ENVIRONMENTAL REVIEW

U.S. Army Garrison-Fort Bliss, Directorate of Public Works, Environmental Division (DPW-ED)-NEPA Office
Bldg. 624, USGA Fort Bliss, TX 79916
Office Number: 915-568-3782

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Date Received: 3/18/2026 **NEPA Log#**:26-0257 **Review Expires**: 4/8/2027

Section I: Outlines Proponent Responsibilities

This environmental review, performed under the authority of NEPA, AR 200-1, and the 30 June 2025 DoD Procedures, serves to identify critical compliance requirements. By documenting federal, state, and local legal obligations, this review allows DPW-Environmental to safeguard the installation against regulatory risk and avoid unforeseen budgetary or schedule delays.

1. **Scope Limitation:** This analysis applies exclusively to the work described in the submitted Work Order and supporting documents.
2. **PM Responsibility:** The Project Manager/Proponent must resolve all environmental issues prior to project award. Concurrence is predicated on full adherence to this guidance.
3. **Review Scope:** This document identifies potential environmental impacts but does not constitute a technical approval of final plans, specifications, or drawings.
4. **Legal Compliance:** The proponent is responsible for complying with all applicable federal, state, and local laws, regardless of whether they are specifically cited herein.
5. **Validity & Resubmission:** Approval is contingent upon an unchanged Scope of Work.
   - Work must be completed within 365 days of the review date.
   - Package resubmission is required if the project changes or the review expires.
   - The proponent must ensure all legally required documentation is submitted to DPW-Environmental.
6. **No Regulatory Relief:** This review does not exempt the proponent from any external federal, state, or local environmental statutes.

Section II: Project Title and Description of Proposed Action:

65% Design Review MED 10211 5J

Roof replacement at building 2417 due to multiple leaks within the building. Multiple work orders over the past month have been placed for both common areas and individual soldier's rooms having leads and water damage. Based on an assessment conducted by Pride on August 1, 2025, it was recommended to request the TPO membrane to be replaced.

ANTICIPATED PROJECT START DATE:

3/27/2026

BLUF:

- **Section III provides critical data regarding environmental requirements necessary for compliance including but not limited to, equipment specifications, abatement/mitigation plans, and SWPPPs.**

Lead and Asbestos in present in Building 2417

*** Provide specifications of new/old unit to Victor Garcia at victor.h.garcia22.civ@army.mil ***

Section III: Provides Environmental Review and Environmental Screening Checklist:
For DPW-ED Subject Matter Expert Use Only

POC FOR THIS ACTION: Evelyn Torruella evelyn.torruella.civ@army.mil
ALTERNATE POC/DPW POC: NA

Previously Reviewed Action: **YES** Previous NEPA Log#: **25-0704**

Comment Directions

1. Each review comment should be succinct and focused on one area for resolution. The four key parts of a quality review comment normally include:
    a. Concern Identification – Identify the location of the concern by Specification Section, Drawing Plan Sheet, Drawing Plan Detail, or Document Reference Number. Include paragraph numbers, sentence, and/or line numbers as appropriate.
    b. Basis for concern – cite the appropriate law, policy, design criteria, guidance, procedure, risk or lessons learned that has not been followed.
    c. Significance of concern – indicate the importance of the concern with regard to its potential impact on the project (plan selection, operations, efficiency, cost, effectiveness, risk, safety, Federal interest, or public acceptability).
    d. Resolution of concern – identify the probable specific action(s)/change(s) that are needed to resolve the concern. If resolution is unknown, state a need for follow up discussions to coordinate the actions required to resolve the concern.
    a. Marked up PDFs – include marked up PDF to provide additional clarity to the concern, the document should not be used as a substitute of a written concern.

PROGRAM: **Cultural Resources-Archeology** **REVIEWER:** Martha Yduarte **CONCURRENCE:** YES- WITH REQUIREMENTS

ATTACHMENT: NA **FINALIZED DATE:** 3/24/2026

PROPONENT is advised to follow the procedures for the inadvertent discovery of cultural materials. If cultural materials are found during any excavation (esp. possible bone) stop working in that area and contact DPW-ED at 915-568-3782. An archaeologist will conduct a site visit and assess the find. Work can continue in that area when all cultural work is completed. If changes to the design occur, please re-submit for review.

FOR ENVIRONMENTAL STAFF ONLY: This action falls under Appendix B (E)(9) Site Work.

PROGRAM: **Cultural Resources-Historic Preservation** **REVIEWER:** Donald J. Sevigny **CONCURRENCE:** YES

ATTACHMENT: NA **FINALIZED DATE:** 2/25/2026

No comment.

PROGRAM: **Natural Resources** **REVIEWER:** Gabriel Ramirez **CONCURRENCE:** YES- WITH COMMENTS

ATTACHMENT: NA **FINALIZED DATE:** 3/19/2026

Work will occur in an existing building, roof replacement. No natural resource concerns are anticipated.

PROGRAM: **Drinking Water** **REVIEWER:** Michelle Brennan **CONCURRENCE:** YES- WITH COMMENTS

ATTACHMENT: NA **FINALIZED DATE:** 3/23/2026

This project does not intend to construct, demolish, nor alter drinking water systems.
If scope of work is modified, the proponent shall re-submit for review and approval.

PROGRAM: **Waste Water** **REVIEWER:** Rebecca Navarrette **CONCURRENCE:** YES- WITH COMMENTS

ATTACHMENT: NA **FINALIZED DATE:** 3/24/2026

Proponent shall follow Section 2.7.6.1 & 2.7.6.2 of the Scope of Work.
If scope of work is modified, the proponent shall re-submit for review and approval.

PROGRAM: **Stormwater** **REVIEWER:** Rebecca Navarrette **CONCURRENCE:** YES- WITH COMMENTS

ATTACHMENT: NA **FINALIZED DATE:** 3/24/2026

Proponent shall follow Section 2.7.2 of the Scope of Work.
If scope of work is modified, the proponent shall re-submit for review and approval.

PROGRAM: **D.E.R.A** **REVIEWER:** Cynthia Hernandez **CONCURRENCE:** YES

ATTACHMENT: NA **FINALIZED DATE:** 3/19/2026

No comment

PROGRAM: **Solid Waste** **REVIEWER:** Cynthia Hernandez **CONCURRENCE:** YES- WITH COMMENTS

ATTACHMENT: NA **FINALIZED DATE:** ENTER DATE OF COMPLETION

vii. Waste & Recyclables Management.
(a). Construction Waste Management. The DoD Strategic Sustainability Performance Plan (SSPP) (reference 1.q) requires that at least 60% of construction and demolition debris be diverted from the waste stream by FY2015. However, it is the Army's intent to manage waste with the goal of Net Zero waste disposal in landfills. Therefore, projects that involve the removal of existing buildings or structures will evaluate the feasibility of deconstruction and salvage rather than conventional demolition and will implement deconstruction wherever markets or on-site reuse opportunities exist or are anticipated.
CONSTRUCTION WASTES REQUIREMENTS: All project generated waste must be disposed of by contractors according to Fort Bliss requirements and regulations
The contractor and its subcontractors are responsible for disposal of excess soil, earth, rock or spoils, and any construction materials in excess. The Environmental Division is not responsible for providing location, sites, and operational limits and logistics for disposal of spoils. Any solid waste generated (non-hazardous or construction debris related) shall be disposed of and by the contractor, its subcontractor or the project proponent. All solid waste that cannot be recycled shall be disposed of at a permitted landfill or other authorized facility. Burning or burying (land disposal) is strictly prohibited by state laws, and any evidence of such will be addressed properly, and the contractor, its subcontractors and the proponent will be responsible for cleaning and removing all debris, trash and contaminated soils, water or other impacted materials, and replacing the materials, equipment or other infrastructure at the proponents, contractors and its subcontractors costs.
RECORDS & DATA REPORTING REQUIREMENT: All weight tickets and manifests for waste and diverted or recycled materials shall be submitted to the government project manager (PM) or contracting officer representative (COR). The government PM or COR will provide to DPW Environmental Division and Pollution Prevention Branch the diversion records.

PROGRAM: **Lead and Asbestos** **REVIEWER:** Donald J. Sevigny **CONCURRENCE:** YES

ATTACHMENT: Asbestos Lead Survey_Bldg-2417_20080703 **FINALIZED DATE:** 3/25/2026

1. The Proponent included comments provided by the DPW-ED Lead and Asbestos program into the latest project SOW. For reference, the Asbestos-Containing Materials and Lead-Based Paint survey for Building 2417 is attached above.

2. Point of contact is D.J. Sevigny at (915) 568-3782 or donald.j.sevigny.civ@army.mil. Alternate point of contact is Victor Garcia, PE, Environmental Engineer, 915-568-0794 or victor.h.garcia22.civ@army.mil.

PROGRAM: **Hazardous Materials** **REVIEWER:** Samuel Del Toro **CONCURRENCE:** YES- WITH COMMENTS

ATTACHMENT: NA **FINALIZED DATE:** 3/24/2026

Prior to use of hazardous or regulated material, the Contractor shall provide the COR and DPW Environmental Division a list of methods and materials for review and approval, pertaining to regulated/hazardous materials, storage, and disposal of waste generated. The facility must maintain a list of chemicals stored and/or used for its operation (e.g., POL, paint, adhesives, additives, etc.), including Safety Data Sheets available at or closed to the storage or work site. A monthly inventory is to be provided to DPW-ED with the types and amounts of materials. Contact Samuel Del Toro at 915-568-5396 or samuel.deltoro.civ@army.mil for inventory forms and training.

PROGRAM: **Hazardous Waste** **REVIEWER:** Michelle Brennan **CONCURRENCE:** YES- WITH COMMENTS

ATTACHMENT: NA **FINALIZED DATE:** 3/23/2026

Upgrades, construction or repair activities that will generate any regulated waste, asbestos and/or lead waste, disposal shall be coordinated with DPW-ED.
Disposal costs shall be charged to the project or related contract as applicable. A copy of the waste profile issued by the disposal facility should be provided to DPW-ED. Waste manifests must use the Fort Bliss Environmental Protection Agency Identification Number, and only DPW-ED personnel appointed in writing by the Garrison Commander are authorized to sign the manifests on behalf of Fort Bliss. The original manifests signed by the disposal facilities shall be provided to DPW-ED.

PROGRAM: **AST/UST** **REVIEWER:** Isaac Trejo **CONCURRENCE:** YES

ATTACHMENT: NA **FINALIZED DATE:** 3/19/2026

No comment

PROGRAM: **SPCC** **REVIEWER:** Isaac Trejo **CONCURRENCE:** YES

ATTACHMENT: NA **FINALIZED DATE:** 3/19/2026

No comment

PROGRAM: **Air** **REVIEWER:** Victor Garcia **CONCURRENCE:** YES- WITH COMMENTS

ATTACHMENT: NA **FINALIZED DATE:** 3/20/2026

HVAC REQUIREMENTS

Technicians that work on refrigerant-containing appliances must be certified by an EPA-approved training provider for the type of equipment on which they work [40 CFR 82.161(a)(1)].

Technicians contracted to install new HVAC/R equipment and/or service existing equipment are also responsible to follow Fort Bliss Refrigerant Management Plan and are subject to the same certification requirements.

No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the environment any refrigerant [40 CFR 82.154(a)(1)].

New purchases of HVAC/R equipment shall use an EPA Significant New Alternatives Policy Program (SNAP) approved refrigerant with an ODS of zero-www.epa.gov/snap.

Provide specifications of new/old unit to Victor Garcia at victor.h.garcia22.civ@army.mil

Failure to report any of the emissions generating equipment listed above may cause regulatory violations and fines.

Click to enter comment. Section can be used as a communication log

Environmental Screening Checklist (Check "yes", "no", "unknown").
Based on the documents provided by Proponent the DPW-ED Subject Matter Experts (SMEs) will check (X) impacts of proposed activities.

Land Use

Yes	No	Unknown	
☒	☐	☐	1. Would the action be consistent with how the area is presently used?
☐	☒	☐	2. Would the action involve disturbing the ground surface?
☐	☒	☐	3. Would the action involve clearing or cutting vegetation?
☐	☒	☐	4. Would the action affect ranges and training areas?

Historic Buildings and Cultural Resources

Yes	No	Unknown	
☒	☐	☐	1. Would the action involve the demolition (interior or exterior) or renovation of a building, especially removal of interior walls, ceilings, floor tile, base cove, paint, or exterior roofing, siding, paint, etc.?
☐	☒	☐	2. Is the building a known historic structure or is there an historical plaque in close proximity to any building affected by the proposed action?
☐	☒	☐	3. Construction of the proposed project is anticipated to have adverse effects on National Historic reservation Act (NRHP)-listed and/or -eligible historic properties and those effects are unlikely to be able to be avoided or mitigated. (Note: All required NHPA Section 106 consultation with SHPO, ACHP, Tribes, and other interested parties must be completed prior to commencing with the proposed project.)
☐	☒	☐	4. All or part of the proposed construction area needs to be surveyed for cultural resources.

Natural Resources

Yes	No	Unknown	
☐	☐	☒	1. Would the action involve the removal or control of animals, birds or insects?
☐	☐	☒	2. Would the action involve removal of vegetation during bird nesting season (15 Feb – 15 Sep)?
☐	☒	☐	3. Would the action be near any known sensitive or protected areas?
☐	☒	☐	4. Would the action take place in or near a spring, playa (dry or wet lake-bed), arroyo (dry or wet drainage channel), or livestock watering tank?
☐	☒	☐	6.Construction, operation, or maintenance of the proposed project would result in unpermitted direct impacts to waters of the U.S., regulated recharge zones, and/or groundwater aquifers.
☐	☒	☐	7. Construction of the proposed project is anticipated to include construction activities on jurisdictional wetlands or require additional surveys to identify and delineate jurisdictional wetlands.
☐	☒	☐	8. Construction of the proposed project is anticipated to include construction activities on highly erodible soil.

Water and Wastewater Systems

Yes	No	Unknown	
☐	☒	☐	1. Would the action require the modification or installation of a plumbing system?
☐	☒	☐	2. Would the action use potable water other than for normal drinking/bathing/waste removal use?
☐	☒	☐	4. Would the action affect an existing well or require the installation of a new well?
☐	☒	☐	5. Would the action take place near any existing water supply, or groundwater monitoring, well?
☐	☒	☐	6. Would the action involve the release of water into a drain, drainage, arroyo, or on-site sewage system (septic tank) or other body of water?
☐	☒	☐	7. Would the action require the development of wastewater or sewage disposal system?
☐	☒	☐	8. Would the action involve an oil/water separator(s) or grease trap(s)?

Air Quality and Noise

Yes	No	Unknown	
☐	☒	☒	1. Would the action result in air emissions (such as from vehicles, generators, paint booths, boilers, incinerators, etc.)?
☐	☒	☐	2. Would the action generate new sources of loud noise, increase the intensity or duration of noise levels, or result in exposure of large numbers of people to high levels of noise?
☐	☒	☐	3. Would the action take place at night? If yes, please state time and duration in comments box.

Hazardous Materials

Yes	No	Unknown	
☒	☐	☐	1. Would the action involve the use of a solvent-like paint thinners or cleaning products?
☐	☒	☐	2. Would the action involve sandblasting, painting, or spray painting?
☒	☐	☐	3. Would disposal or storage of a product that contains petroleum or hazardous materials be required?

Storage Tanks

Yes	No	Unknown	
☐	☒	☐	1. Would the action require a temporary fueling location?
☐	☒	☐	2. Would the action involve the removal, repair or maintenance of above/underground storage tanks?

Roads and Vehicle Traffic

Yes	No	Unknown	
☐	☒	☐	1. Would the action involve off road vehicle traffic/maneuvers?
☐	☒	☐	2. Would the action involve the construction of new roads?
☐	☒	☐	3. Would the action increase the amount of traffic to a particular area?

DERA

Yes	No	Unknown	
☐	☒	☐	1. Construction of the proposed project is to be done on a closed landfill, Installation Restoration Program (IRP), Military Munitions Response Program (MMRP), or Compliance Cleanup (CC) site and would cause significant soil contamination or violate regulations.

Human Health and Safety

Yes	No	Unknown	
☐	☒	☐	1. Have significant adverse effects on public health or safety.

Section IV: Environmental Analysis Determination

Potential environmental impacts have been evaluated and recorded in the preceding checklist. This documentation does not relieve the proponent of the obligation to adhere to all applicable federal, state, and local environmental statutes and regulations.

On the basis of this evaluation the following is appropriate:

This action is covered by CATEX.

☐ Pursuant to environmental analysis, it is hereby determined that the proposed action is not subject to segmentation and that no extraordinary circumstances exist to preclude the application of the identified categorical exclusion (CATEX). This action has either been previously evaluated within an existing Environmental Assessment (EA) or Environmental Impact Statement (EIS) or qualifies for a CATEX in accordance with the **National Environmental Policy Act of 1969 (NEPA)** (42 U.S.C. § 4321 *et seq.*), the **Department of Defense National Environmental Policy Act Implementing Procedures** (dated 30 June 2025), and **Army Regulation 200-1**. Consequently, the action is eligible for a Categorical Exclusion and does not require the preparation of a Record of Environmental Consideration (REC).

(Skip to the "Approved By" section for NEPA Program Manager signature to compete the document.)

REASONING FOR USING CATEX:

A Record of Environmental Consideration (REC) is required.

X This action is eligible for a Categorical Exclusion (CATEX); however, extraordinary circumstances exist that require a Record of Environmental Consideration (REC).

REASONING FOR USING REC: It has been determined that the action qualifies for Categorical Exclusion (CATEX) in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States [U.S.] Code Section 4321 et seq.) requires federal agencies to consider potential environmental impacts prior to undertaking a course of action. In accordance with NEPA, Department of Defense National Environmental Policy Act Implementing Procedures, 30 June 2025 and Army Regulation 200-1, the Army has prepared CatEx (f)(1) for the Routine repair of buildings, facilities, launch pads, structures, utility/communication systems, airfields, grounds, parking areas, targetry and other equipment, special hazards (e.g. ACM and/or LBP) are present and for which a **Record of Environmental Consideration is required**. All screening criteria have been satisfied; therefore, no further action is required.

☐ This action is only partially covered by an existing CATEX, EA, or EIS. Because certain project elements have not been previously analyzed, a supplemental document and a Record of Environmental Consideration (REC) are required.

Title of EA or EIS: _____

☐ The proposed action exceeds the scope of existing CATEXs, EAs, or EISs. Consequently, a supplemental document must be prepared, or a new environmental analysis must be conducted for elements not previously evaluated. An EA or an EIS will be required.

Section V: Approved By

(SIGNATORY CONCURRENCE IS CONTINGENT UPON PROPONENT COMPLIANCE WITH GUIDANCE PROVIDED ABOVE)

MCDANIEL.JOSEPH.LEE.1515103747 Digitally signed by MCDANIEL.JOSEPH.LEE.1515103747 Date: 2026.04.21 14:17:25 -06'00'

4/6/26

Joseph McDaniel
NEPA Program Manager

Date

Section VI: Concurrence (As needed for Record of Environmental Consideration)

The proponent's signature denotes acceptance of the aforementioned conditions and acknowledgment that adherence to this document does not supersede any applicable federal, state, or local environmental statutes.

AUFDENKAMPE.CARL.WILLIAM.1051867153 Digitally signed by AUFDENKAMPE.CARL.WILLIAM.1051867153 Date: 2026.04.28 15:09:03 -06'00'

4/28/26

Project Proponent (Requestor/Lead
Name: Carl Aufdenkampe
Title: Division Chief, DPW-ESD

Date

OFFUTT.SHANE.PATRICK.1104875986 Digitally signed by OFFUTT.SHANE.PATRICK.1104875986 Date: 2026.04.28 13:43:39 -06'00'

4/28/26

Environmental Officer
Name: Shane Offutt
Title: Division Chief, DPW-ED

Date