

**FINAL**  
**ENVIRONMENTAL ASSESSMENT**  
**CONSTRUCTION OF ADDITIONAL COACHES' HOUSING**  
**ON WORTH PLACE**

**UNITED STATES MILITARY ACADEMY**  
**WEST POINT, NEW YORK**



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**April 2006**

**FINDING OF NO SIGNIFICANT IMPACT**  
**CONSTRUCTION OF ADDITIONAL COACHES' HOUSING**  
**ON WORTH PLACE**

UNITED STATES ARMY GARRISON  
WEST POINT, NEW YORK

**I. NAME OF ACTION**

Construction of Additional Coaches' Housing on Worth Place, by the United States Army Garrison at West Point (West Point), Town of Highlands, Orange County, New York.

**II. DESCRIPTION OF ACTION**

PROPOSED ACTION

In 2003, the Association of Graduates (AOG) for the United States Military Academy (USMA) funded the design and construction of six head intercollegiate athletic coaches' houses on the cul-de-sac of Worth Place. The funding was made up from gifts of AOG members in appreciation for the role of athletics in the training of USMA cadets. The six houses were constructed during the period spring 2004 to fall 2005.

Once these were constructed, other members of the AOG approached the USMA to make a gift of three additional houses, identical in size, style and material to the initial six. The Superintendent of the USMA has accepted the gift of three additional houses, also to be used by head coaches of various intercollegiate athletic teams.

The construction of the additional houses would allow quarters in other housing areas to be "freed up" for renovation, and house assistant coaches. There is currently a shortfall in the availability of quarters for civilian intercollegiate athletic coaches at West Point. Worth Place has become the first specific area designated for the housing of head intercollegiate athletic coaches.

ALTERNATIVES

Two alternatives were considered, in addition to the proposed action. The first alternative (Scheme 2) is similar to the Proposed Action (Scheme 1), with the exception of a fourth house. This additional house would require considerable rock removal, as its site is on top of a rock knoll, and would be highly visible from Washington Road.

The third alternative (Scheme 3) consists of seven houses. In addition to the four houses proposed under Scheme 2, three additional houses were proposed for construction on the west side of West Moore Loop. This alternative is more aggressive, in that a medical supply warehouse (Bldg 813) located on West Moore Loop, would have to be demolished. In addition, the houses on West Moore Loop would be more visible from the Washington Road historic corridor.

#### NO ACTION

This alternative proposes not to construct any new head coaches' houses on the USMA main post. This would result in civilian head coaches living in military-style quarters intermingled throughout the main post. These quarters are relatively small, and many are in need of revitalization. The Office of Director of Intercollegiate Athletics (ODIA) would continue to have difficulty attracting high quality coaches for their intercollegiate program.

### III. ANTICIPATED ENVIRONMENTAL EFFECTS

Only minor impacts to the environment are expected to occur as a result of implementing this project. These potential impacts would be limited to increased stormwater runoff from increased impervious surfaces, changes in land use and the visual character of the area, and a slight increase in vehicular traffic.

These impacts will be minimized through the timing of the activity, project phasing, good engineering practices, and appropriate mitigation measures. While they cannot be avoided, they will be reduced below the significance level.

### IV. MITIGATION MEASURES

The following mitigation measures will be employed to address the impacts resulting from the construction activities associated with the construction of three additional coaches' houses:

- Develop a project-specific Storm Water Pollution Prevention Plan, incorporating erosion and sediment controls according to US Army Corps of Engineers (USACE) specifications and good construction practices.
- Develop a project-specific vegetation plan, incorporating planting plans and monitoring schedules according to USMA specifications and US Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) recommendations.
- Develop a project-specific Spill Contingency Plan according to USMA specification for the identification and control of hazardous materials used during construction.
- Perform construction activities from April 1 to November 30, and during normal working (business) hours.
- Develop a project-specific Construction and Demolition (C&D) Waste Management Plan to address the temporary on-site collection and off-site disposal of C&D waste.
- Limit the on-site construction activities to weekday daylight hours to minimize project impacts to traffic and local area activities (Grey Ghost and U.S. Military Band Housing, and Keller Army Community Hospital)

- Require contractors to only use equipment that meets specific air and noise emission standards.

## V. CONCLUSIONS

Implementation of the aforementioned mitigation measures would reduce potential impacts to a level that is not adversely significant to the environment. Therefore, an environmental impact statement is not required for this action.

## VI. DOCUMENT AVAILABILITY AND POINT OF CONTACT

The Draft Environmental Assessment (EA) and the Finding of No Significant Impact (FNSI) was made available for public review for 30 days at the following locations:

Highland Falls Public Library  
298 Main Street  
Highland Falls, NY 10928

Town Clerk  
Town of Highlands  
254 Main Street  
Highland Falls, NY 10928

West Point Community Library  
Bldg 622 Swift Road  
US Military Academy  
West Point, NY 10996

Village Clerk  
Village of Highland Falls  
303 Main Street  
Highland Falls, NY 10928

The comment period ran from Friday, February 24 to Monday, March 27, 2006. During that period, only two written comments were received, both from the New York State, Department of State. One was regarding stormwater runoff and its relationship to one of the State's Coastal Policies (No. 33), and the other was regarding the timber rattlesnake, a threatened species in New York State. Responses to those comments were addressed, and were incorporated into the Final Environmental Assessment.

The point-of-contact for this document was:

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# APPROVAL SHEET

## FINAL ENVIRONMENTAL ASSESSMENT

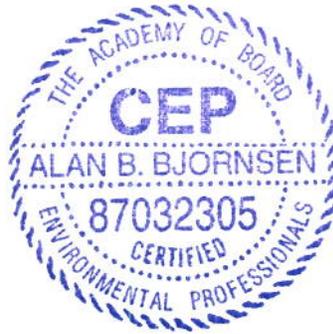
### CONSTRUCTION OF ADDITIONAL COACHES' HOUSING ON WORTH PLACE

DIRECTORATE OF PUBLIC WORKS  
UNITED STATES ARMY GARRISON  
WEST POINT, NEW YORK

APRIL 2006

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# FINAL ENVIRONMENTAL ASSESSMENT

## CONSTRUCTION OF ADDITIONAL COACHES HOUSING ON WORTH PLACE United States Military Academy West Point, New York

April 2006

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## **DOCUMENTS INCORPORATED BY REFERENCE**

### Records of Environmental Consideration

- Construction of New ODIA Coach's House on Worth Place, November 2003
- Removal of Contaminated Soil from Worth Place, April 2004
- Construct New Housing and Upgrade Utilities at Worth Place, June 2004

### Environmental Assessment

- Operation of Temporary MEDEVAC Helicopter Landing Zone (at Worth Place), September 2001

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## **AGENCY CORRESPONDENCE**

- New York State Historic Preservation Office
- New York State Department of State, Coastal Review Unit

## **1 SUMMARY**

In 2003, the Association of Graduates (AOG) of the United States Military Academy (USMA) presented a gift of money for the construction of six houses to be used by civilian head coaches of intercollegiate athletic teams of the USMA. The six houses were constructed on Worth Place, a dead-end road ending in a cul-de-sac, located in the northern portion of the USMA main post, during 2004-2005.

The project was successful, and so gratifying to the AOG and USMA that another monetary gift was given for additional houses to be constructed for athletic coaches.

A study was undertaken by the Engineering Plans and Services Division (EPSD) of the Directorate of Public Works (DPW) to find a site that would be appropriate for the additional houses. After months of investigation and coordination with AOG and USMA agencies, it was decided that the additional houses would be constructed on Worth Place. In addition, while up to seven houses were included in the study, it was also decided that only three would be constructed.

This document presents a brief history of the usage of Worth Place by the USMA, a summary of the development of the initial six houses on Worth Place, an overview of the study to site the additional houses, and the potential effects this action would have on the human environment.

This environmental assessment (EA) shows that the three additional houses can be sited on Worth Place in a manner that minimizes the potential for impact to the human environment. There would still be, however, some adverse impacts that cannot be avoided. Though mostly minimal, the

potential impacts are additional stormwater runoff from increased impervious surfaces, removal of vegetative habitat, change in visual character to Washington Road historic corridor, reduced parking availability, and increased construction traffic, which may also be compounded by interaction with other ongoing and future projects.

## **2 INTRODUCTION AND BACKGROUND**

### **2.1 Location and Description of Site**

The area proposed for the construction of additional head coaches' housing is located in the northern portion of the Main Post, on Worth Place (Figure 1). Worth Place is a cul-de-sac, approximately 350 feet in length that runs northwest from the Washington Road/West Moore Loop intersection (Figure 2). The area is a wooded setting situated between the Grey Ghost Housing community and the USMA Laundry Plant. The Keller Army Community Hospital is located immediately north of Washington Road from Worth Place. Worth Place is currently a residential community for intercollegiate athletic coaches.

### **2.2 History and Background**

Worth Place was originally the site of an incinerator, constructed in 1934. Building 709, the old post incinerator, was located at the southwestern corner of the (upper) parking area. It functioned until 1958, when it became a garbage can washing facility. This continued until 1965, when it became vacant. In 1987 it began use as a warehouse for the storage of materials supporting engineering activities, as well as a 90-day storage facility for hazardous wastes. In

1998 a 275-gallon above-ground storage tank was removed, and in 2001, the entire building was demolished.

In 1958, a one-story brick building, housing the Non-Commissioned Officers (NCO) Club, was constructed on the opposite side of the parking area from the incinerator. Building 759 functioned as an NCO club for its entire history, 43 years. The structure was demolished in 2002.

In 2002, a temporary MEDEVAC helipad was constructed in the former parking lot of the NCO Club (Bldg. 759), at the end of the cul-de-sac on Worth Place. An environmental assessment was prepared for this action, and is incorporated by reference to this document. This helipad functioned until 2004, when a permanent MEDEVAC helipad was constructed on the west (Emergency) end of the KACH.

In 2004, work began on constructing the first of six head coaches' houses on Worth Place. Utilities were brought in to serve the community, and various studies were conducted to determine the area feasible for development. Concurrences were received from the New York State Historic Preservation Office (NYSHPO) and the New York State Department of State (NYSDOS) Consistency Review Unit (CRU) before construction commenced. The first house was occupied in 2004, and the sixth house in 2005.

### **3 DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES**

#### **3.1 Need and Purpose**

In 2003, the Association of Graduates (AOG) for the United States Military

Academy (USMA) funded the design and construction of six head intercollegiate athletic coaches' houses on the cul-de-sac of Worth Place. The funding was made up from gifts of AOG members in appreciation for the role of athletics in the training of USMA cadets. The six houses were constructed during the period spring 2004 to fall 2005.

Once these were constructed, other members of the AOG approached the USMA to make a gift of three additional houses, identical in size, style and material to the initial six. The Superintendent of the USMA has accepted the gift of three additional houses, also to be used by head coaches of various intercollegiate athletic teams.

The construction of the additional houses would allow quarters in other housing areas to be "freed up" for renovation, and house assistant coaches. There is currently a shortfall in the availability of quarters for civilian intercollegiate athletic coaches at West Point. Worth Place has become the first specific area designated for the housing of head intercollegiate athletic coaches.

#### **3.2 Alternatives**

##### **3.2.1 Description of the Proposed Action (Scheme 1)**

The Association of Graduates (AOG) plans to construct three additional coaches' houses on Worth Place in the northern portion of the USMA main post, near the Keller Army Community hospital (KACH). The three houses being proposed are in addition to six that were recently (since 2004) constructed on Worth Place. The locations of the three houses are shown on Figure 3. House No 7, the first of the three new houses, would be located on the south side of Worth Place, about 400 feet from the Worth Place/West Moore Loop/Washington Road intersection.

The house would be somewhat screened from view from Washington Road by topography and existing vegetation. House No. 8, the second of the three houses, would also be located on the south side of Worth Place, but would be only 100 feet from the intersection. The house would require vegetative plantings to screen the side and rear from view from Washington Road. House No 9, the third house proposed, would be on the north side of Worth Place, about 200 feet from the intersection, but backing up to Washington Road. House No. 9 would require vegetation to screen its side and rear from view from Washington Road.

The additional houses would match the appearance of the existing six houses on Worth Place. The style, size, material, and color would be the same as what is already there. The floor space of each is approximately 2,950 square feet, and each would be built with a backyard deck.

### 3.2.2 Alternatives

Two alternatives were considered, in addition to the proposed action. The first alternative (Scheme 2) is similar to the Proposed Action (Scheme 1), with the exception of a fourth house proposed between House Nos. 7 & 8 (Figure 4). This additional house would require considerable rock removal, as its site is on top of a rock knoll, and would be highly visible from Washington Road.

The third alternative (Scheme 3) consists of seven houses. In addition to the four houses proposed under Scheme 2, three additional houses were proposed for construction on the west side of West Moore Loop (Figure 5). This alternative is more aggressive, in that a medical supply warehouse (Bldg 813) located on West Moore Loop, would have to be demolished. In addition, the houses on

West Moore Loop would be visible from the Washington Road historic corridor.

### 3.2.3 Alternatives Considered But Not Carried Forward

The following alternatives were, at one time, considered but, for various reasons, were not carried forward for in-depth assessment:

- Central Apartments – located in the Central (Academic) Area of the USMA
- Dunover Court – Scheduled for demolition to make room for the Community Athletic Facility
- South Moore Loop – located in the Grey Ghost housing area (Figure 6)
- Merritt Road – located in the New Brick housing area (Figure 7)
- Stony Lonesome 2 Housing Area (Figures 8 and 9)
- Smith Place – located near the South Apartments (Figure 10)

### 3.2.4 No Action

This alternative proposes not to construct any new head coaches' houses on the USMA main post. This would result in civilian head coaches living in military-style quarters intermingled throughout the main post. These quarters are relatively small, and many are in need of revitalization. The Office of Director of Intercollegiate Athletics (ODIA) would continue to have difficulty attracting high quality coaches for their intercollegiate program.

## **4 AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS**

### **4.1 Topography, Geology, and Soils**

Worth Place begins at the intersection of Washington Road and West Moore Loop, at approximately 280 feet above mean sea level (amsl), and climbs to about 340 feet, amsl, at the top of the cul-de-sac. Terrain is rather steep, with rock outcrops on both sides of the road, leading up to the cul-de-sac (Figure 11). Soils, formed by the Hollis group, are shallow (generally less than 24 inches) throughout the area.

Topography would be only slightly modified by the proposed action. Bedrock, in the areas of proposed construction would be either blasted or “ripped” using heavy equipment. Soils would be excavated and stockpiled during construction, and reused (regraded) during landscaping. Soil would also be imported to enhance the regrading of the site(s).

### **4.2 Water Resources**

#### **4.2.1 Groundwater**

Groundwater is only present in small quantities in the bedrock at Worth Place. Groundwater was not an issue during the construction of the first six houses on Worth Place, and it is not expected to be an issue during this next phase.

#### **4.2.2 Surface Water**

The nearest surface water is Sinclair Pond Brook, located approximately 100 feet from House #6 on Worth Place (Figure 12). All the other houses are farther away, as would be the proposed new houses. Stormwater from the impervious surfaces on Worth Place is directed to Sinclair Pond Brook. It is anticipated that the increased stormwater

resulting from the impervious surfaces from the additional houses would not be a significant environmental impact. A Stormwater Pollution Prevention Plan would be developed as part of the design for this project, and would include New York state Department of Environmental Conservation (NYSDEC) water quality treatment features (e.g., dry wells, infiltration trenches, etc.), appropriately sized to treat runoff from increased impervious areas (e.g., pavements and roofs). However, the cumulative effects of runoff from other proposed projects are anticipated to have an impact on both Sinclair Pond Brook and Crows Nest Brook. The discharge of stormwater from the proposed project into Sinclair Pond Brook would include appropriate channel and bank protection. In addition, West Point is undertaking environmentally sensitive stream bed and embankment stabilization projects along both Sinclair Pond Brook and Crows Nest Brook, downstream of the proposed project. These projects include: 1) natural stream restoration; 2) bank stabilization with armoring; 3) minor realignment of the channel; and 4) placement/replacement of bed materials (appropriately sized).

### **4.3 Natural Resources**

#### **4.3.1 Wildlife**

The Worth Place is inhabited by mostly small mammals such as woodchucks, rabbits, voles and squirrels. There are no federal or state-listed threatened or endangered species residing in the immediate area of Worth Place. However, sightings of timber rattlesnakes (*Crotalus horridus*), a New York State-listed threatened species, from state hibernaculum (designated O-31) have been documented by West Point Natural Resources Branch personnel within 1,000 feet of the project area. Therefore, there is a possibility that a

wandering individual from hibernaculum O-31 could show up on-site during the mid-May to mid-September time frame, the time when construction activities would be occurring on the site. Care should be taken if this species is encountered. Discussions by the West Point Natural Resources Branch, DPW with the NYSDEC's Endangered Species Unit resulted in development of a standard operating procedure should a timber rattlesnake be encountered within the West Point cantonment area. The Natural Resources Branch would remove the live animal from the site and release the animal in another area of the O-31 population's foraging area. Past encounters handled by the Natural Resources Branch have not adversely impacted the O-31 timber rattlesnake population.

Transient species include small birds and deer. Both the transient and small mammal species would have to relocate to other areas caused by the new construction.

#### 4.3.2 Vegetation

The Worth Place area is vegetated by northern hardwoods, shrubs, and grasses (Figure 13). There are no unique vegetative communities, and no threatened or endangered species present in the vicinity of the proposed construction areas.

#### 4.4 Land Use

The Worth Place area is located in the Community Support Zone, defined by the *USMA Master Plan for 2007*. Worth Place was recently converted from a MEDEVAC helipad to a residential area for intercollegiate athletic coaches. Six houses currently occupy the cul-de-sac area of Worth Place. The addition of three houses along the road leading to the cul-de-sac

would change the current land use from natural wooded to landscape residential.

#### 4.5 Cultural Resources

While the Worth Place area is located in the National Historic Landmark District (NHL) of West Point, the existing structures on the cul-de-sac are not individually eligible for inclusion in the National Register of Historic Places (NRHP), as they were just recently constructed. In addition, the Worth Place area is not sensitive to any archaeological features. However, should an unexpected discovery occur during excavation, the provisions of DPW SOP 16-1 *Protection of Archaeological or Historical Artifacts* would apply.

#### 4.6 Visual Resources

The Worth Place area is wooded and the existing coaches' houses are, for the most part, screened from Washington Road, the main corridor through the northern portion of the main post. Because Worth Place is a cul-de-sac, it is not used by visitors to the USMA, and therefore, the majority of the housing would remain unseen.

The original project (the first six houses) were constructed with the following stipulations, in response to SHPO concerns that the "proposed frame construction, Colonial Revival-style houses may be visible from Washington Road... Washington Road is an important historic corridor at West Point" (SHPO, June 2003). The SHPO desires to avoid developing housing that "turns its back" on Washington Road, creating views of back decks and rear facades. New vegetative screening will be introduced to minimize this type of visibility (SHPO, June 2003).

## 4.7 Traffic

Worth Place is a “dead end” road that intersects with Washington Road at West Moore Loop, near the KACH entrance. Washington Road is the main north-south access road in the northern portion of the USMA main post. Worth Place, because it is a dead end with only six residences, generates little traffic. The lower portion of Worth Place (near Washington Road) is currently used as parking for KACH (approximately five to six cars) personnel.

The construction of additional houses on Worth Place may preclude the current KACH personnel parking on the lower portion of the roadway, but would contribute little in the way of traffic to the West Moore Loop/Washington Road intersection.

## 4.8 Air Quality

While the USMA is in a non-attainment area for ozone, the impact thresholds for volatile organic compounds and nitrogen oxides are not expected to be exceeded by the construction of three residential units. Therefore, no air quality impacts are expected.

## 4.9 Noise

No changes in the amount of noise emanating from Worth Place, as a result of the proposed action, are anticipated. The area is currently a residential area, and the addition of three new houses is not likely to result in any noticeable increase in noise.

## 4.10 Materials and Waste

The proposed action will require the blasting and removal of bedrock on both sides of Worth Place. While some of the excavated rock will be used to regrade and landscape the proposed housing sites, the majority of

the material would be transported off site to an approved disposal location.

Construction and demolition (C&D) waste, generated during the construction of the additional houses, would be collected and transported off-site to an approved disposal location. C&D waste would be collected in dumpsters, monitored daily, and not be allowed to litter adjacent areas.

## 4.11 Additional Environmental Considerations

### 4.11.1 Environmental Justice

Executive Order 12898, *Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations*, purposes to ensure: 1) that environmental decision-making does not disproportionately victimize low-income and minority populations; 2) that low-income and minority communities have access to information about their environment; and 3) that low-income and minority communities have an opportunity to participate in shaping government policies that affect their health and environment.

Because all components of the proposed action would occur within the borders of the USMA reservation (main post), no potential impacts to low-income or minority communities from any of the alternatives could be identified.

### 4.11.2 Protection of Children

Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, purposes to require federal agencies to identify and address the potential for disproportionately high and adverse effects on the environmental health and safety risks on children, resulting from the agencies’ programs, policies, and activities.

The three additional coaches' houses on Worth Place are adjacent to two residential areas with children. While there are currently no physical barriers separating the proposed construction sites from the residential areas, it is anticipated that appropriate health and safety measures would be implemented, so that the proposed action would not negatively affect the children of those areas. As a result, no disproportionately high and adverse impacts on the environmental health and safety of children would occur.

#### 4.11.3 Recent Past, Ongoing, and Reasonably Foreseeable Future Actions (Figure 14)

##### Recent Past

- Worth Place Coaches' Housing – six houses for intercollegiate athletic coaches were constructed between the summer of 2004 and the fall of 2005
- West Point School Upgrades – upgrades to the West Point Elementary School were completed in the spring of 2005, and included a 7,500 square-foot classroom addition, a 152-car parking lot, creation of a bus staging area, removal of two temporary modular structures, and new sidewalk crossings.
- Installation Information Infrastructure Modernization Program (I3MP) – a two-year program (to be completed in Jan 2006) to install 20.6 miles of fiber optic cable, primarily within roadways and rights-of-way at West Point. Washington Road was a major roadway affected.
- MEDEVAC Helipad – originally constructed at the top (end) of the

cul-de-sac on Worth Place as a temporary/emergency helipad, a permanent facility (helipad) is now in place at KACH, near the Emergency Room end of the building.

##### Ongoing

- Washington Gate Security Upgrades – a long-term program (begun in 2003) to increase the security measures at the entrances to West Point. Measures include new roadway configurations, cameras, lighting, gates and barrier systems, and canopies to protect personnel.
- Crows Nest Brook Stabilization – stabilization measures are being implemented in Crows Nest Brook, approximately 0.25 miles downstream from the proposed action (in the Lee Housing area). These measures include minor realignment, widening of the channel, bank armoring, removal and replacement of boulders, and gradient changes.
- Building 693 (Youth Center) Reconstruction – after a fire, the Youth Center is being reconstructed (interior and exterior work)

##### RFFAs

- KACH Expansion – a 50,000 square-foot, 3-story expansion is currently being designed. The expansion includes an addition on the east end of the existing hospital, new parking, and reconfigured access to the new facility.
- U.S. Military Academy Preparatory School (USMAPS) – as a result of the recent Base Realignment and Closure decision to close Fort Monmouth, the USMAPS will be relocated at West Point. The proposed location is at the current

Motor Pool at Washington Gate. The relocation, planned for 2009, will include the relocation of 240 cadets, 28 military staff, and 30 civilian workers. A 30-acre site is being proposed to house barracks, a dining facility, an academic/classroom building, parking areas, athletic fields, a fitness facility, and other buildings (administrative, health, etc.).

- Motor Pool Relocation – because of the proposed relocation of the USMAPS to West Point, the current motor pool facility would be relocated to the range area (Area V) of the USMA reservation. The relocation would be necessary prior to the development of the new USMAPS campus.
- Senior NCO Housing Rehabilitation – Quarters 397 -419 on Merritt Road, and Quarters 423-433, off Washington Road are being rehabilitated for both interior and exterior features.
- Community Activities Center – the old PX and adjacent area is scheduled to be developed as a community activities center, beginning in 2009. The center would include playing fields, a swimming pool, picnic area, roller rink, basketball and volleyball courts, tot lots, and parking.

#### **4.12 Cumulative Impacts**

A cumulative impact is "...the impact on the environmental which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions..." (40 CFR 1508.7). As such, there are specific resources that would be affected, cumulatively, as a result of the implementation of this action.

#### **4.12.1 Stormwater**

The construction of three new houses on Worth Place would result in the increase in impervious surface in the Crows Nest Brook watershed. Crows Nest Brook, along with its principal tributary, Sinclair Pond Brook, has had a number of recent actions that have increased the amount of impervious surface in the drainage basin. Such actions include the West Point Elementary School upgrades, the six coaches' houses on Worth Place, and the MEDEVAC helipad at the KACH. The results are increased flows in the streams during moderate to large precipitation events, as well as increased velocities, which, in combination, have resulted in increased bed and bank erosion downstream in the Lee Housing area. In addition, to this proposed action, the KACH is planning an expansion that will add impervious roof surface, as well as additional paved parking.

#### **4.12.2 Wildlife**

The Worth Place housing would cause further displacement of small mammal habitat on the main post of West Point. The initial six coaches' houses removed approximately 0.95 acres of natural (undisturbed) habitat (two of the six houses were actually sited on the pre-existing, paved cul-de-sac); the three proposed houses are anticipated to remove an additional 0.75 acres, causing small mammals to find shelter elsewhere.

#### **4.12.3 Visual**

The Worth Place housing would result in an increased visual intrusion upon the Washington Road historic corridor. Three proposed houses, if left unscreened would be visible from Washington Road, particularly from the northbound direction. Recently, other visual intrusions to the Washington Road historic corridor have

included the Washington Gate security measures, DPW stockpiles of road materials, MEDEVAC helipad at KACH, and the six coaches' houses at Worth Place. In addition, the KACH is planning a 50,000 square foot expansion, along with additional parking.

#### 4.12.4 Parking

The construction of the three houses may preclude the current KACH staff parking on Worth Place. Currently, from five to six cars park on Worth Place on a daily basis. This possible loss of parking, coupled with the loss of up to 205 spaces when the KACH expansion project begins, would adversely impact both the staff and patients of KACH.

#### 4.12.5 Air Quality

The heating of the three houses proposed for Worth Place would incrementally add minor amounts of combustion by-products to the atmosphere. While each would not be significant, alone, when combined with recent past (six Worth Place Coaches' houses) and proposed future actions (KACH Expansion, USMAPS at the Motor Pool), the result could constitute a moderate air quality impact.

### 4.13 Unavoidable Adverse Environmental Effects

Unavoidable adverse impacts associated with the proposed action consist of increased stormwater runoff, and visual impacts to the Washington Road historic corridor. Measures to reduce and minimize these unavoidable adverse effects are summarized in Section 5.3, Anticipated Environmental Effects and Mitigation Measures.

## 5 CONCLUSIONS

### 5.1 Proposed Action

The West Point Association of Graduates (AOG), through the Directorate of Public Works, is planning to construct three additional coaches' houses on Worth Place, in the northern portion of the main post. The houses are in addition to the six that were recently constructed in 2004-2005. The three new houses will match the six that are already there in size, appearance, and material. The houses will be constructed on Worth Place, one immediately adjacent to the six existing houses on the cul-de-sac, and the other two positioned farther down the hill from the cul-de-sac.

### 5.2 Alternatives

Of the many alternatives that were considered (Section 3.3), two were carried forward to be assessed. Schemes 2 and 3, the alternatives carried forward both had increased potential for impact, particularly with regard to topography, viewshed, and vegetation.

The No Action Alternative was also considered, and considered to be not a viable alternative, as the intent of ODIA is to have all their head coaches housed in separate, detached quarters (houses).

### 5.3 Anticipated Environmental Effects and Mitigation Measures

Topography, Geology, and Soils

- No significant adverse effects for preferred alternative
- Possible blasting required for Schemes 2 and 3 (permits and safety provisions would be required)

### Water Resources

- Minor adverse effects possible during construction of preferred alternative (erosion and sediment controls would be required)
- Moderate adverse effects possible during and after construction if Schemes 2 or 3 implemented (mitigation measures would include erosion and sediment controls, as well as possible detention measures)

### Vegetation

- No significant adverse impacts resulting from development of any alternative
- No threatened or endangered species present

### Wildlife

- No significant adverse impacts resulting from development of any alternative
- No threatened or endangered species present

### Land Use

- Minor impact on land use (change from natural to residential) for preferred alternative
- Moderate impact on land use (change from natural to residential, and demolition of building) for alternatives (Scheme 3)

### Cultural Resources

- No adverse effects to archaeology for any of the alternatives
- Minor adverse effects to historic corridor of Washington Road (slightly more adverse for Scheme 3)
- Vegetative plantings will reduce the potential for impact

### Visual Resources

Construction of additional houses on Worth Place, lower down the hill, and closer to Washington Road, would not alter the identification of the Area of Potential Effects (APE), as defined in the letter to SHPO dated May 16, 2003. The following design conditions have been proposed, and are described in a letter to the SHPO, dated January 11, 2006:

- House No. 7 will require the construction of a retaining wall in its rear yard; it will be predominantly screened from view from Washington Road
- House No. 8 will be generally screened from Washington Road
- House No. 9 will require the planting of vegetation to screen its side and rear yards from Washington Road

### Traffic

- Temporary, moderate adverse impacts to traffic and parking would result from the construction of the additional houses, particularly if the construction coincides with other ongoing or proposed actions
- Parking for KACH workers would cease on Worth Place once construction begins
- No mitigation for parking is planned as a result of this action

### Air Quality

- No significant adverse effects are expected as a result of implementing any of the alternatives
- No mitigation is required

### Noise

- No significant adverse effects are expected as a result of implementing any of the alternatives

- Construction noise will be limited to daylight hours
- Construction equipment shall be equipped with adequate mufflers to minimize noise

Materials and Waste

- Construction activities, including excavation, would generate minor amounts of solid (construction) waste, rock debris, and vegetation waste.
- The contractor is required to develop a Construction and Demolition Waste Management Plan for the management and proper disposal of solid waste during construction

Protection of Children

- No significant adverse effects on the environmental health or safety of children is expected for any of the alternatives

Cumulative Effects

- Potential cumulative impacts are expected to occur to the following resources:
  - Stormwater – increased runoff from additional impervious surfaces (erosion and sediment controls, as well as detention features will be used)
  - Wildlife Habitats – some of these would be removed as a result of construction (small mammals and birds would relocate elsewhere, as they are mobile)
  - Visual – the addition of new houses on Worth Place would increase the visual intrusion upon the historic corridor of Washington Road (vegetative

plantings would minimize or reduce this intrusion)

- Parking – the construction of additional houses on Worth Place would eliminate the current curbside parking by KACH employees. No mitigation is planned, and would only be compounded when the KACH expansion project is implemented.

Unavoidable Adverse Effects

- Stormwater (see above)
- Visual (see above)
- Traffic (see above)

**6 PREPARERS AND CONTRIBUTORS**

**Preparer**

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---

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 B.A., History, University of Maine, 1997

---

## **7 DISTRIBUTION**

### **7.1 Federal Agencies**

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USEPA-Region II  
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(212) 637-7343

Mr. Larry Mango  
U.S. Army Environmental Center  
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SFIM-AEC-EQ  
5179 Hoadley Road  
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Ms. Laura Dean  
Advisory Council on Historic Preservation  
Eastern Area  
Old Post Office Building, Suite 803  
1100 Pennsylvania Avenue NW  
Washington, DC 20004  
(202) 606-8529

### **7.2 Tribal Agencies**

Ms. Sherry White  
Tribal Historic Preservation Officer  
Stockbridge Munsee Band of Mohican  
Indians  
P.O. Box 70  
Bowler, WI 54416  
(715) 793-3970

### **7.3 State Agencies**

Mr. Kenneth Markunas  
Office of Parks, Recreation, and Historic  
Preservation  
New York State Office of Historic  
Preservation  
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P.O. Box 189  
Waterford, New York 12188-0189

Ms. Bridget R. Kennedy  
New York Department of State  
Division of Coastal Resources  
Attn: Consistency Review  
41 State Street  
Albany, New York 12231-0001

Ms. Margaret Duke  
New York State Department of  
Environmental Conservation, Region 3  
Division of Regulatory Affairs  
21 South Putt Corners Road  
New Paltz, New York 12561

Mr. Nicholas B. Conrad  
Information Services  
New York Natural Heritage Program  
625 Broadway, 5<sup>th</sup> Floor  
Albany, New York 12233-4757

### **7.4 Local Agencies**

Mr. Edward Diana  
Orange County Executive  
Orange County Government Center  
255-275 Main Street  
Goshen, New York 10924

### **7.5 Interested Parties**

Mr. Daniel Mackey  
Director of Public Policy  
Preservation League of New York State  
44 Central Avenue  
Albany, New York 12206

## **7.6 Public Venues**

Town Clerk  
Town of Highlands  
254 Main Street  
Highland Falls, New York 10928

Director  
Highland Falls Public Library  
289 Main Street  
Highland Falls, New York 10928

Village Clerk  
Village of Highland Falls  
303 Main Street  
Highland Falls, New York 10928

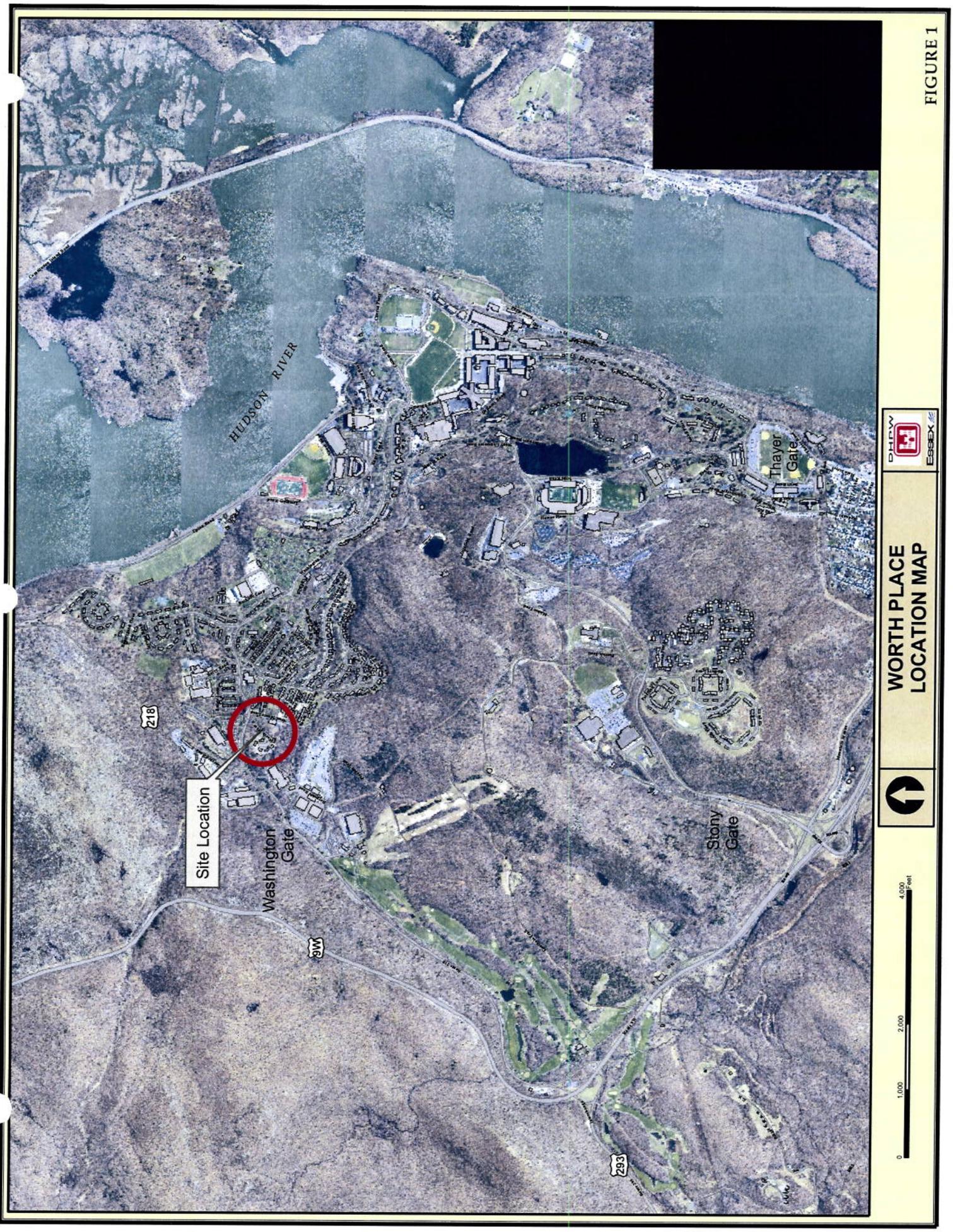
West Point Community Library  
Building 622  
United States Military Academy  
West Point, New York 10996

## 8 REFERENCES

- New York State Department of State. 1993. Scenic Areas of Statewide Significance. New York State Department of State, Division of Coastal Resources and Waterfront Revitalization.
- New York State Department of State. 1982. Coastal Management Program, State Coastal Policies.
- New York State Department of State. 1981. Coastal Area Maps. New York State Department of State, Coastal Management Program.
- United States Military Academy. 2003. Integrated Natural Resources Management Plan: 2003 – 2007. West Point, New York.
- United States Military Academy. 2001. Environmental Assessment for the Operation of A Temporary MEDEVAC Helicopter Landing Zone, West Point, New York. Installation Support Branch, Engineering Plans and Services Division, Directorate of Public Works.
- United States Military Academy. 1998. Master Plan for the Year 2007, West Point, New York.

# **APPENDICES**

# **FIGURES**



Site Location

Washington Gate

Stony Gate

Thayer Gate

HUDSON RIVER

218

200

293



0 1,000 2,000 4,000 Feet



WORTH PLACE  
LOCATION MAP

FIGURE 1



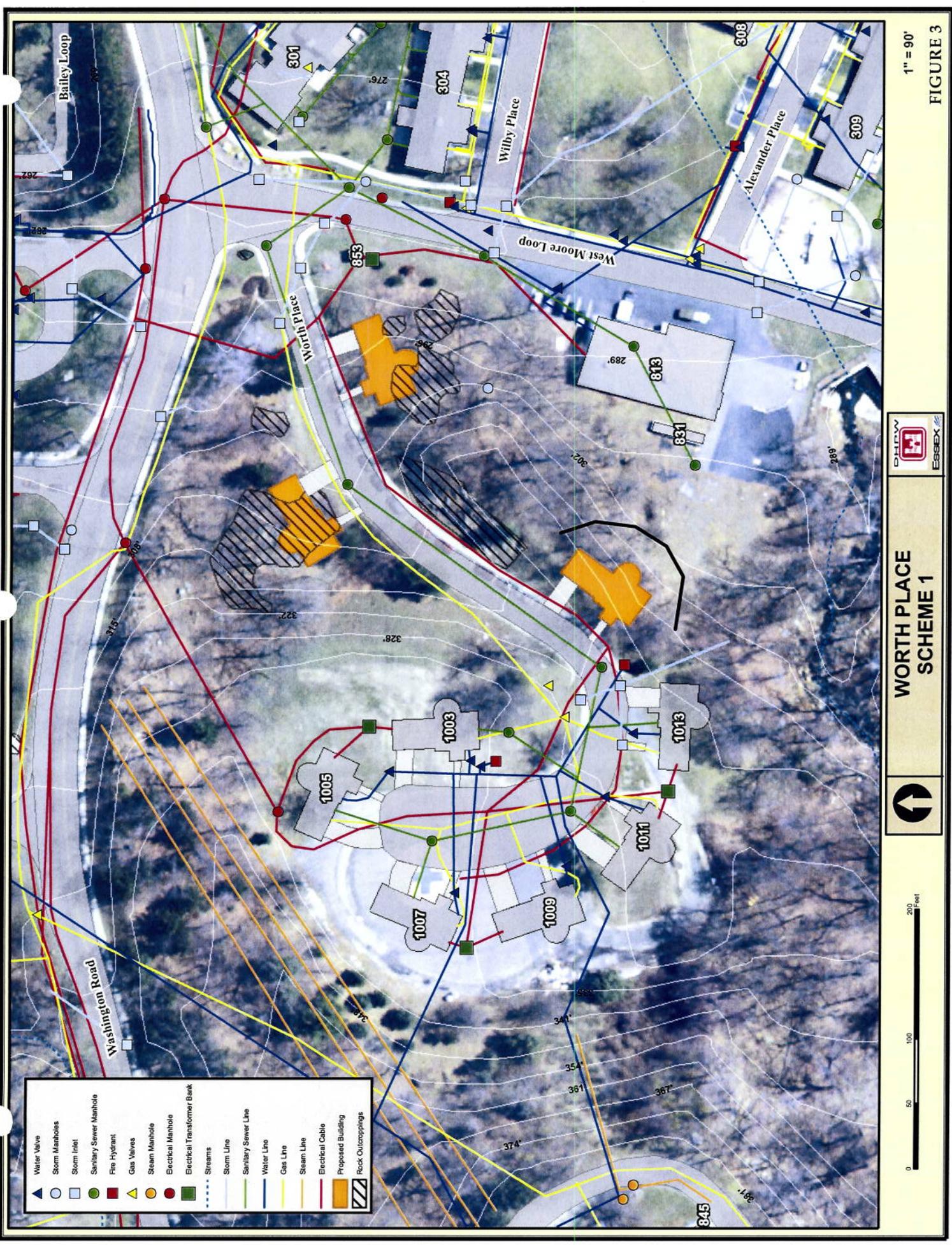
1" = 90'

FIGURE 2



WORTH PLACE  
SITE MAP





- Water Valve
- Storm Manholes
- Storm Inlet
- Sanitary Sewer Manhole
- Fire Hydrant
- Gas Valves
- Steam Manhole
- Electrical Manhole
- Electrical Transformer Bank
- Streams
- Storm Line
- Sanitary Sewer Line
- Water Line
- Gas Line
- Steam Line
- Electrical Cable
- Proposed Building
- Rock Outcroppings



**WORTH PLACE  
SCHEME 1**



1" = 90'

**FIGURE 3**





**WORTH PLACE  
SCHEME 3**



1" = 90'

FIGURE 5



- Water Valve
- Storm Manholes
- Storm Inlet
- Sanitary Sewer Manhole
- Fire Hydrant
- Water Manhole
- Gas Valves
- Steam Manhole
- Electrical Manhole
- Electrical Transformer Bank
- Streams
- Storm Line
- Sanitary Sewer Line
- Water Line
- Gas Line
- Steam Line
- Electrical Cable
- Rock Outcroppings

**Pros**  
 Utilities nearby.  
 Level, buildable site.  
 Appropriate land use.  
 Environmental Study only 8 months.

**Cons**  
 Minor utility rerouting/upgrading.  
 Minor rock excavation.

**SITE 1**

**SOUTH MOORE LOOP**



FIGURE 6



- Water Valve
- Storm Manholes
- Storm Inlet
- Sanitary Sewer Manhole
- Fire Hydrant
- Water Manhole
- Gas Valves
- Steam Manhole
- Electrical Manhole
- Electrical Transformer Bank
- Streams
- Storm Line
- Sanitary Sewer Line
- Water Line
- Gas Line
- Steam Line
- Electrical Cable
- Rock Outcroppings

**Pros**  
 Utilities nearby.  
 Level, buildable site.  
 Appropriate land use.  
 Environmental Study only 8 months.

**Cons**  
 Minor utility rerouting/upgrading.  
 Minor rock excavation.



**SITE 2**  
**MERRITT ROAD**

FIGURE 7



|                             |   |
|-----------------------------|---|
| Water Valve                 | ● |
| Storm Manholes              | ○ |
| Storm Inlet                 | □ |
| Sanitary Sewer Manhole      | ● |
| Fire Hydrant                | ■ |
| Water Manhole               | ● |
| Gas Valves                  | ● |
| Steam Manhole               | ● |
| Electrical Manhole          | ● |
| Electrical Transformer Bank | ■ |
| Streams                     | — |
| Storm Line                  | — |
| Sanitary Sewer Line         | — |
| Water Line                  | — |
| Gas Line                    | — |
| Steam Line                  | — |
| Electrical Cable            | — |
| Rock Outcroppings           | — |

**Pros**  
 Utilities nearby.  
 Level, buildable site.  
 Appropriate land use.  
 Environmental Study only 8 months.

**Cons**  
 Minor utility rerouting/upgrading.  
 Minor rock excavation.

**SITE 3A  
 STONEY TWO**

DHEW  
  
 ESSEX



FIGURE 8



|             |                |             |                        |              |               |               |               |                    |                             |                  |                 |                     |                 |                   |                   |                  |                   |
|-------------|----------------|-------------|------------------------|--------------|---------------|---------------|---------------|--------------------|-----------------------------|------------------|-----------------|---------------------|-----------------|-------------------|-------------------|------------------|-------------------|
| Water Valve | Storm Manholes | Storm Inlet | Sanitary Sewer Manhole | Fire Hydrant | Water Manhole | Gas Valves    | Steam Manhole | Electrical Manhole | Electrical Transformer Bank | Streams          | Storm Line      | Sanitary Sewer Line | Water Line      | Gas Line          | Steam Line        | Electrical Cable | Rock Outcroppings |
| Blue circle | Blue circle    | Blue circle | Green circle           | Red square   | Blue circle   | Yellow circle | Orange circle | Red circle         | Green square                | Blue dashed line | Blue solid line | Green solid line    | Blue solid line | Yellow solid line | Orange solid line | Red solid line   | Grey outline      |

**Pros**  
 Utilities nearby.  
 Level, buildable site.  
 Appropriate land use.  
 Environmental Study only 8 months.

**Cons**  
 Minor utility rerouting/upgrading.  
 Minor rock excavation.



**SITE 3B  
 STONEY TWO**

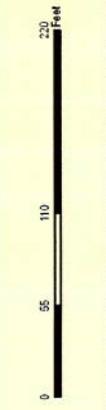
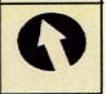


FIGURE 9



- Water Valve
- Storm Manholes
- Storm Inlet
- Sanitary Sewer Manhole
- Fire Hydrant
- Water Manhole
- Gas Valves
- Steam Manhole
- Electrical Manhole
- Electrical Transformer Bank
- Streams
- Storm Line
- Sanitary Sewer Line
- Water Line
- Gas Line
- Steam Line
- Electrical Cable
- Rock Outcroppings

**Pros**  
 Large Site

**Cons**  
 Environmental Study 10-12 Months.  
 Significant utility difficulties.  
 Location/Land use.  
 Large amount of rock excavation.  
 Significant archaeological study.  
 No Sense of Neighborhood.



**SITE 4  
 SMITH PLACE**



**FIGURE 10**



Rock Outcroppings

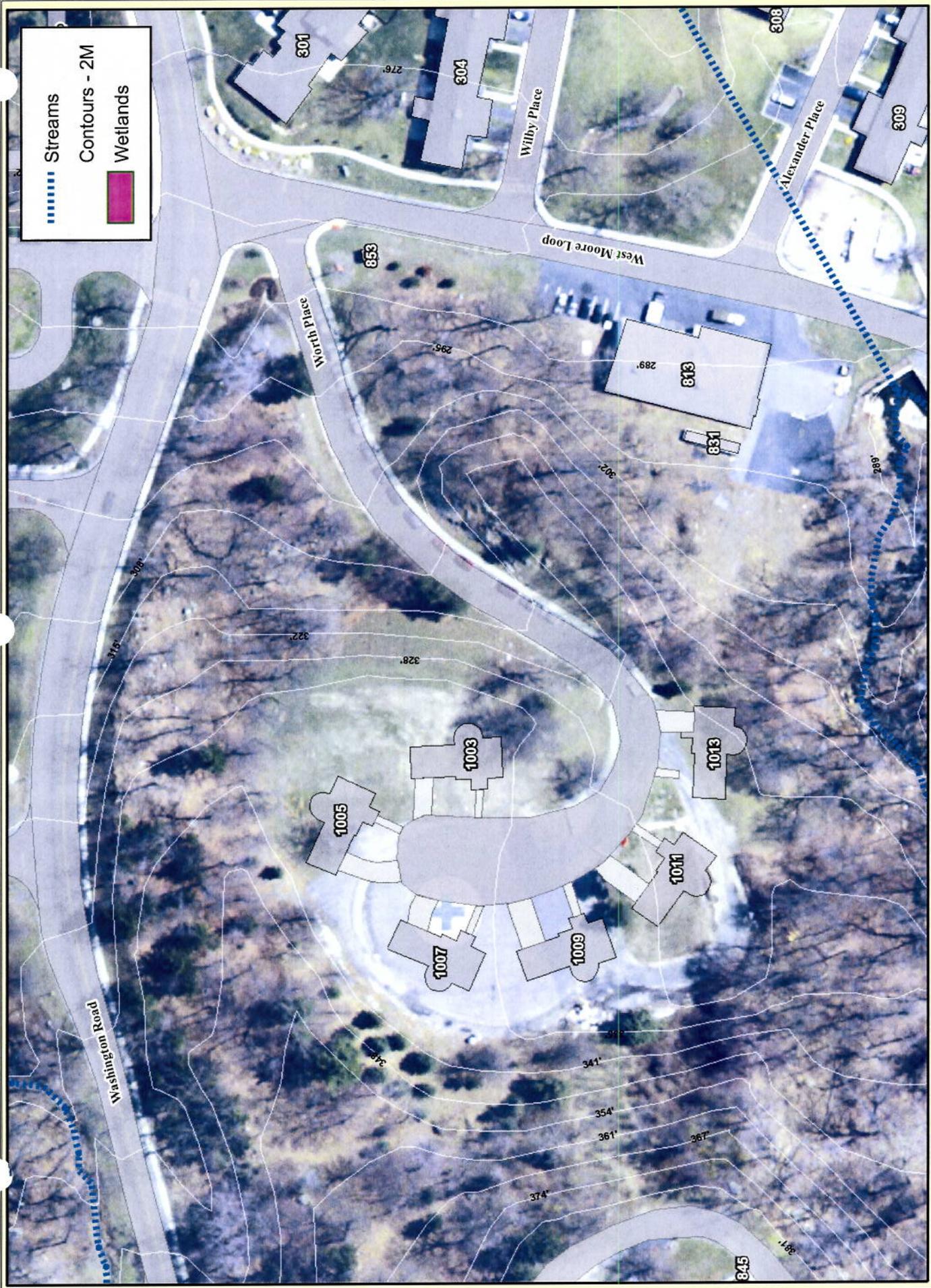
| % Slope |         |
|---------|---------|
|         | 0 - 5   |
|         | 5 - 10  |
|         | 10 - 15 |
|         | 15 - 20 |
|         | 20 - 25 |



**WORTH PLACE  
TOPOGRAPHY / GEOLOGY**

1" = 90'

**FIGURE 11**



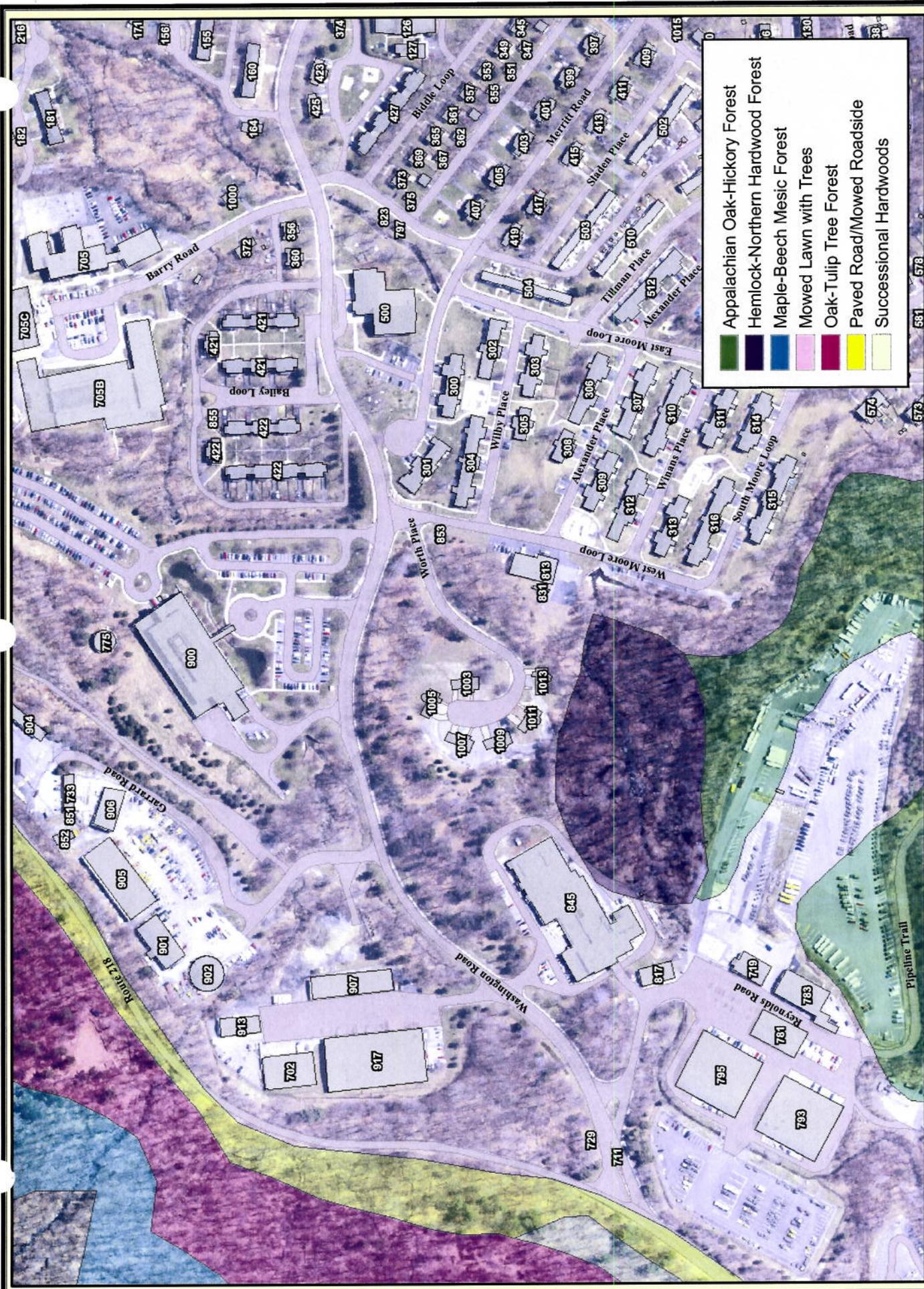
----- Streams  
 Contours - 2M  
 Wetlands

1" = 90'  
 FIGURE 12



**WORTH PLACE  
 DRAINAGE MAP**





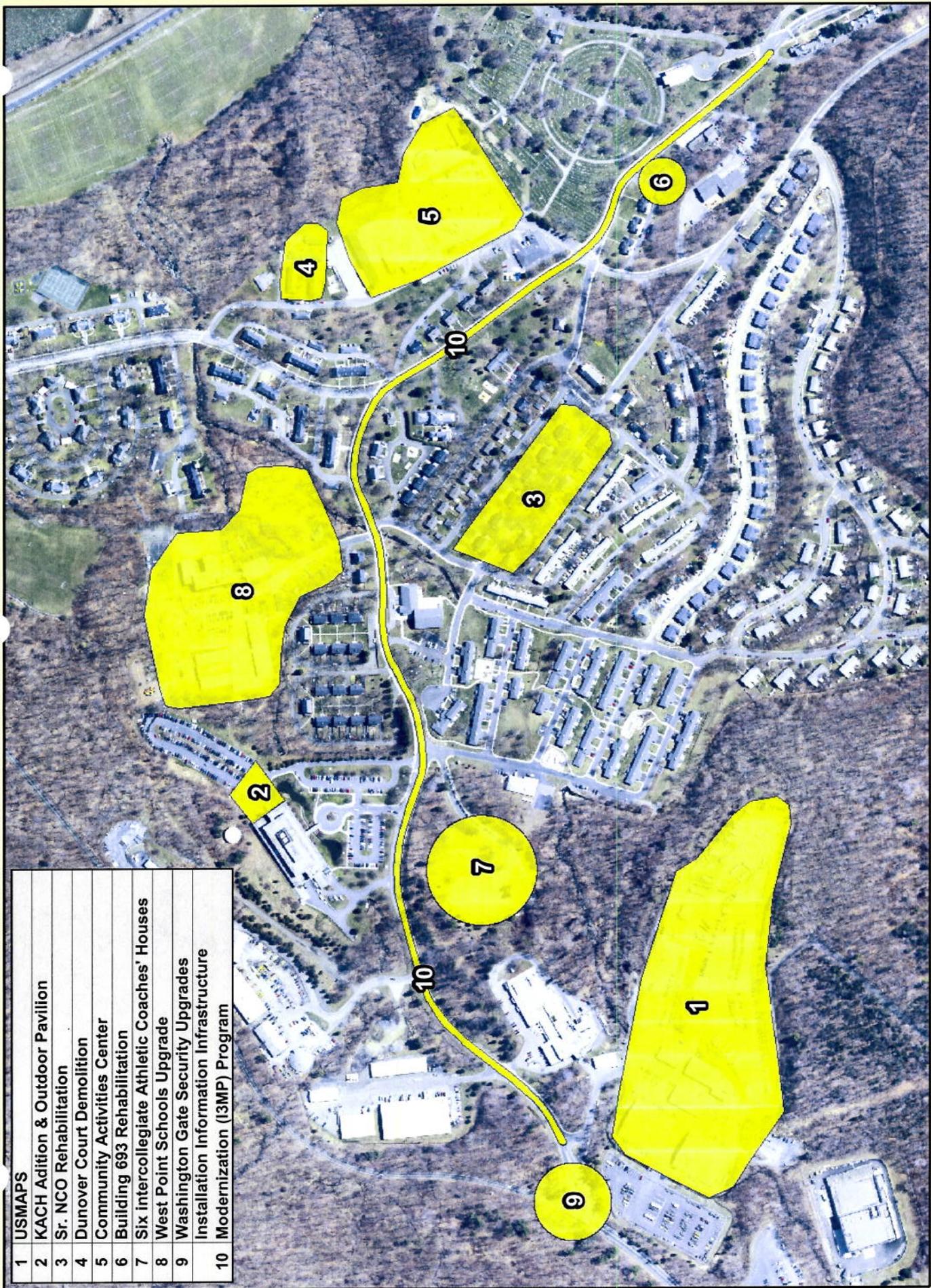
**WORTH PLACE  
VEGETATION MAP**



1" = 300'

FIGURE 13

|    |  |
|----|--|
| 1  | USMAPS   |
| 2  | KACH Adition & Outdoor Pavilion                                      |
| 3  | Sr. NCO Rehabilitation   |
| 4  | Dunover Court Demolition   |
| 5  | Community Activities Center  |
| 6  | Building 693 Rehabilitation  |
| 7  | Six intercollegiate Athletic Coaches' Houses                         |
| 8  | West Point Schools Upgrade   |
| 9  | Washington Gate Security Upgrades                                    |
| 10 | Installation Information Infrastructure Modernization (I3MP) Program |



PROJECTS POTENTIALLY AFFECTING  
THE WORTH PLACE PROJECT



1" = 450'

FIGURE 14

# **PHOTOS**



**Photo No. 1 – Typical Worth Place Coach’s House**



**Photo No. 2 - Worth Place Toward Washington Road  
From Proposed Site (House No. 7)**



**Proposed Site  
Additional  
House #7  
Behind Stone  
Outcropping**

**Photo No. 3 - Proposed Location (House No. 8)**



**Photo No. 4 - Proposed Site (House No. 8)**



**Photo No. 5 - Washington Road from Worth Place**



**Photo No. 6 – Proposed Site (House No. 9)**



**Photo No 7 - Proposed Site (House No.9)**



**Proposed Site  
Additional  
House #9  
Screened by  
Earth and  
Rock Berm**

**Photo No. 8 - Proposed Site (House No. 9)**

# **AGENCY CORRESPONDENCE**



DEPARTMENT OF THE ARMY  
INSTALLATION MANAGEMENT AGENCY  
HEADQUARTERS, UNITED STATES ARMY GARRISON, WEST POINT  
681 HARDEE PLACE  
WEST POINT, NY 10996-1554

REPLY TO  
ATTENTION OF:

April 26, 2006

Directorate of Public Works

Mr William Feldhusen  
Coastal Resources Specialist  
Consistency Review and Analysis  
State of New York  
Department of State  
41 State Street  
Albany, NY 12231-0001

Re: F-2006-0197 DA  
Draft Environmental Assessment  
Construction of Additional Coaches' Housing on Worth Place  
U.S. Military Academy, West Point, New York

Dear Mr. Feldhusen:

The following paragraph is in response to your concern about the timber rattlesnake mentioned in the environmental assessment (EA) for the above-referenced project. The text of the Final EA will reflect the information contained in the response paragraph.

The Worth Place is inhabited by mostly small mammals such as woodchucks, rabbits, voles and squirrels. There are no federal or state-listed threatened or endangered species residing in the immediate area of Worth Place. However, sightings of timber rattlesnakes (*Crotalus horridus*) – a NY-listed threatened species – from state hibernaculum designated O-31 have been documented by West Point natural resources personnel within 1,000 feet of the project area. Therefore, there is a possibility that a wandering individual from hibernaculum O-31 could show up on-site during the mid-May to mid-September time frame during the time when construction activities would be occurring on the site. Care would need to be taken if this species is encountered. Discussions by the West Point Natural Resources Branch, DPW with the New York State Department of Environmental Conservation's Endangered Species Unit (Mr. Alvin Breisch) resulted in development of a standard operating procedure should a timber rattlesnake be encountered within the West Point cantonment area. The Natural Resources Branch will remove the live animal from the site and release the animal in another area of the O-31 population's foraging area. Past encounters handled by the Natural Resources Branch have not adversely impacted the O-31 timber rattlesnake population.

West Point acknowledges your concern for the resources within the coastal zone as well as the Hudson Highlands Scenic Area. I trust this response meets with your satisfaction.

Sincerely,

Alan B. Bjornsen, CEP  
NEPA Coordinator



STATE OF NEW YORK  
DEPARTMENT OF STATE  
41 STATE STREET  
ALBANY, NY 12231-0001

---

GEORGE E. PATAKI  
GOVERNOR

March 24, 2006

Alan B. Bjornsen, CEP  
NEPA Coordinator  
U.S. Army Garrison West Point  
Building 667B, Ruger Road  
West Point, NY 10996

Re: F-2006-0197 DA  
U.S. Army Garrison West Point - Construction of additional new  
housing at Worth Place  
Hudson River, Town of Highlands, Orange County  
Environmental Assessment

Dear Mr. Bjornsen:

Thank you for the Draft Environmental Assessment which we received on February 24, 2006 regarding the above-referenced project.

In F-2003-0672 DA we reviewed the consistency determination regarding the construction of six new houses at Worth Place. We have two questions:

NYS CMP (Coastal Management Program) POLICY #33 states:

**BEST MANAGEMENT PRACTICES WILL BE USED TO ENSURE THE CONTROL OF STORMWATER RUNOFF AND COMBINED SEWER OVERFLOWS DRAINING INTO COASTAL WATERS.**

Given the total of nine houses that will now be sited at the cul-de-sac, what specific practices will be used to reduce the impact of/minimize the additional impervious surfaces and the resulting cumulative impact 'downstream' adding to the impacts resulting from other development projects such as the KACH expansion and existing problems?

We suggest clarifying the discussion of the timber rattlesnake (*Crotalus horridus*) in Section 4.3.1. Timber rattlesnakes are classified as threatened in New York State. Timber rattlesnakes reproduce at a low rate, making for slow population growth. The Environmental Assessment appears to indicate that this is now a developed area with the land use now changed (Section 4.4) from natural wooded to landscape residential. Development with traffic and human disturbance would exist. Therefore please clarify whether this area serves an existing den site and whether the changed land use would affect that population's size, reproductive success, or the viability of the existing habitat serving this population.

Once we have received the final Environmental Assessment and a consistency determination, consistency review

of your consistency determination can commence. We will give that future submission a new number to clearly indicate that consistency review of your consistency determination is commencing. Until that time please refer to our file #F-2006-0197 so that previously submitted material can be accessed.

Sincerely,

A handwritten signature in cursive script that reads "William Feldhusen".

William Feldhusen  
Coastal Resources Specialist  
Consistency Review and Analysis

c: NYS SHPO - Kenneth Markunas  
NYS SHPO - G. Donofrio



DEPARTMENT OF THE ARMY  
INSTALLATION MANAGEMENT AGENCY  
HEADQUARTERS, UNITED STATES ARMY GARRISON, WEST POINT  
681 HARDEE PLACE  
WEST POINT, NY 10996-1554

REPLY TO  
ATTENTION OF:

January 31, 2006

Directorate of Public Works

SUBJECT: F-2003-0672 DA  
Additional Coaches' Houses  
U.S. Army Garrison  
West Point, New York

Mr. Jeffrey Zappieri, Supervisor  
Consistency Review and Analysis  
Division of Coastal Resources  
Department of State  
41 State Street  
Albany, NY 12231-0001

Dear Mr. Zappieri,

This letter provides the New York State Coastal Management Program (NYSCMP) Consistency Review Unit (CRU) with the U.S. Army Garrison West Point's (West Point) negative determination under the Coastal Zone Management Act (CZMA), Section 307 (c) (1) and (2), and 15 CFR 930.35 (d), for the construction of three additional coaches' houses on Worth Place, West Point, New York.

Direct effects on the coastal uses and resources from this undertaking are anticipated to be insignificant. In 2003, West Point received a letter from your division agreeing that the initial six houses proposed for construction on Worth Place would be a negative determination on New York State coastal resources and activities (letter of Oct. 29, 2003, attached). As a result, there would be no additional impacts to the visual and cultural resources of the Hudson Highlands Scenic Area of Statewide Significance as a result of this action. As a result, West Point finds that the proposed construction of three additional coaches' houses on Worth Place will not affect any coastal use or resources, pursuant to 15 CFR 930.35 (b).

Pursuant to 15 CFR 930.41, the NYSDOS CRU has 60 days from receipt of this letter (and its attachments) in which to concur with, or object to, this Negative Determination, or request an extension of 15 days, in accordance with 15 CFR 930.41 (b). The NYSDOS CRU concurrence will be presumed if a response is not received on the 60<sup>th</sup> day from receipt of this letter (on or about April 11, 2006). The NYSDOS CRU response should be sent to:

Alan B. Bjornsen, CEP  
NEPA Coordinator  
U.S. Army Garrison  
Building 667B, Ruger Road  
West Point, NY 10996  
(845) 938-4129 Fax - 7046  
al.bjornsen@usma.edu

Thank you for your cooperation.

Respectfully submitted,

*Alan B. Bjornsen*  
Alan B. Bjornsen, CEP  
NEPA Coordinator



DEPARTMENT OF THE ARMY  
INSTALLATION MANAGEMENT AGENCY  
HEADQUARTERS, UNITED STATES ARMY GARRISON, WEST POINT  
681 HARDEE PLACE  
WEST POINT, NY 10996-1514

REPLY TO  
ATTENTION OF:

11 January 2006

Directorate of Public Works (EP&SD)

Subject: Additional Coach's Housing at Worth Place, U.S. Military Academy (03PR02535)

Mr. Kenneth Markunas  
New York State Office of Parks, Recreation and Historic Preservation  
Historic Preservation Field Services Bureau  
Peebles Island, PO Box 189  
Waterford, New York 12188-0189

Dear Mr. Markunas:

The U.S. Military Academy (USMA) has previously consulted at length with the New York State Historic Preservation Office regarding the construction of six (6) houses for Athletic Coaches at Worth Place, U.S. Military Academy, West Point, New York (03PR02535). No Adverse Effects Determinations were made by the US Military Academy for the initial undertaking on August 19, 2003 (for the first coach's house only) and for the full initial planned construction of six houses on February 24, 2004. The NY SHPO concurred with these effects determinations on August 20, 2003 and March 15, 2004.

This project was implemented with the following stipulations, in response to SHPO concerns that the "proposed frame construction, Colonial Revival style houses may be visible from Washington Road... Washington Road is an important historic corridor at West Point (June 30, 2003):"

- If, however, the new buildings will not be visible from Washington Road, or will be only minimally visible, then the proposed designs may be appropriate. If the setback from Washington Road allows, there may also be opportunities to screen the houses with fences and trees. The SHPO wants to avoid developing housing that turns its back to Washington Road, creating views of back decks and rear facades (June 30, 2003); and
- New vegetative screening will be introduced between the houses and Washington Road, "thickening" the existing vegetation so that the rears of the houses will be only minimally visible or not visible from the road (August 20, 2003).

The USMA has completed construction of the six (6) houses at Worth Place, in compliance with our previous consultation, and these stipulations. Photographs of Worth Place coach's housing from Washington Road are provided.

The USMA has received a request from the Athletic Department to construct an additional three (3) coach's houses at Worth Place. Attached find a design drawing with the final locations of the six completed houses, and the proposed locations for the three additional houses. These three additional houses will be constructed to the identical plans, designs, colors and materials as the six existing houses.

The construction of an additional three (3) houses at Worth Place will not alter the identification of the Area of Potential Effects (APE), as defined in our correspondence dated May 16, 2003.

The following design considerations are noted:

- Additional House #7 will have its rear and side screened by a prominent topographical feature (as provided in attached photographs), and the front of the house will only be minimally visible because of this topographical feature;
- Additional House #7 will require the construction of a retaining wall to its rear. This wall will be constructed of earth-toned (gray-brown) interlocking concrete blocks, per the attached design, to minimize its visual intrusion;

- Additional House #8 will be parallel to Washington Road, and its rear yard will be generally screened from Washington Road by topography to the north; and family housing to the south; and
- Additional House #9 will be located in a topographical depression with a natural berm to its rear, which will assist in screening the rear of the residence from Washington Road. The natural topography and vegetation will remain, and additional vegetation will be added to facilitate screening the rear (east) and (south) side of the house from Washington Road.

The U.S. Military Academy agrees to the following stipulations:

- Additional vegetation will be installed to the east (rear) of House #2, between the rear of Washington Road and House #2, as additional "thickening" is still required at this location;
- Additional vegetation will be installed to the east (side) of Additional House #7, to complement the natural topographical screening of this house;
- The south (side) of Additional House #8 will be screened with landscaping and an ornamental fence to minimize visibility of the rear of the house; and
- The rear (east) and south (side) of Additional House #9 will be screened with vegetation to minimize visibility of the rear and side of the house.

Because of the design configurations and specified stipulations, the US Military Academy believes that the previous No Adverse Effects determination remains valid for this additional undertaking. The U.S. Military Academy requests your review and comment upon this no adverse effects determination. Should you have any questions, please contact me at (845) 938-3522, Fax (845) 938-2529, or E-mail [Douglas.cubbison@usma.edu](mailto:Douglas.cubbison@usma.edu).

Sincerely,

Douglas R. Cubbison  
Cultural Resources Manager  
U.S. Army Garrison West Point

Enclosure (as stated):

- Photographs; and
- Design Drawings