

FINDING OF NO SIGNIFICANT IMPACT (FNSI)
and
FINDING OF NO PRACTICABLE ALTERNATIVE (FNPA)
for
FORT SAM HOUSTON MASTER PLANNING ACTIONS
ENVIRONMENTAL ASSESSEMENT
SAN ANTONIO, TEXAS

AGENCY:

Fort Sam Houston Army Post, San Antonio, Texas.

SUMMARY:

TEC Inc. (TEC) has prepared an Environmental Assessment (EA) for the U.S. Army at Fort Sam Houston (FSH) that analyzed Master Planning construction, repair, and rehabilitation projects at the FSH Army Post. Based on the following summary of potential effects, and as discussed in the accompanying EA, the Commander has determined that the preferred means of accomplishing the Proposed Action (the Master Planning Actions Alternative) is not a major federal action significantly affecting the quality of the human environment, within the meaning of the National Environmental Policy Act (NEPA) of 1969. Therefore, preparation of an Environmental Impact Statement is not required.

INTRODUCTION:

TEC prepared an EA for FSH in accordance with NEPA, 32 CFR Part 651. The EA describes the potential environmental consequences resulting from Master Planning Actions (Proposed Action) and No-Action Alternative. The EA analyzes a scope of 30 proposed master planning facility and infrastructure construction, repair, and renovation projects at FSH. Types of actions proposed include: new facility construction; road widening, extension, and realignment; storm water drainage system repairs; existing facility renovations and expansion; and bridge construction.

BACKGROUND:

FSH is located in the City of San Antonio, Texas, approximately 1 mile northeast of downtown San Antonio. Located within the Interstate 410 beltway, FSH is surrounded by highly urbanized development. The 2,940 acre installation is surrounded by developed property and widely used highways and arterial roads. There is no room for land expansion, so additional development is confined within the installation's borders. FSH serves as the Army's premier medical training, care, and research complex.

PROPOSED ACTION:

The Proposed Action is to implement various master planning facility and infrastructure construction, repair, and renovation projects at FSH. The purpose of the Proposed Action is to meet changing mission support requirements at FSH. The Proposed Action is needed to maintain FSH as an installation that provides world-class medical training, care, and research, and supports headquarters and administrative missions. Implementation of the Proposed Action would accommodate anticipated population, material, and mission growth actions at FSH resulting from various Department of Defense and Army stationing initiatives to modernize, upgrade, expand, and replace facilities on FSH.

The Proposed Action includes the following elements as described in the FSH Master Planning Actions EA. Proposed site locations are also indicated in the EA. Minor siting variations for construction projects may occur within the development footprints:

- Demolish Building 197
- Construct the MacArthur Field Running Track
- Expand and renovate the Historic Theatre, Building 2270
- Construct Installation Management Command (IMCOM) Headquarters (HQ) and associated parking
- Construct Medical Education and Training Campus (METC) parking lot
- Realign Stanley Road between Reynolds Road and New Braunfels Avenue
- Realign Reynolds Road and Widen Scott Road
- Construct the Sixth Army Command and Control Facility
- Construct the Sixth Army Special Troops Command and Control Facility
- Construct the Fifth Army Special Purpose Facility
- Battle Command Training Center Phase II
- Construct an Unaccompanied Personnel Housing (UPH) Permanent Party (PP) building
- Construct a Medical Logistics Company (MED LOG CO) Tactical Equipment Maintenance Facility (TEMF) with Company Operations Facility (COF)
- Drainage system improvements, Scott Road and Wilson Street
- Drainage system improvements, Buildings 2248-2250
- Demolish Chapel Building 1398
- Demolish and replace recreation center Building 1462
- Construct TEMF area development
- Construct 470th Military Intelligence (MI) Brigade (BDE) HQ complex
- Realign and extend Schofield Road
- Construct a Training Aids Center
- Drainage improvements, Patch Road
- Construct the Schofield Road Access Control Point (ACP)
- Construct the 91 W Applied Instruction Building (AIB)
- Construct Chapel
- Construct a student trainee adult sports park
- Drainage system improvements, Winans Road and Nursery Road
- Drainage system improvements, Brooke Army Medical Center (BAMC)

OTHER ALTERNATIVES CONSIDERED:

A fundamental principle of NEPA is that an agency should consider reasonable alternatives to a proposed action. Considering alternatives helps avoid unnecessary impacts and allows an analysis of reasonable

ways to achieve a stated purpose. To warrant detailed evaluation, an alternative must be reasonable. To be considered reasonable, an alternative must be “ready” for decision-making, affordable, capable of implementation, and able to meet an action’s purpose and need.

FSH has excluded from analysis potential alternative(s) that would not satisfy all of the screening criteria identified in the EA because they would not be reasonable alternatives. As the EA illustrates, no alternative to the Proposed Action would satisfy the screening criteria, largely because additional development opportunities on FSH are extremely limited due to existing dense development and site constraints such as floodplains, historic properties, and security considerations. These existing conditions effectively eliminate the possibility of generating detailed siting alternatives to the Proposed Action that would meet mission requirements and could be developed physically. Because the Post could not identify any reasonable alternatives to the Proposed Action, the EA examined only the Proposed Action and the No-Action Alternatives.

ENVIRONMENTAL IMPACTS OF PROPOSED ACTION AND NO-ACTION ALTERNATIVES:

The EA analysis found that with implementation of the following best management practices (BMPs) and potential conservation measures, the Proposed Action would not have any unavoidable significant environmental impacts.

Regulatory Requirements and Best Management Practices

- The design of all new construction would be consistent with the Installation Design Guidelines.
- Construction BMPs would be implemented to moderate the spread of fugitive dust (e.g. watering exposed soils, soil stockpiling, and soil stabilization).
- Construction engineering measures and BMPs would be implemented to reduce the potential storm water runoff and erosion of soils due to an increase in impervious surfaces (e.g. grading and reseeded the land upon completion of construction).
- Potential impacts from highly corrosive and high shrink-swell soils would be prevented with the use of established engineering BMPs.
- Construction BMPs would be implemented to reduce the increase of pollution into Salado Creek potentially resulting from the construction activities.
- A Storm Water Pollution Prevention Plan would be implemented during construction to minimize any potential impacts to sensitive water resources.
- The construction of the Salado Creek Crossing could temporarily impact 0.18 acres of fish and wildlife habitat in Salado Creek and its floodplain. There is potential habitat within the proposed Salado Creek Crossing for migratory birds to nest. If an active bird nest is encountered during construction, it would be avoided.
- As practicable, roadway construction work and construction on Salado Creek Crossing would not occur during peak traffic times to minimize the impact on traffic flows.
- Prior to any demolition, the construction contractor would ensure that demolition would not damage existing utility infrastructure (e.g. buried pipes or power lines).
- All of the storm water drainage improvement projects have the potential to significantly impact utilities during the construction phase, especially if there are utility crossings at the construction point. The construction contractor would review all pre-existing utilities in the area to ensure that any interruption of service is limited and for as brief a time as possible.
- For the handling of hazardous materials needed for construction, the construction contractor would comply with all applicable permits and use standard BMPs designed specifically to minimize the risk

of environmental contamination and harm to human health. The construction contractor would implement a Spill Prevention, Control, and Countermeasure Plan during construction, as applicable, given the volumes of petroleum products on site. The construction contractor would comply with Phase I and II Storm Water regulations under the Federal Clean Water Act to prevent exposure of storm water runoff to construction materials or sediment.

- Hazardous wastes would be handled in accordance with applicable Army regulations and the FSH Oil and Hazardous Substances Emergency Contingency Plan. If an unknown or unidentified waste, such as contaminated soil, is encountered during construction, all construction in the area would stop and the appropriate installation personnel would be notified.
- Undocumented underground storage tanks or pipelines may be encountered during ground disturbance activities. These items may contain products which are hazardous to the environment or human health. If they are encountered during construction, all construction in the area would stop and the appropriate installation personnel would be notified.
- Prior to any building renovation or demolition on a building construction prior to 1985, a complete asbestos survey would be completed. When removal of asbestos-containing material (ACM) is required, the construction contractor would follow industry and Army standards for the encapsulation, removal, and disposal of ACM.
- Prior to any building renovation or demolition, a complete LBP survey would be completed. When removal of lead-based paint (LBP) is required, FSH would follow industry and Army standards for the encapsulation, removal, and disposal of LBP. Buildings 890, 910 -914, 961, 1222, 1278, 1279, 1281, 1290, 1105, 1111, 1462, 2263, 2264, 2266, 2270, 4168, and 4197 would require a LBP survey.
- Buildings 890, 910-914, 961, 1222, 1278, 1279, 1281, 1290, 1105, 1111, 1462, 2263, 2264, 2266, 2270, 4168, and 4197 would also require a polychlorinated biphenyls (PCB) survey or inspection to ensure that no PCB-containing materials would be impacted.
- Due to the age of the installation and its historic uses, not all unexploded ordnance (UXO) may be accounted for. If UXO are encountered during site development, U.S. Army explosive ordnance detonation and disposal support personnel would assess and eliminate any potential explosive hazard prior to resuming construction activities.
- The proposed site of the Training Aids Center would be adjacent to the Conservation visual zone. The size of the building may be sufficient to impact the Conservation visual zone. Therefore, the Training Aids Center would be designed to minimize visual impacts to the Conservation visual zone.
- The MacArthur Field Track would be constructed of materials that do not adversely affect the drainage system.
- To avoid or minimize potential impacts to utilities during construction, the construction contractor would review all pre-existing utilities in this area to ensure that any interruption in service is limited to those times when it is necessary and for as brief a time as possible. If necessary, portable power would be provided to signal lights.
- The Student Trainee Adult Sports Park construction would represent a loss of pervious surfaces within the floodplain, which may impact the storm water drainage system. Any potential adverse impact may be avoided by incorporating design elements to mitigate this impact through the use of pervious track and field surfaces, improved building drainage, and the use of culverts and other such engineering solutions to disperse storm water. Additionally, the recreational fields may require additional irrigation services. The construction contractor would review the water usage to determine if additional recycled water can be purchased for irrigation.

Potential Conservation Measures

Floodplain Development and Wetlands

Three proposed Master Planning Actions would occur in the Salado Creek floodplain and in areas where wetlands are present: Salado Creek Crossing, the Student Trainee Adult Sports Park, and the Schofield Road ACP. The final designs of the Salado Creek Crossing, Schofield Road ACP, and Student Trainee Adult Sports Park would avoid wetlands to the maximum extent practicable. If final designs cannot avoid jurisdictional wetlands or waters of the U.S., then mechanical excavation or the placement of fill material in wetlands or other waters of the U.S. would require a Clean Water Act Section 404 permit and Section 401 State Water Quality Certification. The limits of jurisdictional waters with respect to potential construction footprints would need to be determined prior to final designs. As conditions of the Clean Water Act permit, final project designs would be required to minimize impacts as much as practicable, to restore temporarily impacted areas, and to provide compensatory mitigation for any loss of wetland function if a delineated wetland is actually disturbed. BMPs and potential conservation measures including minimizing extent of fill and construction equipment through site specific design, limiting construction staging to upland areas, and maintaining natural drainage patterns, would be used to minimize impacts to wetlands. Pursuant to Executive Orders (EOs) 11988 and 11990, the Army would take all practicable measures to minimize potential harm to or within the floodplain and wetlands as described above. Additional features to facilitate drainage at the site (culverts, roadside ditches) may be required and would be incorporated during site design and layout. The cumulative effect of the proposed development would not create an obstruction to the floodplain, increase the water surface elevation of the base flood, or increase the flood heights or velocities associated with Salado Creek.

Cultural Resources

Building 197

The proposed demolition of Building 197 would be a direct, adverse impact to a building that is both National Register of Historic Places (NRHP)-eligible and a contributing element to a National Historic Landmark District (NHL). The preparation of Historic American Building Survey/Historic American Engineering Survey (HABS/HAER) document would lessen the impact to this historic structure. While the building would be demolished, the HABS/HAER documentation would serve to record it for posterity. Additionally, the HABS/HAER document would serve as an informational document detailing the building's history and importance to the landscape of the NHL.

Projects for METC Parking Lot, IMCOM Headquarters, and Fort Sam Houston Theatre Rehabilitation impact Historic Properties. However, it has been determined that the adverse impact on Cultural Resources as indicated in the EA is not significant.

DOCUMENT AVAILABILITY:

Copies of the Draft FNSI/FNPA and Draft EA describing the Proposed Action and the No Action Alternatives in detail and presenting the analysis were available for review at the San Antonio Central Library 600 Soledad Street, San Antonio, TX 78205. These documents were also available online at: <http://fshtx.army.mil/sites/local>. Public comments on the Draft FNSI/FNPA and Draft EA were accepted for a 30 day period ending on May 2, 2010. During the public comment period one comment was received from The Society for the Preservation of Historic Fort Sam Houston, Inc. In response to this comment, FSH will continue to seek informal input on preliminary and intermediate exterior designs for the theater extension and IMCOM HQ building. FSH was not able to consider any comments received

after the comment period ended. Copies of the comment letter received during the comment period and the FSH responses are contained Appendix I.

FINDINGS:

Finding of No Practicable Alternative

As the Salado Creek crossing, the Schofield Road ACP, and the Adult Sports Park Proposed Actions are within or in close proximity to the Salado Creek floodplain, other than the No-Action Alternative, no practicable alternative exists to entirely avoid the floodplain because no alternative sites are available that could perform the same function given the location of the activity and the geography. BMPs and potential conservation measures would be used to minimize impacts.

Based upon pertinent considerations discussed herein, the Army hereby finds that there are no practicable alternatives to the Proposed Action at Fort Sam Houston. Furthermore, pursuant to EOs 11988 and 11990, the Army will take all practicable measures to minimize potential harm to or within the floodplain and wetlands at Salado Creek Crossing, the Schofield Road ACP, and the Adult Sports Park.

Finding of No Significant Impact

With implementation of the aforementioned BMPs and potential conservation measures, the Master Planning Actions Alternative would have no significant impacts on environmental resources.

APPROVED BY:

Mary E. Garr
COL U.S. Army
Garrison Commander

Date

Appendix I

Public Comments - Responses



Not Affiliated With The Department Of Defense

APR 25 2010

Mr. David Brigham, Cultural Resources Manger
US Army Garrison Command
2202 15th Street, Suite 07
Fort Sam Houston, TX 78234-5007

Subject: Ltr of 4-08-10 from Garrison Commander, EA on Master Planning Actions at
Fort Sam Houston, April 2010 edition

The enclosure contains our comments on the subject document, although there may be other points needing discussion as the EA proceeds to final form.

Although the enclosed comments are self-explanatory, it is proper to point out that an EA document is most valuable for interested parties when it is received prior to the start of any work on the enumerated projects, and not when that work is underway and/or substantially complete.

Sincerely,

Joan Gaither, President

Enclosure to Ltr on 4-10 EA, Fort Sam Houston Master Planning Actions

The following comments are not intended to be final with regard to this document, but represent the Society's first review of the 4-10 edition of this EA. The comments are not necessarily in the order as found in the EA.

1. Page 2.1, paragraph 2.1.1., line 7 & 8. - With regard to land for expansion, the statement would be more accurate if stated, "There are no DOD funds for land acquisition outside of the Post boundaries. Therefore, additional development is confined within the installation borders". The former Playland Park area (generally bounded by Cunningham, N. Alamo and Josephine St's) was available for purchase for a number of years.

2. Page 2-10, Table 2-4, Standoff Distance - Since this subject has an impact on many of the existing buildings it should be the subject of full discussion with interested parties. As an example, UFC 4-010-01, Appendix A, has a definition of "Controlled Perimeter" which would indicate that the Fort Sam Houston ACP's are the only perimeter that meets that definition. This is further reinforced by the placing of TX PC 30.06 signs at those ACP locations. The question is, when do the "Minimum Standoff Distance" column, 10 meters, of Table 2-4 apply, when within a Controlled Perimeter?

3. Page 2-12, Paragraph 2.3.2- MacArthur Field Running Tract. When the Nov. 2009 Draft EA was issued, this project was well under way and as of the date of the April 2010 EA Draft, is substantially complete. Why the delay on this action while work was underway? Additionally, there is no commentary by the consultant on the Exercise Stations being placed on this Running Tract; either on the page noted above or on page 3-5, lines 20-26.

4. Page 2-16, Lines 20 & 21 - See Number 2 above with regard to Standoff Distance.

5. Page 2-16, Lines 22-23 - There is no commentary by the consultant on the impact of widening Wilson Road and the potential impact on the historic 2nd ID drinking fountain on the corner of Wilson and N New Braunfels and Building 2244.

6. Page 2-16, Line 24-25 - See Number 2 above with regard to Standoff Distance.

7. Page 2-18, Line 3-11 - UPHI Housing; During the last AAP meeting there was discussion on the correct location for this new facility. Figures 2-3, in both the 2009 and 2010 EA versions show the location on Road S-6-N, rather than north of Wilson Street. This needs clarification.

8. Page 2-17 and 3-6, Phase 2 of Battle Command Training Center - There is some slight conflict between the locations of this building on the two pages. Does the consultant

really mean the location is on the corner of Jessup Road and 1st Street?

9. Page 3-14, Lines 31 - 33 ; Community Visual Zone; Building 330, the Post Laundry was demolished at least five years ago.

10, Page 3-14, Line 34 - 41 ; Harris Heights Family Housing. This is an egregious error on the part of the consultant. How could a narrative text, discussing 1950's housing, be next

To a picture of the new 2009 LPC housing?

11. Page 3-55, Lines 36 - 38; The consultant seems to credit one source for the description of the early settlement of San Antonio. Please refer to the publication, "San Antonio", by Frank Jennings, page 84, for a more balanced treatment of the arrival of the Canary Islanders to San Antonio. The settlement of the city was at the direct order of the then Spanish King, Phillip V. Personal claims to land did not override land grants from the Spanish authorities.

12. Appendix B, page 2, Requirement - Noted is the removal of Stanley Road. See 2 above with regard to Standoff Distance.

13. Page 2-14, Lines 2-11 and Appendix A - Renovate and Expand FSH Historic Theater. None of the narrative comments on the need to comply with the Secretary of the Interior Standards for Rehabilitating Historic Buildings. See Attachment A following, particularly items 9 and 10. The project architect Killis Almond and general contractor RKJ Const. should be required to consult with SHPO/THC with regard to the design of the addition to Building 2270.

14. Page 2-15, Lines 1-9 and Page 2-16, lines 1-5 - New IMCOM Headquarters Building. Same comments as Number 13 above with regard to consultation with SHPO/THC. Since architect RSP and general contractor M.A. Mortenson are out-of-state firms design review by THC is important.

Attachment A to Society Letter of 4-25-10 on FSH EA for Master Planning Actions

The following extract from the Secretary of the Interior's Standards for Rehabilitation point out in items 9 and 10 the need to exercise care in the addition to existing historic buildings.

(extracted from the US Dept of Interior publication, "Historic Preservation Certification Application.)

The Secretary of the Interior's Standards for Rehabilitation

The Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility. The Application of these Standards to rehabilitation projects is to be the same as under the previous version so that a project previously acceptable would continue to be acceptable under these Standards.

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

			Fort Sam Houston, Inc.		
5.	2-16	Lines 22 & 23	The Society for the Preservation of Historic Fort Sam Houston, Inc.	There is no commentary by the consultant on the impact of widening Wilson Road and the potential impact on the historic 2nd ID drinking fountain on the corner of Wilson and N. New Braunfels and Building 2244.	<i>There is no indication from Fort Sam Houston that the widening of Wilson Road will impact the drinking fountain or Building 2244.</i>
6.	2-16	Line 24-25	The Society for the Preservation of Historic Fort Sam Houston, Inc.	See Number 2 above with regard to Standoff Distance	<i>Refer to response provided for Comment 2.</i>
7.	2-18	Line 3-11 UPH Housing	The Society for the Preservation of Historic Fort Sam Houston, Inc.	During the last AAP meeting there was discussion on the correct location for this new facility. Figures 2-3, in both the 2009 and 2010 EA versions show the location on Road S-6-N, rather than north of Wilson Street. This need clarification.	<i>The UPH Housing is located correctly on Figure 2-3. The text has been revised on page 3-16 to clarify it will be located near the intersection of Wilson Street and N. New Braunfels Ave. The proposed location is south of Wilson Street.</i>
8.	2-17 and 3-6	Phase 2 of Battle Command Training Center	The Society for the Preservation of Historic Fort Sam Houston, Inc.	There is some slight conflict between the locations of this building on these two pages. Does the consultant really mean the location is on the corner of Jessup Road and 1st Street?	<i>Text has been clarified to explain that the building would straddle Jessup Rd. and be located between 1st and 2nd Streets.</i>
9.	3-14	Lines 31-33 Community Visual Zone; Building 330	The Society for the Preservation of Historic Fort Sam Houston, Inc.	The Post Laundry was demolished at least 5 years ago.	<i>The Post Laundry reference has been eliminated.</i>
10.	3-14	Line 34-41; Harris	The Society for the	This is an egregious error on the part of the consultant. How could a narrative text, discussing 1950's housing, be	<i>Text has been revised to explain that Harris Heights was demolished and rebuilt in 2007</i>

Comment/Response Matrix
Public Comments
Draft EA
Fort Sam Houston Master Planning Actions
April 2010

1.	2.1	Paragraph 2.1.1 Line 7&8	The Society for the Preservation of Historic Fort Sam Houston, Inc.	With regard to land for expansion, the statement would be more accurate if stated, "There are no DoD funds for land acquisition outside of the Post boundaries. Therefore, additional development is confined within the installation borders." The former Playland Park area (generally bounded by Cunningham, N. Alamo, and Josephine St's) was available for purchase for a number of years	<i>Text has been revised to read: "Due to the urban environment surrounding Fort Sam Houston and a lack of funding for the purchase of additional land, further development is confined within the installation's borders."</i>
2.	2-10	Table 2-4, Standoff Distance	The Society for the Preservation of Historic Fort Sam Houston, Inc.	Since this subject has an impact on many of the existing buildings it should be the subject of full discussion with interested parties. As an example, UFC 4-010-01, Appendix A, has a definition of "Controlled Perimeter" which would indicate that the Fort Sam Houston ACP's are the only perimeter that meets that definition. This is further reinforced by the placing of TX PC 30.06 signs at those ACP locations. The question is, when do the "Minimum Standoff Distance" column, 10 meters, of Table 2-4 apply, when within a Controlled Perimeter?	<i>Application of the minimal standoff distance standard of 10m (33ft) can apply to existing buildings provided the buildings are hardened. The comments apply to those situations where reshaping, closing or relocating an existing roadway or parking lot to meet the standard without going to the great expense of hardening an existing structure and in so doing potentially causing an adverse effect from the hardening requirements. Para. B-1.1.2.2 of the UFC establishes that roadways may be closer if parking is controlled.</i>
3.	2-12	Paragraph 2.3.2 – MacArthur Field Running Tract	The Society for the Preservation of Historic Fort Sam Houston, Inc.	When the Nov. 2009 Draft EA was issued, this project was well underway and as of the date of the April 2010 EA Draft, is substantially complete. Why the delay on this action while work was underway? Additionally, there is no commentary by the consultant on the Exercise Stations being placed on this Running Tract; either on the page noted above or on page 3-5, lines 20-26.	<i>The running tracks and exercise stations are very minor projects which have been deemed to have no adverse effect.</i>
4.	2-16	Lines 20 & 21	The Society for the Preservation of Historic	See Number 2 above, with regard to Standoff Distance	<i>Refer to response provided for Comment 2.</i>

		Heights Family Housing	Preservation of Historic Fort Sam Houston, Inc.	next to a picture of the new 2009 LPC housing?	(as shown in the picture).
11.	3-55	Lines 36-38	The Society for the Preservation of Historic Fort Sam Houston, Inc.	The consultant seems to credit one source for the description of the early settlement of San Antonio. Please refer to the publication, "San Antonio," by Frank Jennings, page 84, for a more balanced treatment of the arrival of the Canary Islanders to San Antonio. The settlement of the city was at the direct order of the then Spanish King, Philip V. Personal claims to the land did not override land grants from the Spanish authorities.	Text has been revised to incorporate information regarding King Philip V and his directions for settlement.
12.	Appendix B	Page 2, Requirement	The Society for the Preservation of Historic Fort Sam Houston, Inc.	Noted is the removal of Stanley Road. See 2 above with regard to Standoff Distance	Refer to response provided for Comment 2.
13.	2-14	Lines 2-11 and Appendix A – Renovate and Expand FSH Historic Theater	The Society for the Preservation of Historic Fort Sam Houston, Inc.	None of the narrative comments on the need to comply with the Secretary of the Interior Standards for Rehabilitating Historic Buildings. See Attachment A following, particularly items 9 and 10. The project architect Killis Almond and general contractor RKJ Const. should be required to consult with the SHPO/THC with regard to the design of the addition to Building 2270.	The discussion pertaining to the Standards of Rehabilitation is located in the cultural resources section of the EA. Copies of preliminary and intermediate exterior design drawings for the theater extension and IMCOM HQ building will be provided to The Society for the Preservation of Historic Fort Sam Houston, Inc. for their informal input.
14.	2-15 and 2-16	Lines 1-9 and Lines 1-5 – New IMCOM Headquarters Building	The Society for the Preservation of Historic Fort Sam Houston, Inc.	Same comments as Number 13 above with regard to consultation with SHPO/THC. Since architect RSP and general contractor M.A. Mortenson are out-of-state firms design review by THC is important.	The discussion pertaining to the Standards of Rehabilitation is located in the cultural resources section of the EA. Copies of preliminary and intermediate exterior design drawings for the theater extension and IMCOM HQ building will be provided to The Society for the Preservation of Historic Fort Sam Houston, Inc. for their informal input.