tribes has shown that the greatest interest is the inadvertent discovery of human remains or NAGPRA related items and results of archaeological surveys. In the event of an inadvertent discovery of human remains or funerary items, the OHARNG will follow *Procedures for Inadvertent Discovery of Cultural Materials at Camp Perry Joint Training Center*. These procedures were taken from Standard Operating Procedure #5 of the OHARNG Integrated Cultural Resources Management Plan and modified specifically for CPJTC.

6. A list of POCs for each tribe contacted and copies of pertinent correspondence letters and e-mails can be found in the appendix of the EA or obtained from the OHARNG cultural resources manager.

7. Any questions or concerns regarding Native American Consultation for CPJTC should be directed to the undersigned at DSN 346-6569 or (614) 336-6569. The undersigned can also be contacted via e-mail at [kimberly.s.ludt.nfg@mail.mil](mailto:kimberly.s.ludt.nfg@mail.mil).

//////S/////

KIMBERLY S. LUDT

OHARNG Cultural Resources Manager

**APPENDIX B**

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*Notice of Availability*



# NOTICE OF AVAILABILITY

## ENVIRONMENTAL ASSESSMENT FOR CAMP PERRY JOINT TRAINING CENTER REAL PROPERTY MASTER PLAN

Description. Interested parties are hereby notified that the Ohio Army National Guard (OHARNG) has prepared a draft Environmental Assessment (EA) regarding the proposed action described below.

Statutory Authority. This notice is being issued to all interested parties in accordance with the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality regulations for implementing the procedural provisions of the National Environmental Policy Act (40 CFR 1500-1508) and the Environmental Analysis of Army Actions (32 CFR 651).

Proposed Action. The OHARNG proposes to approve the Camp Perry Joint Training Center Unified Facilities Criteria (UFC) 2-100-01 compliant Real Property Master Plan (RPMP) for the Camp Perry Joint Training Center, Ottawa County, Ohio. The EA evaluates the Proposed Action's potential environmental impacts.

Public Review. The EA and the draft Finding of No Significant Impact (FNSI) will undergo a 30-day public comment period from 1 October 2021 through 31 October 2021 in accordance with 32 CFR Part 651.14, Environmental Analysis of Army Actions. During this period, the public may submit comments on the EA and the draft FNSI. The EA and the draft FNSI can be accessed at the following address:

**Rupp Public Library**  
**310 Madison Street**  
**Port Clinton, Ohio 43452**  
**(419) 732-3212**

Comments. Comments on the EA and the draft FNSI should be submitted during the 30-day comment period via postal mail to: Mr. Tim Morgan, Camp Ravenna Environmental, 1438 State Route 534 SW, Newton Falls, OH 44444.

The Beacon  
205 SE Catawba Rd Suite G  
Port Clinton Oh, 43452

**OHIO NOTARIAL CERTIFICATES  
(AFFIDAVIT)**

**Michael Baker International**  
100 Airside Drive  
Coraopolis PA, 15108

State of OHIO  
County of OTTAWA

Being duly sworn, Katina Britt , Employee of the Beacon, a weekly news paper in Port Clinton, Ohio. Afore said, and general Circulation, Makes oath that the notice, of which Annexed is a true copy, was Published 1 time(s) on

9/30/2021

Katina Britt  
Signature

Sworn to and subscribed in my presence this 14<sup>th</sup> day of October,  
2021 by Katina Britt [Name of Signer].

(Seal)

Linda M. Stinnett  
Notary Signature

**LINDA M. STINNETT**  
NOTARY PUBLIC, State of Ohio  
Recorded in Ottawa County  
My commission expires Dec. 4, 2021

## **APPENDIX C**

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### ***Public and Agency Coordination***



**STATE OF OHIO  
ADJUTANT GENERAL'S DEPARTMENT  
2825 West Dublin Granville Road  
Columbus, Ohio 43235-2789**

February 2, 2018

NGOH-IMR-ENV

Diana Welling, Department Head  
Deputy State Historic Preservation Officer for  
Resource Protection and Review  
Ohio History Connection  
800 E. 17<sup>th</sup> Avenue  
Columbus, Ohio 43211-2474

Dear Ms. Welling:

The Ohio Army National Guard (OHARNG) is preparing an Environmental Assessment (EA) for the approval of the Real Property Master Plan (RPMP) for Camp Perry Joint Training Center (CPJTC) located in Ottawa County. The RPMP will be consistent with the requirements of the Department of Defense's (DoD) Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for RPMP development on DoD installations (DoD, 2012). This new UFC version replaces a version that was last updated in 1986. The new UFC 2-100-1 version includes a focus on energy efficiency and sustainability of the man-made and natural environments through an increased density mixed use transit-oriented development, standardized facility planning, and a commitment to joint operations and joint bases in support of meeting the current missions, preserving long-term military capabilities, supporting the DoD's mission, and enriching the community it serves.

The OHARNG has been instructed by Army National Guard Bureau to identify the proposed action as "approval of the UFC 2-100-01 compliant RPMP" and to not assess the environmental impacts of projects identified in the RPMP. Projects will undergo the appropriate level of National Environmental Policy Act (NEPA) review as they are programmed and funded. The EA is being completed this way because the RPMP is a long-term, big picture planning document. It does not provide the project specific detail needed to conduct project level NEPA analysis nor does it reflect funding availability to actually implement projects. The RPMP is a living, visionary planning document that will be used to guide the long-term development and use of Camp Perry to support the mission of the OHARNG.

Camp Perry is a 640 acre OHARNG training site on the south shore of Lake Erie, approximately 30 miles east of Toledo (see attached map). The facility is located on state land however has a mixture of state and federally supported buildings. Camp Perry was established in 1906 to support OHARNG training and has been used continuously ever since. The primary mission of Camp Perry is to support weapons qualification on the various ranges located at the training site. In addition to serving as a military training site, Camp Perry hosts the National

Rifle Matches annually, has served as an induction center for incoming draftees for World War II, and was used as a Prisoner of War camp during WWII.

The OHARNG developed an initial Camp Perry Training Site Master Plan in 2011. Since this time the OHARNG has implemented projects to improve ranges and facilities and created a few new training venues on the property. Training requirements continually change as do the associated facility needs to support the current and future OHARNG training requirements. The RPMP identifies the OHARNG vision, capital investment strategy, planning standards, and area development plans for Camp Perry.

In compliance with Sections 106 and 110 of the National Historic Preservation Act (NHPA), the OHARNG has undertaken several historic property identification and evaluation efforts at Camp Perry. Those efforts have resulted in the identification of historic properties including the Camp Perry Historic District with 14 contributing elements. In addition, a Phase I Archaeological Survey was previously conducted at Camp Perry in 2005 that encompassed the entire facility. Two archaeological sites were identified during the survey containing late 19<sup>th</sup> to mid-20<sup>th</sup> century building foundations. Neither of these sites is eligible for the National Register of Historic Places and no further work is recommended.

If you have any input at this time or would like further information regarding the master plan or Environmental Assessment, please contact the undersigned at (614) 336-6569 or by e-mail at [kimberly.s.ludt.nfg@mail.mil](mailto:kimberly.s.ludt.nfg@mail.mil). Any letter responses should be mailed to the Camp Ravenna Joint Military Training Center Environmental Office, 1438 State Route 534 SW, Newton Falls, Ohio 44444. Thank you for your time.

Sincerely,

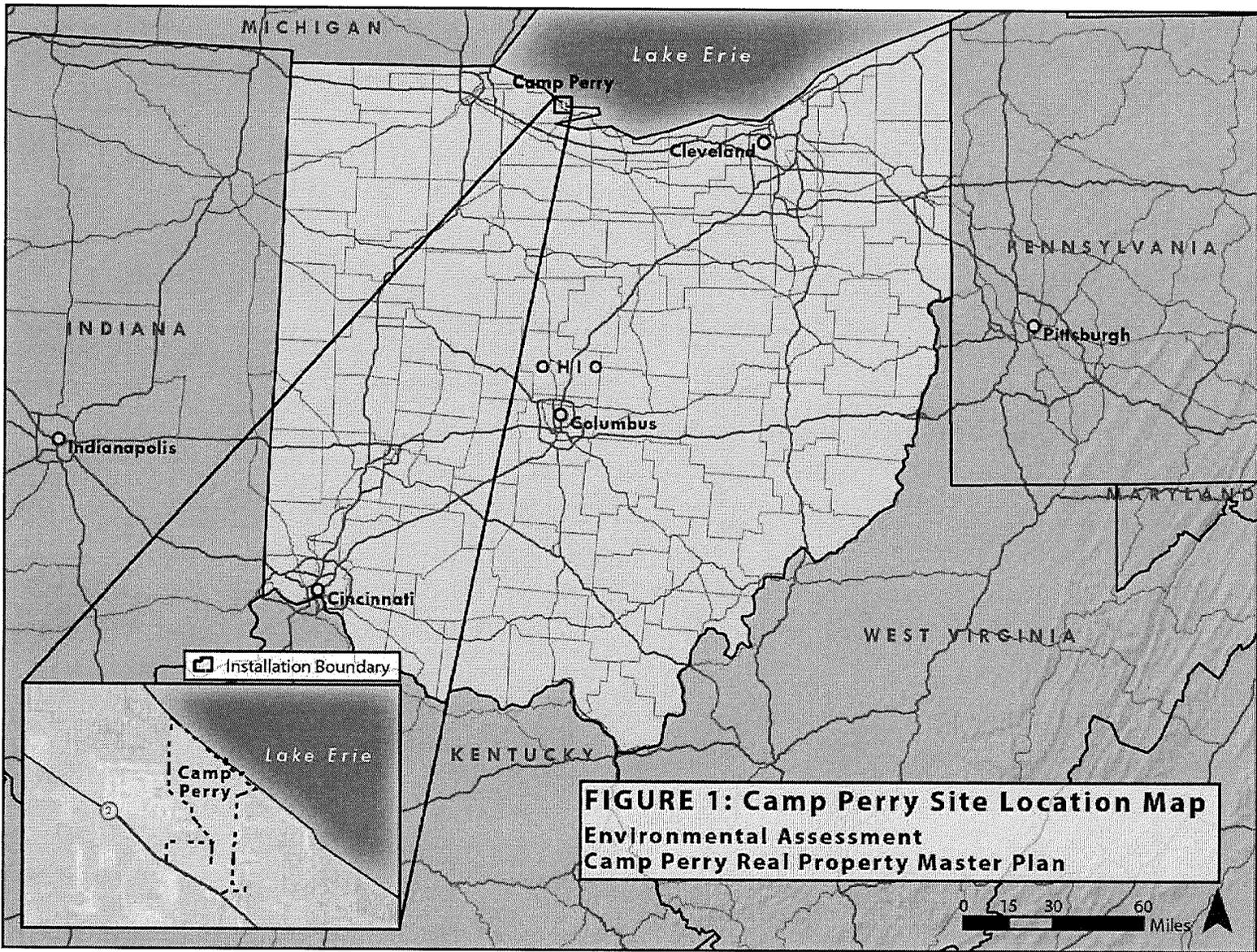


Kimberly S. Ludt  
Cultural Resources Manager  
Ohio Army National Guard

# SECTION 1.0

Purpose of and Need for the Proposed Action

Figure 1 Camp Perry Location Map





March 6, 2018

In reply, please refer to:  
2018-OTT-41112

Kimberly S. Ludt, Cultural Resources Manager  
Ohio Army National Guard  
Camp Ravenna Joint Military Training Center  
Environmental Office  
1438 State Route 534 SW  
Newton Falls, Ohio 44444

RE: Environmental Assessment for Approval of Real Property Master Plan  
Camp Perry Joint Training Center, Ottawa County, Ohio

Dear Ms. Ludt:

This letter is in response to the *Camp Perry Joint Training Center Real Property Master Plan (RPMP) Environmental Assessment DRAFT* received by our office on February 5, 2018.

The Ohio Army National Guard (OHARNG) is preparing an Environmental Assessment (EA) for the approval of the Real Property Master Plan (RPMP) for Camp Perry Joint Training Center (CPJTC) located in Ottawa County. Our office acknowledges receipt of the above referenced draft EA. At this time, we have no comments regarding the draft EA.

We look forward to continuing to coordinate with the OHARNG regarding cultural resources through the Section 106 process. If you have any questions, please do not hesitate to contact me at [jwilliams@ohiohistory.org](mailto:jwilliams@ohiohistory.org) or (614) 298-2000. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Joy Williams".

Joy Williams, Project Reviews Manager  
Resource Protection and Review

RPR Serial No: 1072446

**STATE OF OHIO**  
**ADJUTANT GENERAL'S DEPARTMENT**  
2825 W. Dublin Granville Road  
Columbus, OH 43235-2789

NGOH-IMR-ENV

03 June 2019

Mr. Dan Everson  
U.S. Fish and Wildlife Service  
Ohio Ecological Services Field Office  
4625 Morse Road, Suite 104  
Columbus, Ohio 43230

**SUBJECT:** Intergovernmental and Interagency Environmental Planning Consultation Ohio Army National Guard, Camp Perry Joint Training Center (CPJTC), Environmental Assessment of Real Property Master Plan.

Dear Mr. Everson:

The Ohio Army National Guard (OHARNG) is preparing an Environmental Assessment (EA) for an updated Real Property Master Plan (RPMP) for Camp Perry Joint Training Center (CPJTC). The updated RPMP is consistent with the requirements of the Department of Defense's (DoD) Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for RPMP development on DoD installations (DoD, 2012). This new UFC version replaces a version that was last updated in 1986. The new UFC 2-100-1 version includes a focus on energy efficiency and sustainability of the man-made and natural environments through an increased density mixed-use, transit-oriented development; standardized facility planning; and a commitment to joint operations and joint bases in support of meeting the current missions, preserving long-term military capabilities, supporting the DoD's mission, and enriching the community it serves.

CPJTC is in northwestern Ohio within Ottawa County, approximately 30 miles east of Toledo, Ohio (see Enclosure 1). CPJTC consists of approximately 640 acres. The facility is located on state land; however, it maintains a mixture of state and federally supported buildings. Camp Perry was established in 1906 to support OHARNG training and has been used continuously ever since. The primary mission of Camp Perry is to support weapons qualification on the various ranges located at the training site. In addition to serving as a military training site, Camp Perry hosts the National Rifle Matches annually, has served as an induction center for incoming draftees for World War II, and was used as a Prisoner of War camp during WWII.

The OHARNG developed an initial RPMP in 2011. Since this time, the OHARNG has developed projects to improve ranges and facilities on the property. Some older infrastructure and facilities are not suitable to support the current and future OHARNG training requirements and will be updated or replaced as training requirements and associated facility needs change. The updated UFC 2-100-01 RPMP identifies the OHARNG vision, and includes a capital investment strategy, planning standards, and area development plan for Camp Perry. It will inform future planning and programming decisions for real property construction, renovation, maintenance, and repair at the CPJTC over the near-term (within 5 years) and long-term (20 years) planning horizon. The UFC 2-100-01 RPMP represents a comprehensive approach to developing CPJTC using planning strategies that reinforce capabilities to support the OHARNG's mission, promote quality of life, and enhance sustainability and environmental viability at CPJTC.

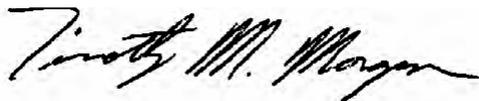
Natural vegetation communities at Camp Perry include pin oak forested wetlands, emergent wetland, old-field, and beach. These areas comprise approximately 25 hectares (63 acres), or 11 percent of the CPJTC. Approximately 124 hectares (310 acres) (54 percent) of CPJTC consists of open water, maintained grasslands, and range areas. The remaining land (approximately 35 percent) at the CPJTC is not dominated by vegetation and includes areas previously developed or disturbed through the emplacement of structures, roads, and other development. Most land within Camp Perry is developed or regularly mowed lawn with little habitat value. Habitat with the most diversity and value are the woodlot and the lake shore (see Enclosure 2). The proposed action does not call for development or modification of these habitat areas, which will help minimize any adverse impacts to wildlife.

CPJTC is located within the Cedar-Portage watershed. Lake Erie forms the entire northern CPJTC border and the mouth of the Portage River is in Port Clinton, approximately 6.4 kilometers (4.0 miles) east of the CPJTC. The subsurface storm water drainage system is composed of catch basins, buried storm water drainage pipes, open channels/streams, and open storm water ponds with outlets to Lake Erie and Lacarpe Creek. Surface waters on the CPJTC include nine ponds that cover approximately 2.9 hectares (7.2 acres), or 0.1 percent of the installation; 2.3 hectares (5.8 acres) of palustrine forested (PFO) wetlands; 1.8 hectares (4.6 acres) of palustrine emergent (PEM) wetlands; and approximately 2.0 kilometers (1.24 miles) of Lake Erie shoreline (see Enclosure 3). The eastern 228 meters (750 feet) of shoreline is designated as a Coastal Erosion Area.

The OHARNG's proposed action is approval of the UFC 2-100-01 compliant RPMP. Under the no action alternative, the UFC 2-100-01 RPMP would not be approved and the OHARNG would manage CPJTC without a UFC 2-100-01 RPMP. The EA will examine the potential effects of the proposed action and will include analysis of a no action alternative, as required by the National Environmental Policy Act (NEPA) of 1969 (Title 42 *United States Code* sections 4321 *et seq.*) and Council on Environmental Quality's (CEQ's) *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act* (Title 40 Code of Federal Regulations [CFR] parts 1500-1508). In accordance with Executive Order 12372, Intergovernmental Review of Federal Programs, we are sending this letter to advise you of this effort and to request your assistance in providing information that may assist us in our review and/or in identifying any potential issues related to the proposed action.

Thank you for your time and assistance. If you need more information or have questions, please contact me by phone at 614-336-6568 or by email at [timothy.m.morgan.nfg@mail.mil](mailto:timothy.m.morgan.nfg@mail.mil). If you choose to respond by mail, send your response to Tim Morgan, Camp James A. Garfield Environmental Office, 1438 State Route 534 SW, Newton Falls, OH 44444.

Sincerely,

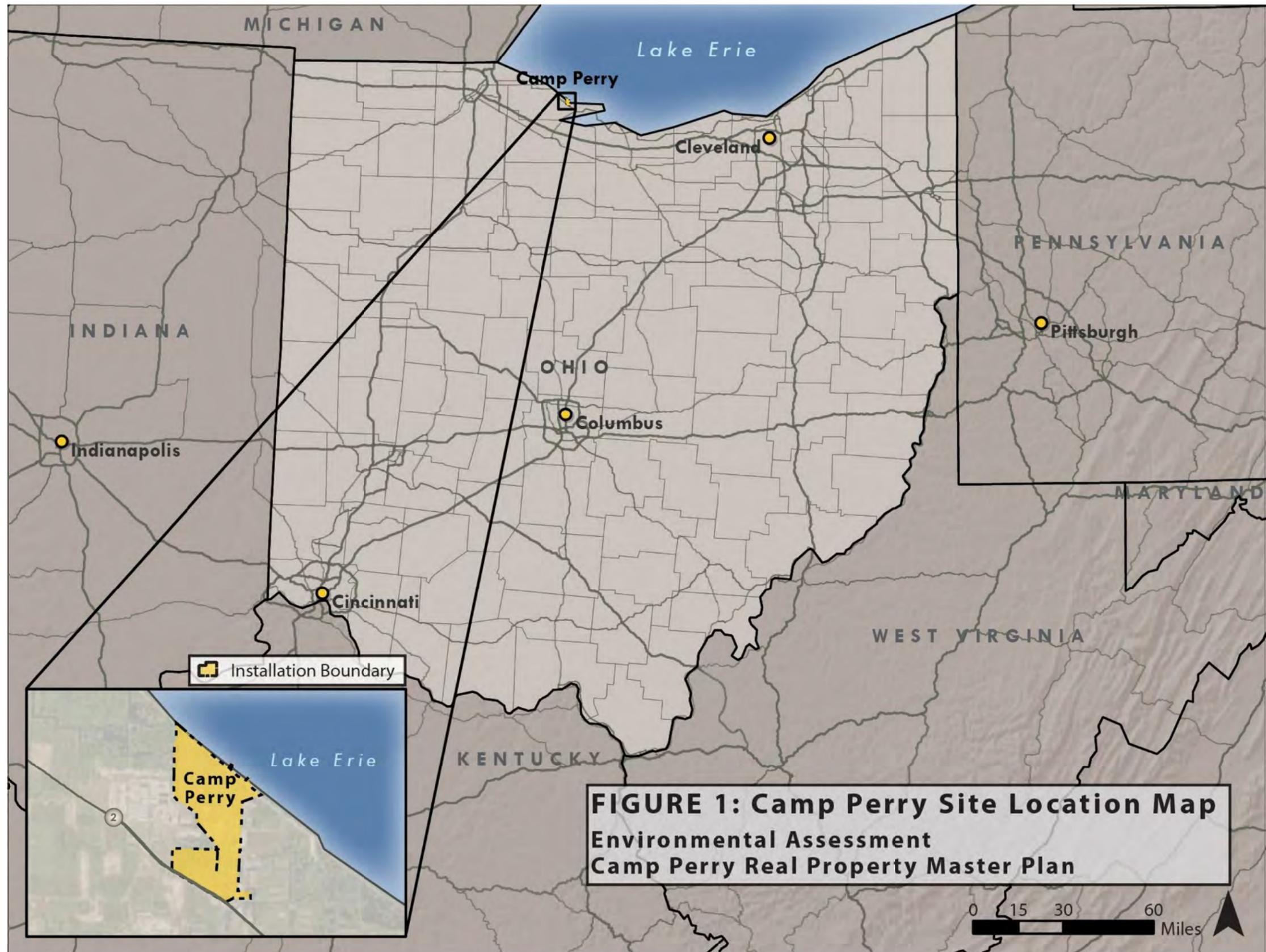
A handwritten signature in black ink that reads "Timothy M. Morgan". The signature is written in a cursive style with a large, stylized initial "T".

Timothy M. Morgan, CF  
State Environmental Supervisor

Enclosure 1: Figure 1 – Location Map

Enclosure 2: Figure 2 – Camp Perry Vegetative Communities

Enclosure 3: Figure 3 – Camp Perry Water Resources Map

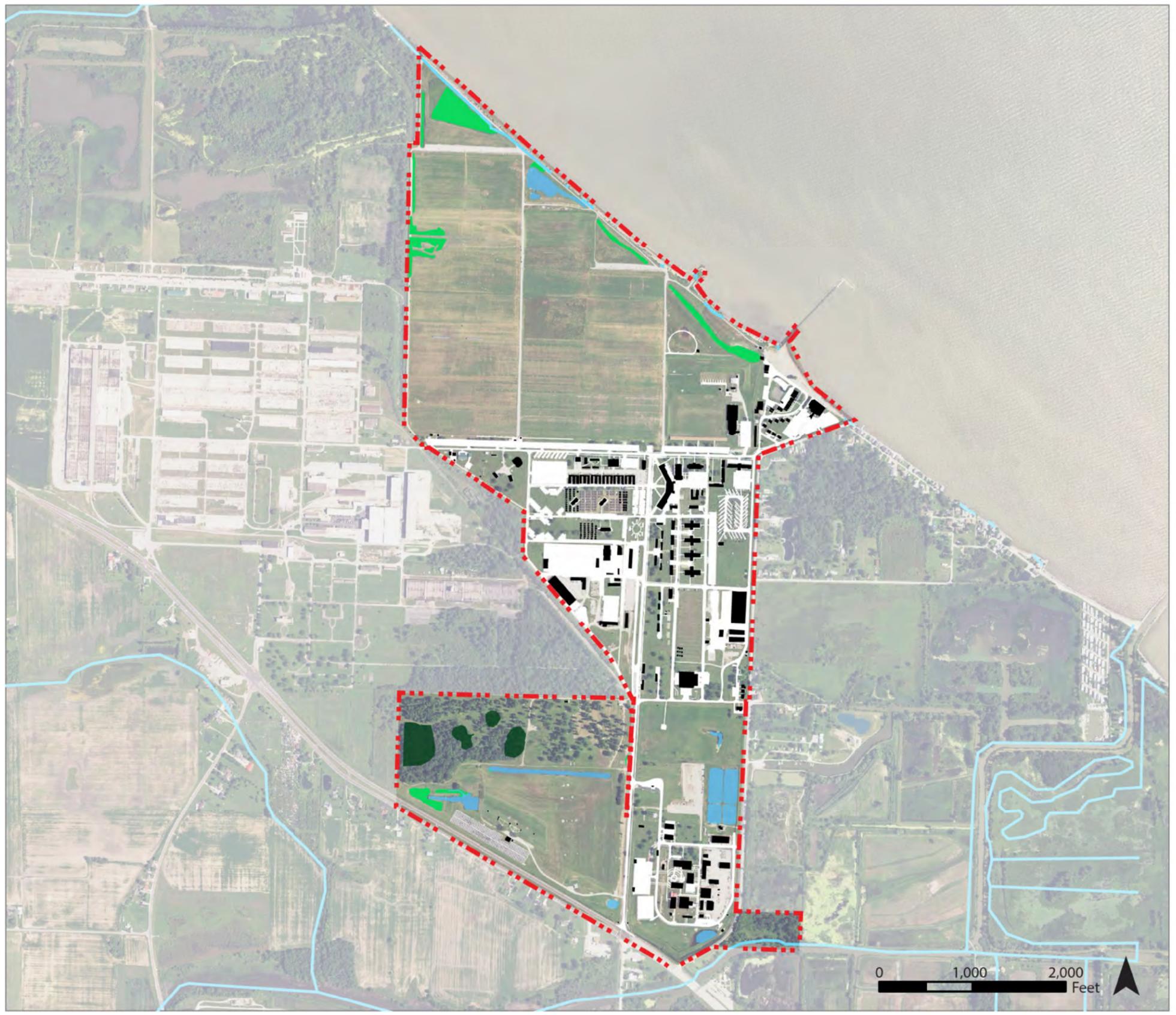




**Camp Perry  
Vegetative Communities**

- Installation Boundary
- Existing Buildings
- Pavement
- Wetland
- Open Water
- Beaches
- Grassland
- Old Field
- Pin Oak Forest

**Figure  
Vegetative Communities**



**Camp Perry  
Water Resources**

-  Installation Boundary
-  Existing Buildings
-  Pavement
-  Stream
-  Surface Water
- Wetlands**
-  PEM (Palustrian Emergent)
-  PFO (Palustrian Forested)

**Figure  
Water Resources**

0 1,000 2,000 Feet

# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

Ecological Services  
4625 Morse Road, Suite 104  
Columbus, Ohio 43230  
(614) 416-8993 / FAX (614) 416-8994



July 17, 2019

Mr. Timothy Morgan  
Camp James A. Garfield Environmental Office  
1438 State Route 534 SW  
Newton Falls, OH 44444

TAILS# 03E15000-2019-TA-1565

Re: Ohio Army National Guard, Camp Perry Joint Training Center, Environmental Assessment of Real Property Master Plan

Dear Mr. Morgan:

The U.S Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. The project will update the Real Property Master Plan (RPMP) for Camp Perry Joint Training Center (CPJTC), a 640-acre property located along the shore of Lake Erie in Ottawa County, Ohio. In conjunction with the RPMP updates, an Environmental Assessment will also be completed. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, fallow fields, and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags  $\geq 3$  inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, and bridges; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves and abandoned mines.

To minimize project impacts to Indiana and northern long-eared bats, we recommend avoiding all trees that are  $\geq 3$  inches dbh wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees  $\geq 3$  inches dbh cannot be avoided, we recommend removal of any trees  $\geq 3$  inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

Portions of CPJTC provide suitable habitat for the endangered Kirtland's warbler (*Setophaga kirtlandii*). While Kirtland's warblers do not nest in Ohio, migrating warblers can be expected to occur in shrub/scrub or forested habitat during spring (April 22-June 1) and fall (August 15-October 15). While migration occurs in a broad front across the entire state, approximately half of all observations in Ohio have occurred within 3 miles of the shoreline of Lake Erie. Kirtland's warblers have been documented in Ottawa County, within approximately 3 miles of CPJTC. Any project that could impact shrub/scrub or forested habitat warrants further consultation with this office, and we recommend that this habitat not be disturbed during the warbler's spring or fall migration period.

Portions of CPJTC provide suitable habitat for the endangered piping plover (*Charadrius melodius*). Piping plover habitat includes sand or pebble beaches with sparse vegetation along the shore of Lake Erie. The portion of CPJTC along Lake Erie supports a sand beach that is suitable piping plover migration stopover habitat, and piping plovers have been documented here in 2013 and 2016. While piping plovers do not currently nest in Ohio, migrating plovers can be expected to occur along the shore of Lake Erie during spring (April 1-May 31) and fall (July 15-October 31). Any project that could impact sand beach habitat warrants further consultation with this office, and we recommend that this habitat not be disturbed during the plover's spring or fall migration period.

Portions of CPJTC provide suitable habitat for the threatened rufa red knot (*Calidris canutus rufa*). Red knots are known to migrate through Ohio and stopover habitat include sand, gravel, or cobble beaches, and mudflats along the shore of Lake Erie. The portion of CPJTC along Lake Erie supports a sand beach that is suitable red knot migration stopover habitat, and Red knots were documented here in 2014. Migrating red knots can be expected to occur along the shore of Lake Erie between April 1 and October 31, which incorporates spring and fall migration and the nesting season. Any project that could impact sand beach habitat warrants further consultation

with this office, and we recommend that this habitat not be disturbed during the red knots' spring or fall migration period.

The threatened eastern prairie fringed orchid (*Platanthera leucophaea*) is known to occur on property immediately adjacent to CPJTC's eastern boundary. This tall, showy orchid is found in wet prairies, sedge meadows, and moist road-side ditches. If suitable habitat is present and proposed to be impacted for a project, we recommend that surveys for this species be conducted when the orchids are in bloom (late June through early July). Any project that could impact emergent wetland habitat warrants further consultation with this office.

Because there is a federal nexus for the project, no impacts to shrub/scrub, forest, emergent wetland, or sand beach should occur until consultation under section 7 of the ESA, between the Service and the Army National Guard, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the above species, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Bald eagles: Nesting bald eagles (*Haliaeetus leucocephalus*) are known to occur on CPJTC. Bald eagles are protected under the Migratory Bird Treaty Act (16 U.S.C. 703-712; MBTA), and are afforded additional legal protection under the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d, BGEPA). The BGEPA prohibits, among other things, the killing and disturbance of eagles. Our database of nest locations may not be complete because new nests are built each year, and nesting pairs sometimes build multiple nests. Therefore, we recommend that the site and surrounding area be evaluated to determine if any additional eagle nests are present and to validate the actual nest location.

In order to avoid take of bald eagles, we recommend that no tree clearing occur within 660 feet of a bald eagle nest or within any woodlot supporting a nest tree. Further, we request that work within 660 feet of a nest or within the direct line-of-site of a nest be restricted from January 15 through July 31. This will prevent disturbance of the eagles from the egg-laying period until the young fledge, which encompasses their most vulnerable times.

If these recommendations cannot be implemented and take of bald eagles is likely, a bald eagle take permit for this project may be necessary. To evaluate your project's potential to affect bald eagles, please visit: <https://www.fws.gov/midwest/eagle/permits/baeatake/index.html>

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus is it important to conserve the functions and values of the remaining wetlands in Ohio ([https://epa.ohio.gov/portals/47/facts/ohio\\_wetlands.pdf](https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf)). CPJTC

currently supports multiple wetland communities including pin oak forested wetlands, emergent wetlands, and open water wetlands. The Service recommends that proposed projects avoid wetland and stream habitats and minimize impacts to water quality (i.e., sedimentation, chemical runoff, etc.) because these areas provide important fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to maintain beneficial hydrologic functions. Best management practices should be used to minimize erosion, especially on slopes adjacent to water bodies. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats. If streams or wetlands will be impacted, the Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required.

In addition, we recommend coordinating with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state lands. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at [john.kessler@dnr.state.oh.us](mailto:john.kessler@dnr.state.oh.us).

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or [ohio@fws.gov](mailto:ohio@fws.gov).

Sincerely,



*for* Patrice Ashfield  
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW  
Kate Parsons, ODNR-DOW

**STATE OF OHIO**  
**ADJUTANT GENERAL'S DEPARTMENT**  
2825 W. Dublin Granville Road  
Columbus, OH 43235-2789

NGOH-IMR-ENV

04 June 2019

Ms. Sara Tebbe  
Ohio Department of Natural Resources  
Office of Real Estate & Land Management  
2045 Morse Road, Building E-2  
Columbus, Ohio 43229-6693

**SUBJECT:** Intergovernmental and Interagency Environmental Planning Consultation Ohio Army National Guard, Camp Perry Joint Training Center (CPJTC), Environmental Assessment of Real Property Master Plan.

Dear Ms. Tebbe:

The Ohio Army National Guard (OHARNG) is preparing an Environmental Assessment (EA) for an updated Real Property Master Plan (RPMP) for Camp Perry Joint Training Center (CPJTC). The updated RPMP is consistent with the requirements of the Department of Defense's (DoD) Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for RPMP development on DoD installations (DoD, 2012). This new UFC version replaces a version that was last updated in 1986. The new UFC 2-100-1 version includes a focus on energy efficiency and sustainability of the man-made and natural environments through an increased density mixed-use, transit-oriented development; standardized facility planning; and a commitment to joint operations and joint bases in support of meeting the current missions, preserving long-term military capabilities, supporting the DoD's mission, and enriching the community it serves.

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The OHARNG developed an initial RPMP in 2011. Since this time, the OHARNG has developed projects to improve ranges and facilities on the property. Some older infrastructure and facilities are not suitable to support the current and future OHARNG training requirements and will be updated or replaced as training requirements and associated facility needs change (see Enclosure 2). The updated UFC 2-100-01 RPMP identifies the OHARNG vision, and includes a capital investment strategy, planning standards, and area development plan for Camp Perry. It will inform future planning and programming decisions for real property construction, renovation, maintenance, and repair at the CPJTC over the near-term (within 5 years) and long-term (20 years) planning horizon. The UFC 2-100-01 RPMP represents a comprehensive approach to developing CPJTC using planning strategies that reinforce capabilities to support the OHARNG's mission, promote quality of life, and enhance sustainability and environmental viability at CPJTC.

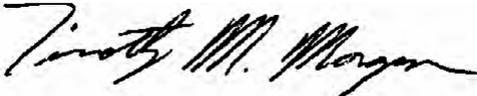
Natural vegetation communities at Camp Perry include pin oak forested wetlands, emergent wetland, old-field, and beach. These areas comprise approximately 25 hectares (63 acres), or 11 percent of the CPJTC. Approximately 124 hectares (310 acres) (54 percent) of CPJTC consists of open water, maintained grasslands, and range areas. The remaining land (approximately 35 percent) at the CPJTC is not dominated by vegetation and includes areas previously developed or disturbed through the emplacement of structures, roads, and other development. Most land within Camp Perry is developed or regularly mowed lawn with little habitat value. Habitat with the most diversity and value are the woodlot and the lake shore (see Enclosure 3). The proposed action does not call for development or modification of these habitat areas, which will help minimize any adverse impacts to wildlife.

CPJTC is located within the Cedar-Portage watershed. Lake Erie forms the entire northern CPJTC border and the mouth of the Portage River is in Port Clinton, approximately 6.4 kilometers (4.0 miles) east of the CPJTC. The subsurface storm water drainage system is composed of catch basins, buried storm water drainage pipes, open channels/streams, and open storm water ponds with outlets to Lake Erie and Lacarpe Creek. Surface waters on the CPJTC include nine ponds that cover approximately 2.9 hectares (7.2 acres), or 0.1 percent of the installation; 2.3 hectares (5.8 acres) of palustrine forested (PFO) wetlands; 1.8 hectares (4.6 acres) of palustrine emergent (PEM) wetlands; and approximately 2.0 km (1.24 miles) of Lake Erie shoreline (see Enclosure 4). The eastern 228 meters (750 feet) of shoreline is designated as a Coastal Erosion Area.

The OHARNG's proposed action is approval of the UFC 2-100-01 compliant RPMP. Under the no action alternative, the UFC 2-100-01 RPMP would not be approved and the OHARNG would manage CPJTC without a UFC 2-100-01 RPMP. The EA will examine the potential effects of the proposed action and will include analysis of a no action alternative, as required by the National Environmental Policy Act (NEPA) of 1969 (Title 42 *United States Code* sections 4321 *et seq.*) and Council on Environmental Quality's (CEQ's) *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act* (Title 40 Code of Federal Regulations [CFR] parts 1500-1508). In accordance with Executive Order 12372, Intergovernmental Review of Federal Programs, we are sending this letter to advise you of this effort and to request your assistance in providing information that may assist us in our review and/or in identifying any potential issues related to the proposed action.

Thank you for your time and assistance. If you need more information or have questions, please contact me by phone at 614-336-6568 or by email at [timothy.m.morgan.nfg@mail.mil](mailto:timothy.m.morgan.nfg@mail.mil). If you choose to respond by mail, send your response to Tim Morgan, Camp James A. Garfield Environmental Office, 1438 State Route 534 SW, Newton Falls, OH 44444.

Sincerely,



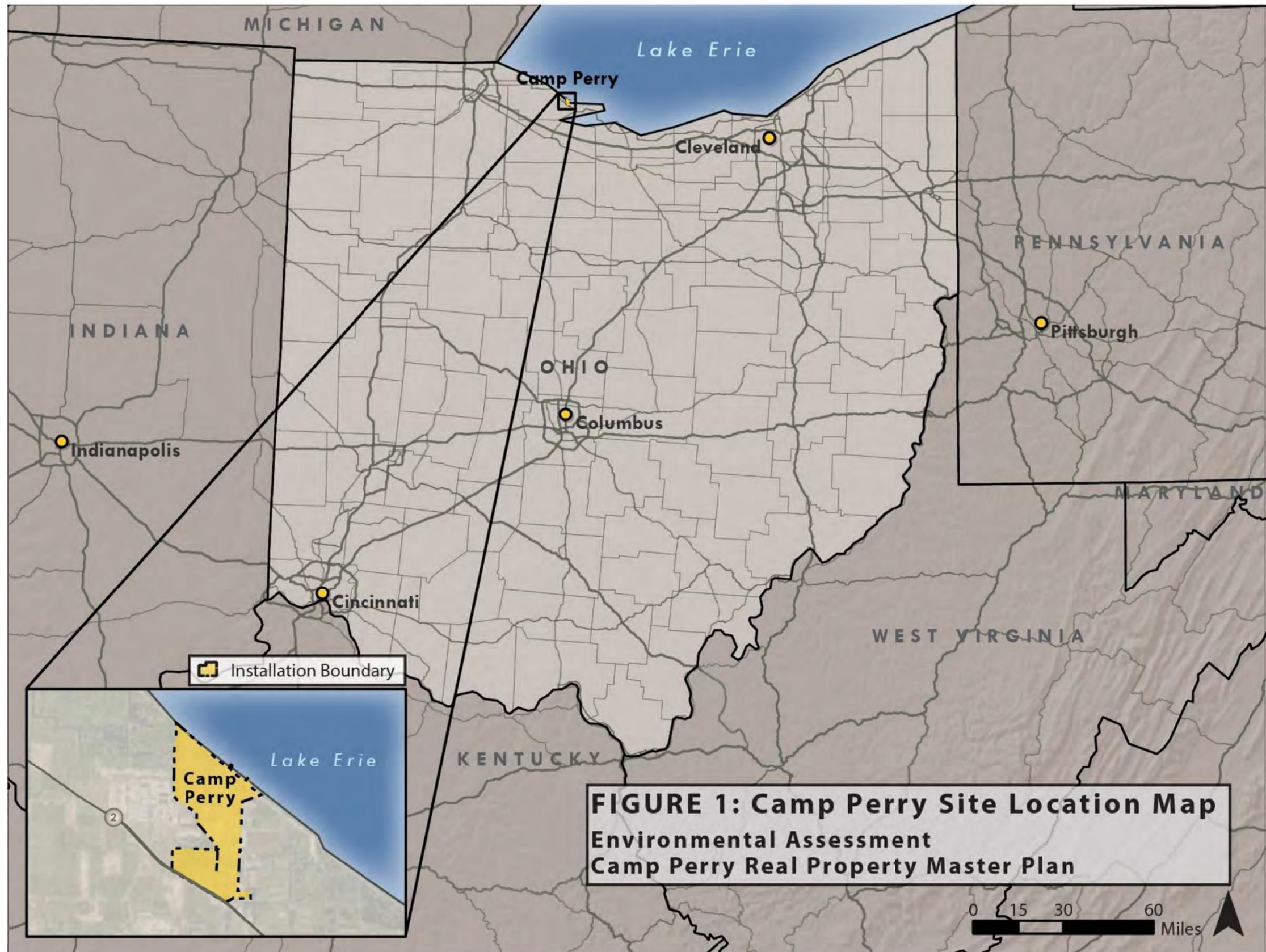
Timothy M. Morgan, CF  
State Environmental Supervisor

Enclosure 1: Figure 1 – Location Map

Enclosure 2: Table 2 – Types of Activities in the RPMP with Potential to Affect the Environment

Enclosure 3: Figure 2 – Camp Perry Vegetative Communities

Enclosure 4: Figure 3 – Camp Perry Water Resources Map



**Table 2 Types of Activities in the RPMP with Potential to Affect the Environment**

Camp Perry Mission Use or Planning Goal	Description of RPMP Measures	Resulting Actions that May Affect the Environment
Installation and Troop Support Facilities (New Buildings)	<ul style="list-style-type: none"> <li>• Maintenance / storage and Wash Rack facilities</li> <li>• Centralized Dining Facilities Administration Center (DFAC) and Range Operations and Control Area (ROCA) facilities</li> <li>• Training Aids, Devises, Simulators, and Simulations (TADSS), Unit Training Equipment Site (UTES), and Engagement Skills Trainer (EST)</li> <li>• Point Project completion with demolition of Cottages</li> <li>• Museum, multi-use facility, and bath house</li> <li>• Headquarters / Administrative facilities</li> <li>• Mission Control Center and Pads including Battalion Headquarters and Command Post Exercise War Fighters</li> <li>• Basic Officer Quarters</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance</li> <li>• Vegetation clearing</li> <li>• Earth moving / filling</li> <li>• Addition of Impervious surfaces</li> <li>• Temporary increase of construction-related greenhouse gas (GHG) emissions</li> <li>• Energy efficiency</li> <li>• Changes to area viewsheds and Historic District</li> <li>• Solid waste generation &amp; disposal</li> <li>• Construction / development in new areas</li> </ul>
Demolish / Repurpose Facilities	<ul style="list-style-type: none"> <li>• Demolition of unsupported and buildings in poor-condition including cottages and old Hutments</li> <li>• Renovate and insulate Motel structures</li> <li>• Rehabilitation of existing buildings capable of being re-purposed</li> <li>• Relocate facilities / operations as necessary</li> </ul>	<ul style="list-style-type: none"> <li>• Generation and disposal of solid and residual wastes</li> <li>• Generation and disposal of hazardous waste and special waste (lead/PCB paint and asbestos)</li> <li>• Temporary ground disturbances earth moving / filling</li> <li>• Reduced impervious surfaces</li> <li>• Changes to area viewsheds and Historic District</li> <li>• Temporary increase of construction-related greenhouse gas (GHG) emissions</li> </ul>
Recreation Improvements	<ul style="list-style-type: none"> <li>• Morale, Recreation &amp; Welfare (MWR) facilities</li> <li>• Expand RV park</li> <li>• Morale, Recreation &amp; Welfare (MWR) facility</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance due to construction</li> <li>• Vegetation clearing</li> <li>• Earth moving / filling</li> <li>• Addition of Impervious surfaces</li> <li>• Temporary increase of construction-related greenhouse gas (GHG) emissions</li> <li>• Changes to area viewsheds and Historic District</li> <li>•</li> </ul>

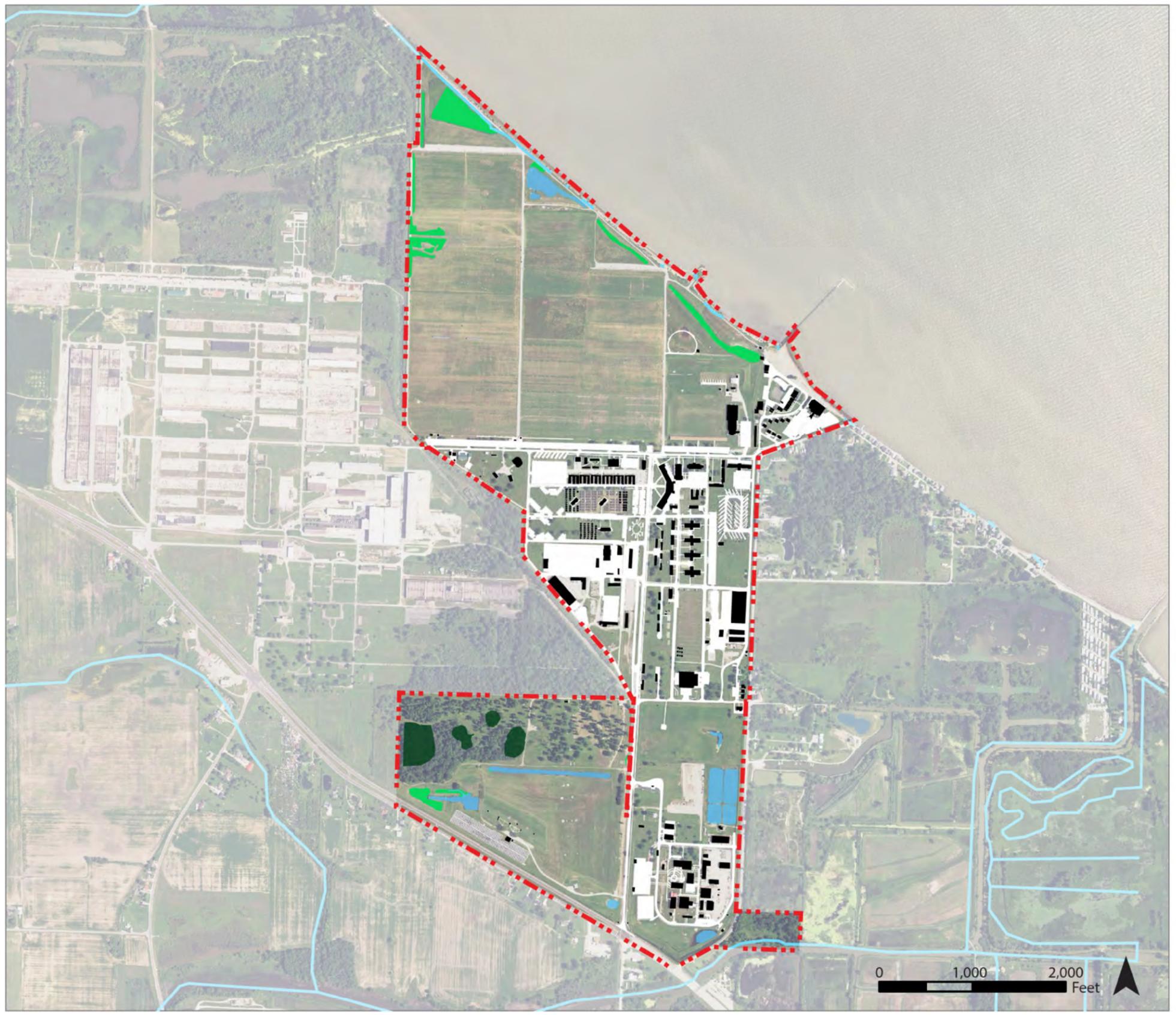
Camp Perry Mission Use or Planning Goal	Description of RPMP Measures	Resulting Actions that May Affect the Environment
Transportation / Logistics	<ul style="list-style-type: none"> <li>• Improve pedestrian access and facilities along select roads</li> <li>• Widen and select roads and improve accessibility for deliveries</li> <li>• Improve Entry Control Points with pull-off areas, guard shack, and barriers</li> <li>• Expand parking</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance</li> <li>• Addition of Impervious surfaces</li> <li>• Increase of construction-related greenhouse gas (GHG) emissions</li> <li>• Changes to area viewsheds and Historic District</li> <li>• Change in traffic patterns &amp; accessibility</li> <li>• Land use</li> </ul>
Utility Development	<ul style="list-style-type: none"> <li>• Upgrade lighting along select roads consistent with historic setting</li> <li>• Upgrade facility Wi-fi service</li> <li>• Infrastructure upgrades</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary ground disturbance</li> <li>• Vegetation clearing</li> <li>• Addition of Impervious surfaces</li> <li>• Increase of construction-related greenhouse gas (GHG) emissions</li> <li>• Changes to area viewsheds and Historic District</li> <li>• Land use</li> <li>• Energy efficiency</li> </ul>



**Camp Perry  
Vegetative Communities**

- Installation Boundary
- Existing Buildings
- Pavement
- Wetland
- Open Water
- Beaches
- Grassland
- Old Field
- Pin Oak Forest

**Figure  
Vegetative Communities**



**Camp Perry  
Water Resources**

-  Installation Boundary
-  Existing Buildings
-  Pavement
-  Stream
-  Surface Water
- Wetlands**
-  PEM (Palustrine Emergent)
-  PFO (Palustrine Forested)

**Figure**  
Water Resources

0 1,000 2,000 Feet

**STATE OF OHIO**  
**ADJUTANT GENERAL'S DEPARTMENT**  
2825 W. Dublin Granville Road  
Columbus, OH 43235-2789

NGOH-IMR-ENV

03 June 2019

Ottawa Regional Planning Commission  
Ottawa County Courthouse  
315 Madison Street  
Room 107  
Port Clinton, Ohio 43452

**SUBJECT:** Intergovernmental and Interagency Environmental Planning Consultation Ohio Army National Guard, Camp Perry Joint Training Center (CPJTC), Environmental Assessment of Real Property Master Plan.

Dear Sir or Madam:

The Ohio Army National Guard (OHARNG) is preparing an Environmental Assessment (EA) for an updated Real Property Master Plan (RPMP) for Camp Perry Joint Training Center (CPJTC). The updated RPMP is consistent with the requirements of the Department of Defense's (DoD) Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for RPMP development on DoD installations (DoD, 2012). This new UFC version replaces a version that was last updated in 1986. The new UFC 2-100-1 version includes a focus on energy efficiency and sustainability of the man-made and natural environments through an increased density mixed-use, transit-oriented development; standardized facility planning; and a commitment to joint operations and joint bases in support of meeting the current missions, preserving long-term military capabilities, supporting the DoD's mission, and enriching the community it serves.

CPJTC is in northwestern Ohio within Ottawa County, approximately 30 miles east of Toledo, Ohio (see Enclosure 1). CPJTC consists of approximately 640 acres. The facility is located on state land; however, it maintains a mixture of state and federally supported buildings. Camp Perry was established in 1906 to support OHARNG training and has been used continuously ever since. The primary mission of Camp Perry is to support weapons qualification on the various ranges located at the training site. In addition to serving as a military training site, Camp Perry hosts the National Rifle Matches annually, has served as an induction center for incoming draftees for World War II, and was used as a Prisoner of War camp during WWII.

The OHARNG developed an initial RPMP in 2011. Since this time, the OHARNG has developed projects to improve ranges and facilities on the property. Some older infrastructure and facilities are not suitable to support the current and future OHARNG training requirements and will be updated or replaced as training requirements and associated facility needs change. The updated UFC 2-100-01 RPMP identifies the OHARNG vision, and includes a capital investment strategy, planning standards, and area development plan for Camp Perry. It will inform future planning and programming decisions for real property construction, renovation, maintenance, and repair at the CPJTC over the near-term (within 5 years) and long-term (20 years) planning horizon. The UFC 2-100-01 RPMP represents a comprehensive approach to developing CPJTC using planning strategies that reinforce capabilities to support the OHARNG's mission, promote quality of life, and enhance sustainability and environmental viability at CPJTC.

The OHARNG's proposed action is approval of the UFC 2-100-01 compliant RPMP. Under the no action alternative, the UFC 2-100-01 RPMP would not be approved and the OHARNG would manage CPJTC without a UFC 2-100-01 RPMP. The EA will examine the potential effects of the proposed action and will include analysis of a no action alternative, as required by the National Environmental Policy Act (NEPA) of 1969 (Title 42 *United States Code* sections 4321 *et seq.*) and Council on Environmental Quality's (CEQ's) *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act* (Title 40 Code of Federal Regulations [CFR] parts 1500-1508). In accordance with Executive Order 12372, Intergovernmental Review of Federal Programs, we are sending this letter to advise you of this effort and to request your assistance in providing information that may assist us in our review and/or in identifying any potential issues related to the proposed action.

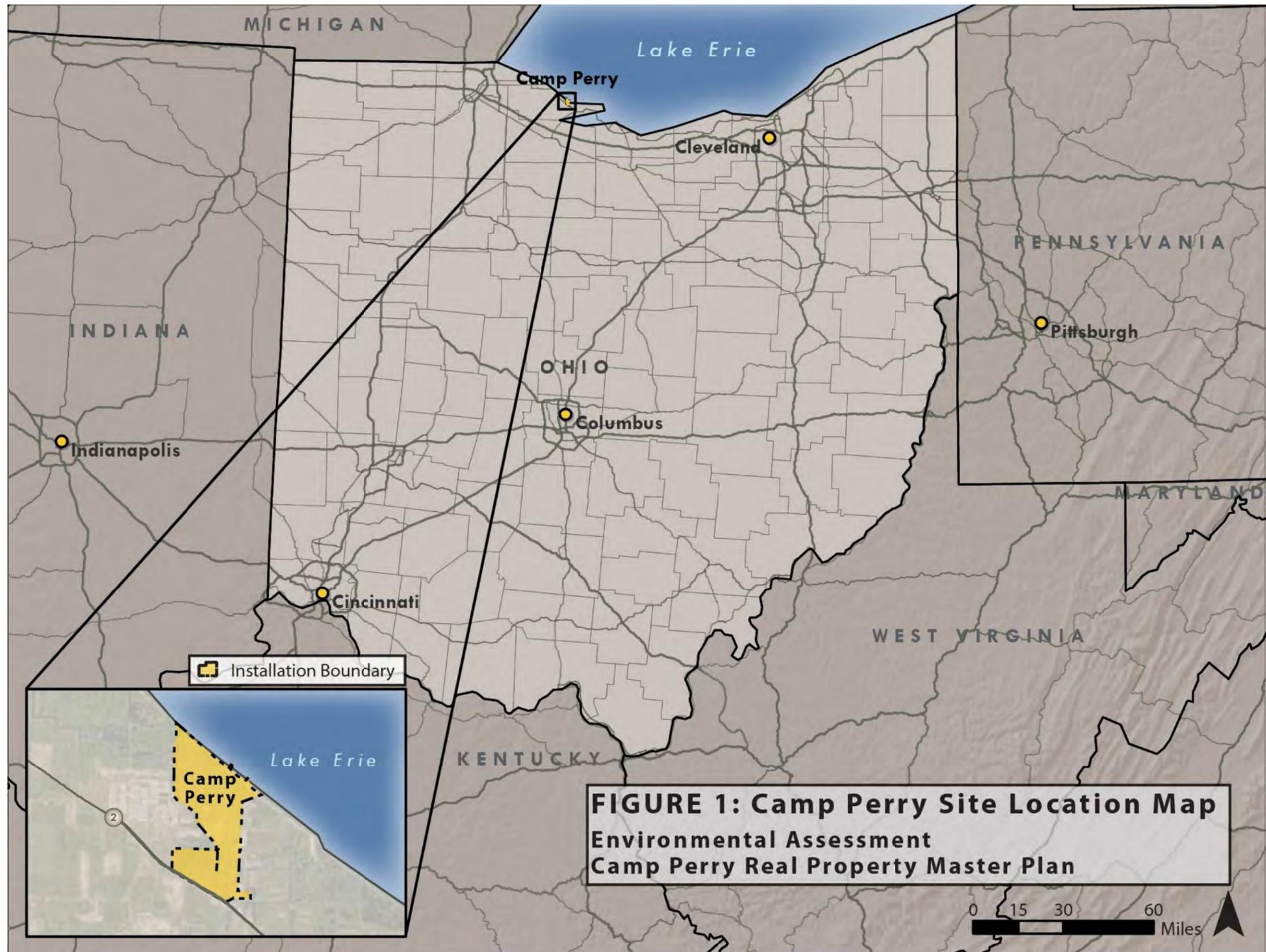
Thank you for your time and assistance. If you need more information or have questions, please contact me by phone at 614-336-6568 or by email at [timothy.m.morgan.nfg@mail.mil](mailto:timothy.m.morgan.nfg@mail.mil). If you choose to respond by mail, send your response to Tim Morgan, Camp James A. Garfield Environmental Office, 1438 State Route 534 SW, Newton Falls, OH 44444.

Sincerely,

A handwritten signature in black ink that reads "Timothy M. Morgan". The signature is written in a cursive style with a large, stylized 'T' and 'M'.

Timothy M. Morgan, CF  
State Environmental Supervisor

Enclosure 1: Figure 1 – Location Map



**STATE OF OHIO**  
**ADJUTANT GENERAL'S DEPARTMENT**  
2825 W. Dublin Granville Road  
Columbus, OH 43235-2789

NGOH-IMR-ENV

03 June 2019

Ottawa Soil and Water Conservation District  
240 W. Lake Street  
Suite B  
Oak Harbor, Ohio 43449

**SUBJECT:** Intergovernmental and Interagency Environmental Planning Consultation Ohio Army National Guard, Camp Perry Joint Training Center (CPJTC), Environmental Assessment of Real Property Master Plan.

Dear Sir or Madam:

The Ohio Army National Guard (OHARNG) is preparing an Environmental Assessment (EA) for an updated Real Property Master Plan (RPMP) for Camp Perry Joint Training Center (CPJTC). The updated RPMP is consistent with the requirements of the Department of Defense's (DoD) Unified Facilities Criteria (UFC) 2-100-01, Installation Master Planning, which provides guidance for RPMP development on DoD installations (DoD, 2012). This new UFC version replaces a version that was last updated in 1986. The new UFC 2-100-1 version includes a focus on energy efficiency and sustainability of the man-made and natural environments through an increased density mixed-use, transit-oriented development; standardized facility planning; and a commitment to joint operations and joint bases in support of meeting the current missions, preserving long-term military capabilities, supporting the DoD's mission, and enriching the community it serves.

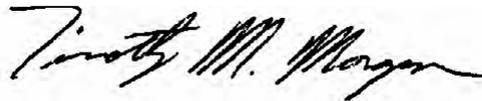
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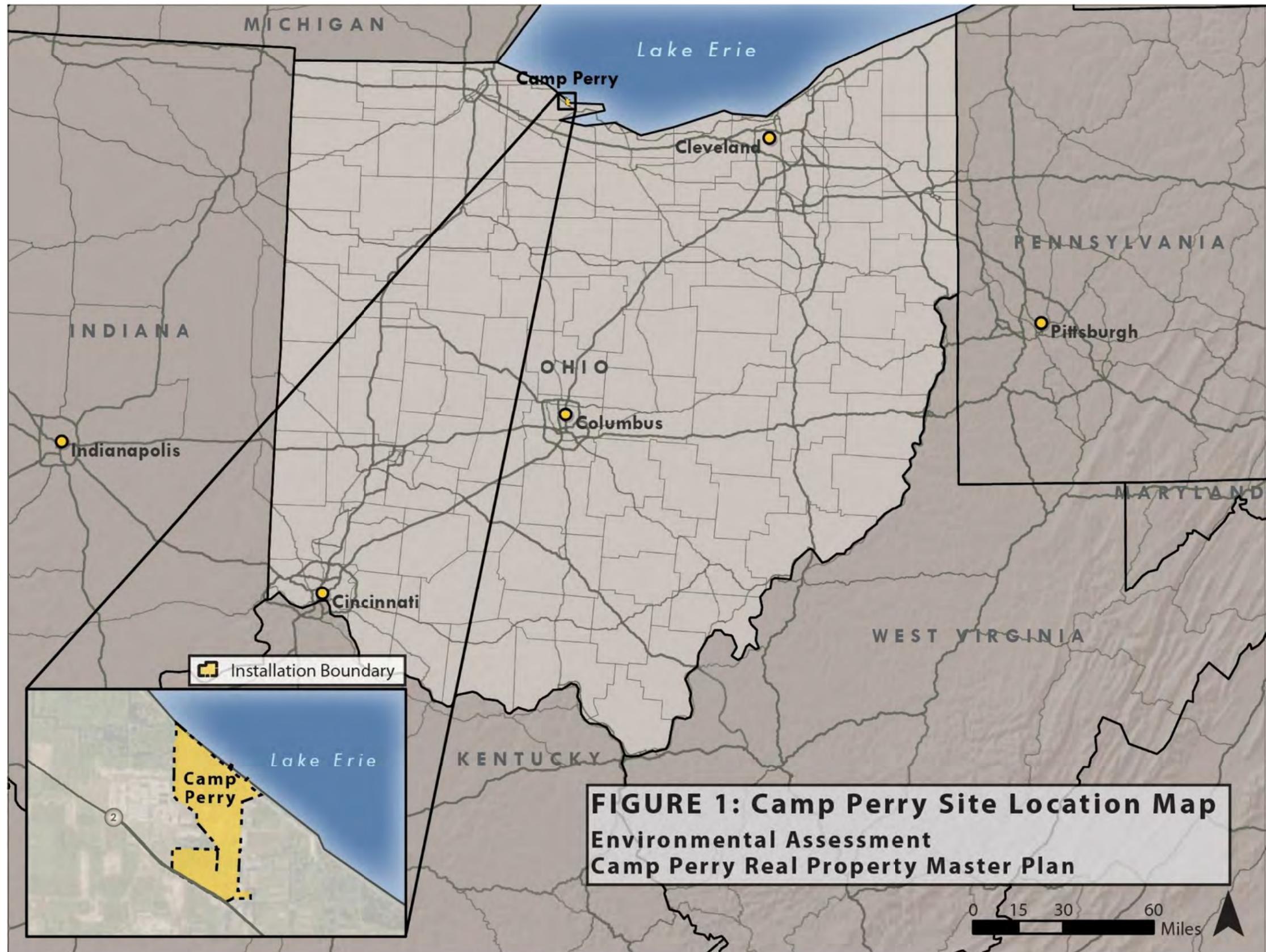
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Timothy M. Morgan, CF  
State Environmental Supervisor

Enclosure 1: Figure 1 – Location Map



**STATE OF OHIO  
ADJUTANT GENERAL'S DEPARTMENT  
2825 West Dublin Granville Road  
Columbus, Ohio 43253-2789**

NGOH-IMR-ENV

15 June 2011

MEMORANDUM THRU Directorate of Installation Management (NGOH-IMR-ZA), JFHQ,  
2825 West Dublin Granville Road, Columbus, Ohio 43235-2789

FOR NGB-ARE-C Chuck Chamberlain, 111 South George Mason Drive, Arlington, VA 22204

*M. D. JUNGEL*

SUBJECT: Removal of Ohio Army National Guard (OHARNG) Camp Perry Joint Training Site (CPJTS) from the List of ARNG Training Sites Requiring Integrated Natural Resources Management Plans (INRMP)

1. References: Memorandum, OASA(I&E), 9 Mar 2006, subject: Integrated Natural Resources Management Plan (INRMP) Determination for 17 Army National Guard (ARNG) Installations.
2. Reference 1.a. lists Camp Perry as one of 17 ARNG installations requiring an INRMP based on the following criteria.
  - a. "Federally listed, proposed, or candidate species are onsite or critical habitat has been designated or proposed on the installation, and on-installation conservation measures are necessary to conserve the federally listed species."
  - b. "Hunting and fishing are allowed for which special State hunting and fishing permits are issued by the installation in accordance with 16 USC 670a(b)(3) (Sikes Act)."
  - c. "Unique biological resources, wetlands, species in decline, or ecological issues require a level of planned management that can only be addressed by an INRMP."
3. The OHARNG conducted planning level surveys and developed an INRMP for CPJTS. Concurrence was received from the Ohio Department of Natural Resources (DNR) on 22 February 2007 and from the US Fish and Wildlife Service on 28 August 2007. The INRMP environmental assessment public reviews were completed on 1 October 2008 and the final Finding of No Significant Impact submitted to NGB at that time. The OHARNG Adjutant General signed the INRMP on 9 April 2009. To date NGB has not signed the final FONSI or the INRMP, therefore the INRMP is not officially final and is not being implemented.

NGOH-IMR-ENV

**SUBJECT: Removal of Ohio Army National Guard (OHARNG) Camp Perry Joint Training Site (CPJTS) from the List of ARNG Training Sites Requiring Integrated Natural Resources Management Plans (INRMP)**

4. In the process of developing the INRMP, and in the years subsequent to its development, it has become obvious that CPJTS does not meet the stated criteria to require an INRMP and that the lack of INRMP implementation has no negative impact on the military mission or natural resources stewardship. There is very little opportunity for natural resources management at CPJTS, certainly not enough to justify implementing and maintaining an INRMP in accordance with the Sikes Act Improvement Act of 1997.

a. CPJTS was established in 1907 and is built on filled lake plain wetland. All but about 15 acres of a small 30 acre forested area has been filled, drained, or otherwise built up and modified. CPJTS is basically a cantonment area and manicured small arms ranges. Vegetation management that supports the mission consists of maintaining low grass cover in the cantonment area and on the ranges with very little opportunity to modify this to improve wildlife habitat.

b. CPJTS has a system of surface impoundments and drainage tile in place to facilitate surface drainage for ranges that are at or below lake level. This system effectively drains the ranges and enables the military mission and is not subject to modification for wetland restoration or natural resources management.

c. CPJTS does have 1.24 miles of lake shore on Lake Erie. This shore line is mostly within the surface danger zone (SDZ) for the ranges and as such cannot be developed or modified. It is protected by a seawall built in the 1970's and access is limited due to the SDZs and impact area. There are state coastal zone management regulations in place that govern construction and shore line stabilization activities along the lake shore. There are no unique habitats or species or activities planned on the lake shore that require an INRMP.

d. In 2006 when the INRMP requirement was identified, there was a nesting pair of bald eagles living on Camp Perry. The bald eagle was listed as a federally threatened species at the time. The bald eagle has since been delisted and is no longer a valid criterion in determining the need for an INRMP. There are no federally listed species at CPJTS and there never was any critical habitat. In addition, one of the eagles died in 2010 and the nest has fallen into disrepair. It's unknown at this point whether the remaining eagle will remain at CPJTS. It was not seen very often in 2010. If the eagle does remain, the OHARNG will continue working with the Ohio DNR and the USF&WS to protect and manage the eagle and avoid mission conflicts.

e. Camp Perry does and has never issued hunting or fishing permits in accordance with the Sikes Act. It's unclear why this criterion was identified in reference 1.a.

f. The planning level surveys showed very low species diversity and did not identify any unique biological resources, wetlands, species in decline, or ecological issues requiring a level of planned management that can only be addressed by an INRMP.

NGOH-IMR-ENV

**SUBJECT: Removal of Ohio Army National Guard (OHARNG) Camp Perry Joint Training Site (CPJTS) from the List of ARNG Training Sites Requiring Integrated Natural Resources Management Plans (INRMP)**

5. Because CPTS does not meet any of the INRMP criteria identified in reference 1.a. and the lack of an INRMP does not negatively impact implementation of the CPJTS military mission and does not negatively impact natural resources, the OHARNG requests that CPJTS in Ottawa County, Ohio be removed from the list of Army National Guard Sites requiring an INRMP.

6. The point of contact for this action is the undersigned below at (614) 336-7095, or [steven.vicario@us.army.mil](mailto:steven.vicario@us.army.mil).



Steven M. Vicario  
1LT, Quartermaster  
Environmental Program Manager  
The Adjutant General's Department

CF:

COL Michael Ore, Construction and Facilities Management Officer

COL Dean Brown, Fort Ohio Commander

LTC Barbara Herrington-Clemens, Camp Perry Joint Training Center Commander

**From:** [Beckley, Eric R CIV NG NGB ARNG \(US\)](#)  
**To:** [Riley, Brian P NFG \(US\)](#)  
**Subject:** RE: any info on Camp Perry INRMP  
**Date:** Monday, January 09, 2017 8:44:07 AM

---

Brian-

Beginning this year, you will no longer need to do annual reporting at the end of the year for Camp Perry and it will be officially off big Army's list of sites requiring an INRMP.

So Camp Perry should be off the list officially and you will only have Camp Ravenna. And FYI- I finally received the official list from Big Army, and Camp Perry is off it.

Sorry for the years long delay in this. For whatever reason, the INRMP list has been stuck at Army for that long with little movement.

V/r

Eric

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

From: Riley, Brian P NFG (US)  
Sent: Thursday, January 05, 2017 11:19 AM  
To: Beckley, Eric R CIV NG NGB ARNG (US) <[eric.r.beckley.civ@mail.mil](mailto:eric.r.beckley.civ@mail.mil)>  
Subject: any info on Camp Perry INRMP  
Importance: High

Hi Eric,

Please see attached email from 15 AUG 2016. I just need to know if it has been determined that Camp Perry does not need an INRMP as is my understanding from the fact that we have not heard otherwise. Please let me know as soon as you can so we can put this matter behind us.

Thank you,

Brian

Brian Riley  
Natural Resources Manager  
Ohio Army National Guard  
Camp Ravenna Joint Military Training Center  
1438 State Route 534 SW  
Newton Falls, Ohio 44444  
Phone: (614) 336-4564  
Email: [brian.p.riley17.nfg@mail.mil](mailto:brian.p.riley17.nfg@mail.mil)

Mr. Timothy M. Morgan, CF  
Camp Ravenna Environmental Office  
1438 State Rt. 534 SW  
Newton Falls, OH 44444

**Re: Camp Perry Environmental Assessment- UFC 2-100-01**

**REQUEST FOR COMMENT PERIOD EXTENSION**

Dear Mr. Morgan,

I am a co-owner of the Bohling marsh, a 100- acre wetland facility that that has been owned and developed for over 60 years primarily at private expense. In recent years Ducks Unlimited, USFWS and ODNR Partners for Habitat and H2Ohio through the Ohio Department of Natural Resource has invested to further develop the property to improve water quality in the western basin of Lake Erie and to improve waterfowl and other specie habitat in the Lake Erie Marsh zone. We are members of Ducks Unlimited and Lake Erie Marsh Association (LEMA). Decades of work and thousands of public tax dollars have been invested in this property to serve as a key environmental resources and resting site for migratory waterfowl protected under the Migratory Bird Treaty (USA/Canada 1918).

Camp Perry has been a good neighbor and we respect the Ohio National Guard and the mission they perform. Our Primary concern is with a very narrow window of newly expanded nighttime operations of firing in Lake Erie as it impacts the migratory waterfowl and other specie during certain times of the day and certain times of the year.

We disagree with the Environmental Assessment dated June 2021 and its Findings of No Significant Impact. We feel that it is a flawed document, short sighted in findings of fact and accurate assessment.

For the document to conclude FONSI, would assume that there are no current or past impact on the environment, in which we disagree. Any further growth in Camp Perry is certain to impact every aspect of the environment.

Overall, we feel that this EA contains wrong statements. Unfortunately, it seems that numerous misstatements have been overlooked and not provided in real time to local government officials. For the EA to state there have been no past complaints is possibly due to no one knowing how or to what entity to voice their displeasure. It appears that numerous agencies were notified over 2 years ago. Have they been provided a copy of this EA? These agencies have a 2-year limit to their response. An updated response from ODNR and USFWS is in order to include H2Ohio concerns.

Numerous attempts to contact individuals regarding the EA, go unanswered. Ottawa County has attempted to make contact via phone and email with no reply. Many voice mail messages state that people are working remotely due to covid. Yet concerned citizens are asked to review the only copy in the county at the public library for 30 days. Then reply by mail. No specific date for comment is entered in the EA. Are the other counties that have been listed in the 5-year capital plan and budget request being asked to review similar biased document in the same manner?

We are requesting an extension for the viewing and comment period due to the lack of proper notification, restrictions on availability and no date in public review and comment noted on Page 6. We also need a contact name and number for the complaint process. This EA process is not following **32 CFR 651.14 Part 651**. Past Environmental Assessments for this facility should be referenced. Mitigation to noise during high migration periods in spring and fall should be put in place. We request that multiple decibel sensors be placed along adjacent residential areas and be monitored and recorded to ensure average noise levels do not exceed 55db per page 3-4.

**Attached are a few of our areas of concern:**

**Land Use**

Camp Perry land use is different from the residential and rural setting in the immediate area. Camp Perry is directly competing with local lodging, campgrounds and conference centers, at the tax payers' expense. Does Camp Perry pay tax to Ottawa County on these rentals? Why has public access to beach and pier areas been recently denied to the non-paying public? The entire base will soon be off limits due to the construction of a gate at the entrance.

**Air Quality:**

Dust from decommissioned sewage treatment plant and 3 old houses by east gate may contain hazardous contaminants, exhaust from numerous vehicles due to construction, demolition and training.

**Noise:**

Document states there are scattered residents when in fact there are over 200 property owners within 1 mile of Camp Perry. We are all disturbed by existing weapons firing at 2 am in the morning. The EA noise assessment reaches out to 2,650 feet. People are hearing it at 3 miles away. Who is the contact for waging a complaint? EA states no complaints. For a recent 3-day period, automatic weapons firing occurred from 7 am until 2 am the next day. We are complaining! Construction is continuous. After reviewing the 5-year budget, it will always be continuous. For the EA to state that noise will only be an impact during construction, will be a long and serious impact on the environment.

**Biological:**

Map does not accurately depict accurate location of wetlands and Eagle nest.

**Cultural:**

There is no mention of the Libben Site that is less than 1 mile south of Camp Perry. Burial site of 1300+ indigenous peoples dating back 1,000 years. Why was this not included in the notification to the listed Native American Tribes?

**Socioeconomic:**

Ottawa National Wildlife Refuge Complex is not in Fremont, Ohio. Top places to view birds is not conducive to Camp Perry EA. Multiple individuals work on base via a temp agency instead of government employment. Camp Perry is using taxpayer dollars to compete with local taxpaying business. Does Camp Perry pay tax to county on its income from various rentals?

**Environmental Justice:**

Minority and low-income population live in the immediate area to the east fence.

**Utilities:**

It appears that the Ottawa County Commissioners, Ottawa Soil and Water Conservation district and Ottawa County Regional Planning have not been notified about the current 2021 Camp Perry EA. We believe the current sewage capacity has exceeded 90%

**Water Resource:**

Building and construction plans are located in a 100- year flood plain. Memorial Day 2021 had Conference Center, Rental housing and campgrounds surrounding areas under several feet of water. Expansion of 5 more houses and campground are just examples of government, building in flood zones, where others are

prohibited. Where are the storm water drainage connections to Lake Erie and LaCarpe Creek located on the water resource map? Any discharged water should be monitored.

### **Wetlands**

Failure to meet mitigation goals in 2006. Past and current demolition for future construction has had many tandem loads of concrete and blacktop hauled off base. Some has gone to the landfill on Tettau Road. Many of the loads are being dumped in wetland locations that may violate the CWA. Are contractors required to show where material is being placed?

### **Fish & Wildlife**

High migratory bird activity is being negatively impacted by weapons firing during spring and fall high migration periods. Noise monitoring not firing during these peak periods should be a part of a mitigation

### **Infrastructure**

Ditch between CR 171 and Camp Perry continuously full of water. Sand bags placed over drain outlet by Camp Perry, along Route 2 and under CR 171. Water degrading roadbed. Numerous temporary repairs made to CR 171 berm. Numerous Camp Perry bound tractor trailer rigs, military vehicles and lost troops tear up road due to no adequate area to turn around. Mapping and GPS has CR 171 as an entry to Camp Perry. East gates (3) are always closed and locked. Railroad track has been removed.

### **Hazardous and Toxic Material**

Munitions continue to be fired into Lake Erie. Houses to be demolished by east gate may contain hazardous material. Sewage treatment plant north of Redhorse Squadron decommissioned with multiple impacts. Old sewage treatment plant and dump on east side of CR 171 has no mention. Buried material in NW corner of base, along Lake Erie has no mention.

We consider ourselves to be good neighbors of Camp Perry and the environment. It is our hope that Camp Perry will share in this vision.

Respectfully,

Michael J Bohling  
1330 N. Camp Perry Eastern Rd.  
Port Clinton, OH 43452  
(419) 297-9222  
[michaelbohling@ymail.com](mailto:michaelbohling@ymail.com)

CC:

Maj. General John C Harris, The Adjutant General, Ohio  
Director Mary Mertz, Ohio Department of Natural Resources  
Director Laurie Stevenson, Ohio Environmental Protection Agency  
State Senator Theresa Gavarone, Ohio's 2<sup>nd</sup> Senate District  
State Representative D.J. Swearingen, Ohio's 89<sup>th</sup> House District  
Rhonda Slauterbeck, Ottawa County Commissioners

**STATE OF OHIO  
ADJUTANT GENERAL'S DEPARTMENT  
2825 West Dublin Granville Road  
Columbus, Ohio 43235-2789**

NGOH-IMR-EE

5 November 2021

MEMORANDUM FOR RECORD

SUBJECT: Response to CPJTC RPMP EA Public Comment dated 1-31 OCT 2021 (Michael J. Bohling)

1. Reference. *Environmental Assessment for Approval of the UFC 2-100-01 Compliant Real Property Master Plan for the Camp Perry Joint Training Center, Ottawa County, Ohio*, dated June 2021.
2. This memorandum is to document responses by the Ohio Army National Guard (OHARNG) comments received on the Camp Perry Joint Training Center (CPJTC) Real Property Master Plan (RPMP) Environmental Assessment (EA). The public comment period was held 1-31 Oct 2021 with the EA available for review at the Rupp Public Library in Port Clinton, Ohio. The OHARNG's Notice of Availability (NOA) was published in the local newspaper, *The Beacon*, on page 7a on Thursday, 30 September 2021. The NOA of availability identified that comments could be submitted to Mr. Tim Morgan at Camp Ravenna Environmental, 1438 State Route 534 SW, Newton Falls, OH 44444 during the 30 day review period.
3. The OHARNG received one letter, with 33 comments, from Michael J. Bohling, 1330 N. Camp Perry Eastern Road, Port Clinton, OH 43452, 419-297-9222, [michaelbohling@gmail.com](mailto:michaelbohling@gmail.com). The OHARNG received the letter via an email from the Ottawa County Commissioner's Administrative Clerk, Rhonda Slauterbeck received 1 November 2021, with initial email contact on 26 October 2021. Mr. Bohling's letter is included with this OHARNG response. The comments have been identified individually in this memorandum for clarity.
4. By way of general comment, the OHARNG's EA is for the approval of a RPMP, and not for CPJTC training activity, operations, or any specific construction or demolition project. The proposed action identified in this EA is, "approval of a RPMP consistent with the military use of Camp Perry and the goals and objectives established in UFC 2-100-01". The EA evaluates a site master plan and not any specific action, activity or project. Approval of this EA in support of the CPJTC RPMP has very little to no potential to impact the environment adversely. Approval of the plan does not mean that current and future projects at CPJTC projects are exempt from the National Environmental Policy Act (NEPA) of 1969, as amended. Individual projects proposed in the future at CPJTC must comply with all applicable environmental requirements. Projects implemented in accordance with the RPMP are required to undergo separate and applicable NEPA analysis.
5. Comments set forth in Mr. Bohling's e-mail received during the 30 day public review period are set forth below, with corresponding agency responses:
  - 1) "Our Primary concern is with a very narrow window of newly expanded nighttime operations of firing in Lake Erie as it impacts the migratory waterfowl and other specie during certain times of the day and certain times of the year."

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This comment, referencing training and operations at CPJTC, is not germane to the proposed action identified within this EA (approval of the site's RPMP). The OHARNG is and remains in compliance with the Migratory Bird Treaty Act, the Endangered Species Act, and the Bald and Golden Eagle Protection Act. The OHARNG actively avoids known direct negative impacts to protected and non-protected species. The OHARNG does have a noise complaint process. The general public is notified the week of firing at CPJTC ranges, the Thursday before a firing event is to occur. An announcement is published in the local newspaper, *The Beacon*. If a member of the general public wishes to file a noise complaint, they may notify CPJTC at 614-336-6203 and 614-336-6252.

- 2) "We disagree with the Environmental Assessment dated June 2021 and its Findings of No Significant Impact."

Comment noted.

- 3) "We feel that it is a flawed document, short sighted in findings of fact and accurate assessment."

Comment noted.

- 4) "For the document to conclude FONSI, would assume that there are no current or past impact on the environment, in which we disagree."

Comment noted. The document concludes in a Finding of No Significant Impact (FONSI) because the OHARNG's proposed action is approval of the site RPMP and not for CPJTC training activity, operations, or any construction or demolition project. The EA states that specific projects as they are developed will undergo separate and applicable NEPA analysis.

- 5) "Any further growth in Camp Perry is certain to impact every aspect of the environment."

Comment noted.

- 6) "Overall, we feel that this EA contains wrong statements."

Comment noted.

- 7) "Unfortunately, it seems that numerous misstatements have been overlooked and not provided in real time to local government officials. For the EA to state there have been no past complaints is possibly due to no one knowing how or to what entity to voice their displeasure. It appears that numerous agencies were notified over 2 years ago. Have they been provided a copy of this EA? These agencies have a 2-year limit to their response. An updated response from ODNR and USFWS is in order to include H2Ohio concerns."

OHARNG mailed interagency coordination letters in June 2019. Letters to federally recognized Native American tribes and the Ohio Historic Connection, attention state historic preservation office, were sent in 2018. The results are summarized on page ES-10 in the Scoping and Public Involvement section of the EA's executive summary and in Section 1.5, pages 1-5 and 1-6. Copies of correspondence can be found in Appendices A and C. The OHARNG received responses from the

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U.S. Fish and Wildlife Service, the Ohio Historic Connection, and two of the many tribes that were contacted. None requested a copy of the EA, outside of the filing for public review, therefore copies were not provided.

Of note, the coordination with these agencies and tribes is maintained by the OHARNG throughout the process of completing any EA. Subsequently, that coordination, to include instances such as the initial formal correspondence listed above, remains valid throughout the duration of the EA process. Time lapsed does not equate to the time allotted to the agencies to for review. Additionally, the OHARNG remains committed to Environmental Stewardship and Environmental Justice, and welcomes external agency or public comments anytime throughout the process, as well as outside of the NEPA process. OHARNG has not been contacted regarding Camp Perry as a priority site in the H2Ohio program, but welcomes the idea of additional discussion on the topic with Ohio EPA and the Ohio DNR.

- 8) “Numerous attempts to contact individuals regarding the EA, go unanswered. Ottawa County has attempted to make contact via phone and email with no reply. Many voice mail messages state that people are working remotely due to covid. Yet concerned citizens are asked to review the only copy in the county at the public library for 30 days. Then reply by mail. No specific date for comment is entered in the EA.”

Although every contact effort made by Mr. Bohling may not have been returned, OHARNG records indicate that Mr. Bohling succeeded in reaching OHARNG staff - specifically in talking with the OHARNG State Environmental Supervisor via cellular telephone throughout the month of October 2021. OHARNG records further indicate that contact attempts via cellular telephone from the Ottawa County Commissioners Office in order to obtain a copy of this EA were not successful - because the Commissioner’s Office used an erroneous telephone number. The Ottawa County Commissioners Office did however contact the OHARNG by e-mail, was promptly responded to, and was courtesy furnished a copy of the EA.

The OHARNG’s established procedure for EA and draft FONSI review is to make the document available in the local public library. In accordance with the NEPA, the review dates of 1-31 October 2021 were published in the Notice of Availability. Of note, the draft FONSI includes place holders for the public review dates, to be filled in after the identified public review period has transpired. Those dates are then added to the FONSI as it is being made final.

- 9) “Are the other counties that have been listed in the 5-year capital plan and budget request being asked to review similar biased document in the same manner?”

This comment, referencing a 5-year capital plan and budget, is not germane to the proposed action identified within this EA. No 5-year capital plan and budget is discussed in the EA.

- 10) “We are requesting an extension for the viewing and comment period due to the lack of proper notification, restrictions on availability and no date in public review and comment noted on Page 6.”

The public review period of 1-31 October 2021, and availability of the EA and draft FONSI for public review, meets NEPA public participation requirements. The OHARNG does not intend to extend the public review period, however the OHARNG welcomes any questions from the public about the

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environmental management program at CPJTC. Please send correspondence to the Ohio National Guard Public Affairs Office at [ng.oh.oharng.mbx.pao@mail.mil](mailto:ng.oh.oharng.mbx.pao@mail.mil).

11) “We also need a contact name and number for the complaint process.”

Please send correspondence to the Ohio National Guard Public Affairs Office at [ng.oh.oharng.mbx.pao@mail.mil](mailto:ng.oh.oharng.mbx.pao@mail.mil).

12) “This EA process is not following 32 CFR 651.14 Part 651.”

32 CFR §651.14 of 32 CFR Part 651 requires integrating NEPA into Army planning. The OHARNG is doing just that, by completing the RPMP EA.

13) “Past Environmental Assessments for this facility should be referenced.”

The OHARNG completed a 2007 EA on the former Camp Perry Integrated Natural Resources Management Plan (INRMP). The 2007 INRMP EA is not directly cited within the RPMP EA, because the INRMP is no longer required. However, its contents were utilized as part of the drafting of the RPMP EA. The natural resources data set forth in the INRMP was reviewed as source of information for the RPMP EA. The OHARNG looks at the potential environmental impacts of all of its projects at CPJTC, and documents those impacts environmental requirements in Records of Environmental Consideration (RECs). See 32 CFR §651.19.

14) “Mitigation to noise during high migration periods in spring and fall should be put in place. We request that multiple decibel sensors be placed along adjacent residential areas and be monitored and recorded to ensure average noise levels do not exceed 55db per page 3-4.”

This comment, referencing noise levels exceeding 55 decibel (db), is not germane to the proposed action (RPMP approval) identified within this EA. The CPJTC RPMP will not generate noise.

15) “Camp Perry land use is different from the residential and rural setting in the immediate area. Camp Perry is directly competing with local lodging, campgrounds and conference centers, at the tax payers’ expense. Does Camp Perry pay tax to Ottawa County on these rentals? Why has public access to beach and pier areas been recently denied to the non-paying public? The entire base will soon be off limits due to the construction of a gate at the entrance.”

CPJTC is a military training base, not a local, state or national park. Training in support of Ohio National Guard Airmen and Soldiers is CPJTC’s primary mission. While the OHARNG welcomes coactive periods of use by the public in some of its facilities, and has a long history of doing so, the use of CPJTC by the general public is a privilege, not a right. For more information on public use of CPJTC facilities, please contact the Camp Perry Lodging and Conference Center at 888-889-7010, [cplccinfo@gmail.com](mailto:cplccinfo@gmail.com), and at [www.cplcc.com](http://www.cplcc.com).

16) “Dust from decommissioned sewage treatment plant and 3 old houses by east gate may contain hazardous contaminants, exhaust from numerous vehicles due to construction, demolition and training.”

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This comment, referencing a decommissioned sewage treatment plant and 3 old houses by the east gate on CPJTC, is not germane to the proposed action identified within this EA (RPMP approval). Of note, OHARNG demolition projects are reviewed in accordance with NEPA, and a REC is completed, ensuring all applicable environmental requirements, to include Clean Air Act compliance and Ohio EPA notification, are followed. See 32 CFR §651.19.

- 17) "Document states there are scattered residents when in fact there are over 200 property owners within 1 mile of Camp Perry. We are all disturbed by existing weapons firing at 2 am in the morning. The EA noise assessment reaches out to 2,650 feet. People are hearing it at 3 miles away. Who is the contact for waging a complaint? EA states no complaints. For a recent 3-day period, automatic weapons firing occurred from 7 am until 2 am the next day. We are complaining! Construction is continuous. After reviewing the 5-year budget, it will always be continuous. For the EA to state that noise will only be an impact during construction, will be a long and serious impact on the environment."

This comment, referencing weapons firing, is not germane to the proposed action (approval of the RPMP) identified within this EA. The OHARNG does have a noise complaint process. As stated in response to comment 1) above, the general public is notified the week of firing at CPJTC ranges, the Thursday before a firing event is to occur. An announcement is published in the local newspaper, *The Beacon*. To file a noise complaint members of the public may notify CPJTC at 614-336-6203 and 614-336-6252.

- 18) "Map does not accurately depict accurate location of wetlands and Eagle nest."

Upon reviewing the map on page 3-10 of the EA, there are old sewage lagoons just north of the 200<sup>th</sup> Red Horse Squadron, identified as areas of surface water. These areas are no longer there. All other details within the map of this EA remain accurate. Wetlands have been delineated on post in various areas utilizing the US Army Corps of Engineers Wetlands manual and other planning level survey methods. Wetland mapping is considered project specific planning. Project specific wetland and other waters of the state delineations are completed on a project specific basis when required as part of the proposed action or activity. The eagle nest is correctly mapped in the Land Use Limitations map in the Pin Oak Forest. The eagles at Camp Perry have been present for many years, and although their nest sites move from time to time, they remain within the general area depicted on this EA's map. It is the OHARNG's observation that the eagles are very tolerant of activities that occur at CPJTC.

- 19) "There is no mention of the Libben Site that is less than 1 mile south of Camp Perry. Burial site of 1300+ indigenous peoples dating back 1,000 years. Why was this not included in the notification to the listed Native American Tribes?"

This comment, referencing a burial site of 1300+ indigenous peoples dating back 1,000 years, is not germane to the proposed action identified within this EA (approval of the RPMP). As referenced in response to comment 7). The Libben Site is not in any way related to the OHARNG's activities at CPJTC or the site RPMP.

- 20) "Ottawa National Wildlife Refuge Complex is not in Fremont, Ohio."

Agreed. The address is 14000 West State Route 2, Oak Harbor, OH 43449.

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- 21) “Top places to view birds is not conducive to Camp Perry EA. Multiple individuals work on base via a temp agency instead of government employment. Camp Perry is using taxpayer dollars to compete with local taxpaying business. Does Camp Perry pay tax to county on its income from various rentals?”

This comment, referencing individuals work[ing] on base via a temp agency instead of government employment, is not germane to the proposed action identified within this EA (approval of the RPMP).

- 22) “Minority and low-income population live in the immediate area to the east fence.”

Refer to section 3.10 of this EA, located on page 3-29. “No minority or low-income population groups were identified, both on an aggregate and individual level, within the CPJTC vicinity. Additionally, no known subsistence level hunting, fishing, or trapping occurs at CPJTC. The absence of minority or low-income populations, and the general absence of children from an active military training site further reduces the potential for impacts.”

- 23) “It appears that the Ottawa County Commissioners, Ottawa Soil and Water Conservation district and Ottawa County Regional Planning have not been notified about the current 2021 Camp Perry EA.”

The OHARNG contacted the Ottawa Soil and Water Conservation District and the Ottawa County Regional Planning Commission in the interagency scoping phase of the EA. OHARNG did not initially contact the Ottawa County Commissioner because County Commissioner’s office is not normally contacted when doing an EA, especially when the Regional Planning Commission is contacted. As stated in response to comment 8), the Ottawa County Commissioner’s Office requested a copy of the EA and OHARNG provided one to them.

- 24) “We believe the current sewage capacity has exceeded 90%.”

CPJTC is connected to the Port Clinton sanitary sewer. Managing the sewer capacity is a responsibility of Port Clinton. If CPJTC ever needed to expand sewer capacity, Port Clinton would have to approve the expansion. No requirement currently exists on CPJTC to request expansion. The EA’s proposed action (approval of the RPMP) will not cause an increase in sewage discharge.

- 25) “Building and construction plans are located in a 100- year flood plain. Memorial Day 2021 had Conference Center, Rental housing and campgrounds surrounding areas under several feet of water. Expansion of 5 more houses and campground are just examples of government, building in flood zones, where others are prohibited.”

The proposed action of this EA, approval of the RPMP, will not cause construction in a floodplain. Any new construction or demolition with re-construction at Camp Perry require a flood plain waiver from the Department of the Army, and must comply with Ottawa County design requirements.

- 26) “Where are the storm water drainage connections to Lake Erie and LaCarpe Creek located on the water resource map?”

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The purpose of this EA's map is to show surface water resources and not storm water discharge points. The discharge from the ranges into Lake Erie is to the west of the pier. The discharge to LaCarpe Creek is in the southeastern part of Camp Perry.

27) "Any discharged water should be monitored."

There is no regulatory driver/requirement that requires a permit or monitoring of these discharges. The ranges are reviewed approximately every five years as part of the U.S. Army's Operational Range Assessment Program. The Operational Range Assessment (ORA) is the Army's systematic effort to evaluate whether munitions constituents (MC) from training and testing munitions are migrating from operational ranges to off-range areas at levels that pose an unacceptable risk to human health and the environment. ORA is the Army's portion of a Department of Defense-wide, proactive initiative to identify and address issues before they cause restrictions to range use or threaten human health and the environment. Army operational ranges are vital to conduct a variety of training scenarios or to test weapons systems. ORA directly supports Army Readiness by keeping operational ranges open and available. If pollutants were to ever enter the lake, the OHARNG would respond accordingly to rectify the issue.

28) "Failure to meet mitigation goals in 2006. Past and current demolition for future construction has had many tandem loads of concrete and blacktop hauled off base. Some has gone to the landfill on Tettau Road. Many of the loads are being dumped in wetland locations that may violate the CWA. Are contractors required to show where material is being placed?"

The proposed action of this EA, approval of the RPMP, has not and will not impact wetlands.

29) "High migratory bird activity is being negatively impacted by weapons firing during spring and fall high migration periods."

The proposed action of this EA, approval of the RPMP, will not generate noise. To date, the OHARNG has not seen any data to support the idea that non-proposed action activities at Camp Perry are negatively impacting migratory birds.

30) "Noise monitoring not firing during these peak periods should be a part of a mitigation".

The proposed action of this EA, approval of the RPMP, will not generate noise.

31) "Ditch between CR 171 and Camp Perry continuously full of water. Sand bags placed over drain outlet by Camp Perry, along Route 2 and under CR 171. Water degrading roadbed. Numerous temporary repairs made to CR 171 berm. Numerous Camp Perry bound tractor trailer rigs, military vehicles and lost troops tear up road due to no adequate area to turn around. Mapping and GPS has CR 171 as an entry to Camp Perry. East gates (3) are always closed and locked. Railroad track has been removed."

These comments, CR 171 and Route 2, is not germane to the proposed action identified within this EA. It is recommended that the issues pertaining to roadways be brought to the attention of Ottawa County engineer's office for CR 171, and the Ohio Department of Transportation for State Route 2. Military

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traffic issues, as identified in comment 31), have been sent to CPJTC, attention to the CPJTC base operations supervisor.

32) “Munitions continue to be fired into Lake Erie. Houses to be demolished by east gate may contain hazardous material. Sewage treatment plant north of Redhorse Squadron decommissioned with multiple impacts. Old sewage treatment plant and dump on east side of CR 171 has no mention. Buried material in NW corner of base, along Lake Erie has no mention.”

The comments made in comment 32) are not germane to the proposed action identified within this EA (approval of the RPMP).

33) “We consider ourselves to be good neighbors of Camp Perry and the environment. It is our hope that Camp Perry will share in this vision.”

The OHARNG is a dynamic organization comprised of men and women dedicated to fulfilling our federal, state, and community missions. Readiness of our units and our Soldiers is integral to each of these missions, and resources that provide and facilitate readiness are a top priority. A sustainable training environment is critical, as well as our continued utilization of training facilities and lands, are key among those resources. The OHARNG is committed to environmental stewardship at all of our facilities and within our communities.

Through sound environmental management, the OHARNG is committed to:

- Assuring the sustainability and availability of training lands and facilities to enable Soldier training and unit readiness.
- Looking to the Environmental Quality Control Committee as the primary means to set and review objectives, targets, and enable continual improvement.
- Complying with all relevant environmental legislation and regulations.
- Executing a formalized educational process that ensures Soldiers are informed of environmental program requirements and are able to execute individual and organizational responsibilities.
- Continually improving upon pollution prevention and reduction strategies through the application of innovative processes.
- Considering the environmental requirements and impacts in all planning processes relative to training, equipment fielding, and construction.

Adherence to these commitments and to the ISO 14001 standard is vital to OHARNG readiness and mission accomplishment, and [is] fully supported by the Ohio National Guard chain of command. The most important part of the OHARNG's eMS is our service members. The OHARNG encourages Soldiers and employees to take ownership of environmental issues that affect their ability to accomplish the mission. To that end, the OHARNG maintains good stewardship of CPJTC and the environment. It is our belief that the surrounding communities and good neighbors surrounding CPJTC share in that same vision.

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6. Point of Contact for this memorandum is the undersigned at [steven.m.vicario.mil@mail.mil](mailto:steven.m.vicario.mil@mail.mil) and 614-336-7095, Mr. Timothy Morgan, State Environmental Supervisor, at [timothy.m.morgan.nfg@mail.mil](mailto:timothy.m.morgan.nfg@mail.mil) and 614-336-6568, and Major (retired) Thomas Daugherty, State Environmental Supervisor, at [thomas.d.daugherty.nfg@mail.mil](mailto:thomas.d.daugherty.nfg@mail.mil) and 614-336-7395.

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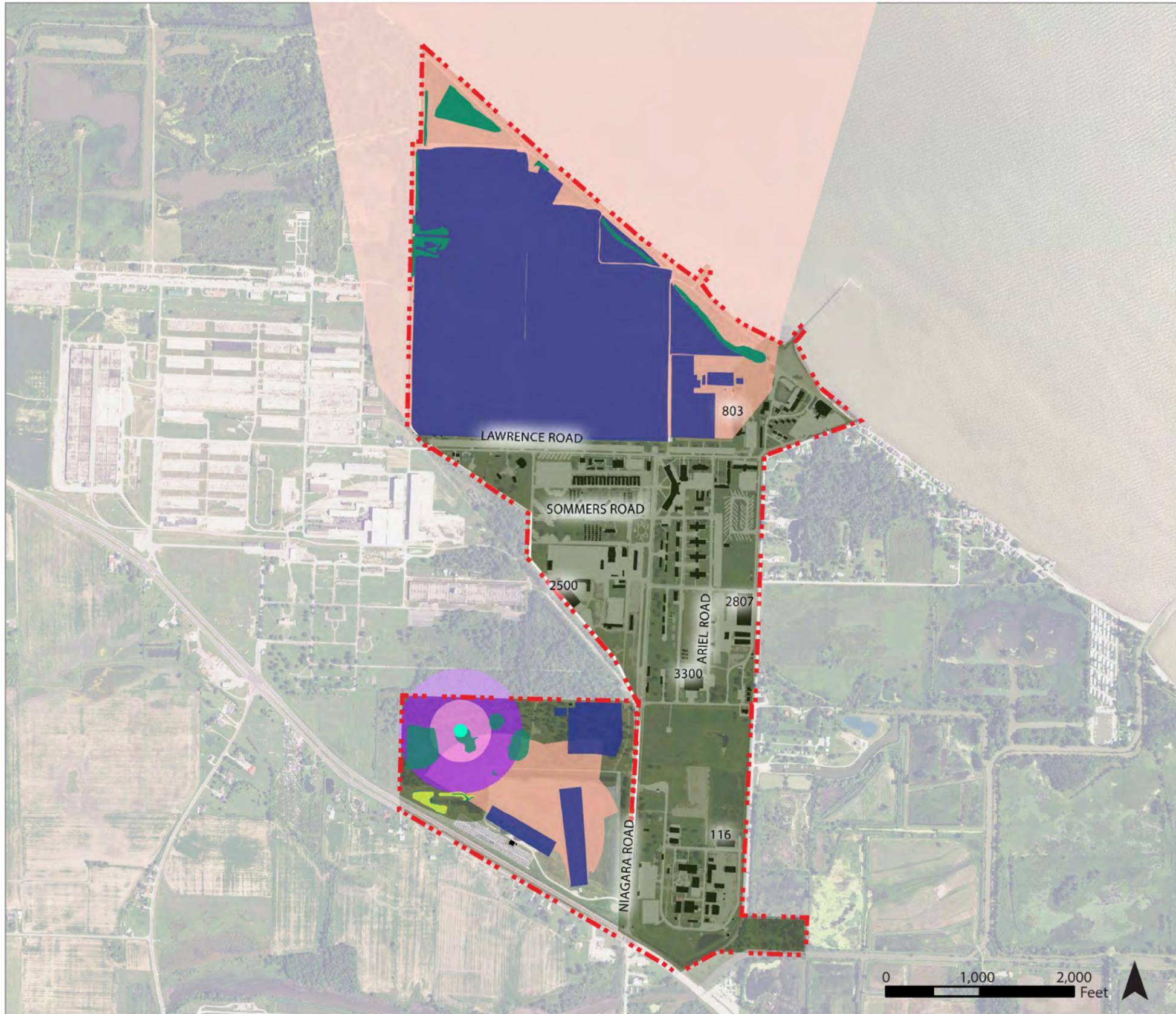
STEVEN M. VICARIO  
MAJ, LG, OHARNG  
Supervisory Environmental Protection Specialist

**APPENDIX D**

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*Land Use Limitations Map*





**Camp Perry  
Land Use Limitations**

-  Installation Boundary
-  Existing Buildings
-  Pavement
-  Impact Area
-  Training Area
-  Range Area
-  Wetlands
-  Wetland Mitigation Site
-  Eagles Nest
-  330ft Year-Round Restrictions Buffer
-  660ft Year-Round Restrictions Buffer

Land Use Limitations

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**APPENDIX E**

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***Army National Guard UFC 2-100-01 RPMP Validation Memo***





## NATIONAL GUARD BUREAU

111 SOUTH GEORGE MASON DRIVE  
ARLINGTON VA 22204-1373

ARNG-IER

25 September 2017

MEMORANDUM FOR OH ARNG CFMO Master Planner

SUBJECT: Real Property Master Plan Review for Army National Guard Training Installations

1. References:

a. ARNG-IER Memorandum, Subject: Real Property Master Plans for Army National Guard Training Installations, 03 December 2015

b. Unified Facilities Criteria (UFC) 2-100-01, *Installation Master Planning*, May 15, 2012

2. A review of the Camp Perry Real Property Master Plan was conducted by IER Master Planning. It has been determined that this plan meets the criteria prescribed by UFC 2-100-01. Current standards (reference b) and policy established in 2013 require compliance with UFC 2-100-01, Tier II at a minimum no later than October of 2018. The plan scored a 97 percent rating on product compliance, and a 90 percent rating on strategy compliance. Tier III compliance is not mandatory but recommended. Please see enclosure 1 for detail notes.

3. Congratulations, this plan meets the current standard. A completed Environmental Assessment is needed to be fully UFC 2-100-01 compliant. Please continue your efforts to ensure efficient use and readiness of real property through master planning.

4. Point of contact is Ms. Sophie O'Neill, at (703) 607-7553, or [ng.ncr.ngb-arng.list.ili-master-planningasiprplans-team-owner@mail.mil](mailto:ng.ncr.ngb-arng.list.ili-master-planningasiprplans-team-owner@mail.mil).

A handwritten signature in blue ink, appearing to read "Bradley S. Willis", is positioned above the typed name.

Encls.

1. ARNG RPMP Tier II Eval. Criteria Form

BRADLEY S. WILLIS

MAJ, EN

Requirements Officer, IER

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