

**Delaware Army National Guard
Demolition of Bunkers 30, 31, 44
River Road Training Site
1197 River Road, New Castle, Delaware
Consistency with Delaware Coastal Zone Management Policies
Submitted November 12, 2020**

Proposed Project:

The Delaware Army National Guard (DEARNG) proposes the demolition of bunkers 30, 31, and 44 at the River Road Training Site (RRTS). Demolition includes disconnection of all existing utilities, demolition of the existing structure and all associated structures including fences, waste removal, and asbestos removal.

In 2018, an Environmental Assessment (EA) was completed for a Combined Support Maintenance Shop and Readiness Center at RRTS. The EA was submitted for a Consistency Determination in 2018 (FC 2018.0009). In support of the above construction, bunkers 30, 31, and 44 will be demolished. Although the scope of the EA did not include the bunker demolition, it provides information to aide in the Consistency Determination. A Record of Environmental Consideration (REC) was also prepared as required by the National Environmental Policy Act (NEPA) for this proposed action.

Consistency Review:

The following review is based upon the summary in the *Delaware Coastal Management Program Comprehensive Update and Routine Program Implementation* dated November 2018.

5.1 CMP Policies for Wetlands Management

Wetlands are located on the RRTS property; however, demolition sites are not within delineated wetlands.

5.2 CMP Policies for Beach Management

No beaches have been identified at the proposed demolition site.

5.3 CMP Policies for Coastal Waters Management

The proposed project will disturb less than 1.0 acre, which should allow for a stormwater standard plan following the Delaware Sediment and Stormwater Regulations (DSSR). Before the start of demolition, DEARNG will obtain approved erosion and sediment control and stormwater management plans. Water quality control at the site will be managed in accordance with the DSSR, as well as with the provisions of this policy.

The proposed project will not impact any designated or existing uses of water. No additional regulated activities listed in Section 5. 3 of Delaware's Coastal Zone Management Policies will

take place. No work is planned that will impact marinas and no marinas are proposed to be constructed.

5.4 CMP Policies for Subaqueous Lands and Coastal Strip Management

No activities associated with the demolition or operation are proposed in, on, over, or under private subaqueous lands and no impacts to subaqueous lands are expected.

No heavy industrial activities will take place at the proposed project site. No manufacturing will occur at the proposed expansion site. No new offshore gas, liquid, or solid bulk product transfer facilities are proposed. No offshore pipelines which transfer bulk quantities of gas, oil, or other liquids to terminals within the coastal strip are proposed. No geological, geophysical, or seismic surveys are proposed.

5.5 CMP Policies for Public Lands Management

No state public lands are located at RRTS. The demolition will not impact any public lands.

5.6 CMP Policies for Natural Areas Management and Inland Bays Watershed Management

The construction contractor will be required to design a site specific sediment and erosion control plan and a pollution prevention plan that conforms to best management practices in the EPA's Storm Water Management for Construction Activities (EPA Document EPA-833-R-92-001, Chapter 3) and/or DSSR. The contractor can also be required to obtain a National Pollution Discharge Elimination System (NPDES) permit prior to initiation of construction at the site. These measures will help to reduce the impact of construction activities on surface waters to an environmentally acceptable, minor level.

Groundwater in Delaware is the primary source of public, rural, and industrial water supply. The water at the RRTS is supplied by the private water company Artesian Water. The proposed demolition at RRTS will not involve significant subsurface excavation, and is not projected to impact the quality of groundwater.

5.7 CMP Policies for Flood Hazard Areas Management

According the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Bunkers 31 and 44 are in a minimal flood hazard area, and Bunker 30 is within the 500 year floodplain. Demolition of Bunker 30 will remove a structure from the 500 year floodplain.

5.8 CMP Port of Wilmington Policies

The RRTS is not in an area that will impact the Port of Wilmington operations.

5.9 CMP Woodland and Agricultural Land Policies

There are woodland areas on the site. Contractors will access the demolition sites via a compacted gravel road that runs through the woodland area; however, the woodland areas will not be adversely impacted by the building demolition.

5.10 CMP Historic and Cultural Areas Policies

In accordance with 36 CFR 800.6(a)(4), the regulations implementing Section 106 of the National Historic Preservation Act, DEARNG has considered the effects of the proposed undertaking on historic properties. Ground disturbance associated with prior construction gives the site a low probability for intact archaeological resources.

In addition, the Advisory Council on Natural Preservation provided Program Comment for World War II and Cold War Era Ammunition Storage Facilities. The bunkers are eligible for the purposes of the Program Comment.

5.11 CMP Policies for Living Resources

Mammal, bird, and reptile species commonly found on the RRTS site are representative of those found throughout the state of Delaware. There are no state- or federally-listed threatened or endangered species on site. The vegetative cover on and around the RRTS includes mowed grass/landscaping, buildings, woodlands, and wetlands. The proposed demolition is within developed areas; therefore, few individuals are likely to be impacted by these actions, and short-term impacts on wildlife are anticipated to be minor. After construction, wildlife will be allowed to return to the site. Returning species are anticipated to be identical to those currently using the site for nesting or feeding. Long-term impacts on wildlife, therefore, are anticipated to be negligible.

5.12 CMP Mineral Resource Management Policies

There are no impacts to mineral resources as a result of the proposed demolition site.

5.13 CMP State Owned Coastal Recreation and Conservation Policies

There are no state owned coastal recreation areas on the site.

5.14 CMP Public Trust Doctrine Policies

The demolition project will be constructed within the existing developed area of the RRTS.

5.15 CMP Energy Facilities Policies

Neither the current RRTS nor the proposed demolition will utilize heavy industry or offshore gas, liquid or solid bulk transfer facilities.

5.16 Public Investment

Use of the State Revolving Fund is not applicable to the demolition project, and will not increase the traffic.

5.17 Recreation and Tourism

The demolition project is not recreational or tourism based.

5.18 CMP Policies for National Defense and Aerospace Facilities

The current RRTS has been in operation at the proposed demolition site. The proposed work of the RRTS will comply with all regulatory and environmental standards imposed under federal law.

5.19 Transportation Facilities

The demolition project is not a transportation project.

5.20 CMP Policies for Air Quality Management

New Castle County, Delaware is located within the Northeast Ozone Transport zone. In this area, nitrogen oxides and volatile organic compounds, the precursors to ozone, are transported by wind over long distances. The emissions from vehicles, motors and other sources may be carried into Delaware by the predominant winds, contributing to formation of ground level ozone.

Construction activities will include the use of both heavy machinery and lighter delivery and personal vehicles. These short-term emissions are generally accounted for in the State Implementation Plan, and are considered minor. Prior to construction, the existing building will be remediated for any potential contaminants, such as lead or asbestos.

5.21 CMP Policies for Water Supply Management

No withdrawal of ground or surface water takes place at the RRTS and none will take place as a result of the project.

5.22 CMP Policies for Waste Disposal Management

No on-site sewage or other wastewater disposal is conducted or will be conducted at the RRTS.

No land disposal sites are used at the current RRTS and none are proposed with the demolition project.

No solid waste is currently disposed of at the site and none are proposed with the demolition project.

No hazardous waste land emplacement units are used at the current RRTS and none are proposed with the demolition project. No storage, treatment, or disposal of hazardous waste will occur within floodplain, wetland, carbonate bedrock, public water supply, and significant environmental, fault, or wellhead protection areas. The DEARNG Hazardous Waste/Material Management and Pollution Prevention Plan (HW/HM2P3) prescribes responsibilities, policies, and procedures for storing and managing hazardous material (HM) and hazardous waste (HW) within the Delaware Army National Guard (DEARNG). Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, requires that the HW/HM2P3 is written to ensure that the DEARNG is in compliance with applicable federal, state, and local laws and regulations.

The demolition project will not involve the use, handling, and storage of hazardous materials or the generation of hazardous wastes. Demolition will include the use of machinery, tools, and materials which may contain hazardous substances (e.g., solvents, lubricants, adhesives, paints, carpeting). The construction contractor will be responsible to use, store, and/or dispose of these substances and materials in accordance with Federal, state, and local laws and the manufacturers' directions. This compliance will reduce the risk of environmental damage as a result of the construction to an acceptable level. During the demolition process, existing lead-based paint, and light ballasts will be removed and disposed of in accordance with all applicable Federal, State, and local laws and regulations. The short-term impact of the proposed work as regards hazardous materials and wastes, therefore, is projected to be minor.

No Underground Storage Tanks exist at the RRTS.

The existing RRTS site has no recorded release of contaminants.

5.23 CMP Policies for Development

The use of the proposed action is consistent with the existing land use of the RRTS.

5.24 CMP Policies for Pollution Prevention

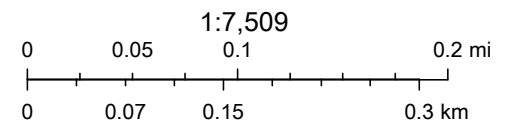
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The primary goal of DEARNG's Pollution Prevention Program is to prevent or reduce pollution at the source whenever feasible. When the generation of wastes and byproducts cannot be prevented by procedure modification or product substitution, then recycling is considered the next alternative. Pollutants that cannot be recycled are treated. Disposal or release of hazardous and nonhazardous wastes to the environment is only performed as a last resort and is conducted in the most environmentally and occupationally safe manner available. Efficient use of raw materials, energy, water, and other resources should be a primary consideration in planning and implementing operations and activities.

RRTS



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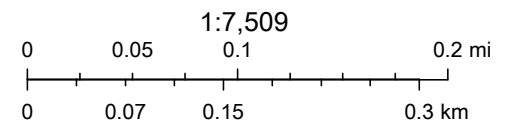
Federal Highway Administration, US Department of Transportation, USDA FSA, GeoEye, Maxar, Delaware FirstMap, Esri, HERE, Garmin, INCREMENT P, Intermap, NGA, USGS, Esri, HERE, iPC, Surdex Corp, 2017

Web AppBuilder for ArcGIS

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