

(b)(6),(b)(7)(C) Field Office Supervisor
United States Fish and Wildlife Service
New Jersey Ecological Services Field Office
4 E. Jimmie Leeds Road, Suite Galloway, NJ 08205

Via email: NJFO_ProjectReview@fws.gov

RE: Elizabeth Detention Center, 625 Evans Street, Elizabeth, New Jersey

Environmental Assessment Project Code: 2024-0111857

Dear Mr (b)(6),(b)(7)(C)

Immigration and Customs Enforcement's (ICE) is responsible for the detention, health, welfare, transportation, and deportation of noncitizens in removal proceedings, and those subject to a final order of removal. ICE's Enforcement and Removal Operations (ERO) field office in Newark, New Jersey has a need for comprehensive detention services for 600 adult male and female noncitizens that include general population, intake, segregated housing, and medical beds at a contractor-owned/contractor-operated detention facility. The facility must be within 50 driving miles from the ERO field office located at 970 Broad Street in Newark, New Jersey.

To accommodate a portion of the detained noncitizen population under ICE jurisdiction, use of the existing Elizabeth Detention Center (EDC) in Elizabeth, New Jersey is proposed (the Proposed Action). WSP USA, Inc. has been contracted to prepare an Environmental Assessment in accordance with the National Environmental Policy Act to evaluate the potential impacts of the proposed action and alternatives associated with use of the EDC to house detained noncitizens under ICE jurisdiction.

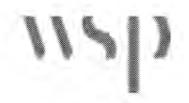
The purpose of this letter is to provide the U.S. Fish and Wildlife Service (USFWS) notice of the Proposed Action and to document compliance with Section 7 of the Endangered Species Act (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.), as well as the Migratory Bird Treaty Act of 1918 (MBTA) (40 Stat. 755, as amended; 16 U.S.C. 703-712), and the Bald and Golden Eagle Protection Act of 1940 (BGEPA) (54 Stat. 240, as amended; 16 U.S.C. 668-668c).

PROPOSED ACTION

The existing EDC consists of intake, housing, medical beds, and other support facilities to provide dining, medical, religious, legal, and other services. To meet ICE needs, the proposed action of housing detained noncitizens at the EDC requires provision of an outdoor recreation enclosure. An outdoor enclosure is planned consisting of a secure fenced walkway from the detention center to a paved area encircling a half basketball court, recreation equipment, a small canopy, a restroom for use by detainees along with security fencing, control gates and CCTV cameras. No new building construction or alterations to the existing EDC structure is proposed. The Proposed Action allows for continued EDC operation during the period of performance.

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WSP USA, Inc.



ACTION AREA

The EDC is located within an approximately three-acre property at 625 Evans Street in Elizabeth, New Jersey. Attachment A shows the facility's regional location, Attachment B provides an aerial view of the Elizabeth Detention Center, and Attachment C shows topographic conditions in and around the facility property.

SPECIES AND HABITATS CONSIDERED

ESA Species

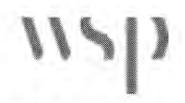
The USFWS Official Species List, included as Attachment D, indicates that one federally listed species and one candidate species may occur within the vicinity of the Proposed Action: the endangered northern long-eared bat (*Myotis septentrionalis*) and the candidate for listing monarch butterfly (*Danaus plexippus*). The Action Area does not contain critical habitat or proposed critical habitat for these or any other species.

Descriptions of these species and their habitats are summarized below from N.J. Department of Environmental Protection and USFWS species profiles.

- Northern long-eared bat: The federally endangered northern long-eared bat is a medium-sized bat that is distinguished by its long ears, particularly as compared to other bats in its genus. The northern long-eared bat is found across much of the eastern and north central United States. White-nose syndrome is the predominant threat to this bat, especially throughout the northeast where the species has declined by up to 99 percent from pre-white-nose syndrome levels at many hibernation sites. Northern long-eared bats spend winter (November 1 to March 31) hibernating in caves and mines and then emerge in early spring. During the active season (April 1 to October 31), northern long-eared bats utilize a wide variety of forested/wooded habitats where they roost, forage, and travel. They may also utilize some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields, and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥3 inches dbh that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of forested/wooded habitat.
- Monarch butterfly: Monarch butterflies are a bright orange color with black and white markings and a wingspan between 3.5 and 4 inches. The caterpillars have many yellow, black and white bands and antenna-like appendages at each end of their body. Monarch caterpillars feed almost exclusively on milkweed and as adults feed on nectar from a wide range of flowers. They lay their eggs on milkweed; there are about 3 to 5 generations born each spring and summer and most of the offspring do not live beyond five weeks. Monarchs are migratory, journeying to central Mexico for the winter each year. In the spring, summer and early fall, they can be found wherever there are nectar-producing plants.

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Migratory Bird Treaty Act Species

The USFWS Official Species List also provided a Migratory Bird Resource List for proposed Action Area. The list comprises USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention. The list indicates that there are seven species of migratory birds that are protected under the MBTA that may occur in the Action Area.

Bald and Golden Eagle Protection Act Species

According to the USFWS Official Species List, bald eagles are known to occur in the vicinity of the Action Area. Bald eagles prefer undisturbed forested areas near large lakes and reservoirs, marshes and swamps, or stretches along rivers where they can find open water and their primary food, fish. Bald eagles prefer to nest, perch, and roost in old-growth and mature forest stands of conifers and hardwoods. Foraging habitat for bald eagles consists of large perch trees near a body of water. The Action Area does not contain the forested habitat near waterbodies that bald eagles prefer.

ANALYSIS AND DETERMINATION OF EFFECTS

ESA Species

Northern long-eared bats are not expected to utilize the Action Area due to the developed nature of the property, the adjoining industrial developments, heavily trafficked surrounding roadways, and human activity. Monarch butterflies are not expected to occur on site other than as a transient individual as vegetated areas that may contain milkweed or other native nectar plants are not present. Based on the analysis, we have reached a determination of No Effect for northern long-eared bat and monarch butterfly.

Migratory Bird Treaty Act Species

Due to the developed nature of the Action Area, migratory birds are not expected to occur except as occasional transients. Any migratory birds that may be present in the Action Area would not remain due to the developed site, the adjoining industrial developments, heavily trafficked surrounding roadways, and human activity. We have determined that the Proposed Action is not likely to jeopardize the continued existence of any migratory birds and would not result in the destruction or adverse modification of designated critical habitat of any such species.

Bald and Golden Eagle Protection Act Species

Based on the lack of suitable habitat within the Action Area, bald eagles are not anticipated to occur. We have determined that the Proposed Action would not result in "taking" bald or golden eagles. The Proposed Action would not substantially interfere with normal breeding, feeding, or sheltering behavior that may cause injury, decrease in productivity, or nest abandonment.

CONCLUSION

The Proposed Action is not expected to result in a "taking" of any listed species. For purposes of consultation under Section 7(a)(2) of the ESA, we have determined that the Proposed Action would have No Effect on northern long-eared bat and monarch butterfly. We understand that USFWS concurrence is not required, and no further action is required for species with No Effect determinations.

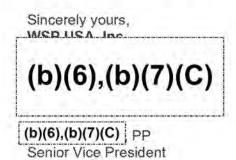
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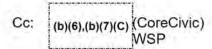
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The Proposed Action is not likely to jeopardize the continued existence of vulnerable migratory birds or BCC, nor the destruction or adverse modification their designated critical habitat. The Proposed Action would not result in "taking," injury, decrease in productivity, or nest abandonment of bald or golden eagles.

We understand that the USFWS presumes that all activities would be implemented as described herein. Any departures from the described activities will be promptly reported to the New Jersey Ecological Services Field Office.

We appreciate your assistance with this matter and look forward to your response. If you have any questions, please do not hesitate to contact me at (b)(6),(b)(7)(C) @wsp.com or 973-407 Thank you.



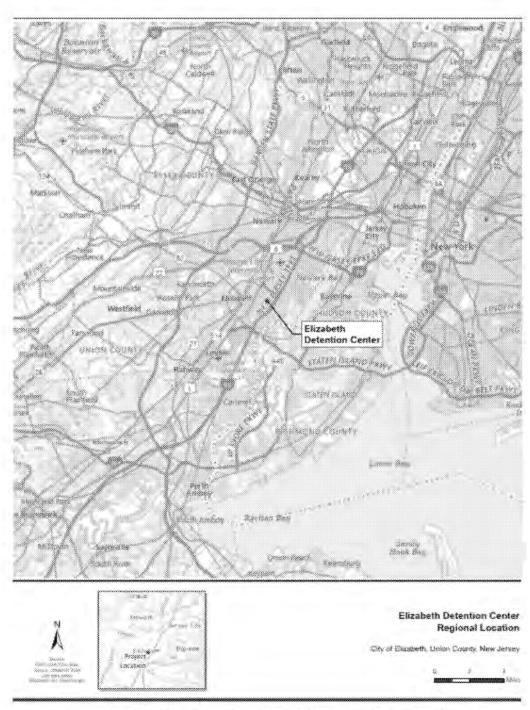


Attachment A: Regional Location – Elizabeth Detention Center Attachment B: Aerial Photograph - Elizabeth Detention Center

Attachment C: Topographic Conditions - Elizabeth Detention Center

Attachment D: Official Species List

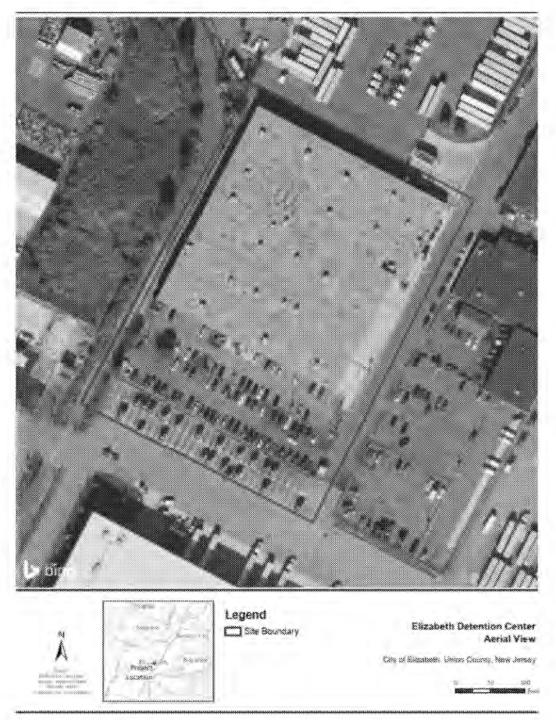
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Attachment A: Regional Location - Elizabeth Detention Center
625 Evans Street, Elizabeth, New Jersey

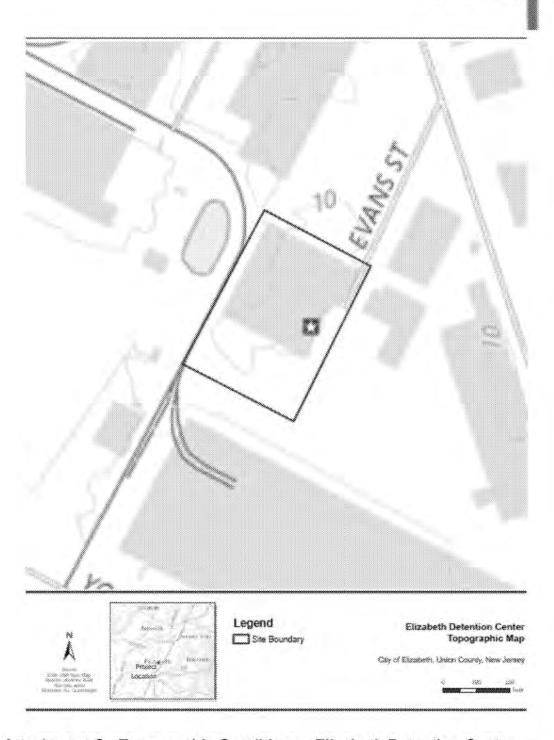
WSP USA, Inc. 5 | Page





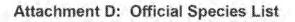
Attachment B: Aerial Photograph - Elizabeth Detention Center 625 Evans Street, Elizabeth, New Jersey

WSP USA, Inc.



: Attachment C: Topographic Conditions - Elizabeth Detention Center 625 Evans Street, Elizabeth, New Jersey

WSP USA, Inc.



WSP USA. Inc.



July 9, 2024

United States Army Corps of Engineers New York Regulatory District Jacob K. Javits Federal Building 26 Federal Plaza, Room ((0)(6)(6)(7)(C) New York, NY 10278-0090

Via email: Cenan-pa@usace.army.mil

RE: Elizabeth Detention Center, 625 Evans Street, Elizabeth, New Jersey Environmental Assessment

Dear New York Regulatory District:

Immigration and Customs Enforcement's (ICE) is responsible for the detention, health, welfare, transportation, and deportation of noncitizens in removal proceedings, and those subject to a final order of removal. ICE's Enforcement and Removal Operations (ERO) field office in Newark, New Jersey has a need for comprehensive detention services for 600 adult male and female noncitizens that include general population, intake, segregated housing, and medical beds at a contractor-owned/contractor-operated detention facility. The facility must be within 50 driving miles from the ERO field office located at 970 Broad Street in Newark, New Jersey.

To accommodate a portion of the detained noncitizen population under ICE jurisdiction, use of the existing Elizabeth Detention Center (EDC) in Elizabeth, New Jersey is proposed (the Proposed Action). WSP USA, Inc. has been contracted to prepare an Environmental Assessment in accordance with the National Environmental Policy Act to evaluate the potential impacts of the proposed action and alternatives associated with use of the EDC to house detained noncitizens under ICE jurisdiction.

The EDC is located within an approximately three-acre property at 625 Evans Street in Elizabeth, New Jersey. The EDC consists of intake, housing, medical beds, and other support facilities to provide dining, medical, religious, legal, and other services. To meet ICE needs, the proposed action of housing detained noncitizens at the EDC requires provision of an outdoor recreation enclosure. An outdoor enclosure is planned consisting of a secure fenced walkway from the detention center to a paved area encircling a half basketball court, recreation equipment, a small canopy, a restroom for use by detainees along with security fencing, control gates, and CCTV cameras. No new building construction or alterations to the existing EDC structure is proposed. The proposed action allows for continued EDC operation during the period of performance.

Based on a review of aerial imagery, National Wetland Inventory mapping, and a recent field inspection, the site is completely developed with the structure and paved parking area with no wetlands or waters of the United States present. For your reference, Attachment A shows the facility's regional location, Attachment B provides an aerial view of the Elizabeth Detention Center, and Attachment C shows topographic conditions in and around the facility property.

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If you have any questions regarding the proposed action, please do not hesitate to contact me at [(b)(6),(b)(7)(C) [@wsp.com or 973-407 [1000-10070] Thank you.

Sincerely yours, WSP USA, Inc.

(b)(6),(b)(7)(C)

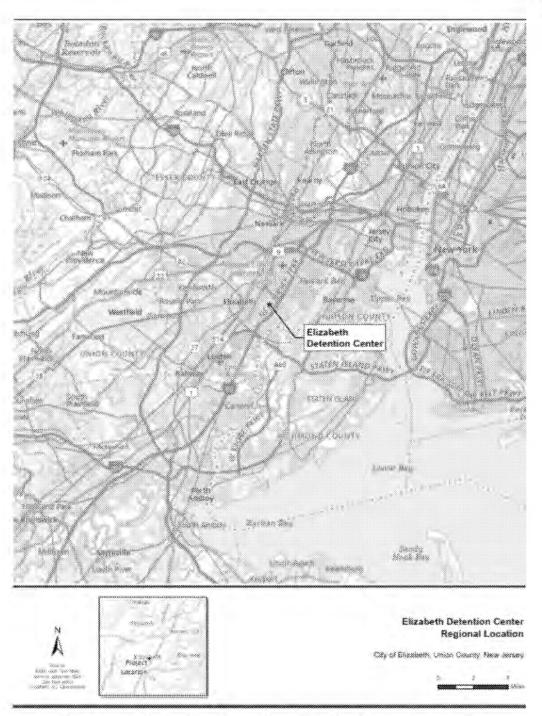
(b)(6),(b)(7)(C) , PP Senior Vice President

Сс: (b)(6),(b)(7)(c) (CoreCivic)

Attachment A: Regional Location – Elizabeth Detention Center Attachment B: Aerial Photograph - Elizabeth Detention Center Attachment C: Topographic Conditions - Elizabeth Detention Center

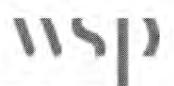
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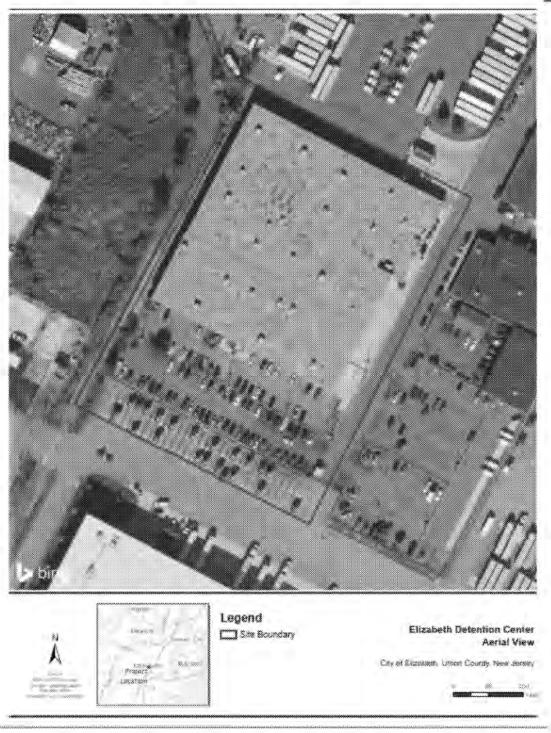
WSP USA, Inc.



Attachment A: Regional Location - Elizabeth Detention Center
625 Evans Street, Elizabeth, New Jersey

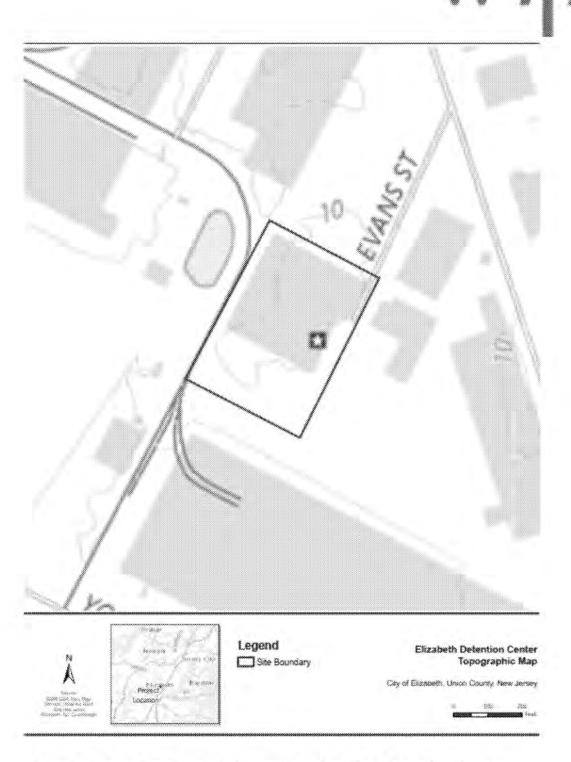
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Attachment B: Aerial Photograph - Elizabeth Detention Center
625 Evans Street, Elizabeth, New Jersey

WSP USA, Inc.



Attachment C: Topographic Conditions - Elizabeth Detention Center
625 Evans Street, Elizabeth, New Jersey

WSP USA, Inc. 5 | Page



Mr. (b)(6),(b)(7)(C) P.G., Director

New Jersey Department of Environmental Protection Office of Permit and Project Navigation, Environmental Review Unit

401 East State Street

Mail code: 401-07J / P.O. Box 420

Trenton, NJ 08625

Via email: (b)(6),(b)(7)(c) @dep.nj.gov

RE: Elizabeth Detention Center, 625 Evans Street, Elizabeth, New Jersey
Environmental Assessment

Dear (b)(6),(b)(7)(C)

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Based on a review of NJ-GeoWeb and a recent field inspection, the site is completely developed, and no wetlands or wildlife habitat are present. NJ-GeoWeb reports that there is a foraging habitat for black-crowned night heron, least tern, little blue heron, glossy ibis, and snowy egret adjacent to the site in an isolated wetland separated from the site by railroad tracks. For your reference, Attachment A shows the facility's regional location, Attachment B

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WSP USA, Inc.

provides an aerial view of the Elizabeth Detention Center, and Attachment C shows topographic conditions in and around the facility property.

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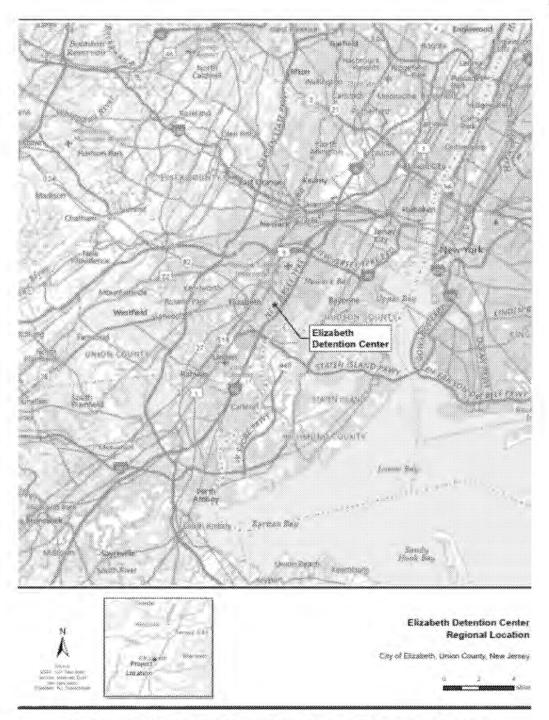
(b)(6),(b)(7)(C)

(b)(6),(b)(7)(C) PP Senior Vice President

Сс: (b)(6),(b)(7)(с) (CoreCivic) WSP

Attachment A: Regional Location – Elizabeth Detention Center Attachment B: Aerial Photograph - Elizabeth Detention Center Attachment C: Topographic Conditions - Elizabeth Detention Center

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Attachment A: Regional Location - Elizabeth Detention Center
625 Evans Street, Elizabeth, New Jersey

WSP USA, Inc.

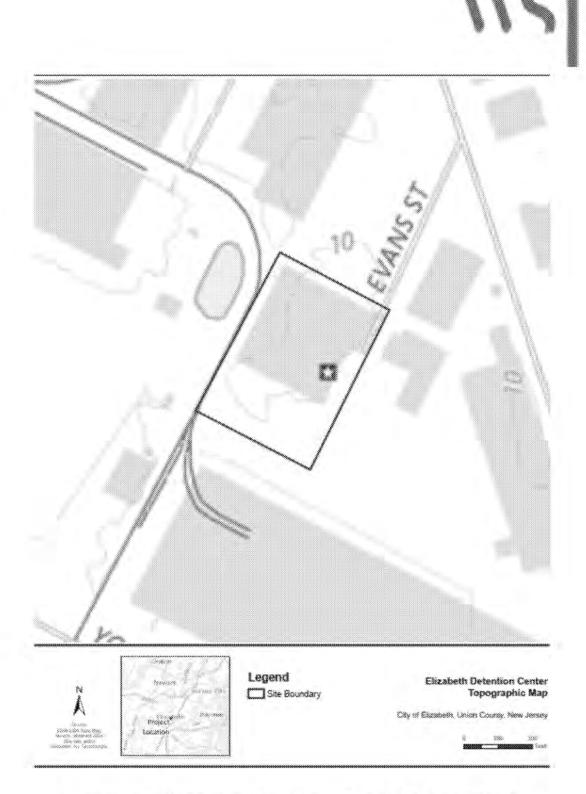
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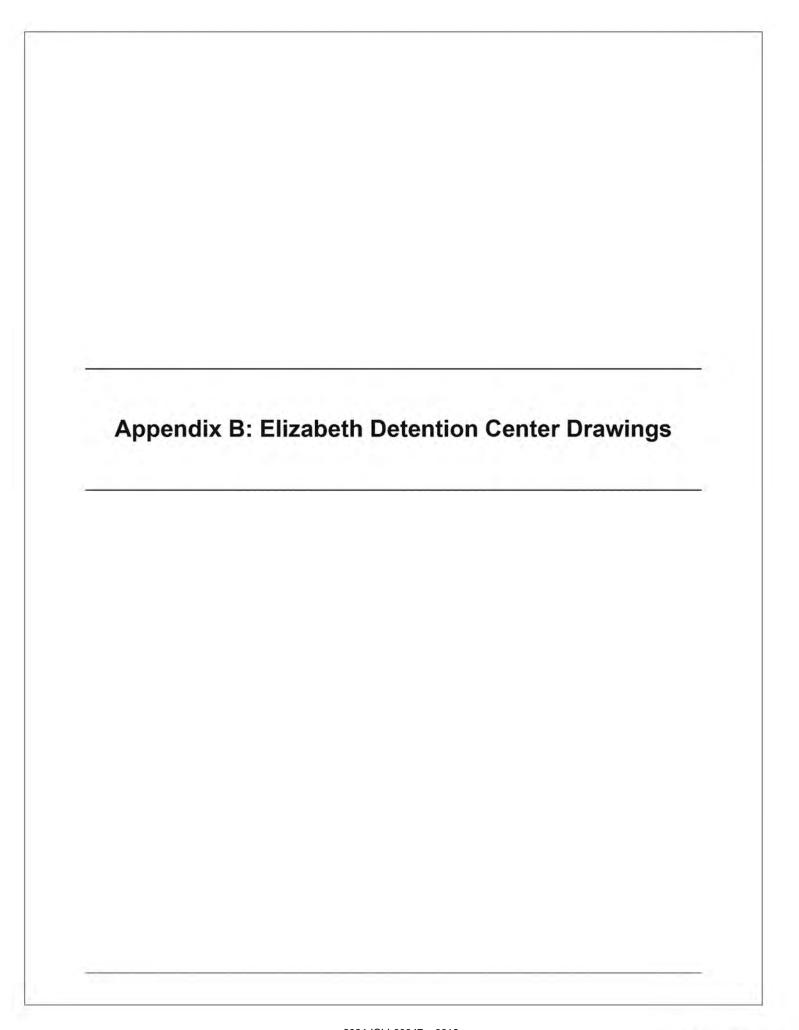
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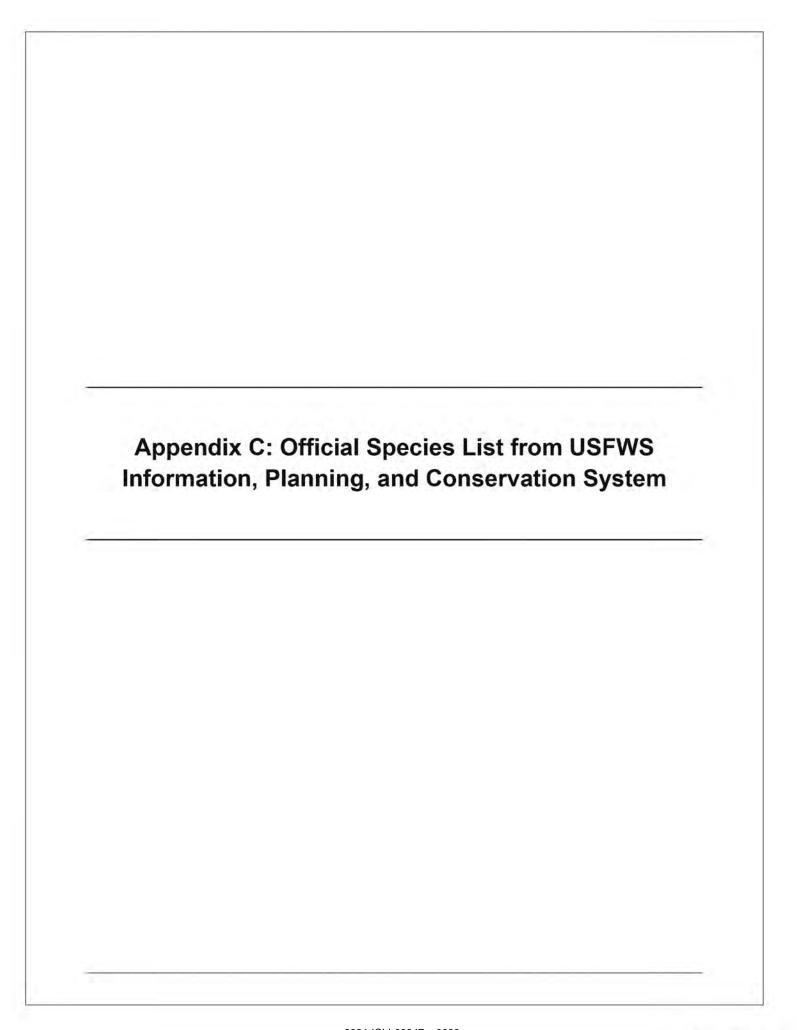
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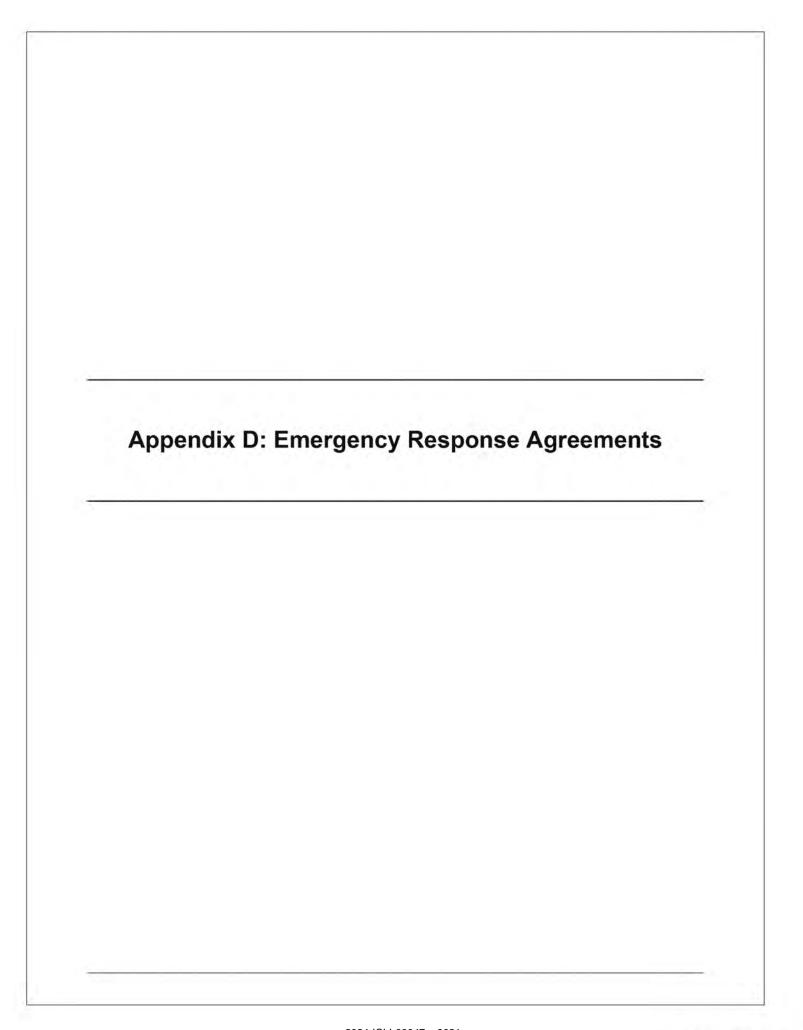


Attachment C: Topographic Conditions - Elizabeth Detention Center
625 Evans Street, Elizabeth, New Jersey

WSP USA, Inc.
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CITY OF ELIZABETH, NEW JERSEY POLICE DEPARTMENT One Police Plaza, Elizabeth, New Jersey 07201

One Police Plaza, Elizabeth, New Jersey 07201 (908) 558 [majoria]



J. CHRISTIAN BOLLWAGE Mayor

(b)(6),(b)(7)(C)

Maintenance & Safety Manager 625 Evans Street Elizabeth, NJ 07201

Response Agreement:

The Elizabeth Police Department is a career-based Police Department and operates on a 24/7 schedule. In the event of an emergency at your facility, you are reminded to have your staff call 911 and give the dispatchers the nature of the emergency. The centralized dispatch will then send the appropriate resources to your location based on the information given. The Elizabeth Police Department will provide police services as regulated by City Ordinance. The Elizabeth Police Department requests that when a call for service is requested by your facility, either by an automatic alarm or via phone that a supervisor meets our personnel at the designated staging area.

Respectfully.

(b)(6),(b)(7)(C)

Deputy Chief of Police 908-403 [minute] onescentic [@clizabethnj.org

2111/vington Avenue Elizabeth, New Jersey 07208-2012 Phone: (908) 8234 Faz: (908) 820-1070

Elizabeth Fire Department

October 10, 2018

Elizabeth Defention Center
(b)(6),(b)(7)(C)
retarmenance & Safety Manager
625 Evans St.
Elizabeth, NJ 0720)

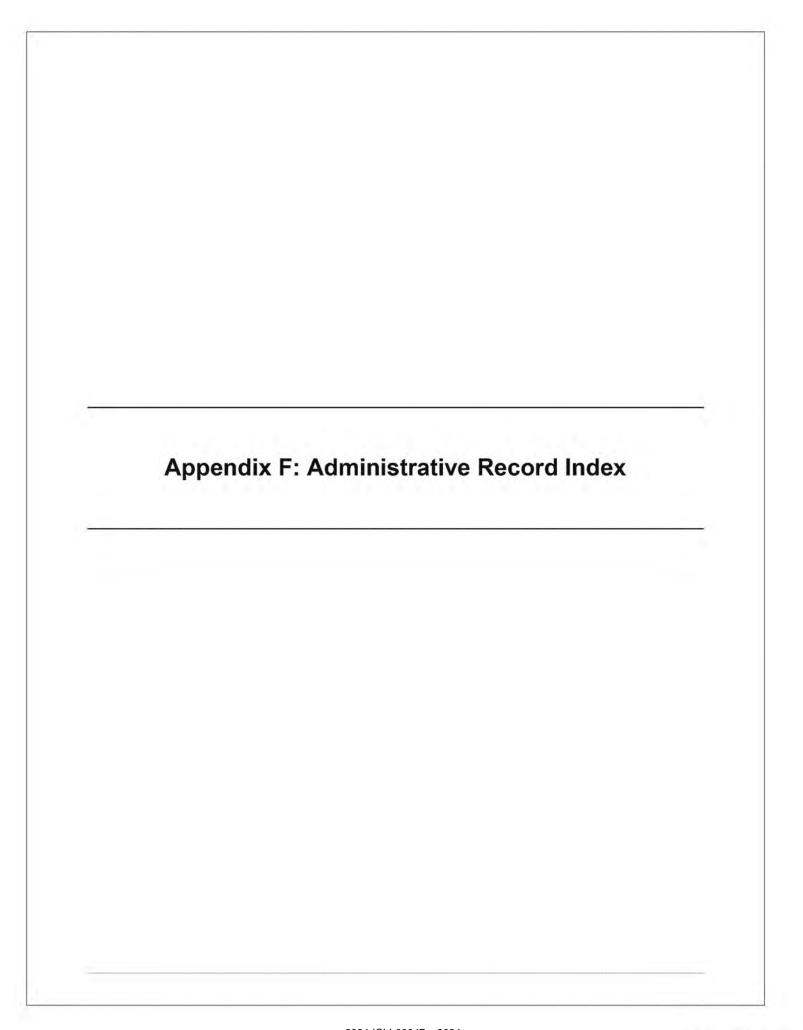
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(b)(6),(b)(7)

(b)(6),(b)(7)(C)
Chief of Department
Flizabeth Fire Department

Remember to check the buttery in your smoke detector



APPENDIX F: ADMINISTRATIVE RECORD INDEX

Environmental Assessment - Contract Award for Comprehensive Detention Services – Newark, New Jersey Area of Responsibility Elizabeth Detention Center - Elizabeth, New Jersey

Document Name/Title	Author	То	Date	Document Description	Record
Consulting Agency Correspondence, U.S. Army Corps of Engineers	(b)(6),(b)(7)(C), Senior Vice President, WSP	U.S. Army Corps of Engineers, New York Regulatory District	July 8 2024	Correspondence confirming the absence of wetlands and waters of the U.S. within Elizabeth Detention Center property.	1
Consulting Agency Correspondence, U.S. Fish and Wildlife Service	(b)(6),(b)(7)(C) , Senior Vice President, WSP	(b)(6),(b)(7)(C) Field Office Supervisor, U.S. Fish and Wildlife Service, NJ Ecological Services Field Office	July 8 2024	Correspondence seeking concurrence on findings regarding threatened and endangered species within/near Elizabeth Detention Center property.	2
Consulting Agency Correspondence, NJ Department of Environmental Protection	(b)(6),(b)(7)(C) , Senior Vice President, WSP	(b)(6),(b)(7)(c) P.G., Director NJ Department of Environmental Protection, Office of Permit and Project Navigation, Environ- mental Review Unit	July 8, 2024	Correspondence seeking concurrence on the absence of wetlands and waters of the U.S. and threatened and endangered species habitats within/near Elizabeth Detention Center property.	3
Consulting Agency Correspondence, U.S. Fish and Wildlife Service	Endangered Species Program/Conservation Planning Assistance U.S. Fish and Wildlife Service, NJ Ecological Services Field Office	(b)(6),(b)(7)(C) Senior Vice President, WSP	July 9, 2024	No Effect letter from U.S. Fish and Wildlife Service concerning endangered species affecting the Elizabeth Detention Center property.	4
Environmental Assessment - Proposal to Award a Contract for Operation and Management of the Elizabeth Detention Center - Elizabeth, New Jersey	(b)(6),(b)(7)(C) Senior Vice President, WSP	(b)(6),(b)(7)(C), Senior Director, CoreCivic	July 16, 2024	Environmental Assessment regarding proposal to award a contract for comprehensive detention services as required by ICE's Enforcement and Removal Operations field office in Newark, New Jersey in compliance with National Environmental Policy Act	5

ENVIRONMENTAL ASSESSMENT

Contract Award for Comprehensive Detention Services - Newark, New Jersey Area of Responsibility

Prepared for:

375 Enterprise Avenue LLC

1633 Broadway, 46th Floor New York, New York 10019

Prepared by:



2000 Lenox Drive, 3rd Floor Lawrenceville, New Jersey 08648

July 16, 2024

EXECUTIVE SUMMARY

Environmental Assessment Contract Award for Comprehensive Detention Services Newark, New Jersey Area of Responsibility

SPONSOR: U.S. Department of Homeland Security, Immigration and Customs

Enforcement

CONTACT: Contracting Officer

U.S. Department of Homeland Security, Immigration and Customs

Enforcement

Office of Acquisition Management

801 I Street, NW, Room 900, Washington, D.C. 20536

CONTACT: (b)(6),(b)(7)(C), Managing Member

375 Enterprise Avenue LLC

1633 Broadway, New York, New York 10019

Tel: 917-697- MALINITY / Email (MALINETTE) @triumphhotels.com

BACKGROUND: Immigration and Customs Enforcement (ICE) is the principal investigative arm of the United States Department of Homeland Security (DHS) and the second largest investigative agency in the Federal Government. ICE'S primary mission is to promote homeland security and public safety through criminal and civil enforcement of federal laws governing border control, customs, trade and immigration. ICE determines the legal immigration status of individuals believed to be illegally present in the interior of the United States through the immigration courts and removes those who are determined to be either inadmissible or in violation with U.S. law.

PROPOSED ACTION: DHS/ICE owns and operates facilities which are used to house detained noncitizens who are in the country illegally. In addition, other public and privately owned and/or operated facilities house and service the detained population not housed within DHS/ICE-owned/operated facilities. ICE's Enforcement and Removal Operations (ERO) field office in Newark, New Jersey has a need for comprehensive detention services for 600 adult male and female noncitizens that include general population, intake, segregated housing, and medical beds at a contractor-owned/contractor-operated detention facility or facilities. The facility or facilities must be within 50 driving miles from the ERO field office at 970 Broad Street in Newark, New Jersey.

To accommodate a portion of the detained noncitizen population under ICE jurisdiction, use of the Albert M. "Bo" Robinson Center (ARC) in Trenton, New Jersey is proposed. The ARC consists of housing, dining, medical, religious, legal, and other support facilities. The proposed action involves use of ARC to house 600 noncitizen detainees during the period of performance.

The detention contractor would be responsible for providing the full range of housing, services, and case management requirements for the ICE mission of enforcement and removal. The ARC includes office space, bed space, space for services such as medical exams, indoor recreation, religious services, and other support space. Such spaces are required by ICE to safely house and manage detained individuals in compliance with applicable detention codes, standards and licenses while they await legal proceedings and processing. Under the procurement, the selected contractor would be responsible for ensuring that the detention center is operated in a manner consistent with the mission of ICE and applicable state and federal laws and regulations.

In accordance with National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code 4321-4347), as amended in 2023 and 2024, and in accordance with ICE's "Procedural Guidance for Complying with National Environmental Policy Act Requirements – Proposed Contract Detention Facility", this

Executive Summary ES-1

Environmental Assessment serves to evaluate the potential impacts of the proposed action and alternatives associated with use of the ARC to house detained noncitizens under ICE jurisdiction.

LOCATION: The ARC is located at 375-377 Enterprise Avenue in Trenton, New Jersey. The center, developed within a 4.34-acre property, is east of U.S. Route 1 and west of Enterprise Avenue which forms its eastern border.

FINDINGS: The proposed action to award a contract for operation and management of the ARC is intended to meet the on-going need to safely house a portion of the detained noncitizen population under ICE jurisdiction. Due to mission needs, proposals for new construction would not be accepted by ICE as part of the procurement. Permanent (operational) impacts are anticipated, with none constituting adverse impacts.

Beneficial impacts would be derived from implementation of the proposed action, including contributions toward fulfilling ICE's mission to protect society along with achieving the goals of the DHS and the mandates of the U.S. Congress. Implementation of the proposed action should result in no adverse impacts as defined by NEPA while resulting in the positive impact of maintaining the ability to safely house detained individuals under ICE jurisdiction. The proposed action would also benefit local and regional economies by the employment opportunities at the ARC during operations. Cumulative, secondary and other related impacts and any potentially adverse impacts would be controlled, mitigated or avoided to the maximum extent possible.

DATE: July 16, 2024

Executive Summary ES-2

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Environmental Assessment

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Acronyms and Abbreviations

APE Area of Potential Effect

ARC Albert M. "Bo" Robinson Center

AST Aboveground storage tank
BMP Best Management Practice

CAA Clean Air Act

CFR Code of Federal Regulations

CO₂ Carbon Dioxide

DHS U.S. Department of Homeland Security

EA Environmental Assessment
EMS Emergency Medical Service

EO Executive Order

ERO Enforcement and Removal Operations

ESA Environmental Site Assessment
FPPA Farmland Protection Policy Act

GHG Greenhouse Gas

HREC Historical Recognized Environmental Condition

ICE Immigration and Customs Enforcement

IPaC USFWS Information, Planning, and Conservation System

mgd Million gallons per day

μg/m³ Microgram per Cubic Meter

NAAQS National Ambient Air Quality Standards

NEPA National Environmental Policy Act

NJDEP New Jersey Department of Environmental Protection

NO₂ Nitrogen Dioxide

NRHP National Register of Historic Places

NWI National Wetlands Inventory

O₃ Ozone

ppm Parts per million

REC Recognized Environmental Condition

SO₂ Sulfur Dioxide

TWW Trenton Water Works

USACE U.S. Army Corps of Engineers

USDA-NRCS U.S. Department of Agriculture, Natural Resources Conservation Service

USEPA U.S. Environmental Protection Agency

USFWS U.S. Fish and Wildlife Service

USGS U.S. Geological Survey

Acronyms and Abbreviations

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1.0 Introduction

Immigration and Customs Enforcement (ICE), one of the agencies of the U.S. Department of Homeland Security (DHS), is responsible for protecting national security and upholding public safety. Strengthening the nation's capacity to detain and remove criminal and other deportable noncitizens is a key component of ICE's strategy to deter illegal immigration and protect public safety. DHS/ICE owns and operates detention facilities to house a portion of the population of detained noncitizens. In addition, other publicly and privately owned and operated facilities house and manage those detained noncitizens not housed within DHS/ICE-owned and operated facilities.

1.1 Purpose of the Environmental Assessment

This document, together with its appendices and incorporations by reference, constitutes an Environmental Assessment (EA) prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, (Pub. L. 91-190, 42 United States Code 4321-4347, as amended in 2023 and 2024), "Regulations for Implementing NEPA" (40 Code of Federal Regulations [CFR] Parts 1500–1508) as issued by the Council on Environmental Quality and amended May 1, 2024, and ICE policies and procedures as described in "Procedural Guidance For Complying With National Environmental Policy Act Requirements – Proposed Contract Detention Facility." Its purpose is to present an assessment of the potential environmental impacts of a proposed federal action to award a contract for comprehensive detention services for 600 male and female detained noncitizens.

The EA, the assessment it presents, and the procedures by which environmental investigations are conducted and incorporated in decision-making are parts of a process established by NEPA to ensure that the environmental consequences of federal projects and actions are adequately considered. The process is designed to ensure that public officials make decisions based on a full understanding of the environmental impacts of proposed actions and take all appropriate steps to "protect, restore and enhance the environment" (40 CFR 1501.7).

1.2 Description of the Proposed Action

ICE maintains various operational divisions, each composed of a number of law enforcement, intelligence or mission support positions. ICE's Enforcement and Removal Operations (ERO) is responsible for the detention, health, welfare, transportation, and deportation of noncitizens in removal proceedings, and those subject to a final order of removal from the U.S. The mission of ERO is to identify, apprehend, detain and remove individuals, who present a danger to national security or are a risk to public safety, as well as those who enter the U.S. illegally or otherwise undermine the integrity of immigration laws and border control efforts. In implementing its mission, ERO is responsible for carrying out all orders for the securing and departure activities of noncitizens who are designated in removal proceedings and for arranging for the detention of noncitizens when necessary and prescribed by law.

The ERO Newark, New Jersey Field Office has a need for comprehensive detention services for 600 adult male and female noncitizens (up to 50 female noncitizens) that will provide for general population, intake, segregated housing, and medical beds at a contractor-owned/contractor-operated detention facility or facilities. Facilities must be within 50 driving miles from the ERO Field Office at 970 Broad Street in Newark, New Jersey. In addition, the facilities shall be within appropriate proximity and access to emergency services (medical, fire protection, law enforcement, etc.) and access to airport services for transportation requirements.

Under the proposed action, the detention contractor would be responsible for housing detained noncitizens and to operate and maintain the facility in a manner consistent with the mission of ICE and applicable state and federal laws and regulations. This EA evaluates the potential impacts of the Proposed Action Alternative and the No Action Alternative, as stipulated by NEPA.

Chapter 1: Introduction

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To accommodate a portion of the detained noncitizen population under ICE jurisdiction, use of the Albert M. "Bo" Robinson Center (ARC) is proposed. The ARC was constructed in 1963, with additions in 2004 and 2008, and consists of approximately 115,000 square feet of floor space within three attached structures. The ARC has a rated capacity of 960 beds and a total capacity of 1,046 beds, allowing 86 beds to be used for segregation as necessary. No new building construction or exterior alterations to the ARC are proposed.

During preparation of the EA, correspondence, news articles, and other indications of interest or concern on the part of the public regarding the proposed action were considered. Federal and state regulatory agencies were consulted, and the resulting scope of study is indicated by the foregoing Table of Contents and the materials presented in the subsequent sections of the document and its incorporations by reference.

Chapter 1.0 of the EA provides this introduction, while Chapter 2.0 provides the background and context of the proposed action including existing conditions and location. Chapter 3.0 describes the purpose and need for the proposed action including the scope and content of the analysis, the decision to be made by ICE, and consultations with key agencies and officials. Chapter 4.0 describes the Proposed Action Alternative and No Action Alternative and identifies the Preferred Alternative. Chapter 5.0 describes baseline conditions within the potentially affected environments, the potential impacts of implementing the No Action and Proposed Action alternatives, and recommended measures to mitigation potential adverse impacts. Chapter 5.0 also provides a summary of potential impacts, the relationship between short-term use of the environment and the maintenance and enhancement of long-term productivity, irreversible and irretrievable commitments of resources, along with cumulative and indirect impacts of the proposed action. Chapters 6.0, 7.0, and 8.0 respectively, list the individuals responsible for the EA's preparation, the information sources used in the preparation of the EA, and a Glossary of terms. Additional information is also provided in the appendices.

1.3 Agency History and Mission

Although an Immigration Bureau existed within the U.S. State Department between 1864 and 1868, prior to 1890 most immigrants were processed into America by the individual states rather than by the federal government. New York State was the most active, and most immigrants arrived by ship through New York City harbor. In the 70 years between 1820 and 1890, nearly 11 million of the roughly 15 million people who migrated to the United States are estimated to have come through the port of New York. By 1890, an average of 1,200 immigrants per day were arriving in New York City harbor, all of whom were processed through Castle Garden in Battery Park, a facility operated by the New York State Board of Immigration Commissioners and the sole landing point and processing center for immigrants in the New York City area. Castle Garden included all facilities and services necessary for examinations, registrations, and assistance immigrants in finding housing, jobs, transportation, and care for the sick and destitute. Part of the rationale for the centralization of facilities in one location was to protect immigrants from criminals and dishonest labor recruiters seeking to exploit them.

By the 1890s, however, as the influx of immigrants into New York continued unabated, the facilities at Castle Gardens grew outdated and overcrowded, and it was determined that the federal government needed to exercise greater control over immigration. Three islands in New York harbor were identified as potential sites for a new and larger immigration station: Governor's Island, Bedloe's Island, and Ellis Island was selected, and plans were made to convert it from a naval powder magazine to a federal immigration station. President Benjamin Harrison signed an appropriation of \$85,000 for that purpose on March 26, 1890. Castle Garden closed on April 18, 1890, having processed more than eight million immigrants in 35 years of operation. A year later, Congress passed the Immigration Act of 1891, the nation's first comprehensive immigration law. It created the Bureau of Immigration within the Treasury Department and placed the Commissioner of Immigration in the port of New York, officially ending state control and processing of immigrants.

Chapter 1: Introduction

Ellis Island opened in 1892 as an immigrant station, and in its first decade of operation processed 3,047,130 immigrants. Only 640,434 people came through all other U.S. ports of entry during that period. Immigration reached its peak during the first decade of the twentieth century with the arrival of 8,795,386 immigrants nationwide, 78 percent of whom entered through New York. In 1903, the Bureau of Immigration was transferred to the Department of Commerce. The highest number of immigrants to the United States in any one year occurred in 1907 when 1,285,349 people arrived, with 1,004,756 passing through Ellis Island alone. It is estimated that almost 50 percent of America's current population are descendants of immigrants who were processed on Ellis Island.

Congress acted to control the flow with the passage of the Immigration Act of 1917, which established a literacy test for the first time and made the mental and physical examinations more stringent. The increased stringency of these examinations and new health requirements, together with security regulations resulting from World War I, restricted immigration. The number of immigrants dropped significantly from 1,2 million in 1914 to an average of about 300,000 during each of the war years to only 110,000 in 1918. During this period, the proportion of immigrants arriving through New York dropped below 50 percent for the first time in history with New York's share of immigrants totaling only 19 percent by 1919.

Immigration rose again after the war, to 430,000 in 1920, and 805,000 in 1921, leading Congress to enact legislation in 1921 and 1924 to limit the number of immigrants allowed into the country. The new legislation imposed the first substantial restrictions on immigration by setting numerical quotas for admissions by nationality. At the same time, American consulates abroad began screening prospective immigrants at their points of origin, so only those warranting further examination arrived at Ellis Island.

During the Great Depression, those leaving the country outnumbered immigrants for the first time in history. The Depression caused fewer people to migrate to the United States, and caused more people to be denied admission. In 1930, 20,000 illegal immigrants were deported because of the high number of jobless Americans. With decreasing immigration and increased deportations, Ellis Island changed from an immigration station to a detention center. In 1933, about 4,500 incoming aliens were detained at the island until they were found to be admissible, usually after three or four days, and more than 7,000 outgoing aliens were held there to await deportation.

Immigration increased again as the economy recovered and then fell off sharply during World War II. In the post-war period, the numerical quota system continued under amendments to the Immigration Act of 1924 and the Immigration and Nationality Act of 1952. Immigration increased quickly after the war, however, partially because of new legislation (i.e., the Displaced Persons Act of 1948 and the Refugee Relief Act of 1953) that relaxed or waived some quotas to allow immigration of war brides, refugees, and orphans.

Until the 1960s, most immigrants to the United States originated from Europe, with smaller numbers arriving from Asia and other countries in the Western Hemisphere. In the 1960s, the national origins principle of determining immigration quotas was discontinued after 40 years of use. During the 1960s and 1970s, various legislations allowed for the immigration of refugees fleeing from political upheavals in specific countries and due to fear of persecution because of race, religion, or political beliefs. In October 1965, the Immigration and Nationality Act was amended putting in place the first numerical ceiling on the total number of immigrants into the United States while abolishing national quotas. The new system provided a ceiling of 290,000 immigrants, which was reduced to 270,000 in 1980.

During the 1980s and 1990s, an average of 150,000 immigrants were naturalized each year. At the same time, however, the number of illegal immigrants grew to become a significant issue with more than one million individuals apprehended annually throughout the country. At that time the Immigration and Naturalization Service (INS) estimated that there were three to six million illegal immigrants in the country with Mexicans making up the largest number of legal and illegal immigrants to the United States. Among its responsibilities, the INS oversaw the detention of individuals awaiting immigration hearings and those awaiting deportation.

Chapter 1: Introduction

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1.4 Department of Homeland Security

Following the terrorist attacks of September 11, 2001, DHS was formed, and among the agencies comprising DHS is ICE. ICE is responsible for protecting national security and upholding public safety by targeting criminal networks and terrorist organizations that seek to exploit vulnerabilities in the nation's immigration system, financial networks, along its borders, at federal facilities, and elsewhere. Strengthening the nation's capacity to detain and remove criminal and other deportable immigrants is a key component of ICE's strategy to deter illegal immigration and protect public safety.

ICE maintains various operational divisions, each composed of a number of law enforcement, intelligence or mission support positions. ERO has primary responsibility for housing individuals who have been apprehended through law enforcement actions and then removing those individuals who, after adjudication of their case, have been ordered to leave the United States.

1.5 Compliance with the National Environmental Policy Act

To effectively manage a portion of the detained noncitizen population, ICE is proposing to contract for comprehensive detention services with a private detention center contractor for a population of up to 600 males and females (the Proposed Action). Such an action has the potential to affect the quality of the human environment and therefore, needs to comply with NEPA. This is to ensure that the potential environmental impacts associated with the proposed action are thoroughly analyzed and documented and that compliance is achieved with NEPA and other environmental statutes including the Clean Air Act of 1974; the Clean Water Act and Amendments, the Endangered Species Act of 1973; the National Historic Preservation Act of 1966; and the Farmland Protection Policy Act of 1981, among other applicable regulations and Executive Orders (EOs).

Preparation of environmental documentation and its consideration by federal, state, and local officials, regulatory agencies, stakeholders, and the public has been carried out to demonstrate that DHS/ICE understands and have considered the potential environmental impacts associated with the proposed action. This includes consideration of the potential impacts associated with providing comprehensive detention serves at the ARC and the attainment of the proposed action's objectives. To adequately assess potential impacts, the analysis involved a multi-disciplinary approach to gathering and analyzing environmental documentation that addresses:

- · Baseline conditions including the natural and man-made environments;
- Potential environmental impacts of the No Action and Proposed Action alternatives and required mitigation;
- A listing of individuals responsible for preparation of the document; and
- A listing of documents and other information sources consulted in the preparation of the documentation.

The environmental impacts of the proposed action are presented in a manner that defines the issues and provides a clear basis for choice among options by decision makers. If the analysis indicates potentially significant effects, which could be reduced to less-than-significant levels with mitigation measures, the document also describes those mitigation measures.

The information and analyses provided within this EA are dependent upon the nature of the environment in which the ARC is located and the range and complexity of the potential impacts. The level of analysis and detail provided herein is commensurate with the magnitude of the expected impact. The analysis of each environmental factor (e.g., biological resources, cultural resources, and air and noise quality, etc.) was developed to the extent necessary to support reasonable conclusions about the degree of expected impacts to that resource.

Chapter 1: Introduction

Environmental Assessment

In furtherance of its commitment to the goals and objectives of NEPA, preparation of this EA was undertaken to independently document the potential environmental impacts associated with the proposed action. News articles, publications, and other indications of interest on the part of the public regarding the proposed action were considered during preparation of the EA.

Based on the documentation represented by this EA, ICE will prepare a separate environmental analysis to independently determine the potential environmental impacts associated with the proposed action. The ICE-prepared document will be widely circulated among elected and appointed officials, regulatory agencies, stakeholders, and others to allow for a public review and comment period lasting no less than 30 days. At that time, individuals with an interest in the proposed action will have an opportunity to review the analyses and offer additional information that should be considered by ICE during the decision-making process. Following the end of the public comment period, the agency will issue its decision as to whether it will or will not proceed with the proposed action.

Chapter 1: Introduction

2.0 Project Background

2.1 Existing Conditions

The procurement requires detention facilities to be within 50 driving miles of the ERO Field Office, at 970 Broad Street in Newark, New Jersey. To accommodate a portion of the detained noncitizen population under ICE jurisdiction, use of the ARC is proposed. The ARC, constructed in 1963, with additions in 2004 and 2008, consists of approximately 115,000 square feet of floor space within three attached structures. The ARC has a rated capacity of 960 beds and a total capacity of 1,046 beds, allowing 86 beds to be used for segregation as necessary. Until 2022, the ARC operated as a prison housing State of New Jersey inmates.

2.2 Project Location

The ARC is located at 375-377 Enterprise Avenue in Trenton, New Jersey 08638. The ARC, developed within a 4.34-acre property, is east of U.S. Route 1 and west of Enterprise Avenue which forms its eastern border (Exhibits 2-1, 2-2, and 2-3). Together the property and the connected ARC structures comprise the "project site." The procurement requires the detention facilities to be within 50 driving miles of the Newark ERO Field Office; the ARC is 48.8 driving miles from the ERO Field Office.

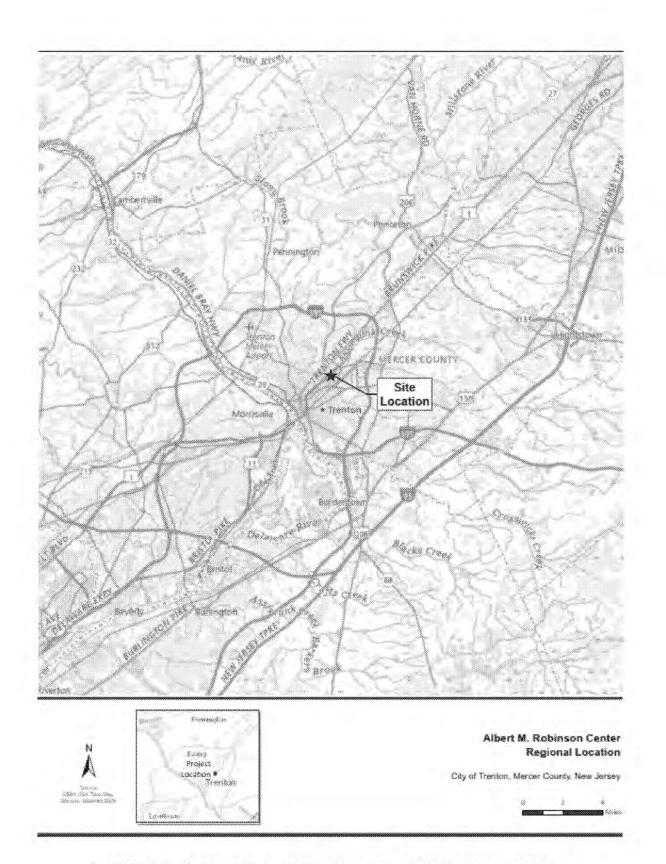


Exhibit 2-1: Regional Location - Albert M. "Bo" Robinson Center

Chapter 2: Project Background

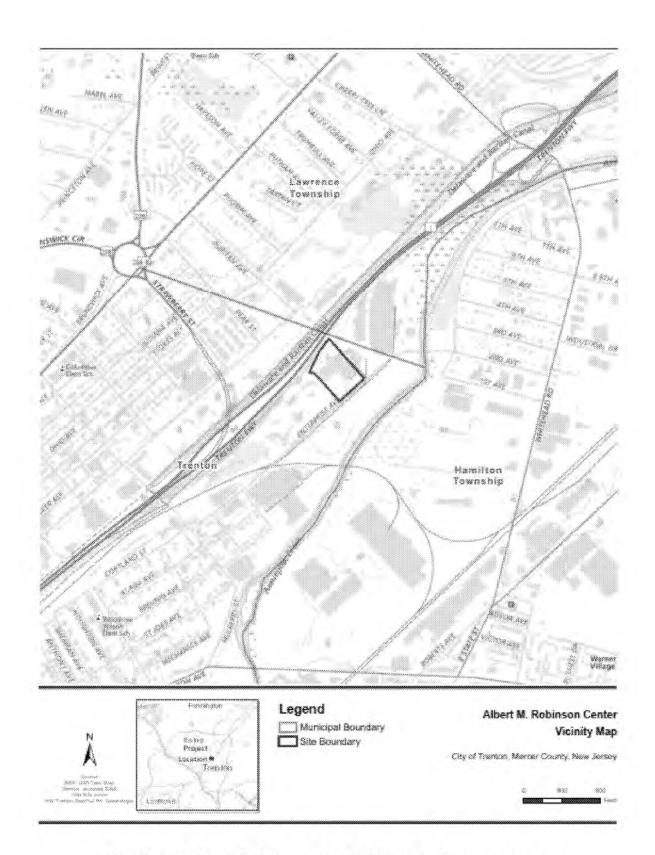


Exhibit 2-2: Vicinity Map - Albert M. "Bo" Robinson Center

Chapter 2: Project Background

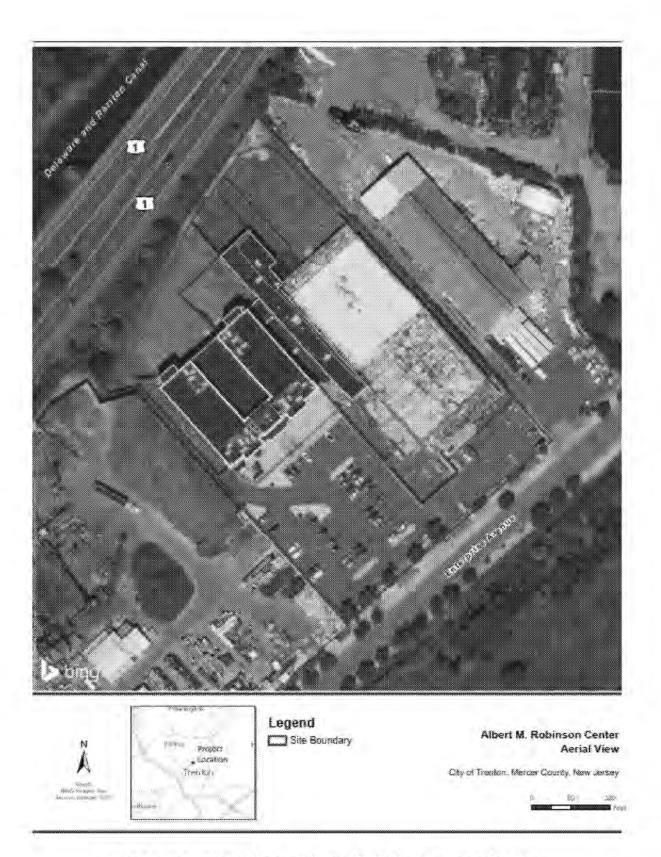


Exhibit 2-3: Aerial View - Albert M. "Bo" Robinson Center

Chapter 2: Project Background

3.0 Purpose and Need for the Proposed Action

3.1 Scope and Content of the Analysis

DHS/ICE relies upon facilities owned and operated by DHS/ICE and non-DHS/ICE-owned facilities that are accessed through intergovernmental service agreements or direct contracts with contractor-owned and operated facilities. DHS/ICE-owned facilities housing a portion of the detained noncitizen population are located across the United States with most found along the southern and northern borders of the U.S. in Texas, California, Florida, Arizona, and New York. The size, configuration and bed capacity of the DHS/ICE facilities varies with each generally operating at full capacity throughout much of the year. Other detained individuals are held in state and local facilities or in contractor-owned and/or operated facilities with the majority of detained noncitizens housed and serviced in non-DHS/ICE-owned and operated facilities.

To accommodate the number of individuals under its jurisdiction, ICE is considering awarding a contract for comprehensive detention services to house and manage a population of detained male and female noncitizens. To do so, use of the ARC is proposed. The ARC would provide the services required by ICE to safely house and manage detained noncitizens in compliance with applicable detention codes, standards, and licenses while they await legal proceedings and processing.

Use of the ARC would be via a contract with DHS/ICE for comprehensive detention services. Under the procurement, the detention contractor would be responsible for ensuring that the ARC is operated in a manner consistent with the mission of ICE. Facilities housing the detained population would operate in compliance with ICE detention standards, which encompass rights covering a broad range of areas including access to legal services, medical treatments, religious services, and recreational activities. DHS/ICE standards related to legal services include visitation rights, access to legal materials, use of telephones, and group presentations on legal rights. Services and programs for the detained population would be developed and implemented to comply with DHS/ICE contract requirements and applicable federal, state and local laws and regulations.

3.2 Decision to be Made

The decision to be made by DHS/ICE is whether to award a contract for comprehensive detention services for a population of 600 individuals to be held at the ARC. The center would provide safe and secure conditions of confinement based on the characteristics of the detained population; access to legal resources and services; recreation spaces; dining service; medical care; visitation, including private areas for attorney-client visits; controlled freedom of movement; and religious services and social programs. Use of the ARC will facilitate the effective and efficient implementation of ICE's mission to safely house and manage detained noncitizens in compliance with applicable detention codes, standards and licenses while they await legal proceedings and processing as prescribed by law.

3.3 Consultations/Engagement

U.S. Fish and Wildlife Service (USFWS), U.S. Army Corps of Engineers (USACE), and the New Jersey Department of Environmental Protection (NJDEP) were notified of the proposed action and asked to provide input regarding potential impacts (Appendix A). Additionally, the interests and comments of local elected and appointed officials as well as the populations at large residing in the City of Trenton and Mercer County were taken into consideration. The ARC was constructed in 1963, with additions in 2004 and 2008, and operated effectively as a prison housing State of New Jersey inmates until it was vacated in 2022. It is expected that resuming operation of the ARC to house detained noncitizens under ICE jurisdiction will also be effective.

4.0 Proposed Action and Alternatives

Guidelines for the preparation of EAs for federal projects or actions, require an investigation and evaluation of alternatives to the proposed project or action based "on the information and analysis presented in the sections on the Affected Environment (40 CFR 1502.15) and the Environmental Consequences (40 CFR 1502.16)." The guidelines state that the EA "should present the environmental impacts of the proposal and the alternatives in comparative form, thus clearly defining the issues and providing a clear basis for choice." The guidelines further state that the alternatives analysis (40 CFR 1502.14) is required to:

- Evaluate reasonable alternatives to the proposed action, and, for alternatives that the agency
 eliminated from detailed study, briefly discuss the reasons for their elimination.
- Discuss each alternative considered in detail, including the proposed action, so that reviewers
 may evaluate their comparative merits.
- Include the No Action Alternative.
- Identify the agency's preferred alternative or alternatives, if one or more exists, in the EA and identify such alternative in the EA unless another law prohibits the expression of such a preference.
- Include appropriate mitigation measures not already included in the proposed action or alternatives.
- Limit their consideration to a reasonable number of alternatives.

The analysis conducted as part of this EA addresses the No Action Alternative and Proposed Action Alternative. A discussion of these alternatives follows. No other reasonable alternatives outside the jurisdiction of DHS/ICE have been identified or warrant inclusion in this EA.

4.1 Proposed Action Alternative

The Proposed Action Alternative consists of awarding a contract for comprehensive detention services for a population of 600 adult male and female noncitizens, in conformance with appropriate standards and requirements at the ARC. The ARC would provide for general population, intake, segregated housing, and medical beds. Drawings of the ARC are included as Appendix B.

Operation of the ARC would be required to meet all ICE requirements and standards. The number of contractor detention center staff (all shifts, full time equivalents) on site to operate and maintain the ARC at full capacity (600 individuals) is estimated at 225 to 250. The facility includes parking to accommodate visitors, attorneys, contractor employees, government staff, in addition to buses and other vehicles for transporting detained individuals. Vehicular access from Enterprise Avenue in Trenton, New Jersey would continue to be used to arrive and depart the ARC. No other actions involving ICE and its use of the ARC are proposed or evaluated in this EA.

4.2 No Action Alternative

The No Action Alternative is defined as a decision by DHS/ICE to not proceed with award of a contract to a detention center contractor for comprehensive detention services for a portion of the detained noncitizen population under ICE jurisdiction. Instead, ICE would continue the current arrangement whereby detained noncitizens are housed in facilities owned and operated by ICE and other public and private contract detention facilities.

Under the No Action Alternative, potential environmental impacts associated with the proposed action, such as noise levels, energy consumption, air emissions, traffic and transportation movements, and utility services would not occur. While the No Action Alternative would avoid these potential impacts, adoption of this alternative would also result in the loss of many positive benefits. The No Action Alternative would not contribute to achieving the mission of ICE, the societal benefits derived from effective and efficient

operation of the nation's immigration system, and positive impacts to the local and regional economies resulting from employment and business opportunities associated with housing and managing a portion of the detained noncitizen population.

The No Action Alternative, by definition, does not meet the purpose and need for the proposed action and does not address the capacity requirements facing ICE. The No Action Alternative is not viable and therefore has been eliminated from consideration. However, in order to compare and contrast the potential impacts of the Proposed Action, the No Action Alternative is carried forward and discussed in Chapter 5.0.

4.3 Preferred Alternative

The Alternatives Analysis has assessed the No Action and Proposed Action Alternatives pursuant to NEPA guidelines. In light of the consideration of alternatives, awarding a contract for comprehensive detention services for a population of 600 detained male and female noncitizens in a contract detention facility within 50 driving miles from the ERO field office in Newark, New Jersey is considered to be the Preferred Alternative as the best means to meet the needs of ICE. The Preferred Alternative includes providing comprehensive detention services for 600 adult male and female noncitizens at the ARC in Trenton, New Jersey.

The Proposed Action Alternative meets the purpose and need for the action, which is to provide comprehensive detention services for a population of detained noncitizens in a contract detention facility and is the alternative preferred by ICE. Services and programs would be implemented to comply with DHS/ICE contract requirements and applicable federal, state and local laws and regulations. Potential impacts of implementing the preferred alternative at the ARC in Trenton, New Jersey are examined in the remainder of the EA.

5.0 Affected Environment, Environmental Consequences, and Recommended Mitigation

5.1 Introduction

Implementation of the proposed action has the potential to affect environmental resources found in and around the ARC as well as resources which exist beyond the boundaries of the project site. This chapter examines environmental resources that have the potential to be affected by implementation of the proposed action involving the ARC. Both natural resources, including topographic features, geology and soils, hydrological and biological resources among others, as well as community resources such as socioeconomic factors, land use, utility services, and transportation networks, are addressed. Each resource description focuses on the relevant attributes and characteristics of that resource with the potential to be affected by the proposed action or that represent potential encumbrances to the proposed action.

NEPA regulations direct federal agencies to access any direct and/or indirect adverse environmental effects which cannot be avoided should the proposed action be implemented, and the means to mitigate adverse impacts if they occur. The NEPA regulations also instruct federal agencies to consider both beneficial and adverse impacts of the proposed action in terms of public health, unique features of the geographic area, the precedential effect of the action, public opinion concerning the action, and the degree to which the impacts are uncertain. Mitigation measures are identified as those actions that would reduce or eliminate potential environmental impacts that could occur as a result of construction or operation of the proposed project or action. Mitigation, as defined by the NEPA regulations, includes:

- "Avoiding the impact altogether by not taking a certain action or parts of an action";
- "Minimizing impacts by limiting the degree or magnitude of the action and its implementation";
- "Rectifying the impact by repairing, rehabilitating, or restoring the affected environment";
- "Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action"; and
- "Compensating for the impact by replacing or providing substitute resources or environments."

The analyses that follow address the potential impacts associated with ARC operation to house 600 male and female detained noncitizens under ICE jurisdiction. Potential impacts and measures to mitigate potential adverse impacts associated with the proposed action are discussed under each topic. Integral to the analyses that follow is the proposed use of the existing ARC facility to house 600 detained noncitizens under ICE jurisdiction.

5.2 Topography

5.2.1 Existing Conditions

Central New Jersey, including Mercer County, lies within the Coastal Plain Physiographic Province, an area south and east of the Piedmont Province with a level to gently roiling landscape. Elevations in Mercer County range from near sea level along the Delaware River in the southwestern part of the county to 250 feet above mean sea level in the northern portion of the county. According to the United States Geological Survey (USGS) Trenton, NJ 7.5 Minute Series topographic map, the ARC property is located at an average elevation of 57 feet above mean sea level (Exhibit 5-1). The topography of the area of Mercer County, within which the ARC is located, is characterized as level with a slight downward slope to the southeast.

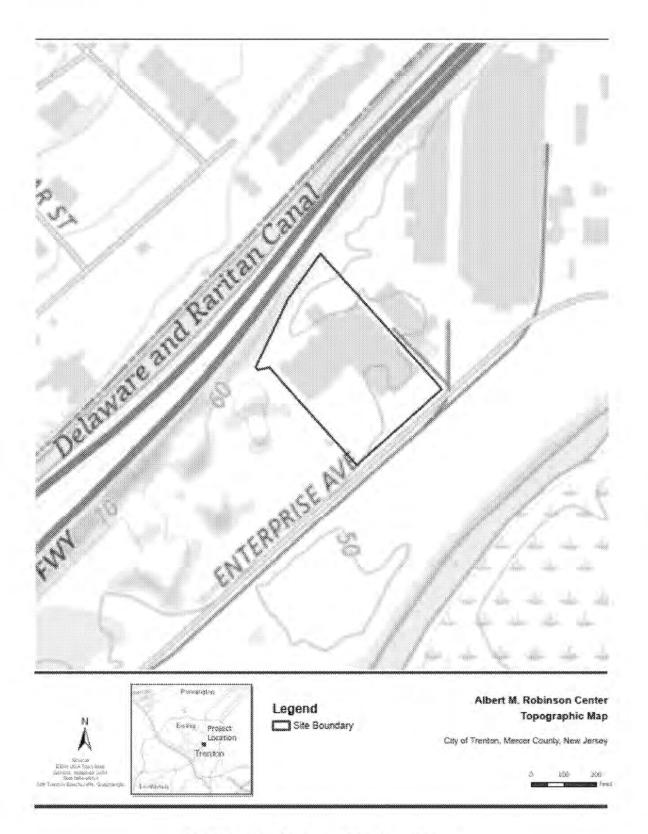


Exhibit 5-1: Topographic Conditions

Chapter 5: Affected Environment, Environmental Consequences, and Recommended Mitigation

5.2.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, topographic conditions would not be adversely affected, and mitigation measures would not be necessary.

b. Proposed Action Alternative

No new building construction or exterior alterations to the ARC are proposed and as a result impacts to topographic conditions would not occur.

5.2.3 Recommended Mitigation

In the absence of topographic impacts, no mitigating measures are warranted.

5.3 Geology

5.3.1 Existing Conditions

New Jersey comprises a geologically diverse portion of the United States' Middle Atlantic region, exhibiting a variety of geological formations comprising four distinct physiographic provinces (listed from south to north) the Atlantic Coastal Plain Province, the Piedmont Province, the Highlands Province, and the Ridge and Valley Province. Each province defines a region in which relief, landforms, and geology are significantly different from that of the adjoining and nearby regions. The boundary between each province is determined by a major change in topography and geology. The project location (Trenton, Mercer County) lies within the Coastal Plain Physiographic Province where the unconsolidated deposits of the Coastal Plain dip to the southeast and range in age from the upper Lower Cretaceous to the Miocene.

Elevations in the Coastal Plain range from 10 to 150 feet above mean sea level. The geologic materials consist mostly of sand, silt, clay, and gravel of marine or fluvial origin. There is, however, a ridge of pre-Triassic quartzite, gneiss, and schist that crops out in the Delaware River, where it forms the falls at Trenton. It extends eastward, at or very near the surface, as far as Princeton Junction. Except for outcrops in the Delaware River, along the beds of some of the creeks, and at one or two other places, the crystalline rocks of this ridge are covered by a veneer of Pleistocene sediments. The surface of the entire Coastal Plain section is, for the most part, nearly level or gently sloping.

Based on historical earthquake locations and the recurrence rate of fault ruptures, the USGS has produced seismic hazard maps that show, by contours, earthquake ground motions that have a common probability of being exceeded in a specified time period under specific geological conditions (USGS 2006). The predicted maximum amount of earthquake-induced shaking with a two percent probability of being exceeded in 50 years is shown on this map. The ground motion is expressed as a percentage of the force of gravity (percent g) and is proportional to the hazard faced by a particular type of building.

In general, little or no damage can be expected with ground motion values less than 10 percent g, moderate damage at 10 to 20 percent g, and major damage at values greater than 20 percent g. Mercer County, including the ARC, is situated on contours ranging from 4 to 8 percent g (Exhibit 5-2). Thus, the potential for damage from seismic activity is a moderate concern in this region of New Jersey.

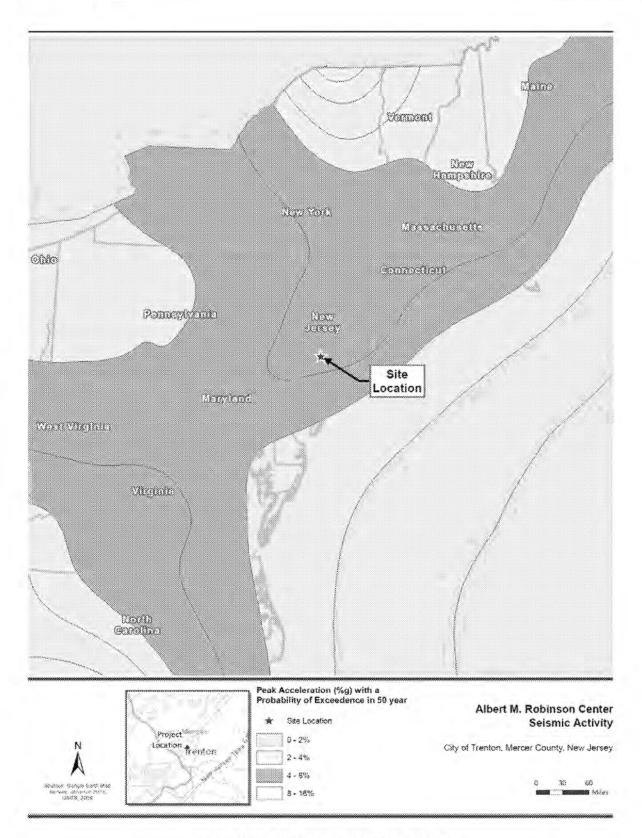


Exhibit 5-2: Seismic Activity Map

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5.3.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, geologic conditions would not be adversely affected, and mitigation measures would not be necessary.

Proposed Action Alternative

No new building construction or exterior alterations to the ARC is proposed, therefore, no impacts to geological conditions are anticipated. Potential seismic hazards are discussed below.

- Ground Shaking. The intensity of ground shaking is highly dependent upon the distance to a
 fault, the magnitude of the earthquake, and the soil conditions beneath the site. The ARC is not in
 an area susceptible to ground shaking.
- Primary Ground Rupture. Primary ground rupture is ground deformation that occurs along the surface trace of the causative fault during an earthquake. The ARC is not known to be on or near an active fault and, therefore, is not susceptible to primary ground rupture.
- Liquefaction. Liquefaction is the transformation of a cohesionless (sandy) soil from a solid to a
 liquid state caused by an increase in pore pressure and a reduction in effective stress. It can
 occur when sandy soils are subjected to strong ground shaking. The potential for liquefaction at
 the ARC property is low.
- Seismically Induced Settlement and Differential Compaction. Seismically induced settlement
 and differential compaction occur when relatively soft or loose soils experience a reduction in
 strength caused by strong ground motion. Seismically induced settlement is not expected to
 occur at the ARC property.
- Other Phenomena. Other phenomena include earthquake-induced flooding and tsunamis.
 Because the ARC is not near or at elevations below major lakes, dams, or other large surface water bodies, these phenomena are not likely to occur.

5.3.3 Recommended Mitigation

Adverse impacts to geological features and conditions are not anticipated and mitigating measures are not warranted.

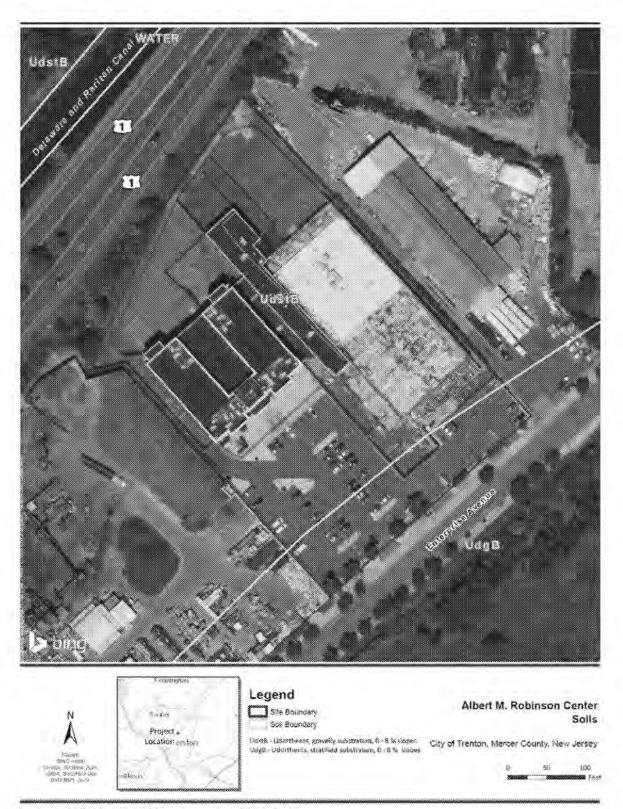
5.4 Soils

5.4.1 Existing Conditions

The "Soil Survey of Mercer County, New Jersey" prepared by the U.S. Department of Agriculture (USDA), Soil Conservation Service (SCS) was used to identify soil types, descriptions, and limitations within Mercer County. Based on the Soil Survey, one soil mapping unit, Cut and fill land, stratified substratum, is identified within and around the ARC property (Exhibit 5-3).

This soil unit is found in areas where the original soil was removed and the underlying substratum, which is mostly sandy and stratified, was exposed; and areas in which sandy soil material was brought in as fill and deposited over the original soil. Slopes generally range from 0 to 5 percent, although small areas in which slopes are between 5 and 10 percent are also in this mapping unit. In the cut areas the texture of the material exposed is dominantly sandy. The permeability of the sandy and gravelly material is moderate to rapid and in most places are well drained. Most areas of this type have been developed for residential, commercial, or industrial uses.

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Source: Soil Survey of Mercer County, New Jersey.

Exhibit 5-3: Soils Map

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Prime farmland is protected under the Farmland Protection Policy Act (FPPA) of 1981, the intent of which is to minimize the extent to which federal programs contribute to the unnecessary or irreversible conversion of farmland to nonagricultural uses. Cut and fill land is not considered a prime farmland soil.

5.4.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, soil conditions would not be adversely affected, and mitigation measures would not be necessary.

b. Proposed Action Alternative

No new building construction or exterior alterations to the ARC are proposed, therefore, impacts to soil conditions are not anticipated. The Cut and fill soil unit found comprising the ARC property, is unsuitable for use as cropland, pasture, or rangeland. Areas defined as Cut and fill land are not considered prime farmland and therefore the FPPA does not apply. There are no agricultural activities currently underway within or around the ARC property, therefore, the proposed action would pose no adverse impact to agricultural activities.

5.4.3 Recommended Mitigation

Adverse impacts to soil characteristics and conditions are not anticipated and mitigating measures are not warranted.

5.5 Hydrology and Water Resources

5.5.1 Existing Conditions

a. Surface Water Resources

The western two-thirds of the Coastal Plain section in Mercer County is drained by Assunpink Creek, Miry Run, and Crosswicks Creek which flow into the Delaware River. The remaining one-third is drained by Big Bear Brook and Rocky Brook, which flow into the Millstone River. There are water resources on the ARC property with the nearest water bodies being the Delaware and Raritan Canal, 160 feet west of the ARC property, and the Assunpink Creek, 375 feet east of the property.

Floodplain Considerations

EO 11988, Floodplain Management, defines floodplains as the lowland and relatively flat areas adjoining inland waters, including at a minimum, that area subject to a one percent or greater chance of flooding in any given year. The area subject to a one percent chance of flooding is referred to as the 100-year floodplain. EO 11988 also established a general policy and specific requirements for compliance by federal departments and agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid the direct or indirect support of floodplain development whenever there is a practicable alternative.

The ARC property is located outside flood hazard Zone X on the FEMA Flood Insurance Rate Map (Exhibit 5-4). Zone X is a flood insurance rate zone used for areas outside the 0.2-percent-annual-chance (500-year) floodplain and is an area of minimal flood hazard.

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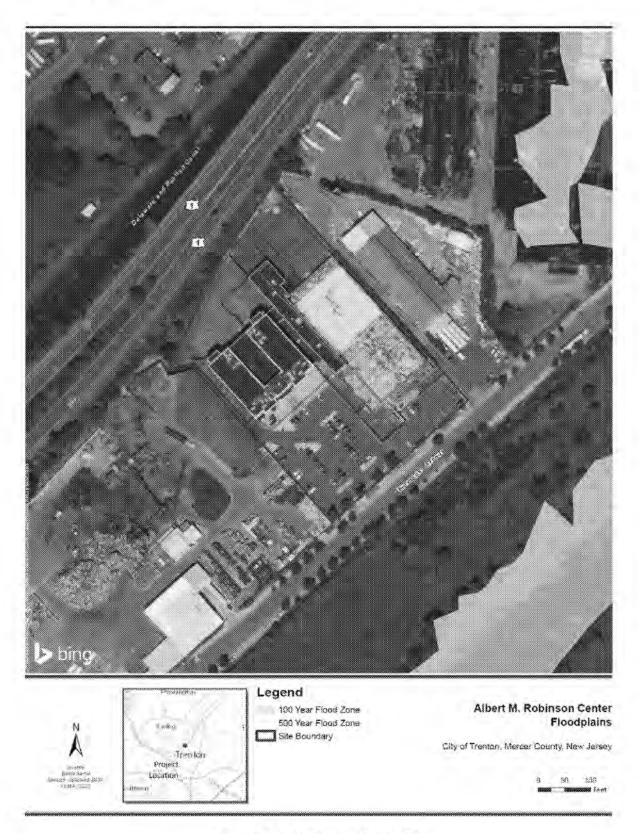


Exhibit 5-4: Floodplains Map

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c. Groundwater Resources

Under natural, undisturbed conditions, shallow groundwater flow generally follows the topography of the land surface and on this basis, groundwater is expected to flow across the ARC property towards the southeast in the direction of the Assunpink Creek. There are no wells tapping groundwater located within the ARC property.

d. Wild and Scenic Rivers

There are approximately 6,450 miles of river in New Jersey, of which 263 miles, or four percent, are designated as wild and scenic. All rivers so designated are in northwestern and southern New Jersey and well away from the City of Trenton and Mercer County.

5.5.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, hydrology and water resources would not be adversely affected, and mitigation measures would not be necessary.

Proposed Action Alternative

No new building construction or exterior alterations to the ARC are proposed and no new impervious surfaces would be added. As a result, adverse impacts to surface waters, groundwater, floodplains, and Wild and Scenic Rivers would not result from the proposed action.

5.5.3 Recommended Mitigation

Adverse impacts involving hydrology and water resources are not anticipated and no mitigating measures are warranted.

5.6 Biological Resources

5.6.1 Existing Conditions

Biological resources have been determined through the use of available database inventories, maps, and a field inspection. The maps included USGS topographic maps and USDA aerial photographs. Habitats within the project site were analyzed and compared to habitat requirements of species known to occur in the surrounding area, including species of special status, to assess their potential for area use.

a. Vegetation

The ARC property is completely developed with only a small number of trees and shrubs used as landscaping along Enterprise Avenue.

b. Common Wildlife

The high degree of development and human activity already excludes most native wildlife. The property contains no natural habitat and any wildlife found in the area consist solely of common species that are adapted to urban environments. Wildlife expected to utilize the property include small terrestrial mammals, birds, insects, and arachnids.

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c. Wetlands and Waters of the U.S.

Wetlands are defined as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal conditions do support a prevalence of vegetation typically adapted for life in saturated soil conditions (33 CFR, Part 328.3). Wetlands are identified by three elements: hydrology, hydric soils, and vegetation. The USACE regulates dredge and fill activities in wetland areas through its permit program pursuant to Section 404 of the Clean Water Act (33 CFR, Parts 320-329, November 13, 1986, and 33 CFR, Part 330, November 22, 1991).

Pursuant to EO 11990 (Protection of Wetlands) and Section 404 of the Clean Water Act, efforts were made to determine whether any potential jurisdictional wetlands and waters of the U.S. are within the ARC property. The USGS 7.5-minute topographic map (USGS 2018), USDA Web Soil Survey, and the National Wetland Inventory (NWI) map (USFWS 2023), were reviewed to determine the likelihood of jurisdictional wetlands on site. The USGS topographic map, USDA Web Soil Survey, and NWI map show that there are no streams, wetlands, or hydric soils within the ARC property.

There are no water resources on the ARC property with the nearest bodies of water being the Delaware and Raritan Canal, 160 feet west of the ARC property, and the Assunpink Creek, 375 feet east of the property (Exhibit 5-5). The review of aerial photographs, topographic maps, NWI maps, and soil survey was supplemented with a field inspection which confirmed that there are no streams, wetlands, or waters of the U.S. within the property.

a. Species of Special Status

Actions by federal agencies are performed in consultation with the USFWS to ensure compliance with Section 7 of the Endangered Species Act and with state laws protecting special status species. Special status vegetation and wildlife species are of particular concern given the challenges associated with development in or near such habitats. To determine whether the proposed action may impact any special status species and their habitats, information from the USFWS and NJDEP was acquired regarding rare species with the potential to occur on or near the project area.

An Official Species List obtained from the USFWS Information, Planning, and Conservation (IPaC) system on July 11, 2024, indicates that one federally listed species, one proposed endangered species, and one candidate species may occur within the vicinity of the Proposed Action: the endangered northern long-eared bat (*Myotis septentrionalis*), the proposed endangered tricolored bat (*Perimyotis subflavus*), and the candidate for listing monarch butterfly (*Danaus plexippus*) (Appendix C). The project site does not contain critical habitat or proposed critical habitat for these or any other species. Descriptions of these species and their habitats are summarized below from NJDEP and USFWS species profiles.

Northern long-eared bat: The federally endangered northern long-eared bat is a medium-sized bat that is distinguished by its long ears, particularly as compared to other bats in its genus. The northern long-eared bat is found across much of the eastern and north central United States. White-nose syndrome is the predominant threat to this bat, especially throughout the northeast where the species has declined by up to 99 percent from pre-white-nose syndrome levels at many hibernation sites. Northern long-eared bats spend winter (November 1 to March 31) hibernating in caves and mines and then emerge in early spring. During the active season (April 1 to October 31), northern long-eared bats utilize a wide variety of forested/wooded habitats where they roost, forage, and travel. They may also utilize some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields, and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥3 inches diameter at breast height that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of forested/wooded habitat.

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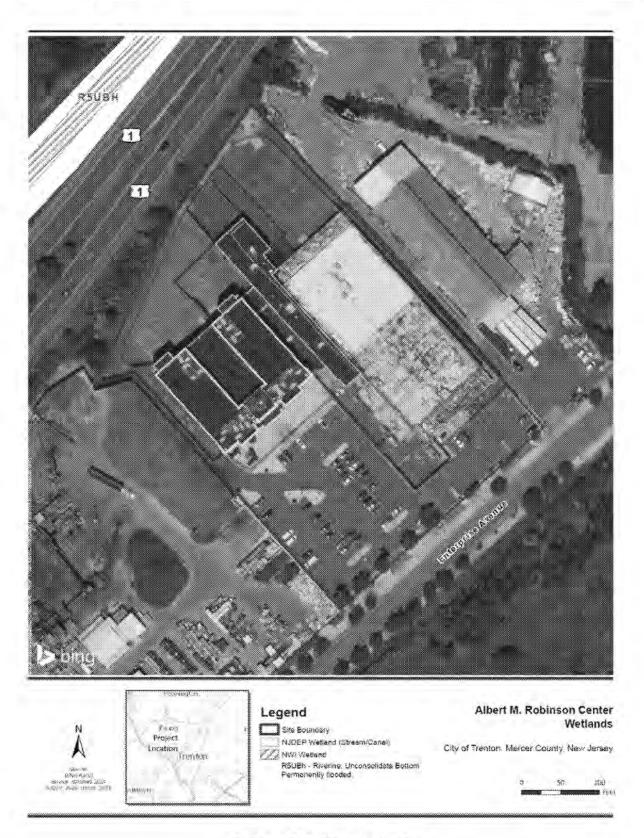


Exhibit 5-5: Wetlands Map

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No forested habitat is present within or adjacent to the project site. Northern long-eared bats are not expected to utilize the ARC property due to the developed nature of the property, adjoining industrial developments, heavily trafficked nearby roadways, and human activity.

• Tricolored bat: The tricolored bat is one of the smallest bats native to North America. As its name suggests, the tricolored bat is distinguished by its unique tricolored fur that appears dark at the base, lighter in the middle, and dark at the tip. The once common species is wide ranging across the eastern and central United States and portions of southern Canada, Mexico and Central America. During the winter, tricolored bats hibernate in caves and mines. Most mating occurs in the fall, with delayed fertilization and twin pups born in spring. During the spring, summer and fall, tricolored bats are found in forested habitats where they roost in trees, primarily among leaves. Their preferred foraging habitat is forest edges and waterways.

Tricolored bats are not expected to utilize the ARC property due to the developed nature of the property, lack of forested habitat within or adjacent to the site, adjoining industrial developments, heavily trafficked nearby roadways, and human activity.

• Monarch butterfly: Monarch butterflies are a bright orange color with black and white markings and a wingspan between 3.5 and 4 inches. The caterpillars have many yellow, black and white bands and antenna-like appendages at each end of their body. Monarch caterpillars feed almost exclusively on milkweed and as adults feed on nectar from a wide range of flowers. They lay their eggs on milkweed; there are about 3 to 5 generations born each spring and summer and most of the offspring do not live beyond five weeks. Monarchs are migratory, journeying to central Mexico for the winter each year. In the spring, summer and early fall, they can be found wherever there are nectar-producing plants.

Monarch butterflies are not expected to occur on site other than as a transient individual as vegetated areas that may contain milkweed or other native nectar plants are not present.

Migratory birds are protected by Migratory Bird Treaty Act of 1918 (MBTA) (40 Stat. 755, as amended; 16 U.S.C. 703-712). The USFWS Official Species List provides a Migratory Bird Resource List for project site. The list comprises USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention. The list indicates that there are 17 species of migratory birds that are protected under the MBTA that may occur in the vicinity of the project site. Due to the developed nature of the property, migratory birds are not expected to occur except as occasional transients.

Bald eagles (*Haliaeetus leucocephalus*) are protected by the Bald and Golden Eagle Protection Act of 1940 (BGEPA) (54 Stat. 240, as amended; 16 U.S.C. 668-668c). According to the USFWS Official Species List, bald eagles are known to occur in the vicinity of the project site. Bald eagles prefer undisturbed forested areas near large lakes and reservoirs, marshes and swamps, or stretches along rivers where they can find open water and their primary food, fish. Bald eagles nest, perch, and roost in old-growth and mature forest stands of conifers and hardwoods. The project site does not contain the forested habitat near waterbodies that bald eagles prefer. Based on the lack of suitable habitat, bald eagles are not anticipated to occur within the project site.

5.6.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, adverse impacts to biological resources would not occur, and mitigation measures would not be necessary.

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Proposed Action Alternative

To meet mission needs, the proposed action allows for resumption of ARC operation during the period of performance. No new building construction or exterior alterations to the ARC are proposed.

Vegetation

Given the developed nature of the ARC property, implementation of the proposed action alternative would result in no disturbance to vegetation.

Common Wildlife

The ARC property consists developed land that does not provide quality habitat for wildlife. Impacts on the common wildlife species that may utilize portions of the ARC property are expected to be negligible and limited to avoidance of the ARC property due to noise and human activity.

Wetlands and Waters of the U.S.

Regulated wetlands and waters of the U.S. are not present on site. Therefore, no USACE Section 404 permitting is anticipated. Wetland or water resources in the vicinity of the ARC would be unaffected given the absence of new building construction or exterior alterations, distance, and separation between the ARC and such resources.

Special Status Species

Information provided by the USFWS indicates that the federally endangered northern long-eared bat, the proposed endangered tricolored bat, and the candidate for listing monarch butterfly may occur within the vicinity of the ARC if suitable habitat is present.

The project area consists of a developed institution with a large paved parking area that is subject to frequent disturbance by human activity from surrounding industrial activities. The proposed action would involve use of existing structures and surrounding paved surfaces with no new construction or exterior modifications proposed. There is no forested habitat within or adjacent to the property that would provide habitat for bats, and no tree removal is required as part of the proposed action. There are no vegetated areas that would provide habitat for monarch butterfly.

Based on known habitat requirements, suitable habitat for threatened and endangered species is not present within the project site. Implementation of the proposed action would have no effect on northern long-eared bat, tricolored bat, or monarch butterfly.

The proposed action is not likely to jeopardize the continued existence of any migratory birds. In addition, the proposed action would not result in the destruction or adverse modification of designated critical habitat of any such species. Similarly, the proposed action would not result in "taking" bald or golden eagles nor substantially interfere with normal breeding, feeding, or sheltering behavior that may cause injury, decreased productivity, or nest abandonment.

5.6.3 Recommended Mitigation

No adverse impacts to biological resources are anticipated and no mitigating measures are warranted.

5.7 Cultural and Historic Resources

5.7.1 Existing Conditions

The cultural resource requirement is met through compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, which is implemented through regulations contained in 36 CFR Part 800. These regulations require federal agencies to consider the existing information, undertake

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identification activities if the existing information is insufficient, determine whether any cultural resources contained within a given project area meet the criteria for eligibility for inclusion in the National Register of Historic Places (NRHP), determine the effect of the proposed action on significant historic properties, consult with the State Historic Preservation Office and afford the Advisory Council on Historic Preservation the opportunity to comment.

a. Archaeology

Due to extensive disturbances related to ARC development and associated infrastructure, the potential for intact archeological deposits or unrecorded archeological sites is low. No previously recorded archeological sites are located within the ARC property.

b. Architecture

A reconnaissance architectural survey was conducted to identify all of the resources within the APE to assess their eligibility for listing in the NRHP. Data collection for this survey involved the compilation of background information and review of previous architectural resource documentation. The APE for the architectural survey includes a 150-foot buffer around the ARC.

Background research indicates that no previously identified architectural resources are located in the APE. However, two properties, the ARC property and one warehouse that meet the 50-year age criterion for NRHP consideration are within the APE. The monitor roof warehouse, located at 391 Enterprise Avenue, was constructed sometime before 1930 (NETR 1931; NJ CRGIS Online Viewer). Several shed roof additions were constructed on the southeast side of the warehouse between 1984 and 1995 (NETR 1984, 1995). The ARC development property had no buildings; however, historic aerial photographs indicate that buildings were on the lot ca. 1960 (NETR 1958, 1963); but were replaced by 2008.

The ARC building at 377 Enterprise Avenue is comprised of a large 1963 warehouse with a narrow one story addition constructed in 2004 and a second three-story education center addition constructed in 2008. The 1963 warehouse, which is the only portion of the building that is over 50 years of age, has a flat roof, masonry walls and a concrete foundation. The main, southeast, elevation has a central double door flanked by fixed, multipaned windows that date to ca. 2008. The long, side elevations have numerous bays of paired aluminum windows (Exhibit 5-6).

The monitor roof warehouse at 391 Enterprise Avenue has metal siding and several awning additions. Other than these alterations, the building has a moderate degree of integrity of design, workmanship, and materials.

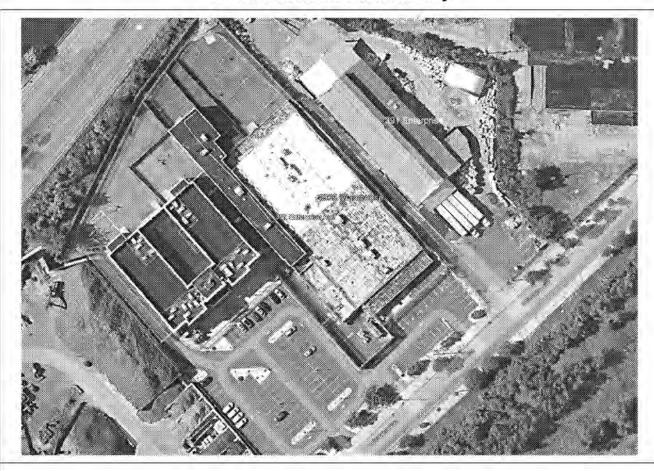
The ARC building at 377 Enterprise Avenue has been altered for its current use with the construction of two large additions and replacement of original windows. Consequently, the building has diminished integrity of design, materials, and workmanship. While the monitor roof warehouse has good integrity, it is a common example of its type that lacks distinction. It is the author's opinion that neither building is eligible for listing in the NRHP under Criteria A, B, or C.

5.7.2 Potential Impacts

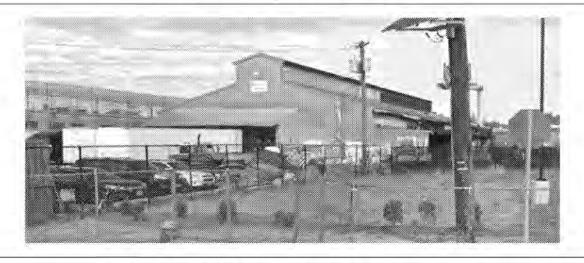
a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, cultural and historic resources would be unaffected, and mitigation measures would not be necessary.

Exhibit 5-6: Architectural Survey



Aerial View of ARC Buildings at 375-377 Enterprise Avenue

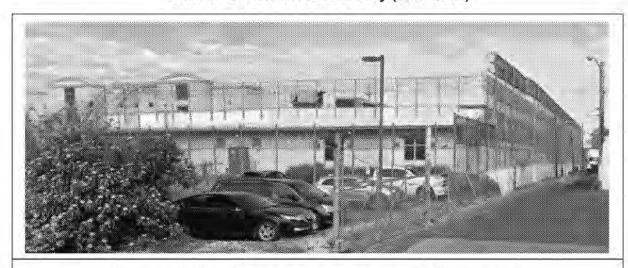


1930s Warehouse, 391 Enterprise Avenue, facing north/northwest

Source: WSP, July 2024.

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Exhibit 5-6: Architectural Survey (continued)



Converted 1963 Warehouse at 377 Enterprise Avenue, facing northwest



ARC Buildings at 375-377 Enterprise Avenue, facing north/northwest

Source: WSP, July 2024.

b. Proposed Action Alternative

Archaeology

Under the proposed alternative, no exterior alterations are proposed and thus no ground disturbance is anticipated for this project. Therefore, no adverse impacts to archaeological resources are anticipated.

Architecture

The APE includes two buildings that are over 50 years old. No new building construction or exterior alterations are proposed and thus the proposed action will have No Effect to Historic Properties.

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5.7.3 Recommended Mitigation

No adverse impacts to cultural and historic resources are anticipated and mitigating measures are not warranted.

5.8 Hazardous Materials

5.8.1 Existing Conditions

The ARC structures and property have been the subject of a Phase I Environmental Site Assessment (ESA). The purpose for conducting the Phase I ESA was to identify the presence of any Recognized Environmental Conditions (RECs), Business Environmental Risks (BERs), Controlled Recognized Environmental Conditions (CREC), and/or Historical Recognized Environmental Conditions (HRECs) as defined by ASTM International (ASTM) Standard Practice E1527-21, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. RECs are the presence or likely presence of any hazardous or petroleum products under conditions that indicate an existing release, a past release, or a material threat of release of such substances onto a subject property. A CREC is a recognized environmental condition affecting a subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls. A BER is a risk which can have a material environment or environmentally driven impact on the business associated with the current or planned used of a property.

Preparation of the Phase I ESA consisted of visual inspections of the ARC including the exteriors of the structures; a review of historical aerial photographs of the property; a review and evaluation of local, state, and federal environmental databases containing information on the property; and interviews with appropriate officials regarding past uses of the property (Appendix D). The following conditions have been identified at the ARC property.

- Recognized Environmental Conditions: The Phase I ESA identified no evidence of RECs.
- Historical Recognized Environmental Conditions: 375 Enterprise Avenue is listed in the NJ SPILLS database under Case Number 03-10-31-1543-11. According to the database, an incident occurred on October 31, 2003 and the incident status is listed as "terminated." Based upon the closure of the spill case, this listing is considered unlikely to impact upon the current environmental quality of the property and is considered to represent a HREC. The property at 377 Enterprise Avenue is listed in the NJ ISRA database under PI Number G000012753 with a case status of NFA (No Further Action) HISTORIC for case names EQUA FAB Incorporated and Royal Engineering Company. A review of the NJDEP Data Miner database for PI Number G000012753 did not provide any additional information. Based upon the No Further Action status, this listing is considered to represent a HREC.
- Controlled Recognized Environmental Conditions: A Deed Restriction is in place at 375
 Enterprise Avenue (Block 23201, Lot 2) under Soil Remedial Action Permit # RAP210001 for
 contamination in soil related to historical operations and historical fill material. Based upon the
 environmental and institutional controls in place and the management of the property under the
 NJDEP LSRP, the listing of the property in the BROWNFIELDS, NJ ISRA, ENG CONTROLS, INST
 CONTROL, SHWS, and UST databases, and the former presence of ASTs and USTs, the ARC is
 considered to represent a CREC.
- Business Environmental Risks: There is a potential that per- and polyfluoroalkyl substances
 (PFAS) compounds were used at the property. It should be noted that, as of April 19, 2024, the
 USEPA have designated PFOA and PFOS as "hazardous substances" under CERCLA; therefore,
 under the ASTM E1527-21 Standard, All Appropriate Inquiries (AAI)-compliant Phase I ESAs must
 address these chemicals and shall conduct a review of a possible release. Historically,

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PFOA/PFOS chemicals were introduced in the late 1930s and since the 1950s through industries including aerospace, semiconductor, medical, automotive, construction, electronics, and consumer products like carpets, clothing, furniture, and food packaging. Many products used by consumers and industry have been manufactured with or from these chemicals.

 De Minimis Conditions: The Phase I ESA did not identify any de minimis conditions in connection with the property.

5.8.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, the use, storage and handling of hazardous materials and the potential for contamination would be unaffected, and mitigation measures would not be necessary.

b. Proposed Action Alternative

Operation of the ARC would involve use of hazardous materials consisting of janitorial supplies, laundry detergents and sanitizers, paints, and other maintenance supplies. All such materials would be properly managed in labeled and locked storage areas with locked, explosion-and fire-proof cabinets provided in designated maintenance areas. ARC leadership and maintenance staff would be responsible for ensuring that policies and procedures for managing the use, storage, and handling of hazardous materials are implemented.

Routine operation of the ARC would also result in minor amounts of regulated wastes. A commercial contractor would be retained to provide waste containers and collect, store, and eventually dispose of any biohazardous medical waste produced by the health care unit. Hazardous materials and medical wastes would be handled in accordance with institution policies and procedures and applicable regulatory requirements.

The volume of hazardous wastes generated during ARC operation would have no adverse impact on the ability or availability of licensed handlers to collect and properly dispose of such wastes. As a result, the proposed action is not expected to result in the release of contaminants into the environment and adverse impacts are not anticipated.

5.8.3 Recommended Mitigation

Adverse impacts involving hazardous materials are not anticipated and mitigating measures are not warranted.

5.9 Fiscal Considerations

5.9.1 Existing Conditions

Fiscal considerations are those having to do with the public treasury or revenue. Potential fiscal impacts could, but do not always, include removal of private property from the public tax rolls; acquisition of private property through use of public funds; and other public expenditures related to a proposed action. Fiscal considerations of federal government-sponsored projects or actions, such as that involving the ARC, are of particular interest to local governments. This is due to the possible loss of tax revenues since federal government agencies typically do not pay property taxes or make similar payments to local governments for federal properties or facilities. In this case, the ARC is in private ownership and is not exempt from property taxes and other payments to local, county, state, and/or federal governments.

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During 2023, the ARC contributed \$118,000 per quarter (\$472,000 annually) in property tax payments to the City of Trenton. In addition to property taxes, there are other annual tax payments, fees, licenses, and similar expenditures levied by state, county, and city agencies. The ARC has been vacant since 2022 and therefore payroll withholding taxes, employee withholding taxes, income taxes, or use tax payments, among other payments have not occurred.

5.9.2 Potential Impacts

No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, there would be no adverse fiscal impacts, and mitigation measures would not be necessary.

Proposed Action Alternative

Implementation of the proposed action will result in a resumption of ARC operation and a resumption in the positive fiscal impacts from the taxes, fees, and other revenues contributed by operation of the ARC to the City of Trenton, Mercer County, and the State of New Jersey. In addition, positive fiscal benefits would be derived by the annual expenditures for labor, materials, supplies and services to operate and maintain the ARC, as well as from the secondary and tertiary economic activity associated with the center's employees and operation. Utility-related expenses are recouped through payment of user charges resulting in no adverse impact.

5.9.3 Recommended Mitigation

Adverse fiscal impacts are not anticipated and mitigating measures are not warranted.

5.10 Visual/Aesthetic Resources

5.10.1 Existing Conditions

The principal aesthetic features of the ARC, constructed in 1963, with additions in 2004 and 2008, consists of approximately 115,000 square feet of floor space within three attached structures containing housing; administrative offices, support services and functions; entrance driveway and parking area; and light fixtures and signage. The ARC is compatible with the surrounding commercial, warehouse, and industrial neighborhood in terms of building scale, site layout and setback, and exterior façade appearance. The ARC is unobtrusive and since its development has become a common feature on the landscape with aesthetic characteristics not considered unique (Exhibit 5-7).

5.10.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, there would be no adverse aesthetic and visual impacts, and mitigation measures would not be necessary.

b. Proposed Action Alternative

No exterior alterations to the ARC are proposed and visual and aesthetic resources would be unaffected. The ARC has successfully coexisted with neighboring properties and the surrounding commercial and industrial environment since its development and would continue as a permanent feature on the

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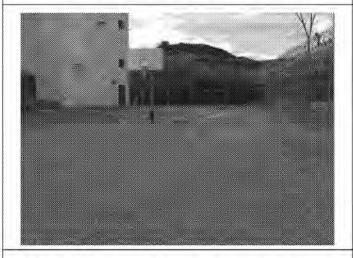
Exhibit 5-7: Representative Photographs - Albert M. "Bo" Robinson Center



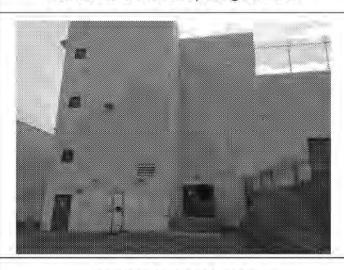
View of ARC exterior towards northwest



View of ARC exterior and parking lot to west



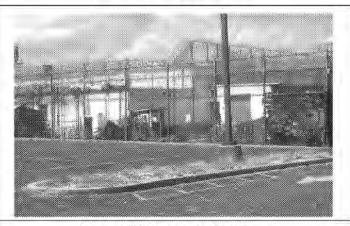
View of ARC recreation enclosure towards southwest



View of ARC towards south



View of ARC towards northwest



View of ARC towards northwest

Source: WSP, July 2024.

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landscape. Views of the ARC from Enterprise Avenue are partially obstructed by trees and shrubs lining the roadway and would remain as is. No change to previous nighttime operation of the ARC is planned.

5.10.3 Recommended Mitigation

Visual and aesthetic resources would be unaffected, therefore, no mitigation measures are warranted.

5.11 Social Environment – Demographics

5.11.1 Existing Conditions

To gauge the potential effects of a proposed project or action, the demographic characteristics of the host community and its surroundings are established and potential demographic changes resulting from the project or action are then identified and assessed. Adverse impacts could result if a project or action would substantially alter the location, composition and distribution of the population or segments of the population within a given geographic area or cause the population to increase or decrease beyond historical trends.

Between 2010 and 2020, the population of the City of Trenton increased 7.0 percent, rising from 84,913 to 90,871. During this time the population of Mercer County increased 5.7 percent from 366,513 to 387,340 while the State of New Jersey increased 5.5 percent from 8,791,894 to 9,288,994. Of the city's 2020 population, approximately 52.0 percent (47,253) were female and 48.0 percent (43,618) were male; percentages slightly different from the State of New Jersey which recorded 50.8 percent females and 49.2 percent males.

In 2020, 24.7 percent of Trenton residents were White; 45.5 percent were Black or African American; 0.5 percent were Native American; 1.1 percent were Asian; and 8.5 percent were of two or more races (U.S. Census). Of the city's population, 38.7 percent were Hispanic or Latino (of any race). Records for the State of New Jersey showed 70.4 percent of all residents were White; 15.5 percent were Black or African American; 0.8 percent were Native American; 10.6 percent were Asian; and 13.8 percent were of two or more races. Of the state's population, 22.7 percent were Hispanic or Latino (of any race).

According to the 2020 U.S. Census, approximately 76.3 percent of city residents 25 years of age or older had a high school diploma in 2020 while 15.6 percent had a Bachelor's degree. This compares to Mercer County where 89.7 percent of persons 25 years of age or older had a high school diploma and 44.2 percent had a Bachelor's degree and the State of New Jersey where 90.6 percent of persons 25 years of age or older had a high school diploma and 42.3 percent had a Bachelor's degree.

5.11.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, the demographic composition of the City of Trenton and Mercer County would not be adversely impacted, and mitigation measures would not be necessary.

b. Proposed Action Alternative

Under the Proposed Action Alternative, the ARC would house 600 detained noncitizens with 225 to 250 staff responsible for operation and maintenance. Data concerning working age populations, labor forces, and educational attainment, together with many years of experience operating the ARC, indicates that there is an adequate labor pool within the City of Trenton and Mercer County (in addition to neighboring Bucks County, Pennsylvania), to restore staffing levels and resume operation without inducing inmigration or adverse population impacts. Resuming ARC operation is also expected to aid with population

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retention to the benefit of Trenton, Mercer County, and the surrounding region. No adverse demographic impacts are anticipated.

ICE is responsible for housing noncitizen detainees and then removing those individuals who have been ordered to leave the United States. As a result, detained noncitizens are not considered residents of the area in which they are housed and are not counted as such by the U.S. Census Bureau at the time of the decennial census. Housing detained noncitizens has no impact upon a host community's population and, therefore, no impact upon state and/or federal population-based aid programs.

5.11.3 Recommended Mitigation

In the absence of adverse impacts, no mitigation measures are warranted.

5.12 Social Environment – Economics

5.12.1 Existing Conditions

According to U.S. Census, the civilian labor force in the City of Trenton, as a percent of the population aged 16 years and over in 2020, was 59.1 percent, a level lower than Mercer County at 63.8 percent and the state as a whole at 65.9 percent. Trenton ranks below the state and national averages for per capita income and median household income. According to the U.S. Census, per capita income for city residents in 2020 was \$27,565 compared to \$50,053 for Mercer County, \$50,995 for New Jersey and \$41,804 for the U.S. Median household income for city residents in 2020 was \$44,444 compared to \$92,697 for Mercer County, \$97,126 for New Jersey and \$74,755 for the U.S.

The City of Trenton recorded a higher percentage of its population with incomes below the poverty line than the State of New Jersey and nation as a whole. In 2020, 26.2 percent of the city's population had incomes below the poverty line, compared to 10.6 percent for Mercer County, 9.7 percent for the state, and 12.6 percent for the nation as a whole (U.S. Census). As of May 2024, the unemployment rate in Trenton was 3.9 percent, 3.7 percent in Mercer County, and 4.6 percent for the state as a whole.

5.12.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, any potential beneficial impacts to the local and regional economies resulting from restoring ARC to productive use would not occur, and mitigation measures would not be warranted.

b. Proposed Action Alternative

Under the Proposed Action Alternative, the ARC would resume operation, housing 600 detained noncitizens and employing 225 to 250 contractor staff. Potential economic impacts from ARC operation are considered beneficial and are the result of direct labor payments as well as expenditures for materials and services, utilities, food purchases, and other necessities. Annual wages, salaries, and expenditures have been projected at \$30 to \$32 million based on the requirements established by ICE for operation and management of the center under the current procurement.

Resuming ARC operation would contribute to the local and regional economy from operational payrolls for labor, material purchases generating local sales, and from related spending by supplying firms and laborers ("multiplier effects"). Related spending is expected to support additional local sales each year, indirectly supporting additional private-sector jobs. These positive economic impacts would occur primarily within Trenton, Mercer County and the central New Jersey area since workers would be drawn from this region and commute to the ARC. The positive economic impacts would occur for the duration of the agreement to house detained noncitizens at the ARC under the ICE procurement.

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In assessing the impact of the proposed action, attention was given to employment and economic goals and objectives. Such an evaluation reveals a proposed action consistent and compatible with goals and objectives of the City of Trenton and Mercer County to seek employment opportunities, stimulate economic activities, and to direct such activities towards areas with available infrastructure. Resuming operation of the ARC is important to achieving the social and economic development goals of the city and county.

5.12.3 Recommended Mitigation

The potential impacts of the proposed action are considered beneficial to the economic well-being of the City of Trenton, Mercer County and the surrounding region by restoring employment and economic opportunities to residents and business owners that had been available prior to 2022. In the absence of adverse impacts, no mitigation measures are warranted.

5.13 Social Environment – Housing

5.13.1 Existing Conditions

Impacts to the housing market could be expected if a proposed project or action would substantially alter the supply of housing, either by reducing the number of housing units or increasing the population above the capacity of the available housing stock. According to the 2020 U.S. Census, there were 34,322 housing units in the City of Trenton with 38.3 percent multi-family units and 61.7 percent single-family units. In Trenton, a majority of units (51 percent) are renter-occupied while statewide renters occupy about 33 percent of all housing units. The city also has a high vacancy rate with nearly one in five units vacant.

Approximately 38.3 percent of all occupied housing units in Trenton were owner-occupied compared to 62.8 percent for Mercer County, and 64.6 percent for the state as a whole. In Trenton, the median value of owner-occupied housing units in 2020 was \$111,200 and the median monthly gross rent (with utilities) was estimated to be \$1,177. Both figures are higher for Mercer County at \$327,600 and \$1,454 and the state as a whole at \$401,400 and \$1,577 respectively.

5.13.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, the supply, availability, and cost of housing would not be affected and there would be no adverse impacts to the local and regional housing markets. Mitigation would not be necessary.

b. Proposed Action Alternative

Under the ICE procurement, ARC operation is expected to employ 225 to 250 administrators, detention officers, and other operation and maintenance staff. Data concerning working age populations, labor forces, and educational attainment, together with many years of experience operating the ARC, indicates that there is an adequate labor pool within the City of Trenton and Mercer County (in addition to neighboring Bucks County, Pennsylvania), to restore staffing levels and resume operation without inducing in-migration or adverse housing impacts.

There is also no need to vacate, demolish, or otherwise alter any existing housing units to implement the proposed action. As a result, there would be no adverse impacts to the local and regional housing markets, the supply, availability and cost of housing would not be affected, and mitigation would not be necessary.

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5.13.3 Recommended Mitigation

The supply, availability and cost of housing would not be affected, therefore, adverse impacts to the local and regional housing markets are not expected. In the absence of adverse impacts, no mitigation measures are warranted.

5.14 Environmental Justice

According to EO 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations (February 11, 1996), environmental justice must be considered in federally funded projects and actions. EO 12898 stipulates that each federal agency, "to the greatest extent practicable", should identify and address, as appropriate, "disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low income populations in the United States...." The EO embodies Title VI of the Civil Rights Act of 1964 and incorporates Title VI provisions into the planning and environmental processes.

Consideration of environmental justice became a formal operating requirement in DHS with the issuance of Directive 023-1, Environmental Planning Program, in April 2006. Directive 023-1 implemented NEPA and required that environmental justice considerations be a part of the review process required by NEPA. (DHS, Environmental Justice Strategy, February 2012). Notice of a revised Directive and Instruction 023-01, which was published in the Federal Register on November 26, 2014 (79 FR 70538), and became effective on March 26, 2015, includes consideration of environmental justice. The analysis conducted in preparing this document considered the demographic, economic, and housing characteristics of the host community within which the ARC is located.

5.14.1 Existing Conditions

The study area for environmental justice was the same used in the analysis of demographics, economics, and housing and reflects the area with potential to experience direct impacts and indirect community, human health, and environmental impacts (City of Trenton). Population and income characteristics from the U.S. Census of Population and Housing and the U.S. Census Bureau, American Community Survey were compiled to identify populations of concern for environmental justice. The following information was compiled to enable a general comparison of the project area with the larger region in which the ARC is located.

- Racial and Ethnic Characteristics—Population of the study area was characterized using the
 racial categories White, Black or African American, Native American, Asian, and Other. These
 categories are consistent with the affected populations requiring study under EO 12898.
- Percentage of Minority Population—Persons of Hispanic origin characterized themselves as White, Black or African American, Native American on the long-form of the U.S. Census. Persons of Hispanic origin who identified themselves as White were included in the calculation of minority population for the purposes of this analysis.
- Low-Income Population—The Percentage of Persons Living Below the Poverty Level, as
 defined by the U.S. Census, is the key indicator used to identify the low-income population in a
 given region. Per Capita Income and Median Household Income are the second measure that
 has been used to characterize income levels within the study area.

5.14.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would

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remain vacant, adverse impacts to environmental justice communities would not occur, and mitigation measures would not be necessary.

b. Proposed Action Alternative

Operation of the ARC would restore considerable employment opportunities and commerce to the benefit of residents and businesses in the city, county, and region as a whole. This would include a \$30 to \$32 million annual operating budget for staff, utility services, materials, supplies, and services. During 2023, the ARC contributed \$118,000 per quarter (\$472,000 annually) in property tax payments to the City of Trenton and when in operation, ARC also contributes state payroll withholding taxes, employee withholding taxes, income taxes, and in use taxes among other payments. As a result, implementation of the proposed action would offer substantial positive benefits to the local population, economy, and housing market.

Implementation of the proposed action will generate potential short- and long-term benefits to the city, county, and surrounding region by resuming the purchase of goods and services from large and small businesses, wholesale and retail sales opportunities, economic activity, and employment opportunities. Based on these factors, the proposed action complies with EO 12898. The analysis of potential socioeconomic impacts on minority and low-income populations are included in this document and the potential impacts reported herein will be fully considered by ICE prior to making a final decision on the proposed action.

Operation of the ARC would not have a disproportionate adverse impact on minority or low-income segments of the population or on the community as a whole. Rather, potential long-term benefits would occur, including to minority and low-income residents, in the form of restored economic activity and employment opportunities, as well as support to the local and regional housing markets. The proposed action would comply with EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.

There are no locations where large numbers of children congregate or reside in proximity to the ARC. In addition, the health and well-being of children within the City of Trenton and Mercer County, along with the availability of facilities and programs serving children, would not be affected. The proposed action would comply with EO 13045, *Protection of Children from Environmental Health and Safety Risk*.

Resuming ARC operation, thereby restoring employment and economic opportunities to minority and low income residents and business owners that have been available since the center began operations, is important to achieving the social and economic goals of the city and county.

5.14.3 Recommended Mitigation

Adverse impacts to environmental justice communities are not anticipated and in the absence of adverse impacts, no mitigation measures are warranted.

5.15 Human Health and Safety

5.15.1 Existing Conditions

a. Law Enforcement

The Trenton Police Department is responsible for law enforcement in the City of Trenton. The Department is organized into eight divisions that service the city's many diverse neighborhoods:

- Administrative Services
- Communications
- Criminal Investigation
- Fiscal Management
- Information Technology
- Internal Affairs
- Patrol
- Special Operations

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Calls for assistance and responses from the Trenton Police Department are dispatched through a central 911 system. The Department's headquarters is located at 225 North Clinton Avenue, 1.6 drive miles from the ARC.

b. Fire Protection

Fire protection service for residents and businesses within the City of Trenton is provided by the Trenton Department of Fire and Emergency Services which has primary responsibility for the following:

- Fire prevention
- Fire suppression
- First responders to Emergency Medical Services incidents
- Response to and control of hazardous materials emergencies
- Rescue of trapped or injured persons
- Response to natural disasters
- Water recovery

In addition, a Technical Rescue Team was developed and is trained in various areas such as building collapse rescue, confined space rescue and rope rescue. The Department operates from the following stations:

- Fire Company 1: Engine 1 460 Calhoun Street, 2.7 drive miles from the ARC
- Fire Company 3: Engine 3 720 South Broad Street, 3.0 drive miles from the ARC
- Fire Company 6: Engine 6 561 North Clinton Avenue, 1.1 drive miles from the ARC
- Fire Company 7: Engine 7 502 Hamilton Avenue, 2.5 drive miles from the ARC
- Fire Company 8: Engine 8 698 Stuyvesant Avenue, 3.7 drive miles from the ARC
- . Fire Company 9: Engine 9 1464 West State Street, 4.6 drive miles from the ARC
- Fire Company 10: Engine 10 244 Perry Street, 2.1 drive miles from the ARC

c. Medical Services

The City of Trenton and Mercer County are the location of numerous hospitals and medical centers, with many located within 10 drive miles of the ARC. Among the closest are the following:

- Capital Health Regional Medical Center, Trenton 3.2 drive miles of the ARC
- Capital Health Medical Center Hamilton 4.5 drive miles of the ARC
- St. Lawrence Rehabilitation Center, Lawrenceville 4.7 drive miles of the ARC
- Robert Wood Johnson University Hospital, Hamilton 4.8 drive miles of the ARC
- Trenton Psychiatric Hospital, West Trenton 5.5 drive miles of the ARC
- Capital Health Medical Center Hopewell, Pennington 7.6 drive miles of the ARC

Each facility offers a wide array of in-patient, out-patient, and emergency services.

5.15.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, there would be no adverse impacts to law enforcement, fire protection, and medical services, and mitigation measures would not be necessary.

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b. Proposed Action Alternative

Law Enforcement

Law enforcement in the City of Trenton is the responsibility of the Trenton Police Department. Calls for assistance and responses from the Police Department are dispatched through a central 911 system. The Trenton Police Department provides necessary police protection and coverage throughout the city.

The ARC operator would be responsible for the center and would rely upon a well-trained and equipped workforce to ensure the overall functioning and security of the facility and to handle emergency situations which may arise. The ARC operator would also advise law enforcement authorities of emergencies at the center and would seek their assistance and cooperation as necessary. Based on many years of operating experience, housing detained noncitizens at the ARC is not expected to place an undue burden on or result in adverse impacts to law enforcement resources and services provided in the City of Trenton.

Fire Protection

Fire protection service to the residents and businesses in the City of Trenton is provided by the Department of Fire and Emergency Services. Calls for assistance and responses from the Department of Fire and Emergency Services are dispatched through a central 911 system. The Department provides fire control and suppression services, emergency medical services, vehicle extrication, and hazardous materials response coverage throughout the city with seven fire stations within 4.6 drive miles of the ARC.

The ARC operator would undertake precautions to guard against fire emergencies during center operation. Precautions would include policies and procedures; inspections, fire prevention, control and evacuation planning; and emergency drills. The ARC would develop and maintain a Fire Prevention and Control Plan to describe staff responsibilities, facility occupancy standards, emergency equipment, and communication, security, and fire drill procedures. In addition, the ARC conforms to applicable federal, state, and local fire safety codes. Emergency fire control equipment that would be maintained on-site include sprinklers/water-based protection systems, fire hydrants, fire extinguishers, and smoke detectors.

Members of the ARC staff would be trained as initial responders in the event of a fire emergency at the facility. The responsibility of ARC responders would be to extinguish small, confined fires and to remove detained individuals and staff from affected areas until fires are extinguished.

The policies, procedures and equipment to be established at the ARC would be maintained while it is housing detained noncitizens. Based on many years of previous experience, operation of the ARC is not expected to place an undue burden upon or result in adverse impacts to the Trenton Department of Fire and Emergency Services.

Medical Services

Detained individuals housed at the ARC would be provided with medical and dental care. The center's staff will include physicians, nurses, and other trained medical personnel and equipment to provide routine health care services. Instances where outside medical assistance would be needed to treat detained individuals are anticipated to be minimal. During those instances when acute emergency treatment is needed, the individual would be stabilized at the ARC and then transported to a nearby hospital for further care.

Operator policies, procedures, manpower, and equipment would be maintained throughout the period the ARC is housing detained noncitizens. Based on many years of operating experience, there is no reason to expect that situations requiring outside medical assistance arising during ARC operation would place an undue burden upon medical facilities or health care providers operating in the City of Trenton or Mercer County. Adverse impacts to area medical services and facilities are not anticipated as a result of the proposed action.

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5.15.3 Recommended Mitigation

Law Enforcement

Potential adverse impacts to law enforcement services are not expected, consequently, no mitigation measures, outside of the need to coordinate and communicate operating activities with the Trenton Police Department, are warranted.

b. Fire Protection

Potential adverse impacts to fire protection services are not expected, consequently, no mitigation measures, outside of the need to coordinate and communicate operating activities with the Trenton Department of Fire and Emergency Services, are warranted.

c. Medical Services

Adverse impacts to area emergency medical services and health care facilities are not anticipated, therefore mitigation measures are not warranted.

5.16 Land Use and Zoning

5.16.1 Existing Conditions

Lands surrounding the ARC are a mix of commercial, warehouse/distribution and industrial uses and transportation infrastructure. Bordering the ARC to the north is a large, enclosed recycling facility processing cardboard, plastics and waste paper as well as a recently constructed 261,000-square-foot warehouse/distribution center. To the west of the facility is the four-lane U.S. Route 1 highway carrying large volumes of auto, light truck and heavy truck traffic. Located east of the ARC is Assunpink Creek, bordered on both sides by a greenway extending for the length of the creek. Lastly, to the south is a large-scale outdoor scrap metal shredding and recycling operation.

The current zoning for the ARC property is Industrial "B" (IB), with use of the ARC permitted by right in the IB zoning district. The property is located in a well-defined industrial and commercial neighborhood and is a legally conforming use. In April 2024, to ensure that housing detained noncitizens under ICE jurisdiction at the ARC is allowable, the property owner has engaged the City of Trenton as summarized below:

- Provided a detailed briefing memorandum to the City's Planning Department in support of the proposed use as an immigration detention facility and sought to engage the City's outside zoning counsel.
- Submitted an application to the City's Project Application Review Committee for review and discussion of the project.
- Filed an application for a zoning permit to confirm the ability use the ARC as an immigration detention facility.
- Provided public notice of same via the local newspaper as well as direct mailed notice to all
 property owners within 200 feet of the ARC property.

A notice of approval by default was filed with the City of Trenton on July 9, 2024 (Appendix A). A copy of the ARC's Certificate of Occupancy is also included in Appendix A.

5.16.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, on-site and nearby commercial and industrial developments would not be adversely

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affected, and potential impacts to land uses would not occur. There would be no direct, indirect, or secondary impacts to land uses and mitigation measures would not be necessary.

b. Proposed Action Alternative

The self-contained nature of the ARC limits potential direct land use impacts to the property itself, with no impacts, in the form of changes to land uses or new land developments, expected to occur on adjoining or nearby properties. Attention was also given to the relationship of the ARC to land use plans and policies of the City of Trenton, revealing a use compatible with land use development goals and objectives.

Resuming operation of the ARC would be consistent with the goals of local planning and development agencies to maintain and expand employment opportunities, stimulate economic activities in the city, and to maintain such activities in areas served by utility and transportation infrastructure. The ARC was constructed in 1963, with additions in 2004 and 2008, and was operational until 2022. It is currently vacant and available to house detained noncitizens, thereby avoiding the need to develop a new facility. Resuming ARC operation is important to achieving the social, economic, and land use development goals of City of Trenton. In addition, the ARC, being largely self-contained and confined to a property where a correctional use has existed for over 50 years, is not expected to result in indirect or secondary land use impacts.

The owner filed an application for a zoning permit to confirm the ability use the ARC as an immigration detention facility and following the Zoning Officer's failure to act within the statutorily prescribed time, filed notice of approval by default with the City.

5.16.3 Recommended Mitigation

Adverse impacts to land uses are not expected from housing detained noncitizens at the ARC and no mitigating measures are warranted.

5.17 Utility Services

5.17.1 Existing Conditions

Water Supply

Trenton Water Works (TWW) is among the largest publicly owned, urban water utilities in the United States. It supplies an average of 27-million gallons of Delaware River-sourced drinking water per day to 63,000 metered customers. The Delaware is the longest free-flowing river in the United States east of the Mississippi, extending 330 miles from the confluence of its East and West branches at Hancock, New York in the Catskill Mountains to the mouth of the Delaware Bay where it enters the Atlantic Ocean.

Established more than 200 years ago, TWW services approximately 225,000 people in Trenton and parts of Hamilton Township, Ewing Township, Lawrence Township and Hopewell Township in Mercer County. TWW has 119 employees who operate a 60-million-gallon water filtration plant and water distribution system that includes a 100-million-gallon reservoir. The system has 683 miles of transmission lines varying in size from 4 to 48 inches in diameter, three pump stations and five interconnections between TWW and other water purveyors.

Operation and maintenance of the water supply system is performed by TWW which provides potable water service to the ARC via a service main interconnected to the city's water distribution network. There are no known limitations to the provision of water supply service to residents and businesses in Trenton.

b. Wastewater Collection and Treatment

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The Trenton Sewer Utility collects, treats, and disposes of wastewater, stormwater, and biosolids that are generated within the city daily. Trenton Sewer Utility houses a 20 million gallons/day wastewater treatment plant, treating both domestic and industrial sewage in accordance with State regulations. The sewer plant is a secondary treatment facility which produces treated sewage with over 97 percent of the suspended solids and over 97 percent of the 5-Day BOD (Biochemical Oxygen Demand) removed before discharge into the Delaware River. The City operates 180 miles of sanitary sewer mains and five sanitary sewer lift stations with most of the lines contained in streets or alleys. Each year, the City cleans approximately 20 percent of the sanitary sewer lines with lines requiring a higher level of maintenance cleaned more frequently.

Operation and maintenance of the wastewater collection and treatment system is performed by the Trenton Sewer Utility which collects wastewaters generated at the ARC via a service main interconnected to the city's wastewater collection system and conveyed to the sewer plant for treatment and disposal. There are no known limitations to the provision of wastewater collection and treatment services to residents and businesses in Trenton.

c. Electric Power Service

Electric power service in Trenton and to the ARC is provided by Public Service Electric & Gas Company (PSEG) which serves 2.4 million customers in 13 northern and central New Jersey counties including Mercer County. PSEG has been providing electric power service to the ARC since it began operations. There are no known limitations to the provision of electric power service to residents and businesses in Trenton.

d. Natural Gas Service

Natural gas service is also provided to the ARC by PSEG, the largest natural gas distribution company in New Jersey. PSEG supplies natural gas to more than 1.9 million customers in 15 New Jersey counties including Mercer County and has been providing natural gas service to the ARC since it began operations. There are no known limitations to the provision of natural gas service to residents and businesses in Trenton.

e. Telecommunications

Telecommunications infrastructure extends throughout Mercer County with AT&T, Verizon, Xfinity, Comcast and Spectrum among the providers of cable television, internet, and telephone services. Telecommunications infrastructure is continually being improved to support customer demands and presently all providers have capacity to serve existing and new customers. There are no known limitations to providing telecommunications services to residents and businesses in Trenton.

f. Solid Waste Management

Solid waste services in the City of Trenton is provided by the Division of Solid Waste Management which is responsible for the collection and disposal of solid waste materials, including bulk items. Several private waste collection and disposal companies also operate in Mercer County including Interstate Waste Services, Covanta, Republic Services, Gold Medal Environmental, Regional Industries, Inc., Cali Carting among others. Collection companies transport wastes to various state-approved transfer facilities and regional landfills for final disposal. There are no known constraints to the collection and disposal of solid wastes originating in Trenton.

5.17.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, there would be no adverse impacts to the provision of utility services, and mitigation measures would not be necessary.

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Proposed Action Alternative

Water Supply

Water is supplied to the ARC via a connection to the city's water supply system. Under the proposed action, operation of the ARC, with a population of 600 individuals and each using an average of 95 gallons per day, would result in an average water demand of 57,000 gallons per day (gpd). Many years of experience operating the ARC confirms that the flow rate and pressure available in the system is adequate to support the water demands during center operation. With no significant increase over historical water use anticipated, the water system and existing supply line are expected to accommodate the ARC's average, peak, and fire flow requirements without the need for improvements or upgrades. The proposed action is not expected to pose an adverse impact to water supply services provided to current or future customers in the City of Trenton.

Wastewater Collection and Treatment

Wastewater flow resulting from operation of the ARC, with a population of 600 individuals, is conservatively estimated to be 95 percent of water demand, or 54,150 gpd. The primary source of flow would be domestic wastewater generated by the housed population which typically occur in a pattern with daily peaks between 6:00 AM and 9:00 PM resulting from periods of peak water usage (meal preparation, personal hygiene, etc.).

Wastewaters from the ARC are conveyed to the city collection system via a main sized to accommodate ARC flows. Many years of experience operating the ARC confirms that adequate capacity is available in the collection and treatment systems to accommodate flows resulting from center operation. With no significant increase over historical flows, wastewater collection and treatment systems are expected to accommodate the ARC without the need for improvements or upgrades. The proposed action is not expected to pose an adverse impact to wastewater collection and treatment systems and services provided to current or future customers in the City of Trenton.

Electrical Service

Electric power is provided to the ARC by service lines which are sized to accommodate the center's power requirements. The ARC was constructed in 1963, and until 2022 housed a population of over 950 individuals. Many years of experience operating the ARC confirms that adequate capacity is available in the electric power system to meet the needs of the center. With no significant increase over historical population and staffing or how the ARC operates, the electric power system is expected to accommodate the center without the need for improvements or upgrades. The proposed action is not expected to pose an adverse impact to electric power services provided by PSEG or to current or future customers in the region.

Natural Gas Service

Natural gas is provided to the ARC by PSEG via an underground service line. The ARC was constructed in 1963, and until 2022 housed a population of over 950 individuals. Many years of experience operating the ARC confirms that adequate capacity is available in the natural gas system to meet the needs of the center. By resuming operation, the volume of natural gas required during operation should be easily accommodated. With no increase over historical natural gas use anticipated, the existing supply infrastructure is expected to accommodate the ARC's average and peak requirements without the need for improvements or upgrades. The proposed action is not expected to pose an adverse impact to natural gas services provided by PSEG or to current and future customers in the region.

Telecommunications

Telecommunications infrastructure extends throughout Mercer County with multiple providers of cable television, internet, and telephone services available. The ARC was developed in 1963 and until 2022, housed a population of over 950 individuals. By resuming operation there would be no significant change in the nature and level of telecommunications services required during operation. The proposed action is

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not expected to result in adverse impacts on telecommunications infrastructure, services, providers, or customers in the area.

Solid Waste Management

The ARC is currently unoccupied therefore there are no solid wastes requiring collection and disposal. However, during operation, the ARC will generate solid wastes requiring collection and disposal by one of the many commercial haulers which serve the Mercer County area and previously served the ARC. During ARC operation and using a conservative estimate of four pounds per individual per day and a maximum population of 600, approximately 1.2 tons per day (438 tons annually) would require collection and disposal.

To minimize the volume of wastes requiring disposal, the center would institute a program to separate recyclables from the waste stream. Paper is routinely shredded for informational security reasons and glass is not typically found in a secure detention setting. Wastes would be stored on-site in self-contained dumpsters with collection and disposal the responsibility of the licensed carter retained by the center operator to remove and dispose of solid wastes.

There would be no significant change in the nature and overall volume of solid wastes requiring collection and disposal which historically has represented a very small portion of the total solid waste stream in the region. The proposed action is not expected to pose an adverse impact to solid waste collection and disposal services provided to current or future customers in the City of Trenton.

5.17.3 Recommended Mitigation

Water Supply

With no adverse impacts to the public water supply system expected, no mitigation measures, beyond communication and coordination as needed with the appropriate TWW officials, are warranted.

Wastewater Collection and Treatment

With no adverse impacts to the public wastewater collection and treatment system expected, no mitigation measures, beyond communication and coordination as needed with the appropriate Trenton Sewer Utility officials, are warranted.

Electrical Service

No adverse impacts to electric generation and distribution systems are expected and no mitigation measures, beyond communication and coordination as needed with the power provider (PSEG), are warranted.

Natural Gas Service

No adverse impacts to the natural gas distribution system are expected and no mitigation measures, beyond communication and coordination as needed with the gas provider (PSEG), are warranted.

Telecommunications

No adverse impacts to telecommunications systems and services are expected and no mitigation measures, other than coordinating and communicating with the appropriate service providers, are warranted.

Solid Waste Management

No adverse impacts to solid waste collection and disposal services are expected and no mitigation measures are warranted. To minimize the volume of solid waste requiring disposal, during operation the ARC would separate wastes for recycling.

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5.18 Traffic and Transportation Systems

5.18.1 Existing Conditions

The roadway network in the City of Trenton and Mercer County is well developed and consists of major highways and arterials extending into central New Jersey and westward to Morrisville and Pennsylvania. The city is accessible from Interstate 95 (I-95), also known as the New Jersey Turnpike, extending from Delaware to the south to New York to the north, and I-295 encircling the Trenton area and bypassing the Philadelphia metropolitan area. The city and county are also served by intrastate highways including U.S. Route 1, U.S. 206, U.S. 130, and State Route 31 and State Route 33 providing convenient north-south and east-west connectivity to population centers in and around Mercer County.

Motor vehicle access to the ARC is from Enterprise Avenue, an important north-south thoroughfare connecting various industrial districts located east of the U.S. Route 1 corridor. Enterprise Avenue consists of one 12-foot-wide travel lane in each direction, a dedicated bicycle lane, and a pavement surface in good condition.

NJ Transit is the state's public transportation corporation providing safe, reliable and affordable public transportation to a service area of 5,325 square miles. NJ TRANSIT is the nation's third largest provider of bus, rail and light rail transit, linking major points in New Jersey, New York and Philadelphia. The agency operates 253 bus routes and 12 rail lines statewide and has an active fleet of 2,221 buses, 1,231 trains and 93 light rail vehicles.

NJ Transit operates an extensive bus network of intra and interstate routes throughout New Jersey and into New York and Philadelphia with many local routes (600, 601, 603, 605, 606, 607, 608, 609, 611, 612, 613, 619, and 624) serving Mercer County. Bus Route 624 provides service to the southern portion of Enterprise Avenue with multiple stops in relatively close proximity to the ARC and connections to other routes in addition to the Trenton Transit Center and Train Station.

There are also train stations in Hamilton and Trenton (the Trenton Train Station), operating on New Jersey Transit's Northeast Corridor Line. The Northeast Corridor Line offers frequent service from Trenton to Newark and New York City to the north and Philadelphia to the south.

5.18.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, transportation infrastructure serving the City of Trenton and Mercer County would not be adversely affected, and no mitigation measures would be necessary.

b. Proposed Action Alternative

Under the proposed action, increased motor vehicle traffic involving trips by employees, visitors, service and delivery vehicles, and for detainee transportation would occur on roadways leading to the ARC. Weekdays typically experience the greatest number of employee trips as fewer trips are made by administrative personnel and service vehicles on weekends. The total number of employee, visitor, service delivery and detainee transport trips resulting from the proposed action is not expected to change (increase or decrease) over the historical volume of vehicles using Enterprise Avenue to arrive and depart the ARC during operation.

Pedestrian and bicycle traffic and public transit services have been considered in assessing potential transportation impacts associated with the proposed action. While there are public bus and rail transit routes operating in proximity to the ARC, and although bicycle transportation is an alternative to motor

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vehicle use, it is expected that employees and visitors will use single-occupancy vehicles for travel to and from the ARC.

ICE's responsibilities include seeing to the transport of detained individuals for outside medical treatment and for deportation when necessary. The number of daily transports is not expected to be substantial with no adverse impacts to traffic volumes on roads leading to and from the ARC.

Implementation of the proposed action is not expected to result in a significant change in the historical volume of employee, visitor, service and delivery traffic arriving at and departing from the ARC when operational. As a result, adverse impacts are not expected to result from the proposed action.

5.18.3 Recommended Mitigation

Adverse impacts to transportation systems or traffic operations are not monitoring anticipated during ARC operation and no mitigation measures are required.

5.19 Air Quality and Greenhouse Gases

5.19.1 Existing Conditions

a. National Ambient Air Quality Standards/Attainment Status

The USEPA defines ambient air quality in 40 CFR 50 as "that portion of the atmosphere, external to buildings, to which the general public has access." In compliance with the 1970 Clean Air Act (CAA) and the 1977 and 1990 Amendments (CAAA), USEPA has designated criteria air pollutants in which ambient air quality standards have been established. Ambient air quality standards are intended to protect public health and welfare and are classified as either primary or secondary standards. To date, USEPA has promulgated National Ambient Air Quality Standards (NAAQS) for six criteria air pollutants: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), particulate matter with a diameter less than or equal to a nominal 10 micrometers or 2.5 micrometers (PM₁₀ and PM_{2.5}, respectively), sulfur dioxide (SO₂), and lead (Pb). A description of NAAQS pollutants is provided in Table 5-1.

Counties in the U.S. that do not meet the NAAQS for a particular pollutant are called "non-attainment areas" for this criteria pollutant; areas that meet both primary and secondary standards are known as "attainment areas." The New Jersey Ambient Air Monitoring Network consists of 29 sites throughout the state with one station located in Trenton at 120 Academy Street and monitoring PM_{2.5} concentrations. According to the Green Book published by the USEPA (current as of June 30, 2024), Mercer County is classified by the USEPA as being in nonattainment for 8-hour Ozone (2015 standard).

a. Greenhouse Gases and Climate Change

Greenhouse gases (GHGs) are chemical compounds found in Earth's atmosphere that absorb and trap infrared radiation as heat. Global atmospheric GHG concentrations are a product of continuous release and storage of GHGs over time. The accumulation of GHGs in the atmosphere increases temperatures and warms the planet through a greenhouse effect (USEPA 2016).

The GHGs emitted into the atmosphere through human activities are carbon dioxide (CO₂); methane (CH4); nitrous oxide (NO₂); and fluorinated gases such as hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride (USEPA 2016e). NO₂ is emitted from agricultural and industrial activities and the combustion of fossil fuels and solid waste. Fluorinated gases are often used as an electrical insulator in high-voltage substation equipment and although emitted in small quantities, they have the ability to trap more heat than CO₂ (USEPA 2016e).

When operating, the ARC is a source of GHG emissions from use of heating, ventilation, and air conditioning equipment, performing building and grounds maintenance activities, and staff and visitor

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Environmental Assessment travel. Interior and outdoor lighting can also be considered an indirect source of GHG emissions since electricity is often generated by GHG emissions-producing facilities. Climate change refers to the suite of changes occurring to the Earth's atmospheric, hydrologic, and oceanic systems. Although a global phenomenon, climate change manifests itself differently such as through sea level rise, increased ambient temperatures, changes in rainfall patterns, increased wildfire

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Table 5-1: Description of NAAQS Criteria Pollutants

Sulfur Dioxide (SO₂): A toxic, colorless gas with a distinctly detectable odor and taste. Oxides of sulfur in the presence of water vapor, such as fog, may result in the formation of sulfuric acid mist. Human exposure to SO₂ can result in irritation to the respiratory system, which can cause both temporary and permanent damage. SO₂ exposure can cause leaf injury to plants and suppress plant growth and yield. SO₂ can also cause corrosive damage to many types of manmade materials.

Particulates (PM_{2.5} / PM₁₀ / TSP): Particulates originate from a variety of natural and anthropogenic sources. Some predominant anthropogenic sources of particulates include combustion products (wood, coal and fossil fuels), automotive exhaust (particularly diesels), and windborne dust (fugitive dust) from construction activities, roadways and soil erosion. Human exposure to inhalable particulate matter affects the respiratory system and can increase the risk of cancer and heart attack. Small particulates affect visibility by scattering visible light and when combined with water vapor can create haze and smog. Micron and submicron particles are those that assume characteristics of a gas and remain suspended in the atmosphere for long periods of time. Until recently, particulate pollution had been measured in terms of total suspended particulates (TSP). These standards have been replaced with revised measurements of particulate matter under 10 microns in diameter (PM₁₀) in 1987. Particles less than 10 micrometers in diameter (PM₁₀) pose a health concern because they can be inhaled into and accumulate in the respiratory system. Particles less than 2.5 micrometers in diameter (PM_{2.5}) are referred to as "fine" particles and are believed to pose the largest health risks. In 1997, USEPA established annual and 24-hour NAAQS for PM_{2.5} for the first time. In 2006, USEPA revised the 24-hour NAAQS for PM_{2.5}.

Carbon Monoxide (CO): A colorless, odorless, tasteless and toxic gas formed through incomplete combustion of crude oil, fuel oil, natural gas, wood waste, gasoline and diesel fuel. Most combustion processes produce at least a small quantity of this gas, while motor vehicles constitute the largest single source. Human exposure to CO can cause serious health effects before exposure is ever detected by the human senses. The most serious health effect of CO results when inhaled CO enters the bloodstream and prevents oxygen from combining with hemoglobin, impeding the distribution of oxygen throughout the bloodstream. This process reduces the ability of people to do manual tasks, such as walking.

Nitrogen Dioxide (NO₂): A reddish-brown gas with a highly detectable odor, which is highly corrosive and a strong oxidizing agent. Nitric oxide (NO) and nitrogen dioxide (NO₂) constitute what is commonly referred to as nitrogen oxides (NO_x). NO_x are formed by all combustion and certain chemical manufacturing operations. During combustion, nitrogen (N) combines with oxygen (O) to form NO. This combines with more oxygen to form NO₂. Under intense sunlight, NO₂ reacts with organic compounds to form photochemical oxidants. Oxidants have an effect on atmospheric chemistry and are gaseous air pollutants that are not emitted into the air directly. They are formed through complex chemical reactions which involve a mixture of NO_x and reactive volatile hydrocarbons (VOC) in the presence of strong sunlight. Human exposure to NO₂ can cause respiratory inflammation at high concentrations and respiratory irritation at lower concentrations. NO is not usually considered a health hazard. NO_x reduce visibility and contribute to haze. Exposure to NO_x can cause serious damage to plant tissues and deteriorate manmade materials, particularly metals.

Ozone (O₃): An oxidant that is a major component of urban smog. O₃ is a gas that is formed naturally at higher altitudes and protects the earth from harmful ultraviolet rays. At ground level, O₃ is a pollutant created by a combination of VOC, NO_x and sunlight, through photochemistry. Ground-level O₃ is odorless and colorless and is the predominant constituent of photochemical smog. Human exposure to O₃ can cause eye irritation at low concentration and respiratory irritation and inflammation at higher concentrations. Respiratory effects are most pronounced during strenuous activities. O₃ exposure will deteriorate manmade materials and reduce plant growth and yield.

Lead (Pb): Lead is in the atmosphere in the form of inhalable particulates. The major sources of atmospheric lead are motor vehicles and lead smelting operations. USEPA estimates that ambient concentrations have decreased dramatically in recent years (a drop of 70 percent since 1975) largely due to the decreasing use of leaded gasoline. Health effects from atmospheric lead occur through inhalation and consequent absorption into the bloodstream. Excessive lead accumulation causes lead poisoning with symptoms such as fatigue, cramps, loss of appetite, anemia, kidney disease, mental retardation, blindness and death.

Source: USEPA 2024.

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activity, changes to ocean currents, extreme weather events, and altered terrestrial and marine ecosystems. While the warming trend has been evident over the past 100 years, recent decades have seen an accelerated warming rate with the past several years ranking among the warmest on record.

Most of the observed temperature increase can be attributed to both natural and anthropogenic activities that contribute heat trapping GHGs in the atmosphere. GHGs, particularly CO₂ from the burning of fossil fuels, cause the atmosphere to trap the sun's heat. While the insulating effect of the atmosphere is important to living systems, the rapid increase in GHGs since the mid-19th century is adversely affecting nature's systems.

a. Radon

Radon is a colorless, odorless, tasteless gas produced by the natural breakdown of uranium in soil and rocks resulting in such by-products as polonium, bismuth, astatine, and lead. As a gas, radon can migrate through permeable soils and through fractures in rocks and when inhaled over a long period of time, these by-products can cause lung cancer. Radon moving through soil near the ground surface usually escapes into the atmosphere, however, it can migrate into buildings through construction joints, foundation cracks, etc. Western Mercer County exhibits the potential for high radon levels while eastern Mercer County, including the City of Trenton, exhibit the potential for moderate radon levels (Exhibit 5-8).

5.19.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant, local and regional air quality would not be adversely affected, and mitigation measures would not be necessary.

b. Proposed Action Alternative

Potential air quality impacts as a result of the proposed action may occur from routine ARC operations and motor vehicle traffic associated with facility operation. The ARC is equipped with mechanical equipment for producing heat and hot water and is the primary stationary sources of air emissions. Based on many years of experience, it is not anticipated that resuming ARC operation would have an adverse impact on air quality,

Motor vehicle operations represent a potential source of air emissions and impacts. The predominant air quality impact associated with motor vehicle operation is the emission of CO, hydrocarbons, and NOx with hydrocarbons and NOx emissions precursors for the formation of ozone. Under the proposed action, the ARC would resume operation with 600 detained individuals to be housed with 225 to 250 contractor employees responsible for its operation and maintenance.

By maintaining an equivalent detainee population and staff there would be no significant change in the numbers or types of vehicles traveling to and from the facility. Reductions in vehicular emissions resulting from continually improving emissions-control technology and the growing acceptance of electric vehicles further preclude the likelihood of transportation-related air quality impacts. Motor vehicle operation associated with the proposed action is not expected to pose local or regionally adverse impacts to air quality.

The potential for the proposed action to influence global climatic change has been considered including the potential for increased emissions of chlorofluorocarbons, halons, or greenhouse gases and the potential for global climate changes to affect the proposed action. Operation of the ARC is not expected to result in significant emissions of CFRs, halons, or greenhouse gases. Climate change is a long-term phenomenon that may result in an increase in extreme weather; however, the facility and surrounding infrastructure (e.g., electrical power grid, water supply, wastewater treatment, etc.) is expected to

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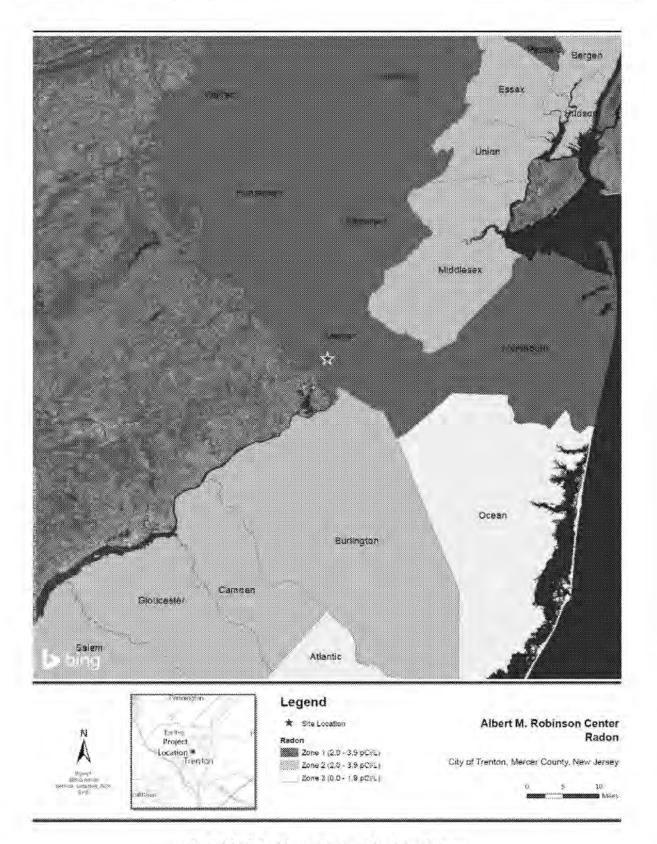


Exhibit 5-8: New Jersey Radon Zones

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continue providing the necessary services despite the possible impacts. In addition, the ARC is not located in an environment that would be adversely affected by changes in sea levels.

Radon is a colorless, odorless, tasteless gas that, when inhaled over a long period of time, can cause lung cancer. The ARC was constructed in 1963, with additions in 2004 and 2008, and until 2022, had been operating for many years without experiencing adverse effects.

5.19.3 Recommended Mitigation

Other than properly operating and maintaining mechanical equipment that meets applicable permitting and emission control standards, no mitigation measures are warranted. The federal government encourages the formation of carpools and vanpools and, where available, the use of public transit to minimize the potential for air quality impacts from motor vehicle operations. Encouraging the use of carpools and vanpools offers a particularly viable option given the exclusive reliance on private auto use for accessing the ARC and the pool of workers traveling daily to the center. The analysis of potential air quality impacts indicates that no mitigation beyond these actions would be warranted.

The ARC is not located in an area that is considered particularly vulnerable to climate change and associated weather or other physical impacts. The ARC is located outside flood zones and is well inland from the Atlantic coastline and is not vulnerable to hydrologic changes resulting from climate change.

While most radon escapes harmlessly into the atmosphere, it can migrate into buildings. During operation, testing equipment will be used, as necessary, to ensure indoor radon concentrations do not exceed the USEPA action level.

5.20 Noise

5.20.1 Existing Conditions

Noise is traditionally defined as any unwanted sound. It is emitted from many sources including aircraft, industrial operations, railroads, power generating stations, and motor vehicles. Among the most common, motor vehicle noise is usually a composite of noises from engine, exhaust and tire-roadway interaction. Individuals living and working in urbanized environments are often exposed to high noise levels from many sources as they go about their daily activities. Loud noises bother some individuals more than others and some patterns of noise also enter into an individual's judgment of whether or not a noise is offensive. For example, noises occurring during sleeping hours are considered to be more of a nuisance than the same noises during the daytime hours.

Lands surrounding the ARC are a mix of commercial, warehouse/distribution and industrial uses and transportation infrastructure. Bordering the ARC property to the north is a large, enclosed recycling facility processing over 3,000 tons of cardboard, plastics and waste paper each month. Apart from the sounds from large trucks transporting recycled materials to and from the facility, noises from this use and direction are not audible within the property or within the interior of the ARC itself.

Bordering the facility to the west is the four-lane U.S. Route 1 highway carrying large volumes of auto, light truck and heavy truck traffic and while roadway and vehicle noise is experienced intermittently within the ARC property, it is not audible within the interior of the ARC itself. Located east of the ARC is Assunpink Creek and a large greenway extending on both sides for the length of the creek. Aside from occasional bird and wildlife calls, the greenway does not contribute to the ambient noise environment of the area.

The principal noise source in the area originates from the outdoor scrap metal shredding operation located immediately south of the ARC property. This active industrial operation generates elevated noise levels primarily from the heavy equipment used to move scrap metal to the shredder and when

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consolidating the shredded material into large piles. While the noise experienced within the ARC property is near constant, it is not audible within the interior of the ARC itself.

5.20.2 Potential Impacts

a. No Action Alternative

Under the No Action Alternative, the proposal to award a contract for comprehensive detention services for a population of noncitizen detainees under ICE jurisdiction would not be implemented. The ARC would remain vacant with noise levels and conditions unchanged. In the absence of adverse impacts, mitigation measures would not be necessary.

Proposed Action Alternative

Potential noise impacts could result from routine ARC operation and motor vehicle traffic associated with facility operation. The ARC has been operating for many years and during that time has not been a significant noise source. During operation, no significant change (increase or decrease) is expected to the number of employees, visitors, and vendors arriving and departing by motor vehicles from historical norms.

The absence of noise-producing equipment and outdoor activities is expected to result in noise levels that will be imperceptible beyond the boundary of the property. Furthermore, noise originating from the industrial uses and transportation infrastructure that surround the ARC property dominate the ambient environment and exceed any noise produced by ARC operation.

The ARC's relatively isolated location within an industrial district further limits any noise originating from the center to be experienced beyond the property boundary. As a result, the proposed action would not result in adverse noise impacts associated with vehicles traveling to and from the facility. In the absence of adverse impacts, no mitigation measures would be warranted.

5.20.3 Recommended Mitigation

Adverse noise impacts during ARC operation are not anticipated, therefore, no noise mitigation measures are warranted.

5.21 Consideration of Secondary and Cumulative Impacts

5.21.1 Secondary Impacts

Secondary impacts are those that are "caused by an action and are later in time or farther removed in distance but are still reasonably foreseeable" (40 CFR 1508.8). Secondary impacts are typically associated with projects or actions that may indirectly result from new construction or improvement of a facility. Secondary impacts differ from those directly associated with the construction and/or operation of a facility and are often caused by what is referred to as induced development. Induced development may include a variety of secondary effects such as changes in land use, water quality, economic vitality and population density. Therefore, the potential for secondary impacts to occur is determined in large part by the individual local planning objectives and the location of a proposed project or action.

Resuming ARC operation would result in less-than-significant impacts to the project site and surrounding host community. Less-than-significant impacts would be anticipated to utility services, traffic and transportation movements, noise levels, and air quality in the vicinity of the project site. The self-contained nature of the ARC would not affect local land use patterns and would have no secondary impacts on land use. The use of water supply, wastewater collection and treatment, electric power, natural gas, solid waste collection and disposal, and telecommunications infrastructure to serve the ARC is not expected to induce or foster additional development in the area of the center.

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Economic activity and population retention is an intended consequence of the proposed action. Any such potential impact would be considered beneficial by City of Trenton and Mercer County officials. Such activity would also be consistent with the goals of local planning and development authorities to maintain current and secure additional employment opportunities while stimulating new/expanded economic activities in the area. Local planning and economic development agencies have the skills and resources to manage future developments so as to maintain the quality of the natural and man-made environments.

The proposed action, in concert with other actions, would also contribute to the efficient operation of the nation's immigration system. Beneficial impacts, both direct and secondary to the region's economy, would also be realized by the ARC's operating budget. Secondary impacts and other potentially adverse impacts would be controlled, mitigated, and avoided to the extent possible. There are no present or foreseeable actions occurring in the City of Trenton or Mercer County that are directly attributable to or would be affected by the proposed action.

5.21.2 Cumulative Impacts

The intent of the cumulative effects analysis is to determine the magnitude and significance of past, present and reasonably foreseeable future actions, both beneficial and adverse, in terms of context and intensity. ARC operation is not expected to result in cumulative effects, in terms of intensity or context, to any social, cultural or natural features. The incremental rate of growth in the City of Trenton and Mercer County, the absence of other reasonably foreseeable actions, and the local regulatory framework, all function to offset potentially negative cumulative impacts.

5.22 Summary of Any Significant Impacts and Required Mitigation

For each resource category, the impact analysis conforms to the same general approach. When possible, quantitative information is provided to establish impacts. Qualitatively, these impacts are measured based on the criteria below:

- None/Negligible: The resource would not be affected, or changes would be either non-detectable
 or if detected, would have effects that would be slight and local. Impacts would be well below
 regulatory standards, as applicable.
- Minor: Changes to the resource would be measurable, although the changes would be small and localized. Impacts would be within or below regulatory standards, as applicable. Mitigation measures would reduce any potential adverse effects.
- Moderate: Changes to the resource would be measurable and have both localized and regional scale impacts. Impacts would be within or below regulatory standards, but historical conditions are being altered on a short-term basis. Mitigation measures would be necessary to reduce any potential adverse effects.
- Major: Changes would be readily measurable and would have substantial consequences on a
 local and regional level. Impacts would exceed regulatory standards. Mitigation measures to
 offset the adverse effects would be required to reduce impacts, though long-term changes to the
 resource would be expected.

Impacts are predicted based on the degree of change or loss of the resource from baseline conditions. Impacts may be direct or indirect. Direct impacts are caused by an action and occur at the same time and place as the action. Indirect impacts are caused by an action and occur later in time or are farther removed from the area but are still reasonably foreseeable (40 CFR Part 1508).

Housing detained noncitizens at the ARC would not result in adverse impacts to topography, geology, soils, water resources, biological resources, cultural resources, land use, hazardous materials, visual and aesthetic conditions, environmental justice communities, utility services, transportation movements, noise levels, and air quality. At the same time, the population, local and regional economies, and housing

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market of the City of Trenton, Mercer County and the central New Jersey region would benefit by virtue of the annual operating budget of approximately \$30 to \$32 million, a workforce of 225 to 250 staff, and from payments of various local, county and state taxes and fees.

ARC operation would be conducted in compliance with applicable federal, state and local statutes, implementing regulations, EOs, and permit requirements. Unavoidable impacts would follow the mitigation measures identified for each resource to reduce or eliminate impacts. Use of the ARC to house 600 noncitizen detainees would contribute to achieving national security and public safety goals. Potentially adverse impacts associated with ARC operation would be controlled, mitigated, or avoided to the extent possible. Table 5-2 presents a summary of impacts under the No Action and Proposed Action Alternative.

Table 5-2: Summary of Impacts under No Action and Proposed Action Alternatives

Resource Area	Impacts: No Action Alternative	Impacts: Proposed Action Alternative
Topography	A contract for comprehensive detention services would not be awarded and adverse impacts to topographic conditions would not occur.	The proposed action would not alter topographic conditions; impacts to topography are considered none/negligible.
Geology	A contract for comprehensive detention services would not be awarded and adverse impacts to geologic resources would not occur.	The proposed action would not disturb geologic features and conditions; impacts to geologic conditions are considered none/negligible.
Soils	A contract for comprehensive detention services would not be awarded and adverse impacts to soils would not occur.	The proposed action would not disturb or alter soils and agricultural activities would not be affected. Impacts to soils are considered none/ negligible.
Hydrology and Water Resources	A contract for comprehensive detention services would not be awarded and adverse impacts to water resources would not occur.	The proposed action would not affect impervious surfaces, therefore, no increase in stormwater runoff volumes or adverse impacts to FEMA designated 100-year floodplains are anticipated. Impacts to hydrology and water resources are considered none/negligible.
Biological Resources	A contract for comprehensive detention services would not be awarded and adverse impacts to biological resources would not occur.	The proposed action would not disturb uplands, drainageways, tree stands, wetlands and waters of the US, or special status species habitats. Impacts to biological resources are considered none/negligible.
Archaeological and Historic Resources	A contract for comprehensive detention services would not be awarded and adverse impacts to cultural and historic resources would not occur.	The proposed action would not disturb or affect archaeological and historic resources; impacts to cultural resources are considered none/negligible.
Hazardous Materials	A contract for comprehensive detention services would not be awarded and adverse impacts associated with hazardous materials would not occur.	While there is no evidence of RECs or de minimis conditions, HRECs, CRECs, and BERs have beer identified involving the property. The proposed action is not expected to release contaminants into the environment. Impacts due to hazardous materials are considered none/negligible.

Chapter 5: Affected Environment, Environmental Consequences, and Recommended Mitigation

Resource Area	Impacts: No Action Alternative	Impacts: Proposed Action Alternative
Fiscal Considerations	A contract for comprehensive detention services would not be awarded and adverse impacts associated with fiscal considerations would not occur.	ARC operation would not affect the current ownership arrangement; no adverse fiscal impacts to the City of Trenton, Mercer County, or the State of New Jersey are anticipated. Impacts are considered none/negligible.
Visual and Aesthetic Resources	A contract for comprehensive detention services would not be awarded and adverse impacts to visual and aesthetic resources would not occur.	With no changes to the exterior appearance and characteristics of the ARC, the proposed action would not change or affect the aesthetic environment or visual landscape. Impacts considered none/negligible.
Demographic Characteristics	A contract for comprehensive detention services would not be awarded and adverse impacts to area demographic characteristics would not occur.	No population groups would be relocated or removed and no sensitive population groups (e.g., children, minorities, and seniors) would be adversely affected. Impacts are considered none/negligible.
Economic Characteristics	A contract for comprehensive detention services would not be awarded and adverse impacts to local and regional economies would not occur.	The proposed action would result in long-term employment and material purchases, both considered beneficial to the region's economy and a positive impact. No businesses or other economic activities would be adversely affected, displaced, or eliminated by the proposed action. Impacts are considered none/negligible.
Housing Characteristics	A contract for comprehensive detention services would not be awarded and adverse impacts to the supply, availability, and cost of housing would not occur.	Under the proposed action, the number of staff employed at the ARC would return to historic levels. Impacts to the region's housing market are considered none/negligible.
Environmental Justice	A contract for comprehensive detention services would not be awarded and adverse environmental justice-related impacts would not occur.	The proposed action would provide employment and commercial opportunities to the benefit of minority and low-income populations. Impacts that would disproportionately and adversely affect minority or low-income populations are considered none/negligible. The proposed action complies with EO 12898, Environmental Justice.
Human Health and Safety	A contract for comprehensive detention services would not be awarded and adverse impacts to community services and facilities would not occur.	The proposed action is not expected to adversely affect law enforcement, fire protection, or medical services in the area. Impacts are considered none negligible.
Land Use and Zoning	A contract for comprehensive detention services would not be awarded and adverse impacts to land use would not occur.	The self-contained nature of the ARC limits potential impacts to the property only. Impacts to land use and zoning are considered none/ negligible.

Resource Area	Impacts: No Action Alternative	Impacts: Proposed Action Alternative
Water Supply Service	A contract for comprehensive detention services would not be awarded and adverse impacts to water supply service would not occur.	The proposed action is expected to restore water demands to near historic levels and be accommodated by Trenton's water supply infrastructure. Impacts to water supply infrastructure and service are considered none/negligible.
Wastewater Service	A contract for comprehensive detention services would not be awarded and adverse impacts to wastewater collection and treatment services would not occur.	The proposed action is expected to restore wastewater flows to near historic levels and be accommodated by Trenton's wastewater collection and treatment infrastructure. Impacts to wastewater infrastructure and service are considered none/negligible.
Electrical Service	A contract for comprehensive detention services would not be awarded and adverse impacts to electrical service would not occur.	The proposed action is expected to restore electric power demands to near historic levels and be accommodated by the current power provider (PSEG). Impacts to electric power infrastructure and service are considered none/negligible.
Natural Gas Service	A contract for comprehensive detention services would not be awarded and adverse impacts to natural gas service would not occur.	The proposed action is expected to restore natura gas demands to near historic levels and be accommodated by the current gas provider (PSEG). Impacts to natural gas infrastructure and service are considered none/negligible.
Telecommunication Services	A contract for comprehensive detention services would not be awarded and adverse impacts to telecommunication services would not occur.	The proposed action is expected to return telecommunications requirements to near historic levels and be accommodated by area providers. Impacts to telecommunications infrastructure and services are considered none/negligible.
Solid Waste Services	A contract for comprehensive detention services would not be awarded and adverse impacts to solid waste management services would not occur.	The nature and volume of solid waste generated daily is expected to return to near historic levels. Collection and disposal would be accommodated by waste management providers serving central New Jersey with impacts considered none/negligible.
Traffic and Transportation Systems	A contract for comprehensive detention services would not be awarded and adverse impacts to transportation systems would not occur.	The number of staff, visitors, service deliveries, and other transports to/from the ARC would return to near historic levels. Impacts to traffic and transportation systems are considered none/ negligible. Employees and visitors traveling to the facility will be encouraged to carpool.
Air Quality and Greenhouse Gases	A contract for comprehensive detention services would not be awarded and adverse impacts to air quality would not occur.	Energy use is expected to return to near historic levels along with air emissions. The volume of staff, visitors, service deliveries, and other transports would also return to near historic levels Impacts to air quality and greenhouse gases are considered none/negligible.

Resource Area	Impacts: No Action Alternative	Impacts: Proposed Action Alternative
Noise	A contract for comprehensive detention services would not be awarded and adverse impacts to noise conditions would not occur.	ARC operation is not expected to affect noise levels from current conditions with impacts considered none/negligible.

5.23 Relationship Between Short-Term Use of the Environment and the Maintenance and Enhancement of Long-Term Productivity

Regulations for the preparation of EAs require such documents to address the relationship between short-term use of the environment and the maintenance of long-term productivity. Any potential short-term impacts must be contrasted with the economic output and productivity that would result by maintaining jobs, payrolls, personal income, and the purchases of materials, supplies, and services during ARC operation. The economic vitality of the City of Trenton and Mercer County would also benefit on a long-term basis by the workforce of 225 to 250 employees and the approximately \$30 to \$32 million annual budget during ARC operation. These productivity gains would continue for the term of the contract to house detained noncitizens at the ARC.

5.24 Irreversible and Irretrievable Commitments of Resources

Regulations for the preparation of EAs also require such documents to address irreversible and irretrievable commitments of resources associated with the proposed action. Irreversible and irretrievable resource commitments involve use of nonrenewable resources and the effects that use of these resources will have on future generations. Irreversible effects primarily result from use or destruction of a specific resource that cannot be replaced within a reasonable timeframe (e.g., energy and minerals). Irretrievable commitments of resources that could result from implementation of the proposed action involve the consumption of energy and human labor resources. The use of these resources would be considered to be enduring, lasting throughout the lifespan of the facility.

In some cases, the resources committed would be recovered in a relatively short period of time. In other cases, resources would be irreversibly or irretrievably committed by virtue of being consumed or by the apparent limitlessness of the period of their commitment to a specific use. Irreversibly and irretrievable commitments of resources can sometimes be compensated for by the provision of similar resources with substantially the same use or value.

- Material Resources: Any building materials consumed in preparation for housing 600 noncitizen
 detainees would be offset by maintaining safe and secure operation of the ARC and the resulting
 societal benefits. A portion of any such materials may also be recycled at some future date.
- Energy Resources: Energy resources would be irretrievably consumed, including petroleum-based fuels, natural gas, and electricity. During routine ARC operation, gasoline would be consumed as employees, visitors, and service vehicles travel to and from the facility.
 Consumption of energy resources would not place a significant demand on their availability in the region, and adverse impacts are not expected.
- Human Labor Resources: The use of human labor for ARC operation is considered an
 irretrievable commitment in that it would preclude such personnel from engaging in other
 productive work activities. Human labor resources devoted to ARC operation is estimated to be
 225 to 250 person-years of staff time annually. Restoring employment at the ARC is also
 considered beneficial.

6.0 List of Preparers

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Chapter 7: References

8.0 Glossary

- 100-year floodplain Land area along the sides of a river or stream that becomes inundated with water during a flood that statistically has a 1 percent chance of occurring in any given year.
- 500-year floodplain Land area along the sides of a river or stream that becomes inundated with water during a flood that statistically has a 0.2 percent chance (or 1 in 500 chance) of occurring in a given year.
- Aguifer Body of permeable rock that can contain or transmit groundwater.
- Attainment area Areas with concentrations of criteria pollutants that are below the levels established by the NAAQS.
- Conditionally Exempt Small Quantity Generator A facility is a CESQG if it generates less than 220 pounds of hazardous waste per month; no more than 2.2 pounds of acutely hazardous waste per month, or more than 220 pounds of Class 1 non-hazardous waste per month.
- Criteria pollutant Six pollutants that can harm human health and the environment and cause property damage. Regulated by the Clean Air Act.
- Critical habitat Specific geographic areas that contain features essential to the conservation of endangered or threatened species and that may require special management and protection.
- Cultural resources All sites, buildings, structures, districts, and objects as defined by the National Historic Preservation Act, as amended.
- Earthquake Shaking of the ground caused by an abrupt shift of rock along a fracture in the earth or a contact zone between tectonic plates.
- Ecoregion Area defined by its environmental conditions, especially climate, landforms and soil characteristics.
- Endangered species (Federal) Species that are in danger of extinction throughout all or a significant portion of their ranges and that have been listed as endangered by the U.S. Fish and Wildlife Service or the National Marine Fisheries Service following procedures outlined in the Endangered Species Act (Title 16 USC Part 1531 et seq.) and its implementing regulations (Title 50 CFR § 424).
- Fault A fracture in the earth's crust along which two blocks of the crust have slipped with respect to each other.
- Flood Inundation of normally dry land resulting from the rising and overflowing of a body of water.
- Freshwater emergent wetland Freshwater-based area characterized by erect, rooted, herbaceous hydrophytes, excluding mosses and lichens. This vegetation is present for most of the growing season in most years.
- Greenhouse gas Gases that trap heat in the atmosphere by absorbing outgoing infrared radiation.

 Greenhouse gas emissions occur from natural processes and human activities.
- Invasive species Species that are not native to an ecosystem and whose introduction causes or is likely to cause economic or environmental harm or harm to human health.

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Environmental Assessment

- Liquefaction The loss of strength in loosely packed, saturated sediments in response to strong shaking, potentially causing major damage during an earthquake.
- Maintenance area Nonattainment areas that meet the NAAQS and the re-designation requirements in the Clean Air Act are re-designated as maintenance areas.
- Migratory Bird Treaty Act This act (Title 16 of USC Part 703 et seq.) states that it is unlawful to pursue, take, attempt to take, capture, possess or kill any migratory bird or any part nest, or egg of any such bird unless permitted by regulations.
- Nonattainment area Areas where the concentration of one or more criteria pollutants is found to exceed the regulated level for one or more of the National Ambient Air Quality Standards.
- Regulatory floodway Channel of a river or other water course and adjacent land areas that must be reserved for discharge of the base flood without cumulatively increasing water surface elevation more than a designated height. Communities must regulate development in these floodways to ensure no increases in upstream flood elevations.
- Riparian zone The area along the banks of a natural watercourse.
- Soils Unconsolidated material overlying bedrock.
- Waters of the U.S. Streams and wetlands which have a significant hydrological and ecological connection to traditional navigable waters, interstate waters, and territorial seas.

Chapter 8: Glossary



(b)(6),(b)(7)(C) Field Office Supervisor
United States Fish and Wildlife Service
New Jersey Ecological Services Field Office
4 E. Jimmie Leeds Road, Suite [—]
Galloway, NJ 08205

Via email: NJFO_ProjectReview@fws.gov

RE: Albert M. "Bo" Robinson Center, 375 Enterprise Avenue, Trenton, New Jersey Environmental Assessment

Project Code: 2024-0115063

Dear Mr (b)(6),(b)(7)(c)

Immigration and Customs Enforcement's (ICE) is responsible for the detention, health, welfare, transportation, and deportation of noncitizens in removal proceedings, and those subject to a final order of removal. ICE's Enforcement and Removal Operations (ERO) field office in Newark, New Jersey has a need for comprehensive detention services for 600 adult male and female noncitizens that include general population, intake, segregated housing, and medical beds at a contractor-owned/contractor-operated detention facility. The facility must be within 50 driving miles from the ERO field office at 970 Broad Street in Newark, New Jersey.

To accommodate a portion of the detained noncitizen population under ICE jurisdiction, use of the existing Albert M. "Bo" Robinson Center (ARC) in Trenton, New Jersey is proposed (the Proposed Action). WSP USA, Inc. has been contracted to prepare an Environmental Assessment in accordance with the National Environmental Policy Act to evaluate the potential impacts of the proposed action and alternatives associated with use of the ARC to house detained noncitizens under ICE jurisdiction.

The ARC is located within an approximately 4.34-acre property at 375 Enterprise Avenue in Trenton, New Jersey. The ARC consists of intake, housing, medical beds, and other support facilities to provide dining, medical, religious, legal, and other services. No new building construction or exterior alterations to the existing ARC structure is proposed. The proposed action allows for resumption of ARC operation during the period of performance.

The purpose of this letter is to provide the U.S. Fish and Wildlife Service (USFWS) notice of the Proposed Action and to document compliance with Section 7 of the Endangered Species Act (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.), as well as the Migratory Bird Treaty Act of 1918 (MBTA) (40 Stat. 755, as amended; 16 U.S.C. 703-712), and the Bald and Golden Eagle Protection Act of 1940 (BGEPA) (54 Stat. 240, as amended; 16 U.S.C. 668-668c).

PROPOSED ACTION

The existing ARC consists of intake, housing, medical beds, and other support facilities to provide dining, medical, religious, legal, and other services. No new building construction or exterior alterations to the existing ARC structure is proposed. The Proposed Action allows for resumption of ARC operation during the period of performance.

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ACTION AREA

The ARC is located within an approximately 4.34-acre property at 375 Enterprise Avenue in Trenton, New Jersey. Attachment A shows the facility's regional location, Attachment B provides an aerial view of the Albert M. "Bo" Robinson Center, and Attachment C shows topographic conditions in and around the facility property.

SPECIES AND HABITATS CONSIDERED

ESA Species

The USFWS Official Species List, included as Attachment D, indicates that one federally listed species, one proposed endangered species, and one candidate species may occur within the vicinity of the Proposed Action: the endangered northern long-eared bat (*Myotis septentrionalis*), the proposed endangered tricolored bat (*Perimyotis subflavus*), and the candidate for listing monarch butterfly (*Danaus plexippus*). The Action Area does not contain critical habitat or proposed critical habitat for these or any other species.

Descriptions of these species and their habitats are summarized below from N.J. Department of Environmental Protection and USFWS species profiles.

- Northern long-eared bat: The federally endangered northern long-eared bat is a medium-sized bat that is distinguished by its long ears, particularly as compared to other bats in its genus. The northern long-eared bat is found across much of the eastern and north central United States. White-nose syndrome is the predominant threat to this bat, especially throughout the northeast where the species has declined by up to 99 percent from pre-white-nose syndrome levels at many hibernation sites. Northern long-eared bats spend winter (November 1 to March 31) hibernating in caves and mines and then emerge in early spring. During the active season (April 1 to October 31), northern long-eared bats utilize a wide variety of forested/wooded habitats where they roost, forage, and travel. They may also utilize some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields, and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥3 inches dbh that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1.000 feet of forested/wooded habitat.
- Tricolored bat: The tricolored bat is one of the smallest bats native to North America. As its name suggests, the tricolored bat is distinguished by its unique tricolored fur that appears dark at the base, lighter in the middle, and dark at the tip. The once common species is wide ranging across the eastern and central United States and portions of southern Canada, Mexico and Central America. During the winter, tricolored bats hibernate in caves and mines. Most mating occurs in the fall, with delayed fertilization and twin pups born in spring. During the spring, summer and fall, tricolored bats are found in forested habitats where they roost in trees, primarily among leaves. Their preferred foraging habitat is forest edges and waterways.

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• Monarch butterfly: Monarch butterflies are a bright orange color with black and white markings and a wingspan between 3.5 and 4 inches. The caterpillars have many yellow, black and white bands and antenna-like appendages at each end of their body. Monarch caterpillars feed almost exclusively on milkweed and as adults feed on nectar from a wide range of flowers. They lay their eggs on milkweed; there are about 3 to 5 generations born each spring and summer and most of the offspring do not live beyond five weeks. Monarchs are migratory, journeying to central Mexico for the winter each year. In the spring, summer and early fall, they can be found wherever there are nectar-producing plants.

Migratory Bird Treaty Act Species

The USFWS Official Species List also provided a Migratory Bird Resource List for proposed Action Area. The list comprises USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention. The list indicates that there are 17 species of migratory birds that are protected under the MBTA that may occur in the Action Area.

Bald and Golden Eagle Protection Act Species

According to the USFWS Official Species List, bald eagles are known to occur in the vicinity of the Action Area. Bald eagles prefer undisturbed forested areas near large lakes and reservoirs, marshes and swamps, or stretches along rivers where they can find open water and their primary food, fish. Bald eagles prefer to nest, perch, and roost in old-growth and mature forest stands of conifers and hardwoods. Foraging habitat for bald eagles consists of large perch trees near a body of water. The Action Area does not contain the forested habitat near waterbodies that bald eagles prefer.

ANALYSIS AND DETERMINATION OF EFFECTS

ESA Species

Northern long-eared and tricolored bats are not expected to utilize the Action Area due to the developed nature of the property, the adjoining industrial developments, heavily trafficked surrounding roadways, and human activity. No forested habitat is present within or adjacent to the project site, and no tree removal is required as part of the proposed action. Monarch butterflies are not expected to occur on site other than as a transient individual as vegetated areas that may contain milkweed or other native nectar plants are not present. Based on the analysis, we have reached a determination of No Effect for northern long-eared bat, tricolored bat, and monarch butterfly.

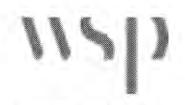
Migratory Bird Treaty Act Species

Due to the developed nature of the Action Area, migratory birds are not expected to occur except as occasional transients. Any migratory birds that may be present in the Action Area would not remain due to the developed site, the adjoining industrial developments, heavily trafficked surrounding roadways, and human activity. We have determined that the Proposed Action is not likely to jeopardize the continued existence of any migratory birds and would not result in the destruction or adverse modification of designated critical habitat of any such species.

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WSP USA, Inc.

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Bald and Golden Eagle Protection Act Species

Based on the lack of suitable habitat within the Action Area, bald eagles are not anticipated to occur. We have determined that the Proposed Action would not result in "taking" bald or golden eagles. The Proposed Action would not substantially interfere with normal breeding, feeding, or sheltering behavior that may cause injury, decrease in productivity, or nest abandonment.

CONCLUSION

The Proposed Action is not expected to result in a "taking" of any listed species. For purposes of consultation under Section 7(a)(2) of the ESA, we have determined that the Proposed Action would have No Effect on northern long-eared bat, tricolored bat, and monarch butterfly. We understand that USFWS concurrence is not required, and no further action is required for species with No Effect determinations.

The Proposed Action is not likely to jeopardize the continued existence of vulnerable migratory birds or BCC, nor the destruction or adverse modification their designated critical habitat. The Proposed Action would not result in "taking," injury, decrease in productivity, or nest abandonment of bald or golden eagles.

We understand that the USFWS presumes that all activities would be implemented as described herein. Any departures from the described activities will be promptly reported to the New Jersey Ecological Services Field Office.

We appreciate your assistance with this matter and look forward to your response. If you have any questions, please do not hesitate to contact me at robert.nardi@wsp.com or 973-407-1681. Thank you.

Sincerely yours, WSP USA, Inc.

(b)(6),(b)(7)(C)

(b)(6),(b)(7)(C) PP Senior Vice President

Cc: (b)(6),(b)(7)(C) WSP

Attachment A: Regional Location – Albert M. "Bo" Robinson Center Attachment B: Aerial Photograph - Albert M. "Bo" Robinson Center

Attachment C: Topographic Conditions - Albert M. "Bo" Robinson Center

Attachment D: Official Species List

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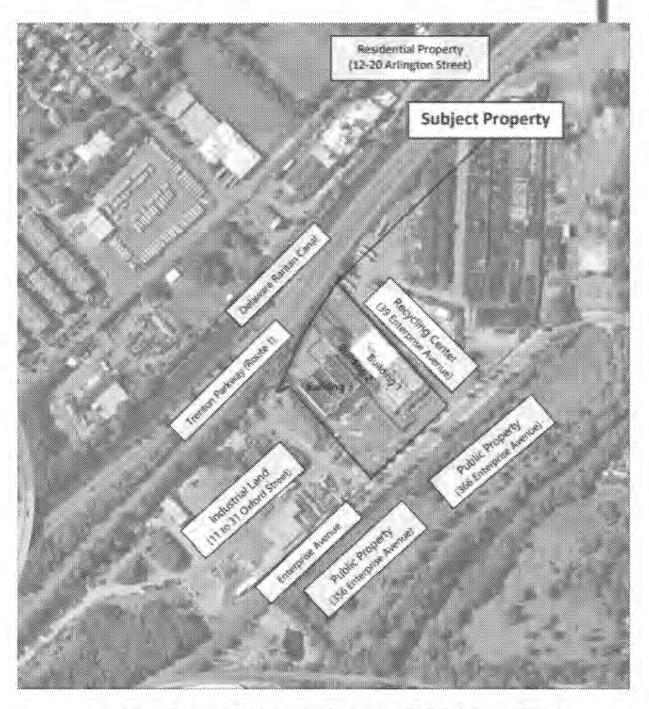


Attachment A: Regional Location - Albert M. "Bo" Robinson Center 375 Enterprise Avenue, Trenton, New Jersey

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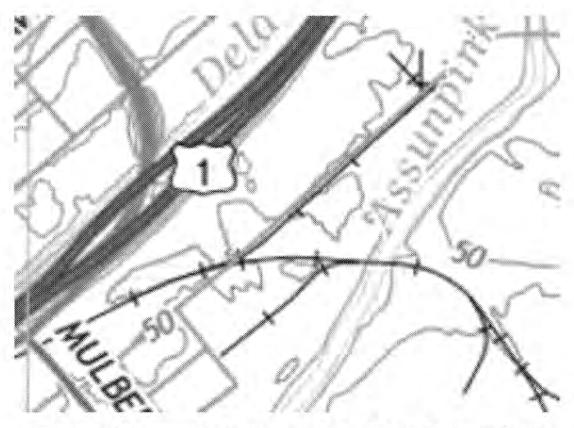
Attachment B: Aerial Photograph - Albert M. "Bo" Robinson Center 375 Enterprise Avenue, Trenton, New Jersey

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Attachment C: Topographic Conditions - Albert M. "Bo" Robinson Center 375 Enterprise Avenue, Trenton, New Jersey

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WSP USA, Inc.



July 11, 2024

United States Army Corps of Engineers New York Regulatory District Jacob K. Javits Federal Building 26 Federal Plaza, Room (MA)(MA)(C) New York, NY 10278-0090

Via email: Cenan-pa@usace.army.mil

RE: Albert M. "Bo" Robinson Center, 375 Enterprise Avenue, Trenton, New Jersey Environmental Assessment

Dear New York Regulatory District:

Immigration and Customs Enforcement's (ICE) is responsible for the detention, health, welfare, transportation, and deportation of noncitizens in removal proceedings, and those subject to a final order of removal. ICE's Enforcement and Removal Operations (ERO) field office in Newark, New Jersey has a need for comprehensive detention services for 600 adult male and female noncitizens that include general population, intake, segregated housing, and medical beds at a contractor-owned/contractor-operated detention facility. The facility must be within 50 driving miles from the ERO field office at 970 Broad Street in Newark, New Jersey.

To accommodate a portion of the detained noncitizen population under ICE jurisdiction, use of the existing Albert M. "Bo" Robinson Center (ARC) in Trenton, New Jersey is proposed (the Proposed Action). WSP USA, Inc. has been contracted to prepare an Environmental Assessment in accordance with the National Environmental Policy Act to evaluate the potential impacts of the proposed action and alternatives associated with use of the ARC to house detained noncitizens under ICE jurisdiction.

The ARC is located within an approximately 4.34-acre property at 375 Enterprise Avenue in Trenton, New Jersey. The ARC consists of intake, housing, medical beds, and other support facilities to provide dining, medical, religious, legal, and other services. No new building construction or exterior alterations to the existing ARC structure is proposed. The proposed action allows for resumption of ARC operation during the period of performance.

Based on a review of aerial imagery, National Wetland Inventory mapping, and a recent field inspection, the site is completely developed with the ARC and paved parking area with no wetlands or waters of the United States present. For your reference, Attachment A shows the facility's regional location, Attachment B provides an aerial view of the Albert M. "Bo" Robinson Center, and Attachment C shows topographic conditions in and around the facility property.

2000 Lenox Drive, 3rd Floor | Lawrenceville | NJ | 08648 | USA |

WSP USA, Inc.



If you have any questions regarding the proposed action, please do not hesitate to contact me at (b)(6),(b)(7)(C) @wsp.com or 973-407-

Sincerely yours,
WSP USA, Inc.

(b)(6),(b)(7)(C)

(b)(6),(b)(7)(C)

PP
Senior Vice President

Cc: (b)(6),(b)(7)(c)
WSP

Attachment A: Regional Location – Albert M. "Bo" Robinson Center Attachment B: Aerial Photograph - Albert M. "Bo" Robinson Center

Attachment C: Topographic Conditions - Albert M. "Bo" Robinson Center

2000 Lenox Drive, 3rd Floor | Lawrenceville | NJ | 08648 | USA |

WSP USA, Inc.



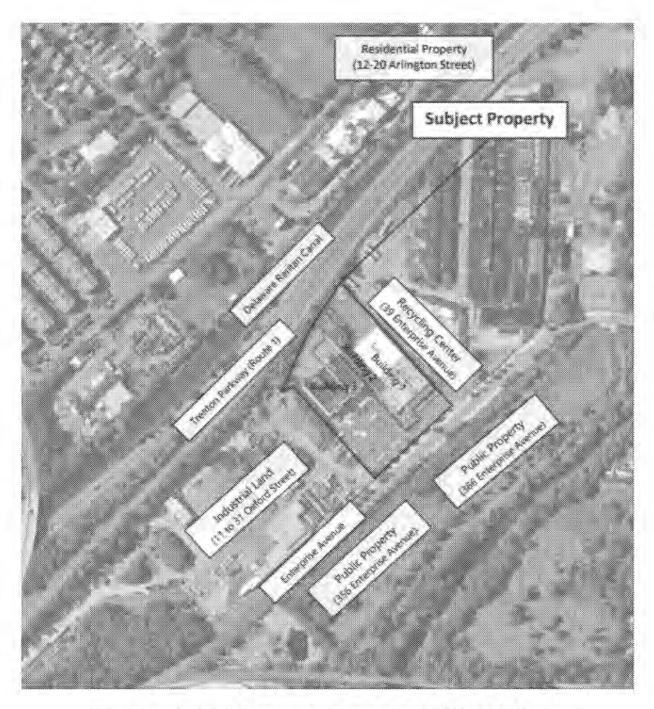
Attachment A: Regional Location - Albert M. "Bo" Robinson Center 375 Enterprise Avenue, Trenton, New Jersey

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WSP USA, Inc.

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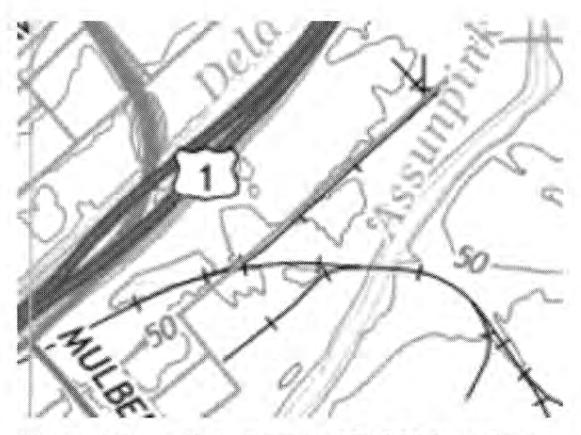


Attachment B: Aerial Photograph - Albert M. "Bo" Robinson Center 375 Enterprise Avenue, Trenton, New Jersey

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WSP USA, Inc.

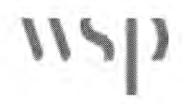




Attachment C: Topographic Conditions - Albert M. "Bo" Robinson Center 375 Enterprise Avenue, Trenton, New Jersey

2000 Lenox Drive, 3rd Floor | Lawrenceville | NJ | 08648 | USA |

WSP USA, Inc.



July 11, 2024

Mr. (b)(6),(b)(7)(C) P.G., Director
New Jersey Department of Environmental Protection
Office of Permit and Project Navigation, Environmental Review Unit
401 East State Street
Mail code: 401-07J / P.O. Box 420
Trenton, NJ 08625

Via email: (b)(6),(b)(7)(C) adep.nj.gov

RE: Albert M. "Bo" Robinson Center, 375 Enterprise Avenue, Trenton, New Jersey Environmental Assessment

Dear (b)(6),(b)(7)(C)

Immigration and Customs Enforcement's (ICE) is responsible for the detention, health, welfare, transportation, and deportation of noncitizens in removal proceedings, and those subject to a final order of removal. ICE's Enforcement and Removal Operations (ERO) field office in Newark, New Jersey has a need for comprehensive detention services for 600 adult male and female noncitizens that include general population, intake, segregated housing, and medical beds at a contractor-owned/contractor-operated detention facility. The facility must be within 50 driving miles from the ERO field office at 970 Broad Street in Newark, New Jersey.

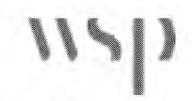
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The ARC is located within an approximately 4.34-acre property at 375 Enterprise Avenue in Trenton, New Jersey. The ARC consists of intake, housing, medical beds, and other support facilities to provide dining, medical, religious, legal, and other services. No new building construction or exterior alterations to the existing ARC structure are proposed. The proposed action would allow for resumption of ARC operation during the period of performance.

Based on a review of NJ-GeoWeb and a recent field inspection, the property is completely developed, and no wetlands or wildlife habitat are present. NJ-GeoWeb reports that there is a riparian corridor along the northwest boundary of the property; however, the waterbody that is associated with the riparian corridor is separated from the site by US Route 1. For your reference, Attachment A shows the facility's regional location, Attachment B provides an aerial view of the Albert M. "Bo" Robinson Center, and Attachment C shows topographic conditions in and around the ARC property.

2000 Lenox Drive, 3rd Floor | Lawrenceville | NJ | 08648 | USA |

WSP USA, Inc.



If you have any questions regarding the proposed action, please do not hesitate to contact me a [(b)(6),(b)(7)(C)]@wsp.com or at 973-407

Sincerely yours, WSP USA, Inc.

(b)(6),(b)(7)(C)

(b)(6),(b)(7)(C) pp Senior Vice President

Cc: (b)(6),(b)(7)(C) WSP

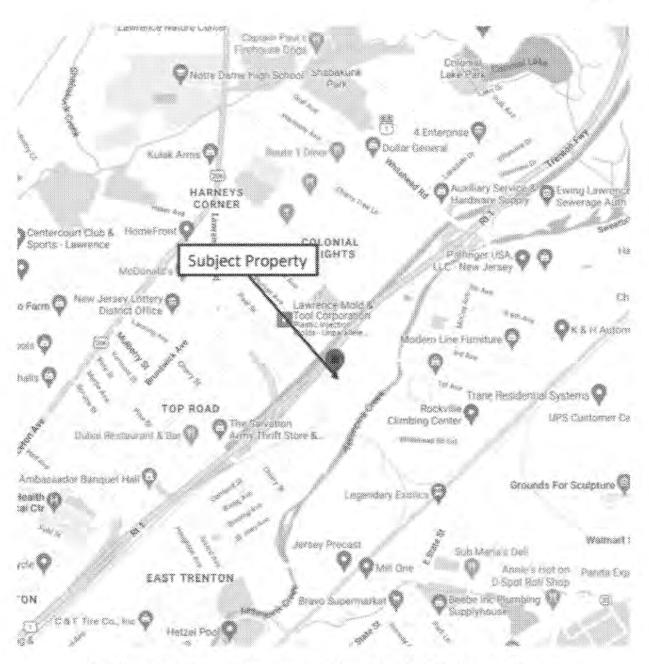
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Attachment C: Topographic Conditions - Albert M. "Bo" Robinson Center

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WSP USA, Inc.

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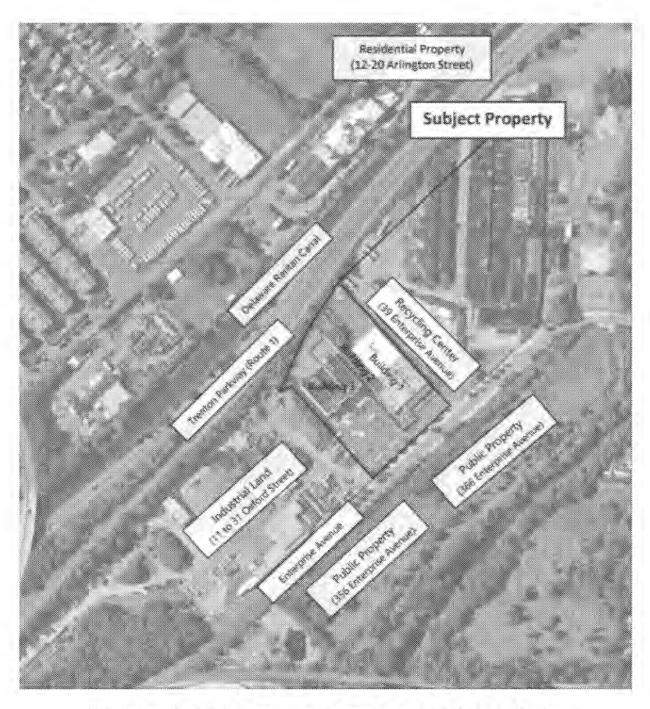
Attachment A: Regional Location - Albert M. "Bo" Robinson Center 375 Enterprise Avenue, Trenton, New Jersey

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WSP USA, Inc.

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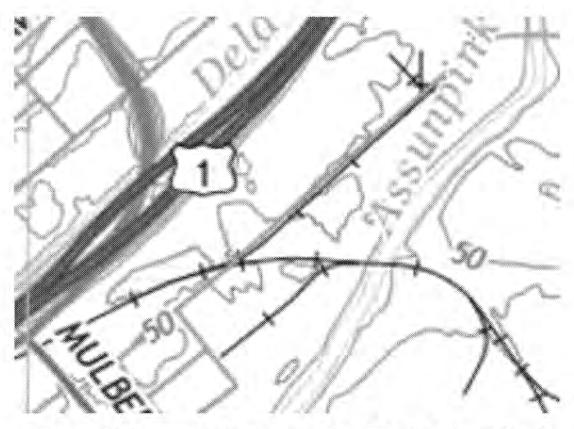
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WSP USA, Inc.

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Attachment C: Topographic Conditions - Albert M. "Bo" Robinson Center 375 Enterprise Avenue, Trenton, New Jersey

2000 Lenox Drive, $3^{\rm rd}$ Floor | Lawrenceville | NJ | 08648 | USA |

WSP USA, Inc.

5 | Page

290 West Mount Pleasant Avenue Sulf [minimum] Livingston, NJ 07039



Court Piaza South West West 21 Main Street, Surt Hackensack, NJ 07501

P: 973.53 F: 973.533.111 #ssbw.com

[(b)(6),(b)(7)(C)] Esq.

[(b)(6),(b)(7)(C)] @tisslaw.com

973.327 [(b)(6),(b)(7)(C)]

Reply to Livingston office

July 9, 2024

VIA E-MAIL (b)(6),(b)(7)(c) (a) triumphhotels.com)

(b)(6),(b)(7)(C)

375 Enterprise Realty LLC 1633 Broadway, 46 Floor New York, New York 10019

Re: 375-377 Enterprise Avenue, Trenton, New Jersey

Dear Mr (b)(6),(b)(7)(c)

You have engaged this office to act as legal counsel to 375 Enterprise Realty LLC, (the "Developer"), in connection with securing all necessary zoning approvals with respect to the real property located at 375-377 Enterprise Avenue, Trenton, New Jersey (the "Property"). Particularly, it is the intention utilize the Property as an immigration detention facility. The Property was most recently used as a residential correctional facility.

We have made multiple attempts, both verbally and in writing, to voluntarily engage with the City of Trenton (the "City") to discuss the proposed use. The City to date has been entirely unresponsive. In light of the City's failure to act upon the Developer's informal requests, on April 12, 2024 this office filed a formal application for a zoning permit confirming that the Property could be utilized as the intended detention facility (the Zoning Permit Application"). A copy of the Zoning Permit Application is attached hereto as **Exhibit A**. Pursuant to N.J.S.A. 40:55D-18, the City's zoning officer was required to make a determination within ten (10) days of receipt of the application. In the event the zoning officer fails to make a determination within the ten day period, the application is deemed granted. Id.

The City's zoning officer failed to make a determination within ten days. Consequently, this office, by letter dated April 26, 2024 provided notice to the City that the application was deemed statutorily approved. **Exhibit B**. Additionally, pursuant to N.J.S.A. 40:55D-10.4, this office arranged for publication of a notice of default approval as well as service of such notice upon property owners within 200 feet. Proof of such notice was thereafter provided to the City as statutorily required. **Exhibit C**. The 45-day appeal period in which to challenge the default approval has expired.

(b)(6),(b)(7)(C)

July 9, 2024 Page 2

Given the expiration of the appeal period, this office shall file a formal request with the zoning officer for a Certificate of Default Approval. In the event that the zoning officer fails to execute same, then we may proceed to obtain a court order to compel same.

Very truly yours,

(b)(6),(b)(7)(C)

(b)(6),(b)(7)(C)

EXHIBIT A

290 West Mount Pleasant Abersus Suite manus Livergation, NJ 070354



45 Essex Street Suite [23] Hackensack, NJ 07601

P: 973 53 11 973 553 (fit tisslaw/com

(b)(6),(b)(7)(C) ., Esq. (b)(6),(b)(7)(C) @tisslaw.com 973.32 [misslaw/rice] Reply to Livingston office

April 12, 2024

VIA FED-EX

Zoning Officer Inspections Division City of Trenton 319 East State Street, 2nd Floor Annex Trenton, NJ 08609

Re: 375-377 Enterprise Avenue, Trenton, New Jersey
ZONING PERMIT APPLICATION PURSUANT TO N.J.S.A. 40:55D-18

Dear Sir/Madam:

This office represents 375 Enterprise Realty LLC, (the "Owner"), the owner of the property located at 375-377 Enterprise Avenue, Trenton, New Jersey (the "Property"). Please accept this letter as the Owner's application for a Zoning Permit pursuant to N.J.S.A. 40:55D-18 permitting the Property and its existing buildings, currently used as a residential correctional facility, to be used as a Federal immigration detention center. Based upon the zoning approvals currently in place we respectively submit that it can.

For the convenience of your review, and in addition to the Owner's attached Project Application Review Committee application, we have included with this letter the following documents:

- (a) Resolution of the City of Trenton Zoning Board of Adjustment dated April 17, 1996(Exhibit A);
- (b) Resolution of the City of Trenton Zoning Board of Adjustment dated January 5, 2000, memorialized January 19, 2000 (Exhibit B);
- (c) Amended Resolution of the City of Trenton Zoning Board of Adjustment dated December 20, 2000, memorialized January 17, 2001(Exhibit C);

¹ Despite request, as well as a search of the City's records, the Owner has been unable to obtain a specific Zoning Permit application form utilized by the City. To the extent one exists, we respectfully request that this letter and its attachments be utilized in place of same.

- (d) Resolution of the City of Trenton Zoning Board of Adjustment dated (memorialized)November 15, 2006 (Exhibit D);
- (e) City of Trenton Certificate of Occupancy dated August 11, 2009 (Exhibit E);
- (f) City of Trenton Zoning Report May 8, 2017 (Exhibit F);
- (g) ALTA/NSPS Title Survey, dated March 7, 2023, prepared by E2 Project Management LLC. (Exhibit G);
- (h) Sample Listing of Existing Immigration detention centers including correctional and prison facilities serving such purposes. (Exhibit H);

(For purposes of this opinion, items (a) through (e) above are hereinafter collectively referred to as the "Zoning Documents").

Based upon the foregoing, and for the reasons further set forth below, it is clear that an immigration detention facility would be an allowable use of the Property under the previously granted approvals, particularly as it qualifies as a correctional facility consistent with the Property's existing approvals. Specifically:

- 1. Pursuant to City of Trenton Zoning and Land Development Ordinance, Chapter 315 et seq. (as updated and amended) prisons and similar facilities are not permitted uses within Industrial Zones A and B within which the Property sites. Accordingly, the prior operator, Community Education Center, Inc. ("CEC"), applied for and received use variance relief and site plan approval from the Trenton Zoning Board of Adjustment (the "Board") to "construct a residential correctional facility to be located at 375 Enterprise Avenue, Trenton, New Jersey", which approval was memorialized in the Board's resolution dated November 15, 2006 (the "2006 Resolution"). The 2006 Resolution confirmed that CEC operated the Bo Robinson residential correctional facility at 377 Enterprise Avenue and that the 375 Enterprise Avenue property would be used to expand and operate that facility's use. The 2006 Resolution confirmed that the Board "had previously found that the use on this site was appropriate for the site." See 2006 Resolution, p.2, para 5.
- 2. Pursuant to the Certificate of Occupancy dated August 11, 2009, permit number 07-0855, the facility is a "prison" with a total of 1283 beds.
- 3. It is the understanding of this office that until recently the Property housed the Albert M. "Bo" Robinson Assessment & Treatment Center and housed both state and county inmates. According to the nongovernmental site <u>prisonal.org</u>, Albert M. Bo Robinson Assessment & Treatment Center is/was a Medium-Security Facility for inmates above 18 years of age. It is stated there that the Facility is currently administered and operated by the New Jersey Department of Corrections Programs, and that the services offered at the Bo Robinson Assessment & Treatment Center included individual and group counseling, cognitive-behavioral therapy, substance abuse programming, educational services, life skills, cultural diversity programs, family

programming, gender-specific treatment, workforce development activities, work release services, faith-based services, and alumni and aftercare programs. Apparently, and until recently, the facility was operated by the GEO Group which claimed to be committed to providing leading, evidence-based rehabilitation programs to individuals while in-custody and post-release into the community through the 'GEO Continuum of Care.' GEO's diversified services platform provides unique capabilities for the delivery of educational and vocational programs, cognitive behavioral and substance abuse treatment, and faith-based services across the entire corrections spectrum.

Further, GEO claimed to provide "complementary, turnkey solutions for numerous government partners worldwide across a spectrum of diversified correctional and community reentry services. From the development of state-of-the-art facilities and the provision of management services and evidence-based rehabilitation to the post-release reintegration and supervision of individuals in the community, GEO offers fully diversified, cost-effective services that deliver enhanced quality and improved outcomes."

According to the non-governmental site https://prisonfinder.org:

The Albert M. "Bo" Robinson Assessment & Treatment Center is run and operated by GEO Group, but it is currently under the New Jersey Department of Corrections.

The Albert M. "Bo" Robinson Assessment & Treatment Center does not have a security level. It thrives on voluntary commitment. The facility is known as a residential reentry center, which is like a halfway house.

It is home to inmates who are almost done with their stint in jail. Usually, they have another 3 to about 12 months left of their sentence to complete, and they can come here if they are a low-security risk.

4. Variances run with the land and are not personal to the property owner who obtained the grant. Aldrich v. Schwartz, 258 N.J. Super. 300, 308 (App. Div. 1992); DeFelice v. Zoning Bd. Of Adjustment of Point Pleasant Beach, 216 N.J. Super. 377, 381 (App.Div.1987); Farrell v. Estell Manor Zoning Bd. Of Adjustment, 193 N.J. Super. 554, 558 (Law Div.1984).

NOTEABLE CASES, STATUES, AND REGULATIONS:

The mission of the U.S. Immigration and Customs Enforcement's ("ICE") Enforcement and Removal Operations (ERO), which from time to time utilizes immigration detention centers, specifically including correctional facilities is to protect the homeland through the arrest and removal of those noncitizens who undermine the safety of our nation's communities and the integrity of U.S. immigration laws:

 To fulfill the agency's critical mission, ERO oversees civil immigration detention in facilities nationwide that house noncitizens to secure their presence for immigration proceedings or removal from the U.S.

> ICE detains noncitizens who are subject to mandatory detention or those that ICE determines are a public safety or flight risk during the custody determination process.

DHS specifically promulgated regulations, contained in 48 C.F.R. § 3017.204-90, authorizing ICE to enter contracts for "detention or incarceration" facilities to house or detain individuals for civil immigration violations. See also N.J.S.A. § 30:4-8.16(a). The purpose of prisons is to house and detain individuals for criminal violations. The detention for civil violations in ICE centers is analogous to detention for criminal violations in prisons.

In terms of statutory definitions, N.J.A.D.C. § 10A:31-1.3 defines "detainer" as a warrant or formal authorization to hold an inmate for prosecution or detention by a Federal, state, or local law enforcement agency or the U.S. Immigration and Customs Enforcement (ICE). Detainers may include, but are not limited to:

- 1. Adjudicated criminal charges for which sentence has been imposed;
- 2. Criminal charges resulting from indictment, for which there is no final disposition (open charges);
- 3. Warrants for violation of parole or probation; and
- 4. Immigration detainers.

(Emphasis added)

Pursuant to 28 C.F.R. § 115.5 General Definitions:

- Detained means any person detained in a lockup, regardless of adjudication status.
 - Facility means a place, institution, building (or part thereof), set of buildings, structure, or area (whether or not enclosing a building or set of buildings) that is used by an agency for the confinement of individuals.
 - Jail means a confinement facility of a Federal, State, or local law enforcement agency
 whose primary use is to hold persons pending adjudication of criminal charges, persons
 committed to confinement after adjudication of criminal charges for sentences of one
 year or less, or persons adjudicated guilty who are awaiting transfer to a correctional
 facility.
 - Prison means an institution under Federal or State jurisdiction whose primary use is for the confinement of individuals convicted of a serious crime, usually in excess of one year in length, or a felony.
 - Resident means any person confined or detained in a juvenile facility or in a community confinement facility.

Under N.J.S.A. § 30:4-8.16(a), an "immigration detention agreement" is "any contract, memorandum, intergovernmental service agreement, or memorandum of understanding that authorizes the State, local government agency, or private detention facility to house or detain individuals for civil immigration violations." N.J.S.A. § 30:4-8.16(a); Id. at *9. A private

detention facility is defined in the statute as "any privately owned or operated facility that houses or detains individuals for civil immigration violations." <u>Id.</u> at *9.

Notably, Congress has expressed a clear preference for the federal government to consider using existing facilities before building its own. 8 U.S.C. § 1231(g)(1)—(2). Id. at *36. The language and framework of the Immigration and Nationality Act (the "INA") make plain Congress's intent that the federal government is authorized to decide whether to detain individuals for civil immigration violations, and if so how to detain them, without submitting to state regulation. Id. at 51.

Further, as discussed in the recent New Jersey District court case CoreCivic Inc. v. Philip D. Murphy, the Department of Homeland Security (DHS) has promulgated regulations permitting ICE to "enter into contracts of up to 15 years' duration for **detention or incarceration** space or facilities, including related services." CoreCivic Inc. v. Philip D. Murphy, 2023 U.S. Dist. LEXIS 152099 (D.N.J. Aug. 29, 2023), *5 (emphasis added); see also 48 C.F.R. § 3017.204-90. CoreCivic discussed the unconstitutionality of a Statewide ban preventing State, local, and private detention facilities from entering into agreements to detain noncitizens. The court struck down the ban because of issues concerning the Supremacy Clause and intergovernmental immunity: "when federal law gives discretion to a federal official to hire a contractor to perform federal work, a state cannot override the federal official's decision to do so." Id. at *24 (quoting Geo Group, Inc. v. Newsom, 50 F.4th 745 (9th Cir. 2022) (en banc)). The New Jersey District court found this case persuasive in rending its decision in CoreCivic.

Further, in <u>Florence v. Bd. of Chosen Freeholders</u>, the United States Supreme Court considered the question of whether people arrested for minor offenses should be subjected to invasive searches when prison officials have no reason to suspect concealment of weapons, drugs, or other contraband... Notably, stated in its opinion that "[t]he term 'jail' is used in a broad sense to include prisons and other detention facilities." <u>Florence v. Bd. of Chosen Freeholders</u>, 566 U.S. 318, 322 (2012).

CONCLUSION:

An immigration detention center clearly falls within the scope and definition of a "prison" or a "jail" or correctional facility as the inmates/detainees it houses are primarily detained awaiting disposition of their case. The purpose of an immigration detention center is to hold noncitizens awaiting immigration proceedings, similar to jails or other correctional facilities holding inmates awaiting trial. This conclusion is conclusively evidenced by the fact that ICE does indeed correctional and jail facilities for immigration detention center throughout the Nation. See Exhibit H.

In light of the foregoing, from a land use law perspective an immigration detention facility is clearly an allowable use of the Property under, and consistent with, the previously granted approvals referenced above and the currently prevailing law. Please issue the requested permit accordingly

(b)(6),(b)(7)(C)

Very truly yours,

/s (b)(6),(b)(7)(C)

(b)(6),(b)(7)(C)

EXHIBIT A

THE BOARD OF ADJUSTMENT CITY OF TRENTON

RESOLUTION

WHEREAS, an application on appeal from the refusal of the Building Inspector to grant a permit has been made to this Board of Adjustment by Steven J. Picco Esq., for Mr. John Clancy, owner of lessee of the premises hereinafter mentioned and described, to convert property into an Institutional Use, requesting exception to the Revised General Ordinances of the City of Trenton, on the land and premises known and designated as 377 Enterprise Avenue; and

WHEREAS, said land and premises are located in an Industrial "B" Zone:

WHEREAS, this Board held a public hearing on April 17, 1996, in the Council Chambers, City Hall, Trenton, New Jersey, on said appeal; and

WHEREAS, due notice of said hearing was given to all property owners within 200 feet in every direction of any apart of the aforesaid premises; and

WHEREAS, this Board had made an inspection of the premises in question as well as the immediate surrounding neighborhood in general, and has weighed and considered all of the testimony and the evidence produced at the hearing, and finds therefrom the following reasons to exist in connection with the aforestated application to wit:

The use contemplated would be an improvement to the subject property,
based thereon, has determined that the strict appli

and based thereon, has determined that the strict application of the provisions of the Ordinance of the City of Trenton would result in peculiar and practical difficulties to or exception and undue hardship upon the applicant and that a variance from such strict application would relieve such difficulties or hardships without substantially impairing the intent and purpose of the Zone Plan and the Zoning Ordinance, now therefore.

(cont'd)

RESOLUTION

BE IT RESOLVED by the Board of Adjustment that in pursuance to and by virtue of the authority vested in it by the laws of the State of New Jersey N.J.S.A. 40:550-69 etceq., it hereby GRANTS to Steven J. Picco Esq., for Mr. John Clancy, to convert property into an Institutional Use with exception to Chapter 19-23.1 (Use) of the Revised General Ordinances of the City of Trenton, on the land and premises known and designated as 377 Enterprise Avenue.

BE IT FURTHER RESOLVED by this Board of Adjustment, that this permit be granted with the following conditions:

- Applicant shall initially limit the maximum number of clients that will be housed at this facility at one time to 300. Increasing capacity above this threshold will require approval from the Zoning Board of Adjustment.
- Substance abuse treatment shall be restricted to those individuals residing at the facility. No drop in or out-patient treatment shall be permitted.
- 3. The applicant shall indicate what on-site security measures will be provided during the entire day to insure that the clients do not wander off the facility, or disrupt the adjacent residential neighborhoods
- 4 Applicant shall indicate the peak hours of activity at the facility and what measures will be taken to protect against undue noise or nuisance, particularly between 8:00 p.m and 7:00 a.m.
 - between 8:00 p.m and 7:00 a.m.

 Applicant shall indicate how client visitation will be handled.

VOTE TO GRANT: 6-0

THE BOARD OF ADJUSTMENT

James Brown, Chairman Frank Clark Gertrude J. McCray Aida Ramirez Laurence Reilly Mary Ann Tolbert

DATED: APRIL 17, 1996

1, HEREBY CERTIFY THIS TO BE A TRUE AND ACCURATE COPY OF THE RESOLUTION ADOPTED BY THE CITY OF TRENTON ZONING BOARD OF ADJUSTMENT AT A PUBLIC HEARING HELD ON MAY 15, 1996.

TERESA DEPULA. SECRETARY BOARD OF ADJUSTMENT CITY OF TRENTON

lless &

[9.3.5.1.1] [Bo Robinson_Enterprise Way_NJ_Zoning 1.pdf] [Page 2 of

EXHIBIT B

THE BOARD OF ADJUSTMENT CITY OF TRENTON

RESOLUTION

WHEREAS, an application on appeal from the refusal of the Building Inspector to grant a permit has been made to this Board of Adjustment by Steven Picco Esq., for Community Education Centers, owner or lessee of the land and premises hereinafter mentioned and described, to srect an addition to the existing structure for a Change of Use to !-3 An Assessment Center and Preliminary and Final Site Review, requesting exception to Chapter 19-24.1 (Use) and Chapter 19-12.10 (Preliminary and Final Site Review), on the land and premises known and designated as 377 Enterprise Avenue; and

WHEREAS, said land and premises are located in an Industrial "B" Zone; and

WHEREAS, this Board held a public hearing on January 5, 2000, in the Council Chambers, City Hall, Trenton, New Jersey, on said appeal; and

WHEREAS, due notice of said hearing was given to all property owners within 200 feet in every direction of any part of the aforesaid premises; and

WHEREAS, this Board had made an inspection of the premises in question as well as the immediate surrounding neighborhood in general, and has weighed and considered all of the testimony and the evidence produced at the hearing, and finds therefrom the following reasons to exist:

The use contemplated will be an improvement to the subject property,

and based thereon has determined that the strict
application of the provisions of the Ordinances of the City
of Trenton would result in peculiar and practical
difficulties to or exception and undue hardships upon the

(cont'd)

application would relieve such difficulties or hardships without substantially impairing the intent and purpose of the Zone Plan and the Zoning Ordinance, now therefore:

BE IT FURTHER RESOLVED by this Board of Adjustment, that this permit be granted with the following conditions:

- Applicant shall indicate on sheet A-1, See sheet A-4 for owner's list.
- Zoning data should indicate 11 feet existing for side yard provided 17 feet 4 inches to new addition.
- 3. Check spelling in note #4.
- Applicant shall provide signature box with owner's name, address, etc., signature block for city officials must be provided.
- Applicant shall provide a revised plan drawn to scale.
- 6. Applicant shall provide as-built information for the existing drainage system. At the southeast corner, the tranch drain is tied into the existing inlets on Enterprise Avenue with two 6 inch PVC pipes. Applicant shall detail where the 15 inch pipe that comes from the side of the building connects on Enterprise Avenue.
- Applicant shall provide existing utilities information on plan.
- If dumpster is enclosed, information for enclosing dumpster shall be provided.
- Applicant shall indicate what drainage is existing and what is being proposed.
 Inverts of trench drains and pipes shall also be indicated.
- 10. Elevations at the northwest corner of the existing parking area indicate a low point by 2 feet or more. Applicant shall verify elevations. Also, plan lacks elevations in several areas. It is difficult to determine if drainage problem will develop.
- 11. A third set of steps is shown on sheet A-4 but not on A-2. The location is questionable. Sheet A-4 shows the steps on the existing building but sheet A-5 show the steps on the new addition. Applicant shall indicate the correct location of the proposed steps.
- Applicant shall provide an up-to-date survey to accompany these plans.
- Grate #4526 as indicated on sheet A-2 will not fit on inlet.
- Class "B" concrete should be used for trench drain and/or inlet if block is not used.

(cont'd)

- 15. Note #5 is not as per zoning data on sheet A-1. Sheet A-1 indicates 23 parking spaces provided, not 43. Plan count shows 27 spaces. Applicant shall make necessary changes.
- 16. Isolux charts are shown but location of different wattage fixtures is not indicated. Applicant shall indicate location of wattage fixtures.
- There is no lighting proposed at front parking lot. Applicant shall provide lighting at front of parking lot.

VOTE TO GRANT: 7-0

THE BOARD OF ADJUSTMENT
CITY OF TRENTON

Laurence Reilly, Chairman David Bosted Anthony Chell Ronald Luccarelli Barbara Maddox Aida Ramirez Cordelia Staton

DATED: JANUARY 5, 2000

I, HEREBY CERTIFY THIS TO BE A TRUE AND ACCURATE OF THE RESOLUTION ADOPTED BY THE CITY OF TRENTON ZONING BOARD OF ADJUSTMENT AT A PUBLIC HEARING HELD ON JANUARY 19, 2000.

TERESA DEPULA, SECRETARY BOARD OF ADJUSTMENT CITY OF TRENTON

EXHIBIT C

THE BOARD OF ADJUSTMENT CITY OF TRENTON

AMENDED RESOLUTION

WHEREAS, an application on appeal from the refusal of the Building Inspector to grant a permit has been made to this Board of Adjustment by Steven Picco Esq., for Community Education Centers, owner or lessee of the land and premises hereinafter mentioned and described, to erect an addition to the existing structure for a Change of Use of 1-3 an Assessment Center and Preliminary and Final Site Review, requesting exception to Chapter 19-24.1 (Use) and Chapter 19-12.10 (Preliminary and Final Site Review), on the land and premises known and designated as 377 Enterprise Avenue; and

WHEREAS, said land and premises are located in an Industrial "B" Zone; and

WHEREAS, this Board held a public hearing on January 5, 2000, and revised on December 20, 2000, in the Council Chambers, City Hall, Trenton, New Jersey, on said appeal; and

WHEREAS, due notice of said hearing was given to all property owner within 200 feet in every direction of any part of the aforesaid premises; and

WHEREAS, this Board had made an inspection of the premises in question as well as the immediate surrounding neighborhood in general, and has weighed and considered all of the testimony and the evidence produced at the hearing, and finds therefrom the following reasons to exist:

The use contemplated will be an improvement to the subject property,

And based thereon has determined that the strict application of the provisions of the

Ordinances of the City of Trenton would result in peculiar and practical difficulties to or

exception and undue hardships upon the application would relieve such difficulties or

hardships without substantially impairing the intent and purpose of the Zone Plan and the

Zoning Ordinance, now therefore:

BE IT FURTHER RESOLVED by this Board of Adjustment, that this permit be granted with the following conditions:

- 1. Applicant shall indicate on sheet A-1, See sheet A-4 for owner's list.
- Zoning data should indicate 11 feet existing for side yard provided 17 feet 4 inches to new addition.
- 3. Check spelling in note #4.
- Applicant shall provide signature box with owner's name, address, etc., signature block for city officials must be provided.
- Applicant shall provide a revised plan drawn to scale.
- 6. Applicant shall provide as-built information for the existing drainage system. At the southeast corner, the trench drain is tied into the existing inlets on Enterprise Avenue with two 6-inch PVC pipes. Applicant shall detail where the 15-inch pipe that comes from the side of the building connects on Enterprise Avenue.
- Applicant shall provide existing utilities information on plan.

(CONT'D)

- If Dumpster is enclosed, information for enclosing Dumpster shall be provided.
- Applicant shall indicate what drainage is existing and what is being proposed. Inverts of trench drains and pipes shall also be indicated.
- Elevations at he northwest corner of the existing parking area indicate a low point by 2 feet or more. Applicant shall verify elevations. Also, plan lacks elevations in several areas. It is difficult to determine if drainage problem will develop.
- 11. A third set of steps is shown on sheet A-4 but not on A-2. The location is questionable. Sheet A-4 shows the steps on the existing building but sheet A-5 show the steps on the new addition. Applicant shall indicate the correct location of the proposed steps.
- Applicant shall provide an up-to-date survey to accompany these plans.
- 13. Grate #4526 as indicated on sheet A-2 will not fit on inlet.
- Class "B" concrete should be used for trench drain and/or inlet if block is not used.
- Note #5 is not as per zoning data on sheet A-1. Sheet A-1 indicates 23 parking spaces provided not 43. Plan count shows 27 spaces. Applicant shall make necessary changes.
- 16. Isolux charts are shown but location of different wattage fixtures is not indicated. Applicant shall indicate location of wattage fixtures.
- 17. There is no lighting proposed at front parking lot. Applicant shall provide lighting at front of parking lot.
- 18. An occupancy increase of 100 beds.

VOTE TO GRANT: 6-0

THE BOARD OF ADJUSTMENT CITY OF TRENTON

Laurence Reilly, Acting Chairman Anthony Chell Barbara Maddox Michael Marclante Aida Ramirez Patricia Stewart

DATED: DECEMBER 20, 2000

I, HEREBY CERTIFY THIS TO BE A TRUE AND ACCURATE OF THE RESOLUTION ADOPTED BY THE CITY OF TRENTON ZONING BOARD OF ADJUSTMENT AT A PUBLIC HEARING HELD ON JANUARY 17, 2001.

TERESA DEPULA, SECRETARY BOARD OF ADJUSTMENT CITY OF TRENTON

[9.3.5.1.2] [Bo Robinson_Enterprise Way_NJ_Zoning 2.pdf] [Page 2 of 2]

Block 211-A Work Site Location

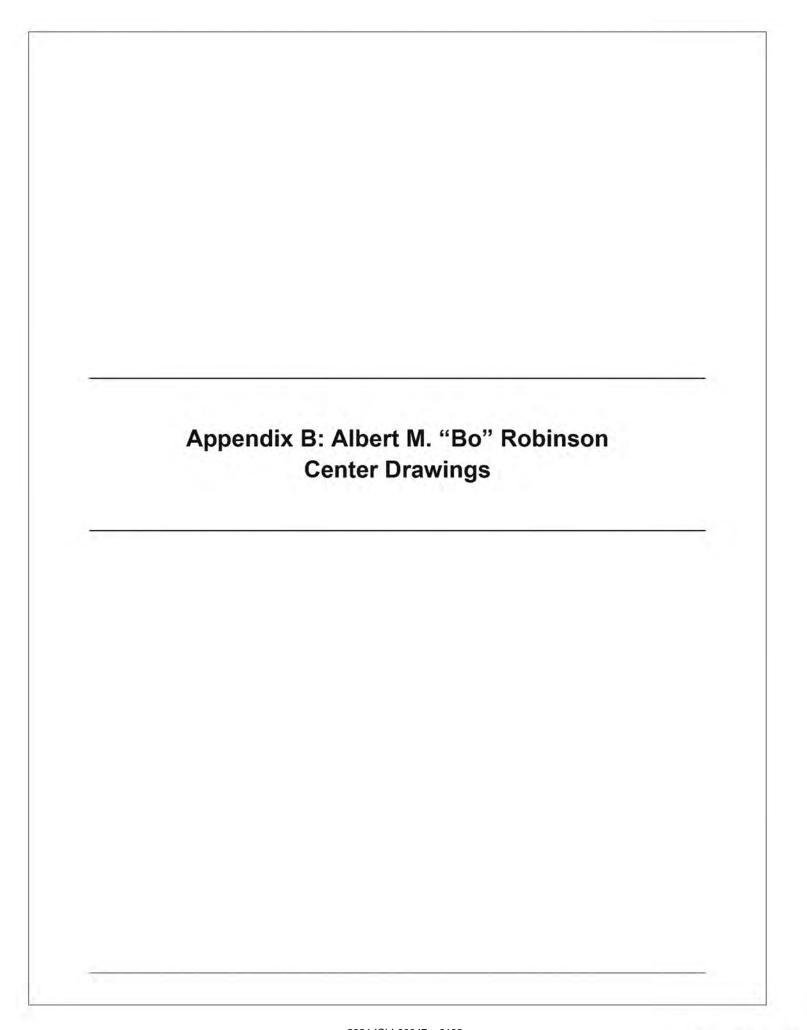


CERTIFICATE

Home Warranty No.	NJ10979	93	······································
Type of Warranty Plan:	State	Priv	
Use Group		1-3	
Maximum Live Load		100	PSF
Construction Classification		3-B	
Maximum Occupancy Load	400 NEW 8	EDS NEW	ADDITION TOTAL 1283
Description of Work/Use:			

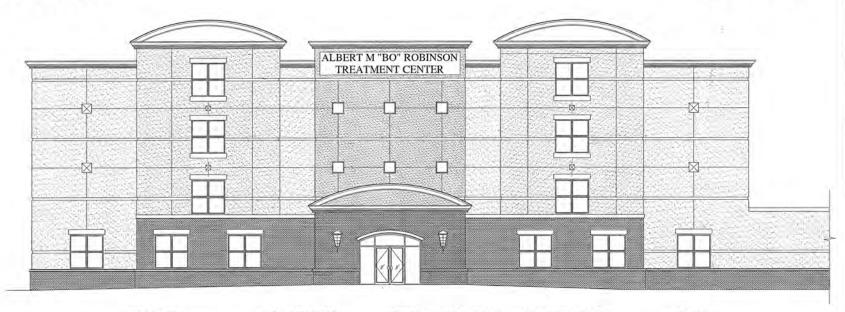
401 1001	Maximum Live Load 100 PSF
Owner in Fee/Occupant COMMUNITY EDUCATION CENTER	Construction Classification 3-B
75 LIVINGSTONIAVENUE	Maximum Occupancy Load 400 NEW BEDS NEW ADDITION TOTAL 1283
ROSELAND NEW BERSEY	
	Description of World/Use:
Contractor A & E CONSTRUCTION!	
152 GARRETT ROAD	
UPPER DARBY, PA. 19052	NEW ADDITION & RENOVATION TO PRISON AS PER APPROVED PLANS
Tele.	
Lis No of Eligran Reg. No.	
	eulits.
CERTIFICATE OF OCCUPANCY	CERTIFICATE OF CLEARANCE - LEAD ABATEMENT 5:17
serves notice that said building or structure has been constructed its acceptance	regions and the server notice that based on written certification, lead abatement was performed
with the New Jersey Uniform Construction Code and is approved for occupancy	as per NJAC 5:17, to the following extent:
3. 15. 15. 15. 15. 15. 15. 15. 15. 15. 15	Total removal of lead-based paint hazards in scope of work
CERTIFICATE OF APPROVAL	Partial or limited time period (years); see file
serves notice that the work completed has been constructed or installed in accor-	
usince with the New Jersey Uniform Construction Code and is approved. If the permit	CERTIFICATE OF CONTINUED OCCUPANCY
was issued for minor work, this certificate was based upon what was visible at the time	r region
of inspection.	This serves notice that based on a general inspection of the visible parts of the building
TEMPORARY CERTIFICATE OF OCCUPANCY/COMPLIANCE	there are no imminent hazards and the building is approved for continued occupancy
is is a temporary Certificate of Occupancy or Compliance, the following conditions	
must be met no later than 20 or the owner will be subject	herives notice that said potentially hazardous equipment has been installed and/or maintained in accordance with the New Jersey Uniform Construction Code and is
to fine or order to vacate:	approved for use until
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U.C.C. F260 (rev. 3W



ALBERT M. "BO" EDUCATION & TREATMENT CENTER

TRENTON NEW JERSEY



CLIENT

COMMUNITY EDUCATION CENTERS
TS LIVINGSTON AVENUE
ROSELAND NJ 07068
P: 413-226-2900
F: 913-140-1193
CONTACT: ROBERT MANN

ARCHITECT

ZAMPOLIN 4 ASSOCIATES 187 FARVIEW AVENUE WESTWOOD NJ 07675 P: 201-958-1166 P: 201-958-1175 CONTACT: ROBERT E. ZAMPOLIN

CIVIL ENGINEER

GC STEMART ASSOCIATES INC. 320 RUNNYMEDE ROAD ESSEX FELLS IN 07021 P: 973-226-0141 F: 973-226-3061 CONTACT: CHUCK STEMART

STRUCTURAL

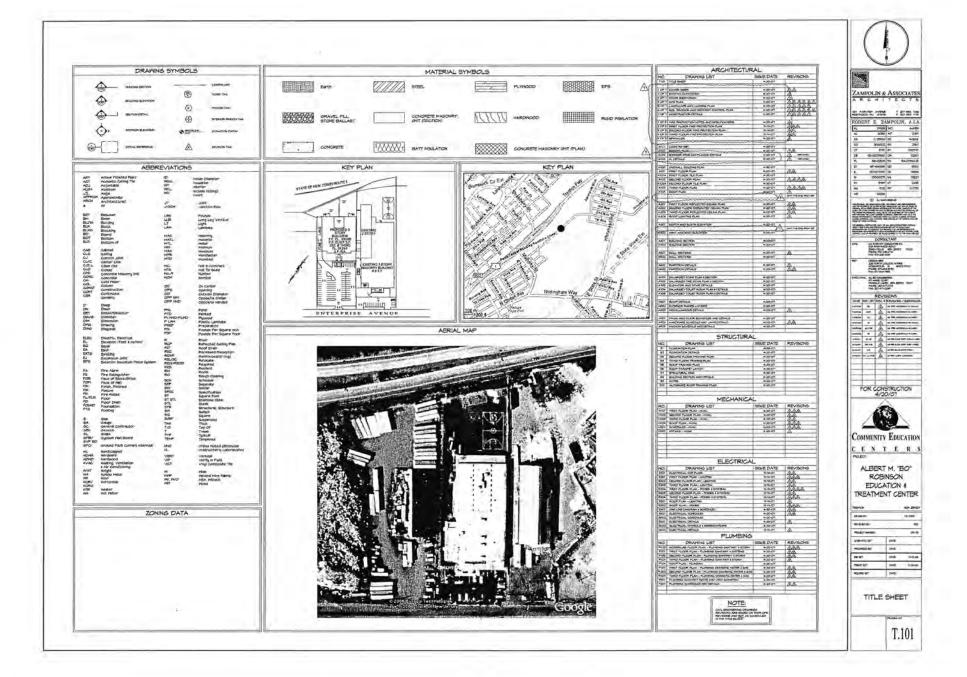
ALLED ENGINEERING 917 MARIE COURT FRANKLIN LAKES NJ 07417 P: 201-671-0744 F: 201-671-0249 CONTACT: SHERIF EL FAR

MEP

DESIGN-AIRE ENGINEERING, NC. 220 NORTH COLLEGE AVENUE INDIANAPOLIS, IN 45202-8702 P: 517-464-4949 F: 517-464-4949 CONTAGT: DAVE HAUN

FOR CONSTRUCTION 4-20-07 ZAMPOLIN & ASSOCIATES

A R C H I T E C T S



1

PRELIMINARY/ FINAL SITE PLAN COMMUNITY EDUCATION CENTERS, INC.

LOTS 9 & 11 BLOCK 211A 375 ENTERPRISE AVENUE CITY OF TRENTON MERCER COUNTY, NEW JERSEY

BLOCK 211A LOT9 BLOCK 211A LOT 11 STATE OF NEW JERSEY ROUTE 0 ZONE 1394 0 **0**

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- I APRODUAL AND CENTED CATION OF THE SOCI ENGRICH AND STOCKENT CONTROL IS AND BY THE SOCI CONSESSATION OF STREET





THIS PLAN HAS BEEN APPROVED AT A MEETING BY THE ZONING BOARD OF ADJUSTMENT OF THE CITY OF TRENTON ON____



GENERAL CONSTRUCTION NOTES

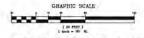
(where applicable)

[Free Specifications: 4-inch quarry process on compacted sub-basis, plus 4-inch state
basis, plus 2-each FARE, full compact and freedomizants).

GENERAL NOTES

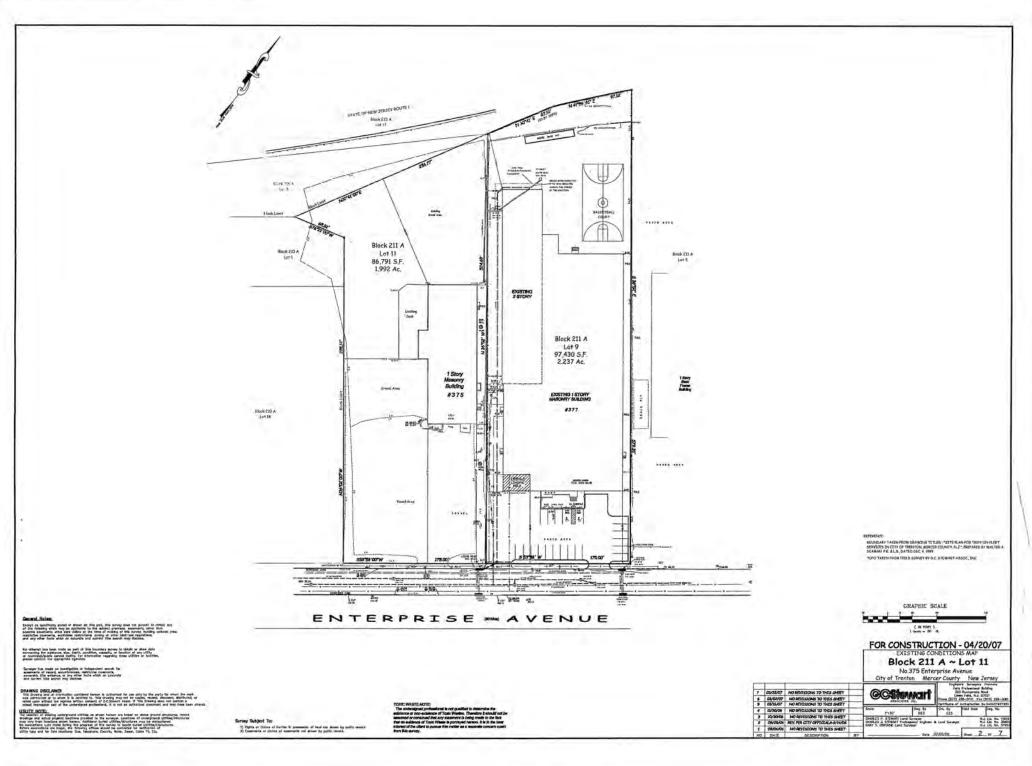
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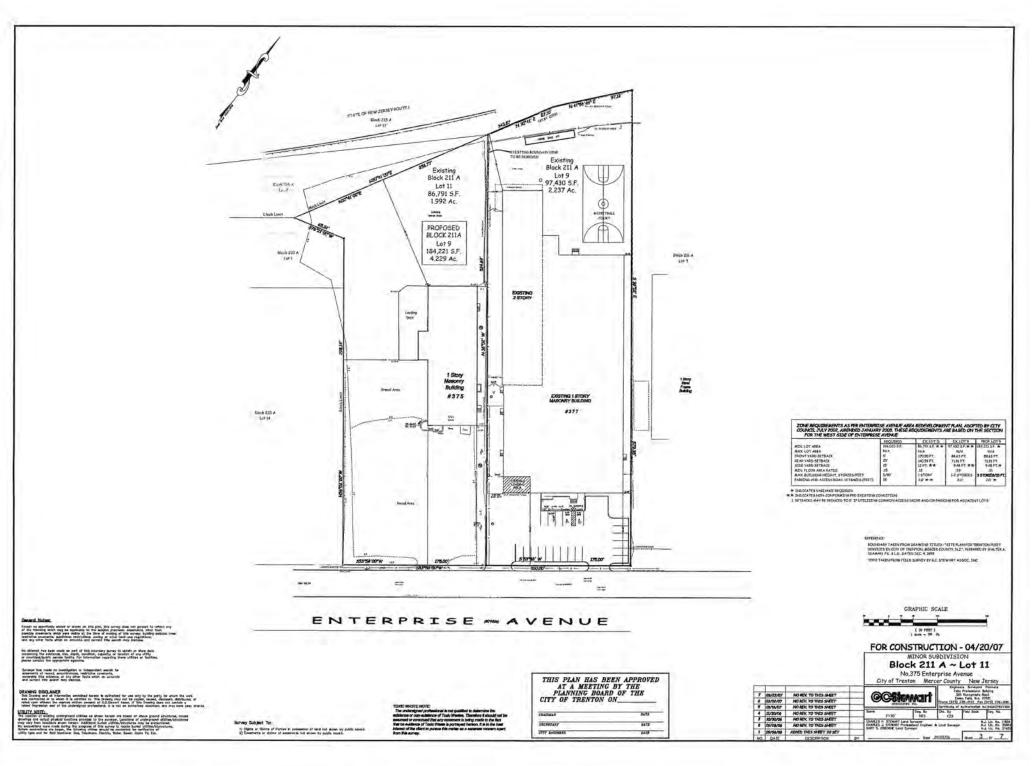
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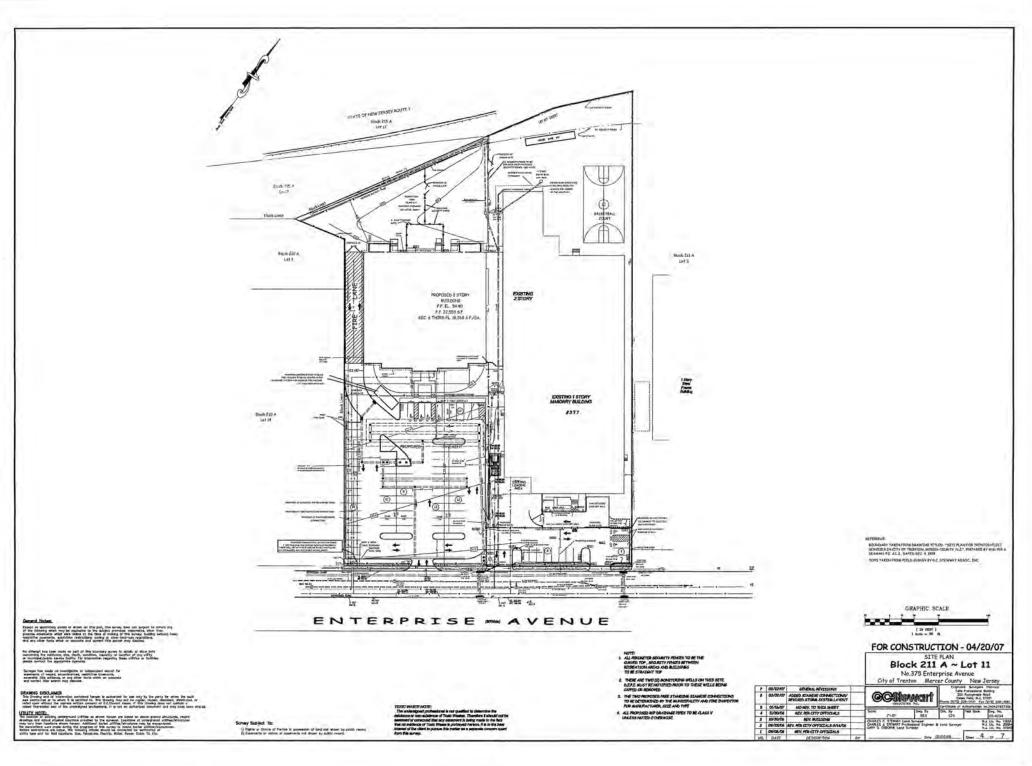


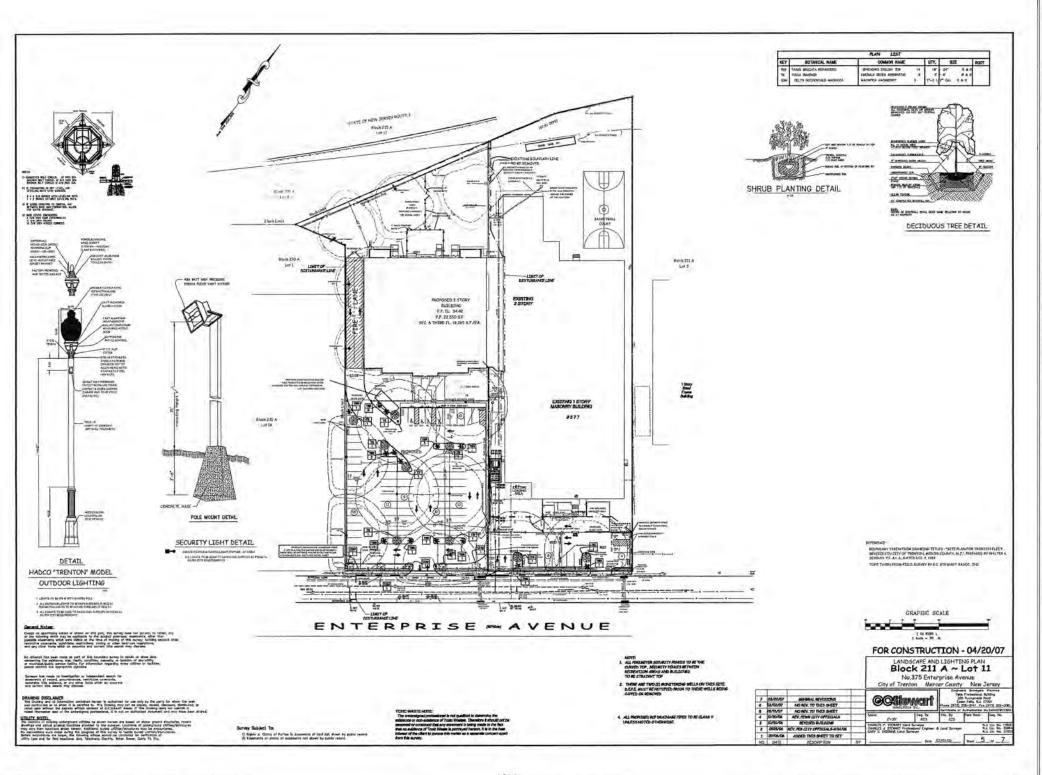
FOR CONSTRUCTION - 04/20/07

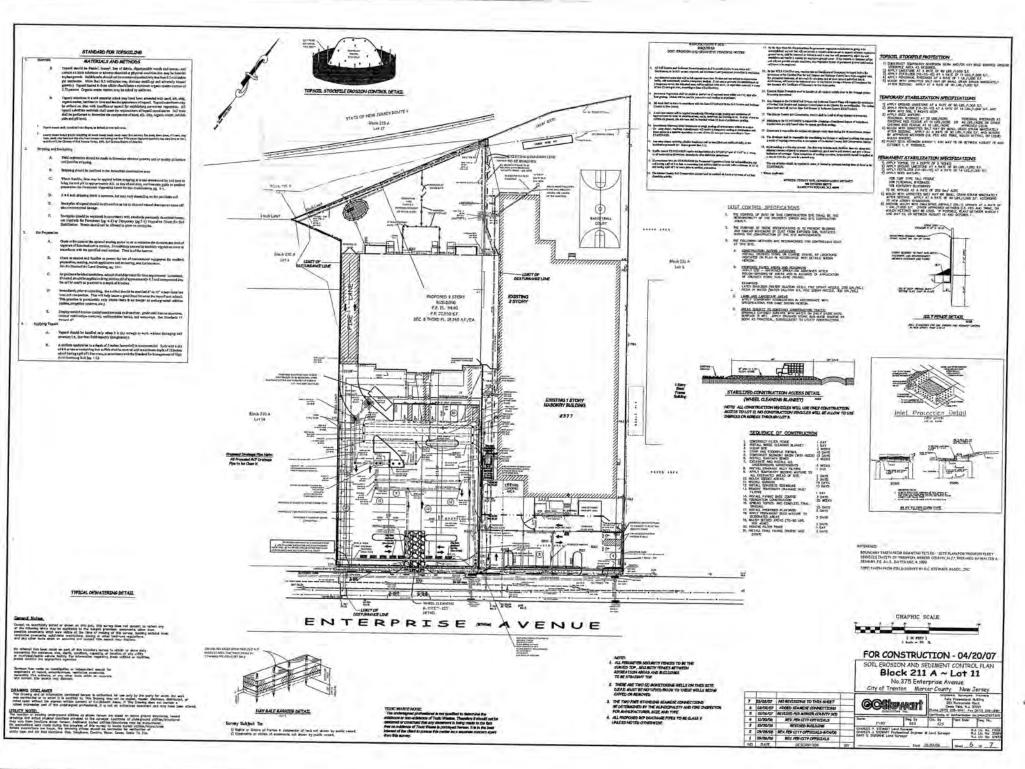
Block 211 A ~ Lot 11 No.375 Enterprise Avenue

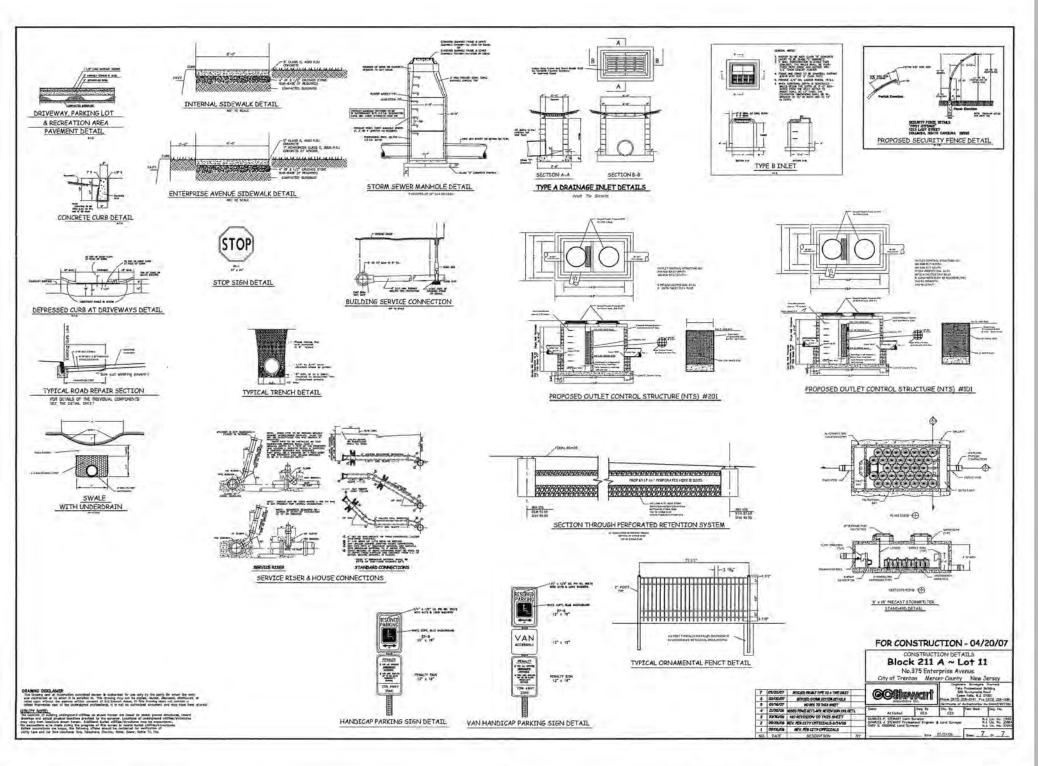












CODE REVIEW

PROJECT NAME ALBERT HI THO EDICATION I TREATMENT CENTER

315 ENTERPRISE AVENUE, TRENTON, N.

APPLICABLE CODE: NITRINATION BISLIDIO CODE: NON-JERGY BITTON 2000
NATIONA: STANCARD PILIPERIS CODE 2003
NATIONA: STANCARD PILIPERIS CODE 2003
NATIONA: STANCARD PILIPERIS CODE 2003
NATIONA: ERECTRICAL CODE 2003
NATIONA: ERECTRICAL CODE 2003
NATIONA/COLANICAL CODE 2003

51,551.52 FT.

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HUMBER OF STORES
TYPE OF CONSTRUCTION
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DECOMO PLOOR AREA
THRO FLOOR AREA 5 5-A 23,640 50 FEET 17,501 50 FEET 16:408 SQ FEET

RIDOF REGREATION AREA 14.219 SQ FEET

CHAPTER 3 - USE AND OCCUPANCY CLASSIFICATION

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CHAPTER 5 - GENERAL BUILDING HEIGHTS AND AREAS

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TABLEAR AREA (9,000 ST. AREA EN 2006 FOR MILITATORY FOR AUTOMATIC SPRONCES STATEMENT. SPRONCES STATEMENT FOR AUTOMATIC SPRONCES STATEMENT STATEMEN

CHAPTER 6 - TYPES OF CONSTRUCTION

ITABLE HOOL: FIRE RESISTANCE RATING FOR EXTERIOR SEPARATION DISTANCE.

FIRE SEPARATION DISTANCE ABOVE BULEING CONNECTION MOOF LEGS. THAN 50 FT SPEATER THAN 110 FT. RATING REQUIRED 1 LYOUR.

100 to 4 000 XX TOP - C gwo 6 RIGHT ELEVATION (EAST)

LOW ROOF BUILDING CONNECTION

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INCREMENTED ASSESTED SPRINGLER SYSTEM IN BOTH BUILDINGS (IDC YOAL) !

CHAPTER 7 - FIRE RESISTANCE - RATED CONSTRUCTION

HANNIM ALLOWBLE AREA OF EXTERIOR MALL CHEMICS (TABLE 124.6) HE
EXTERIOR MALLS 5. GREATER THAN 10 MID LESS THAN 10 FEET FROM CONTENUE OF THE
BALDING CORNECTION ROOF, RAFE OF EXTERIOR MALL ALLOWED 15 45% OF THE TOTAL
BLEVATION AREA (BC TABLE 104.6).

CLASSIFICATION OF OPENING, PROTECTED, FULLY SPRINGLERED, FICA DAY

BOTH EXISTING AND HEM FIRE EXPOSED MALLS ARE LESS THAN THE ALLOMABLE AREA AND GRALET AS INTERCRECTED OFBINISS IN THE FIRE EMPORED AREA SEE ELEVATION AND EXCITATION PACKANG SELLOM FOR TABLISTICAL AND CONDITION.

FRE SEPARATION ASSENSUES (106.3.5) REQUIRED PROVIDED SCREDOR HALLS FOR 1 1004 2.2.1) 1 HR. 1916 1514 SHOKE COMPARTMENT MALLS 1 660

CHAPTER 8 - INTERIOR FINISH REQUIREMENTS:

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CHAPTER 9 - FIRE PROTECTION SYSTEMS

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903.5 AN AUTOMATIC SPRINKLER SYSTEM IS REARRED FOR USE BROWN (I MOTHUTCHAL THIS BILLING IS EQUIPED WITH AN AUTOMATIC FREE SUPPRESSOR SYSTEM FOR COSSILY IN ACCORDANCE WITH SPRINKLES, FLOW SHITCHES SHALL BE THEN NOT THE ALAKS SYSTEM TO SOLDE WHOM WHO THE STREET IS ACTIVATED.

STAND FFE SYSTEMS ARE NOT REQUIRED IN A SPRINKLERED BULDING OF THIS TYPE AND OCCUPANCY, (BC 405.5)

NEW FIRE PROTECTIVE SIGNALING SYSTEM SHALL BE INSTALLED AS REQUIRED BY BC 4012.62 FOR AN N3 COCCUPANCY.

STITCH SHALL BE ACTIVATED ST A HANCE, ALARM, FIND DSCIDE, OR ACUATION OF AUTOWATIC SPRINGER STITCH STAPF SHALL BE MOTIFED OF ANY STITCH NITURTION, A FRESIGNAL STITCH SHALL NOT BE LIEED.

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ALL RESIDENT ROOMS HOLLDING SLEEPING AREAS, DAY ROOMS, COLINICADES AND GROUP ROOMS ALL COMMON SIZE.

IN ALL RETURN AIR DISCHORK AT HVAC INITS

VERLE ALARMS (DIRCOSE) CHALL BE: PROVIDED IN ALL COMMON & PUBLIC AREAS, I ADA DESIGNATED GLEEPINS ROOMS

ALDRIE ALARMS AREA REQUIRED TO PROVIDE A HIN, GOING LEVEL OF TO JOBS

ALDREE ALARMS SHALL BE INSTALLED IN ALL ADA DESIGNATED

CHAPTER 10 - MEANS OF EGRESS

OCCUPANT LOAD I TABLE (003.0.2.2.) REFER TO ESPERIS FLAN DIAG IS 102)

BIS DOQUEANTS THE NUMBER NOLLOWS 140 COQUEANTS FROM DISTING BULDING

PROJECT IS DESIGNED FOR A TOTAL RESIDENT BED CAPACITY OF ADD

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(TABLE 1004523)

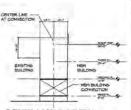
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HEADROOM (1009 S.S.2)
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INFROTESTED EXTENOR NALL OPENINGS ON ELEVATIONS

NOW BUILDING REVATION AREA
AREA OF SHIPPOTED BOOMS AND HINDOWS + 1/3 6 SF
AREA OF FRE DIVIDID ELEVATION + 204/19F
1126 SF/ 2041 SF + 84% LESS THAN 45% ALLOHABLE.

EXSTING BUILDING ELEVATION AREA
AREA OF IMPROPRIETE DIMERSORY - 20044 SP
/ AREA OF EXPOSED ELEVATION - 1786 SP
20 44 SF / 1136 SF - 25% LEDG THAN 46% ALLEMHOLE



SCHEMATIC SECT. through CONNECTION

G.101

CODE REVIEW

OBERT E ZAMPOLIN, A.LA

W. Charles

DO TOTAL AND DATE PORT

FOR CONSTRUCTION

COMMUNITY EDUCATION CENTERS

ALBERT M. "BO"

ROBINSON

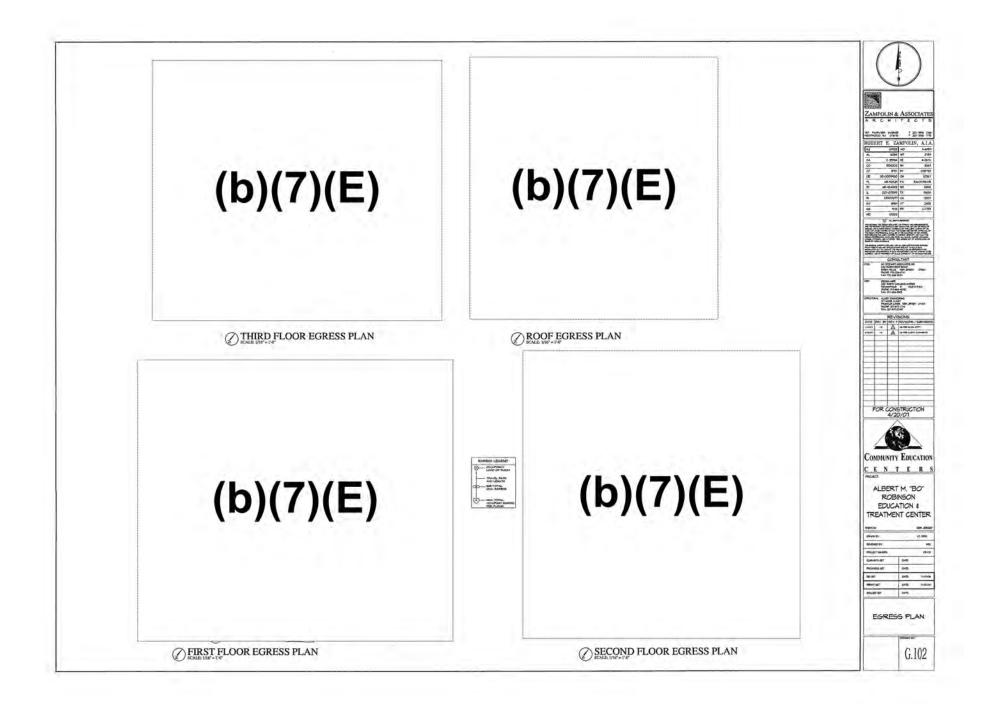
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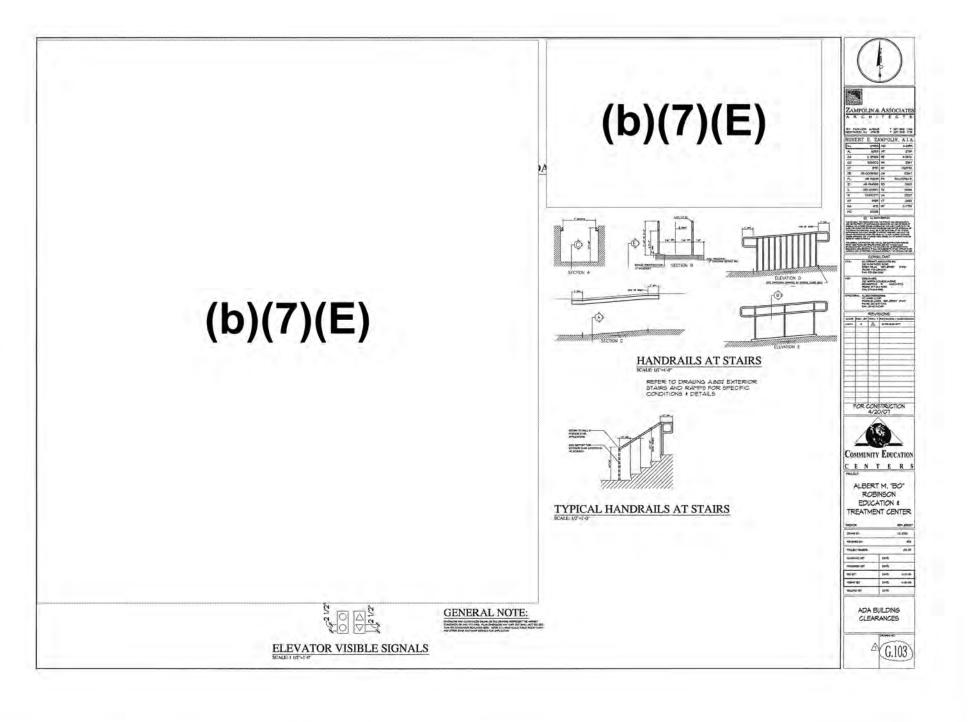
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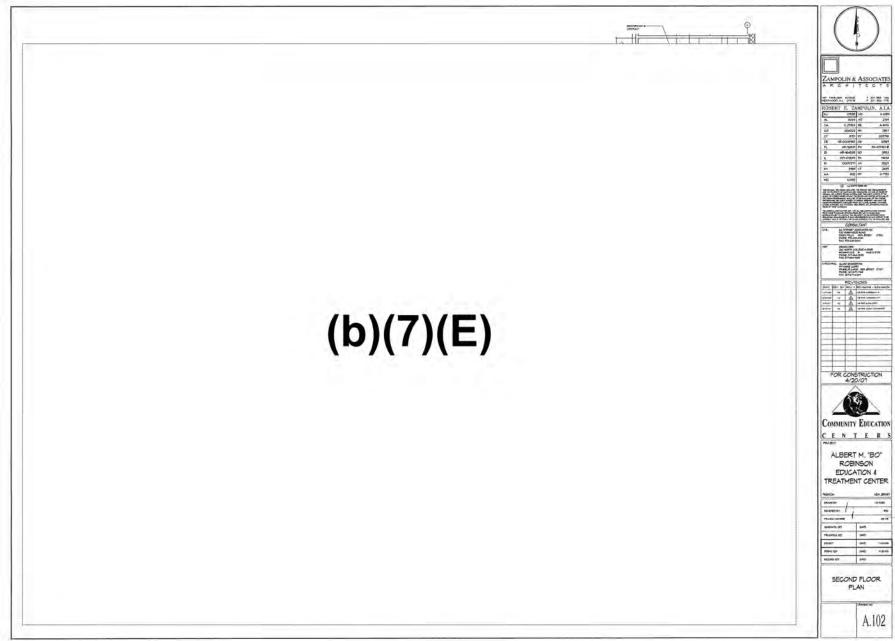
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(b)(7)(E)ALBERT M. "BO" ROBINSON EDUCATION & TREATMENT CENTER FIRST FLOOR PLAN FIRST FLOOR PLAN A.101

(b)(7)(E)ALBERT M. "BO" ROBINSON EDUCATION & TREATMENT CENTER FIRST FLOOR TILE PLAN FIRST FLOOR TILE PLAN A.101A

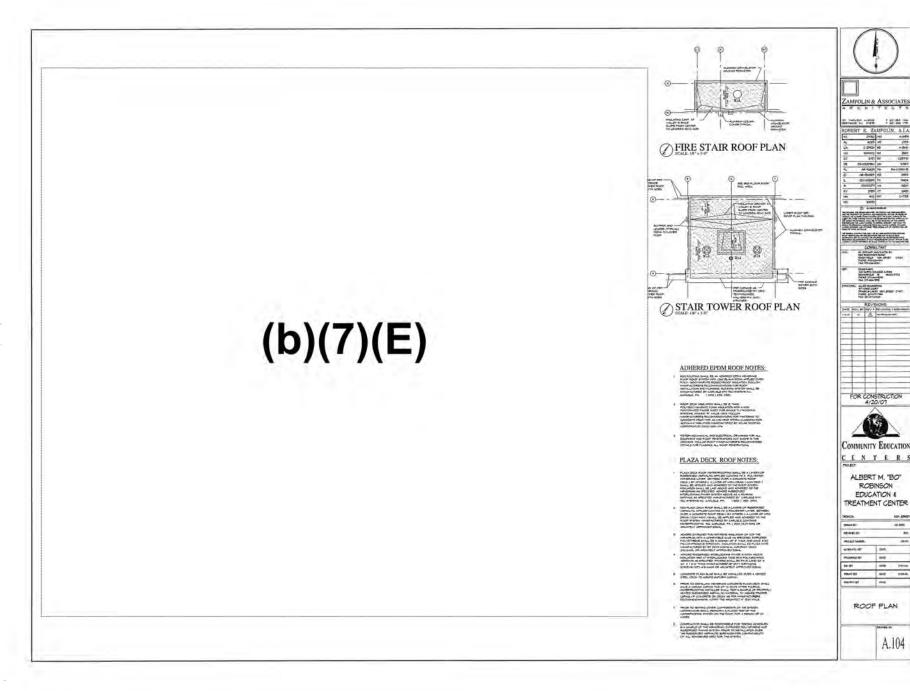




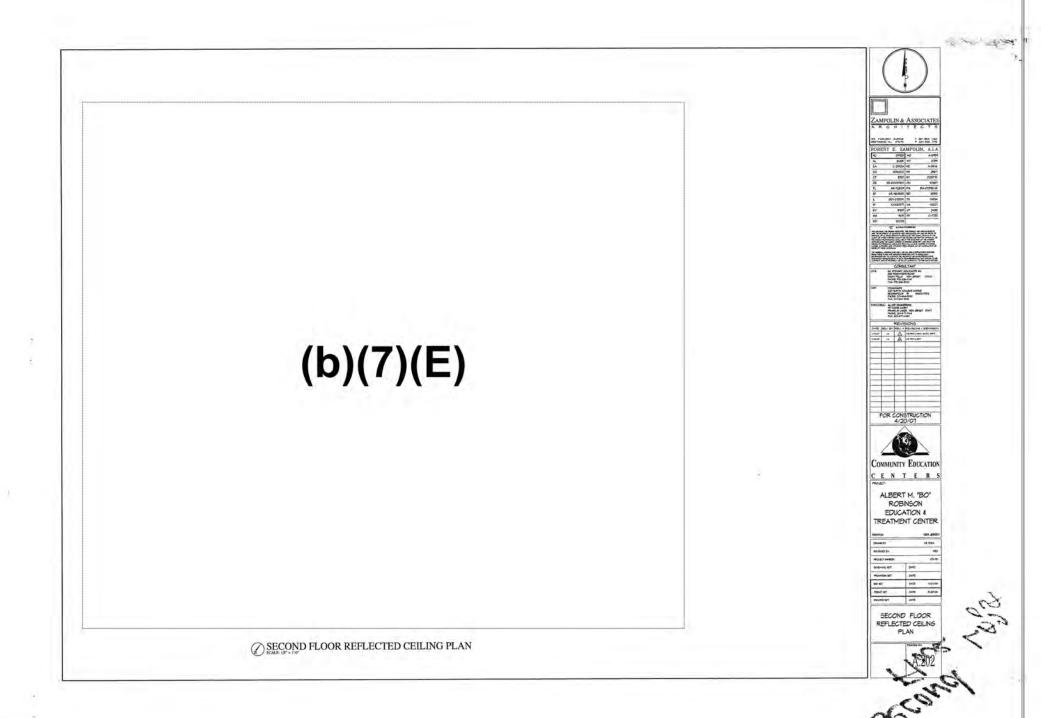
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OR FINISH NOTES PHS SHOWN ARE BASED ON ARMSTRONG MOUSTRES UT X 12" VINTL COMP. TLES. COORDINATE ALL 1016 N. GEG. (b)(7)(E)COMMUNITY EDUCATION CENTERS ALBERT M. "BO" ROBINSON EDUCATION & TREATMENT CENTER SECOND FLOOR TILE PLAN A.102A

(b)(7)(E)ALBERT M. "BO" ROBINSON EDUCATION & TREATMENT CENTER THIRD FLOOR PLAN THIRD FLOOR PLAN A.103



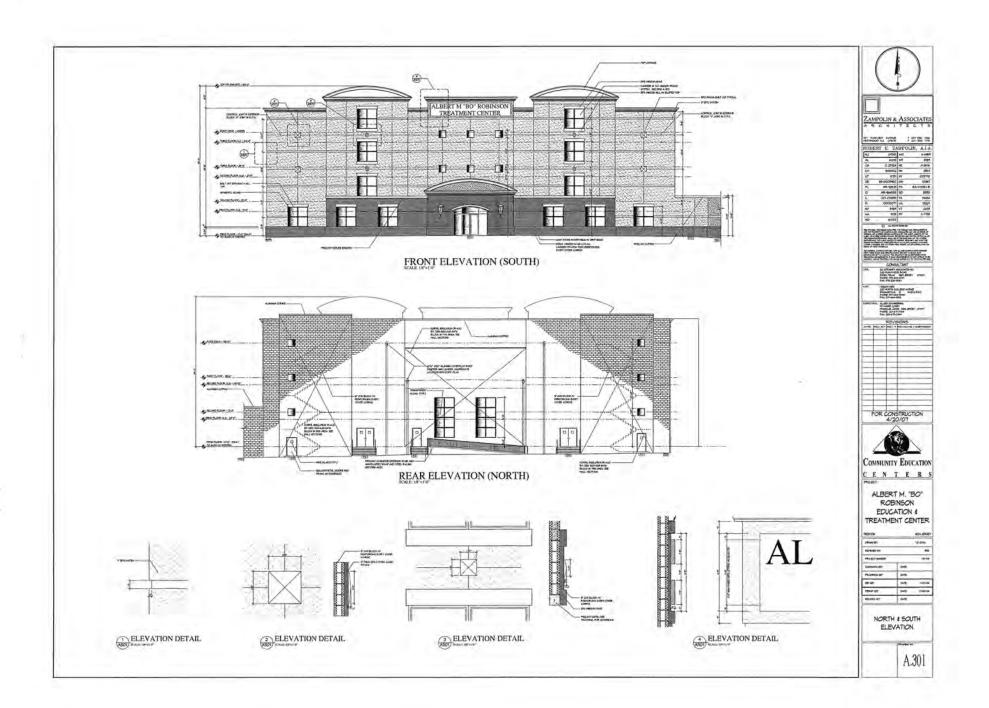
LIGHT FIXTURE SCHEDULE (b)(7)(E)EMERGENCY LIGHTING NOTE COMMUNITY EDUCATION ALBERT M. "BO" ROBINSON EDUCATION & TREATMENT CENTER FIRST FLOOR REFLECTED CEILING PLAN FIRST FLOOR REFLECTED CEILING PLAN A.201

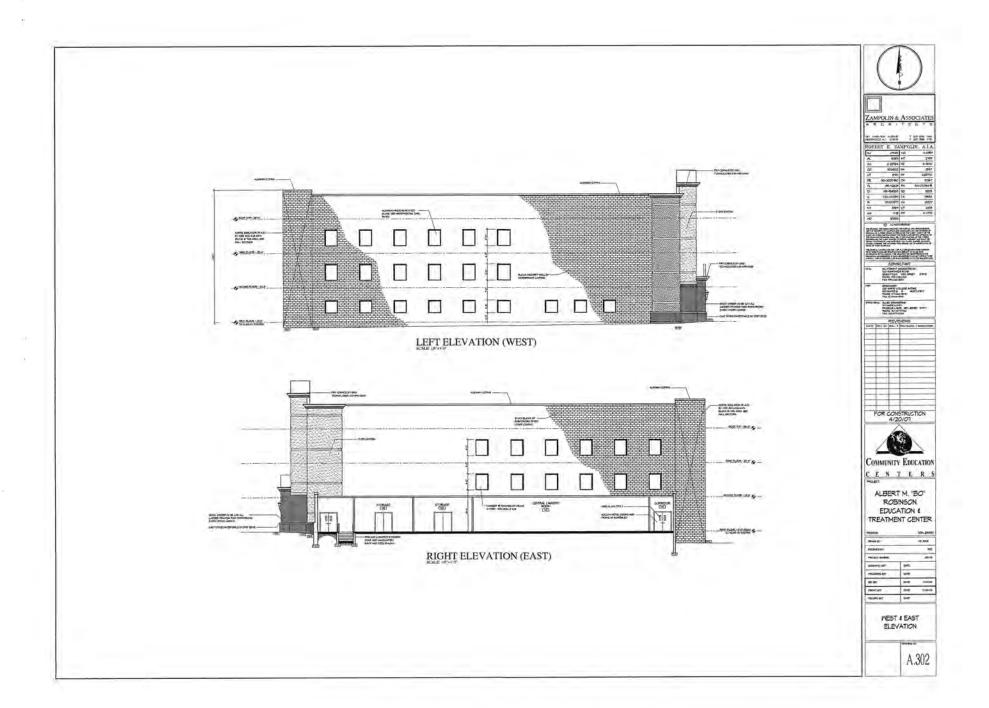


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(b)(7)(E)THIRD FLOOR REFLECTED CEILING PLAN

(b)(7)(E)COMMUNITY EDUCATION ALBERT M. "BO" ROBINSON EDUCATION & TREATMENT CENTER ROOF LIGHTING PLAN ROOF LIGHTING PLAN



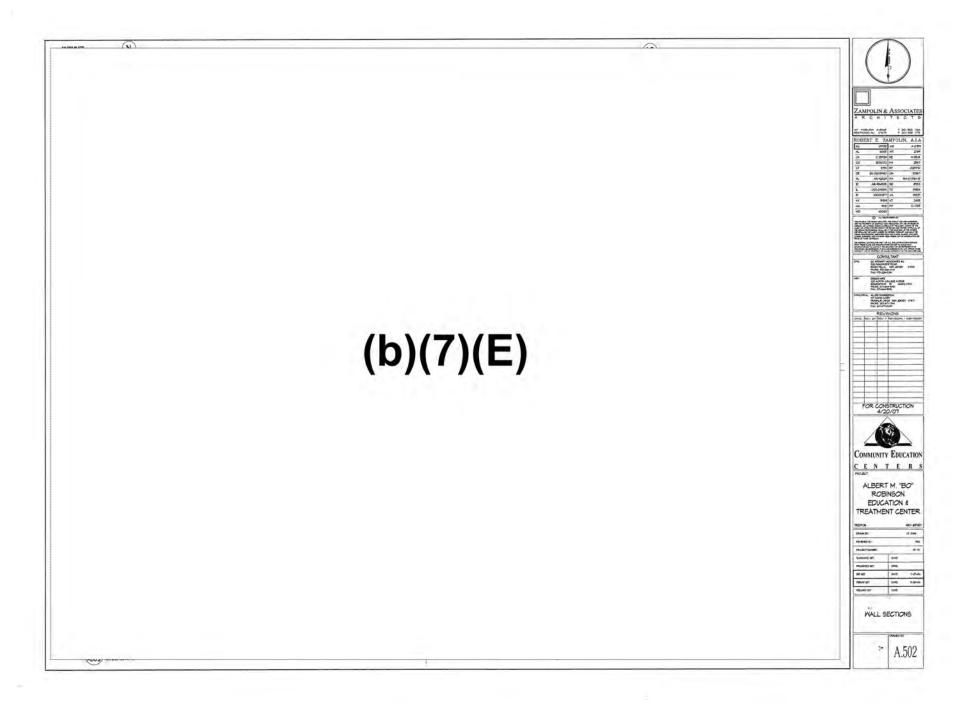






(b)(7)(E)A501 SCALE NO - 1'-1"

ZAMPOLIN &	ASSOCIATES
ROBERT E. Z.	AMPOLIN, A.I.A.
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ZAMPOLIN & ASSOCIATES (b)(7)(E)COMMUNITY EDUCATION ALBERT M. "BO" ROBINSON EDUCATION & TREATMENT CENTER ENLARGED STAIR PLANS & SECTION A.701

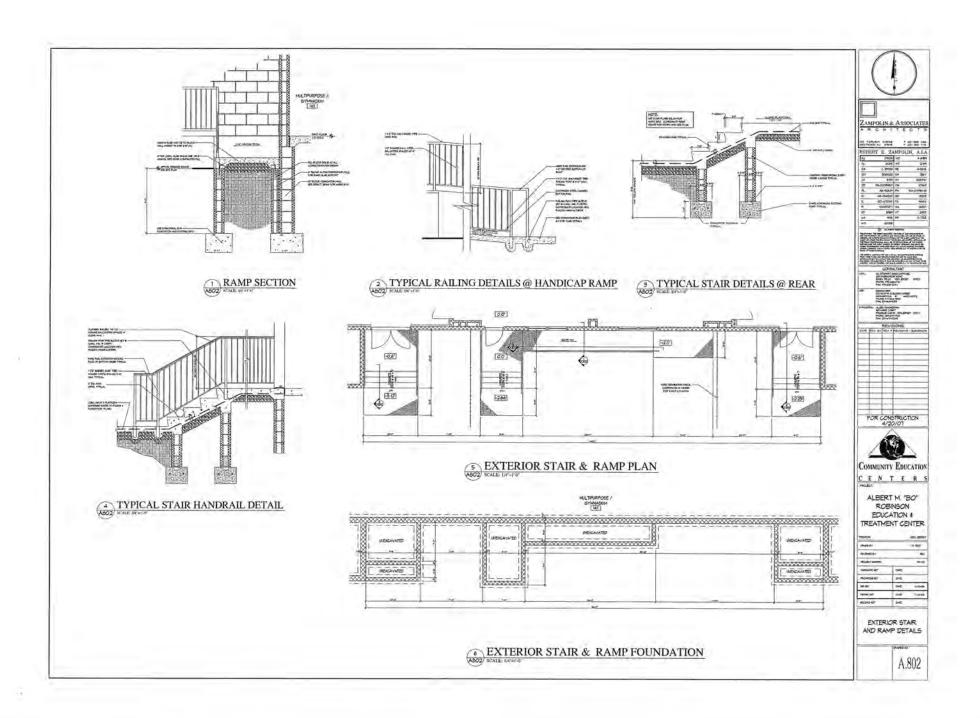






TOU CT DOOM ACCESSODIES (b)(7)(E)ALBERT M. "BO" ROBINSON EDUCATION & TREATMENT CENTER ENLARGED TOILET ROOM PLANS & DETAILS A.705

(b)(7)(E)12 TYPICAL ALUMINUM COPING DETAIL (12" CMU) (b)(7)(E)13) NOT USED ALBERT M. "BO" ROBINSON EDUCATION & TREATMENT CENTER 14 NOT USED ROOF DETAILS A.801 15 NOT USED



11 NOT USED 15 NOT USED (b)(7)(E)14 NOT USED 10 NOT USED CENTERS ALBERT M. "BO" ROBINSON EDUCATION & TREATMENT CENTER 4 NOT USED 13 NOT USED (b)(7)(E)MISCELLANEOUS DETAILS A.803 12 NOT USED B PASS THROUGH AT

mi054	ROOM TYPE	FLOOR-	PLOOR FINISH	TABLE		TODE	William			LINES		REMARKS
YPE		1,000		21.00	MATERIAL		MATERIAL	FINISH:	HATERIA		HEIGHT	(P.1.07 1).
A.	LOBBY	VCT	NOW SUP MAX	VM	-		6PB	PANT	6YB	PANT	4-0"	
8	OFFICE	VGT	HONELPHAN	VIENT		-	3/16	PANT	ACT	TYPEH	4-0	
-6	CONFERENCE ROOM	VET	HON SLP MAN	VIVYL	-		6PB	PANT	ACT	TYPE4	4-0"	
p	PASSAGE (OFFICE AREA)	VCT	NOW SUP WAX	AMUT	-	-	GMB	PANT	ACT	TYPEH	4-0"	
	CORREDOR	VCT	HONSEPHAX	VINYL	-	-	546	PANT	SVB	PANT	4-0	
r	CORREDOR	VCT	HOH SLF WAX	VWYL	-		one block	PANT	6rB	PANT	4-0	
6	LECTURE ROOM	VCT	NON SUP MAX	VML	-		GPB	PANT	ACT	TYPE-1	14'-€7"	
H	COUNSEL	VCT	NON SUP MAX	NAMT.		20	GMB	PANT	5/6	PANT	4-0	THE RESIDENCE OF THE SECRET AND
11.	SYMMASIM	EFOXY	5MOOTH	WHYL			BLOCK	PANT	DIF.	PART	20-0+	AN ENGINE SELECTION OF THE PROPERTY AND
J	TOLET ROOMS (PUBLIC)	CER.T.	MATT FINSV	CERT	-	100	BLOCK	PANT	6MB	PART	4-0"	
K	DNNS ROOM	VCT	HON SLE WAX	MACH			BLOCK	FANT	SMB	PART	4-0.	
JL.	CENTRAL LANDRY ROOM	EPOXY	NON SUP	BPOXY	2	2.5	OPE BLOCK	PANT.	GMB	PANT	41-0"	
м	CONTROL CENTER	VGT	NON SLP MAX	VERYL.	-	100	6PE BLOCK	PANT	676	PANT	4-0	
ĸ	H.G. TOL RM. (GONTROL)	CERT	MATT FRISH	CERT			GNB	PANT	- 6MB	PART	B-0	
0	DORN UNIT	VCT	NON BLP PAX	VIML	12	100	SPES .	PANT	GNE	PANT	4-0	
P	ADA DORM UNIT (NOT USED)											
0	TOLET ROOM (RESIDENT AREAS)	EPCXY	NON SUP	EPOXY	-		BLOCK	PANT	GMES	PART	4-01	
K	SHOVER ROOM (RESIDENT AREA)	BACKI,	NON SUP	EPOXY			BLOCK	FANT	GNB	PANT	10'-0"	sertile retrieved drugs (States
9	DAY ROOM	VCT	NOI SUP PAX	VMYL			648	PANT	6MB	PANT	100	MUST TO REPUBLIED VEHICLE PLANS FOR VEHICLE FORM LOCATION
7	UNIT OFFICE	VCT	NON SUP MAX	VINC	1991		Gr6	PANT	GP183	PANT	4.0	-
V.	UNIT OFFICE N.C. TOIL	CERT.	MATT FINSH	CERT.	-		6MB	PANT	GNB	PANT	5-0	
٧	SORRIDOR	VCT	HON BUT HAX	VHYL	-		SPD	PANT	GNE	PAINT	4-0	
n	SALLY PORT	VCT	NON SUP YEAR	-	-	-	BLOCK	FANT	SVB	PANT	4-0"	ACTION DISCOURT BOLL PLAN PRODUCT OF PARTY OF PRODUCT OF PARTY AND ACTION OF PARTY AND
x	JANITOR CLOSET	EPOXY	NON SLIP	EFORY	-		SPE	PANT	GPE	PANT	81-0"	
Y	STORAGE	CONC	TROPLED SHOOTH		-2		BLOCK	PART	EXP.	-	100	
1	STORAGE	CONC	TROWLED SMOOTH	- 10			BLOCK	PANT	GMB	PART	4-0"	
AA	STAIR	SONG.	TRIGINLED SHOOTH	-	-	-	buook:	PANT	GPB	PART		SHOPE FLIST OF THEIR TURNS FLORES THE STREET STATES
AB	UTILITY ROOM (MECHANICAL)	GONG.	TROPLED SMOOTH		-		BLOCK	PANT	Exp	-	1.00	THE PERSON NAMED AND POST OF THE PERSON NAMED
AC	UTILITY ROOM (MECHANICAL)	CONC.	TROWLED SHOOTH	9	-	-	BLOCK	PANT	EXP		-	
AD	ELEVATOR HACHINE	GONG.	TROVUED SMOOTH	-	-	13.2	Bucck	PANT	DO*	-		
AE	ROOF RECREATION	RUBBER	SOLON AV WILLIAMS				BLOCK	PANT	-		OPBI	CONTINUES (PARTY THAN AND THAN IN PACTOR SOUTH
AF	JANITOR GLOSET	EPOXY	NON SUP	EFOXY	-	-	BLOCK	PANT	SMB	PANT	D-0*	
AG	UTILITY OWSE	CONC	TROVLED SHOOTH	-		12	BLOCK	-	6660	PANT	4.0	LANCRY FOR UTLITY CHRISE
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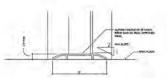
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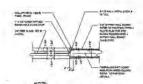


ALUMINUM SADDLE (B)

SADDLE DETAILS

TYPICAL VISION PANEL DETAIL

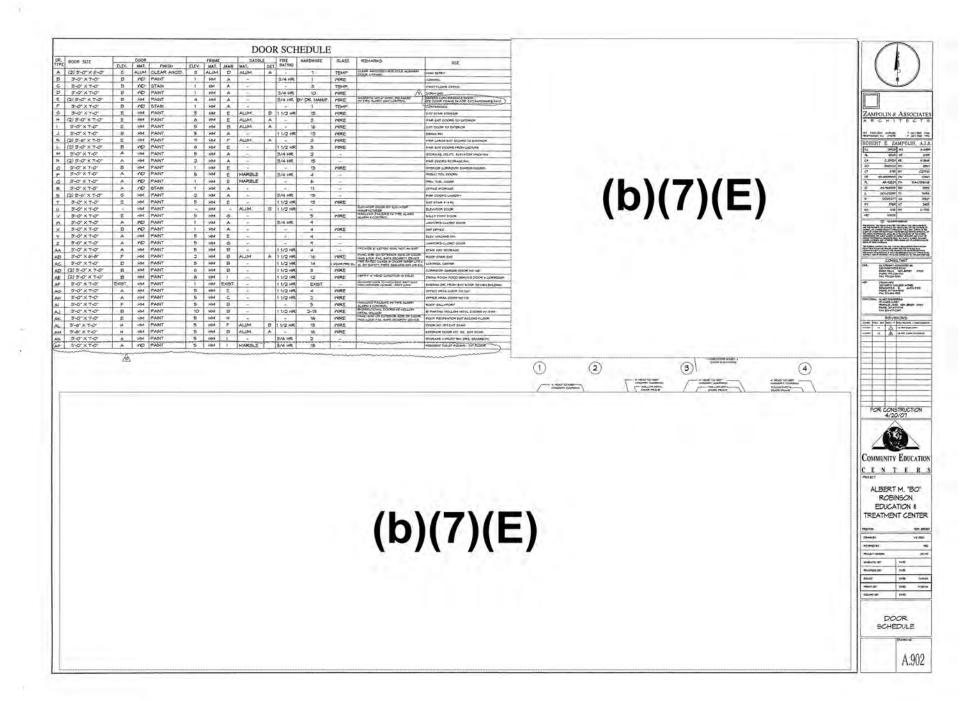
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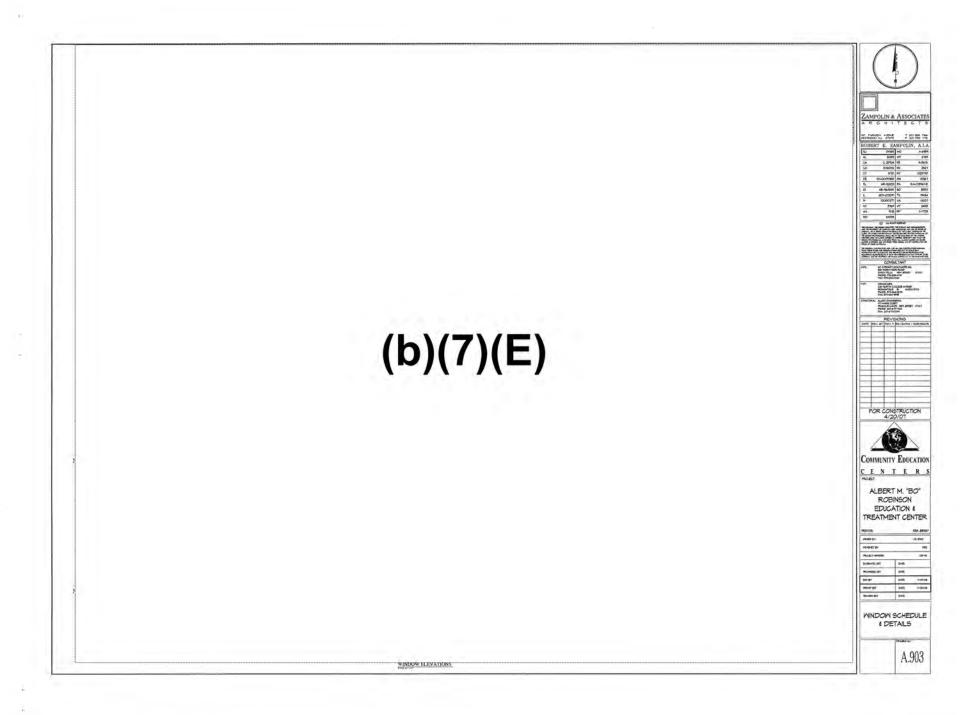


NOTE: RETEX TO VISION PANEL ELEVATIONS AND FLOOR PLANS FOR LENGTH

TYPICAL VISION PANEL JAMB DETAIL

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- NOTES:

 1. FINISH FIRST FLOOR ELEVATION IS (54.4°)

 2. ALL FOOTINGS SHALL BEAR ON UNDISTURBED SUTURBE SOL, OR COMPACTED GRANULAR FILL WITH MIN. EXAMIS CAPACITY OF 4,000 PSF.
- WITH MAN. ELARMIC CAPACITY OF LODO FIST.

 4. ROTTOM LEVEL OF EXTERIOR FOOTINGS SHALL. BE

 1-e- MAN. BELOW ADMOSTST SHACE.

 5. DONOETE FOR THE FLOOR SYSTEM SHALL

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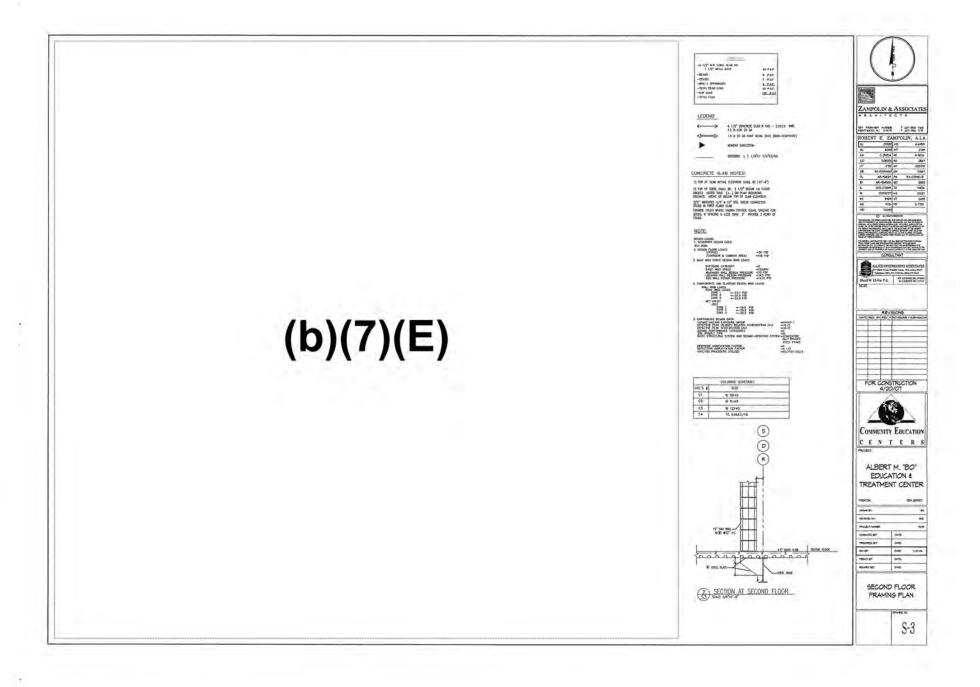


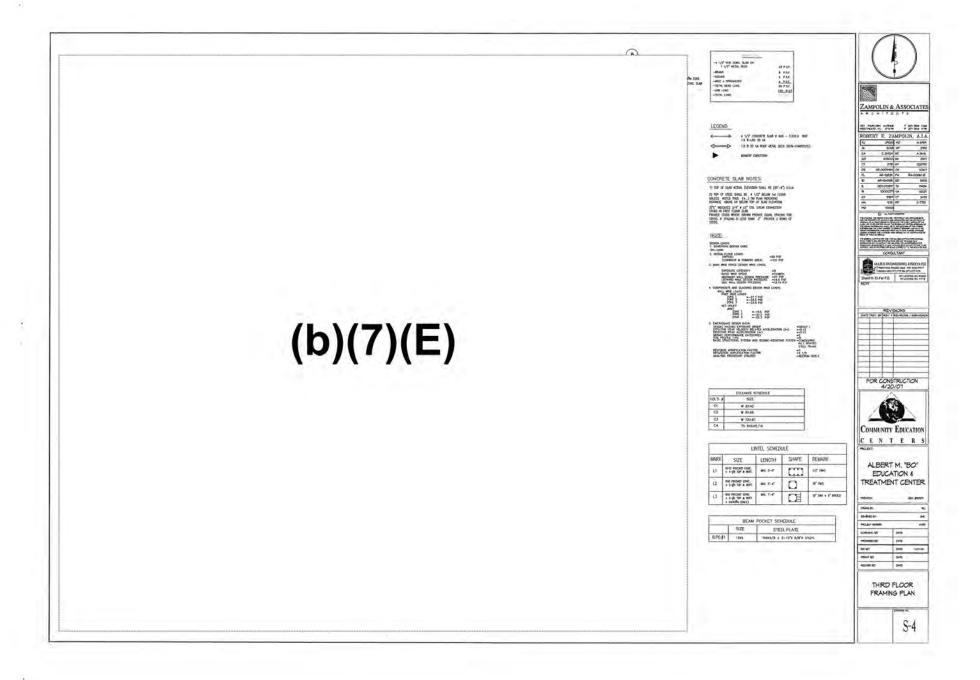
ALBERT M. 'BO' EDUCATION 4 TREATMENT CENTER

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FOUNDATION PLAN







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ALBERT M. "BO" EDUCATION & TREATMENT CENTER

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ROOF FRAMING PLAN







CONTRACTOR RESPONSIBILITY

- N. ALL WORL SHALL COMPLY WITH THE RECLIMENTATE OF ACT CHE-MIT
- SLAD SHILL BEAR ON 4 R. POPOUS CRUSHED STORE FILL WITH 1 NE SAND LIMES CHES TOP BESIFICIAL SLADS ON CHOCKE WITH WHEN AT 2 K. BELDY TOP SLAD
- SAW CUT ALL CONSTRUCTOR ATTERS OF L/A THE DEPTH OF SLAE AFTER A DO DAY WAT FILL ALL CONSTRUCTION AND CONTRACTION ADMITS WITH CPCORY JOHN FILLIE
- SERVICE SOL SHILL BE CONNECTED TO A MINIMUM OF RELATIVE CENSEST IN BEST
- ALL FOOTNESS SHALL BEAK ON SOUG LARKSHARD VIRGIN SOUL OF CONTROLLED COMPACT FELL, MITS A MINIMAN SEARING CAPACITY OF 4000 P.E.F.
- ENTERIOR BACK FILING SHALL BE DONE AFTER HISTALIANS SHE CONCRETE FLOOR SYSTEM
- 4. DETAILS AND DIADRESIS SHOWN IN ANY SECTION AFFET TO ALL SHEAT SECTIONS. WHILE INTO STATEMENT.
- ALL CONDUCTS FORMACOS TAVAL COMPLY WITH THE LATEST EXTENS OF AG DAY (PERSONALIDATE PRINCIPLE FOR CONCRETE FORMACOS) FO 1 (CONCRETCION AND WELFORDS REVISION HAT
- 3. THE TOTAL DESIGN SHALL BE SUBMITTED TO THE STRUCTURE. DISTRICT FOR READIN AND APPROVAL.
- A. ALEN JOHNS MICHAEL WHENTEND MEET FORW ADMIS TO A
- OBTAIN APPROVE BETTER FRANCE CHESINGS IN CHILCTERY.
 MONDRESS WHICH ARE NOT INDICATED IN DRIVINGS.
- MYEV FORM RELEASE AGENT ON FORMACK IN ACCORDING WITH IMMUNICIPIER'S RECOMMENDATIONS.
- 7 APRY FORM MISSAGE ASSIST PROF TO PLACEMENT OF SECUNDARY STEEL, AND HOME SECUNDS, AND DIRECTION STEELS.
- 4. PROMOG FORMED GROWNS WHERE RECOVERED FOR FITTERS TO BE OMETICAL IN OIR PARESHIP THROUGH CONCRETE WHEN.
- ALTA CONCRETE. IN SPINO'S GEING BABIN MITT BE GIVE DIRECTED.

CONCRETE REINFORCEMENT

- ALL CONCRETE, ECHALS AND CONSTRUCTION AND TO COMPLY HITH THE LATEST DESTINA OF THE MIX 301 & NO 318 CODE AND LOCAL CONCRETE CONTRACTOR OF THE MIX STATES OF THE CODE AND LOCAL CONTRACTOR OF THE CONTRACTOR OF THE
- 3. WILDER WAS MESH SHINL CONFORM IC A S.F.M. A-AMI. PLACE, SUPPORT, AND STOLER REPROPORCIMENT ALMOST DESPLACEMENT, OR NOT DEAVE FROM REQUIRES FORTICK.

W. CAST-IN-PLACE CONCRETE

- ALL CONCRETE OCTALS AND CONSTRUCTION AND TO DOMES HAVE DRE LATEST EDISON OF DIE AD 301, ACI-STR, ACI-STR.
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- 13 TO HOT PATCH, FUL TOUCH-UP, HERME, OF REPLACE EXPOSED CONCRETE EXCEPT LINCON CHPWELS DISCOUNT OF ENGINEER FOR EACH HOWELD, AREA.

VII. OPEN WEB STRUCTURAL STEEL MEMBERS

- 2, JOSES SHOULD HAVE 2 1/2" MINISH BESTING ON STRUCTURE.
- 1 PHONES SOUT SLOOK WASHING COURSE, MICHIGAN SOUT IS SUPPORTED.

- COLUMN DRITTON CHORGE OF ALL ORDS WERE CITED, JOSETS NO.
- ALL DIA JOSTS THAT MR. 37-0 FEST ON LONGER TO BE WANTED TO THE DIABET AS TEXTAMENOUS BY STEEL JOST
- STEEL USED IN THE IMMUNICIPIES OF JUSTS AND JUST SHOOKS SHALL COMPLY WITH THE APPLICABLE STEEL AND WITHOUT LAND SHEED SHOOKS
- IN ALL MATERIALS SHALL RECEIVE AS LEAST ONE SHOW COST OF PARAM-IV ACCORDANCE WITH FED. SPACE IT PASS EACH CHIEFLY
- THE MELTIN DECK LOS AT 15, O'C TO STRANDALMS WITHERS YOURS

- ALL MASSAMS BLOCK LIMITS SHALL COMPTION TO ASTRO-CHO-MICHING BLOCK LIMITS BELOW CROCK AND ALL EXTERNOR WALLS SHALL BE SOURCE A-1 ON C-1. ALL RECOX BELOW SHALL BE COMMITTED.
- COPUT IN SERIO BEING MED CADUTED COLIS SWALL BY MADE WITH THY I CHARLIS AND STORE ADDRESSES AND SHALL DEVELOP SHOOT POR PLUE DAYS.
- THE OF MALE DAY SEE OF OPENING AND EACH OF COMMON AND THE PROPERTY AND COMME OF AND AND THE PROPERTY OF DESCRIPTION OF DESCRIPTION AND EACH OF CHARLES AND AND ADDRESS OF THE PROPERTY OF DESCRIPTION AND EACH OF COMMING.
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X. STRUCTURAL STEEL NOTES

- A SHOP CONNECTIONS SHIELD BE MAIN MINI HIGH STIRES BELLTS HE WILDS.
- 6 THE CHARLES CHARME WING WIR HEN STREET
- C. COMMISSION DAVIGON) TOLK SHEAR CANADITY OF THE MCMISSION

- THE ALL STRUCTURAL STREET SHOULD HAVE DIVE SHOP DON'T DO FRANT IN ACCOMMENCE WITH FED SPICE TIT-P ASS (PRE) I

(b)(7)(E)



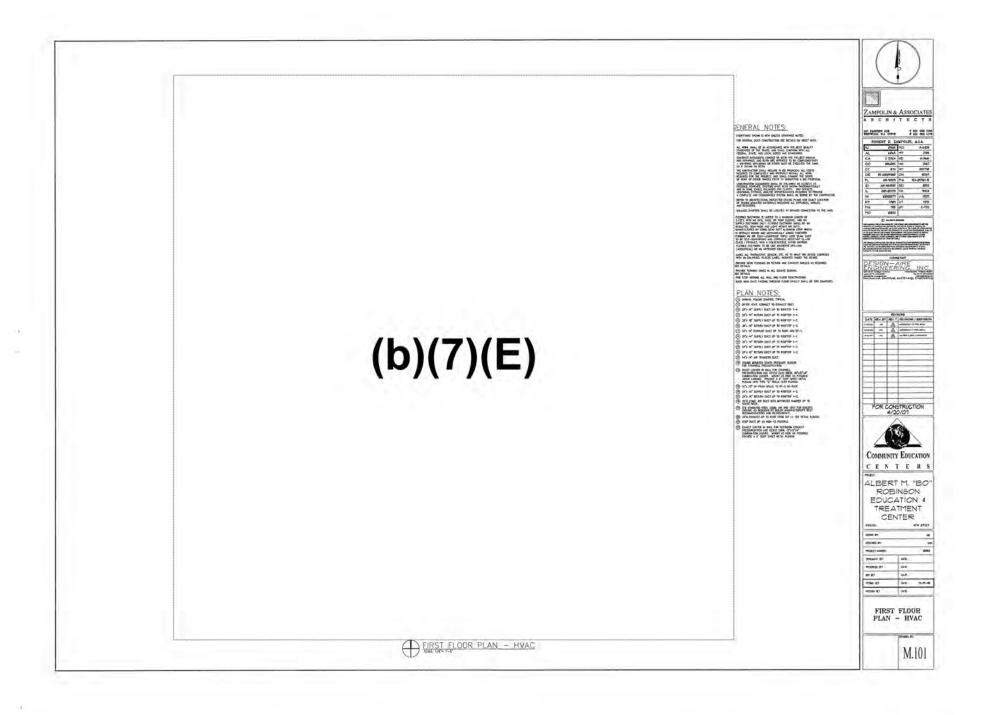


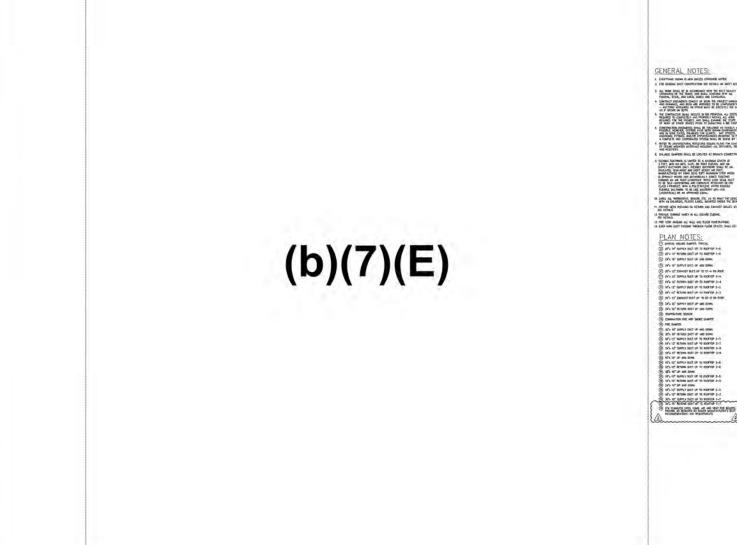




EDUCATION 4 TREATMENT CENTER

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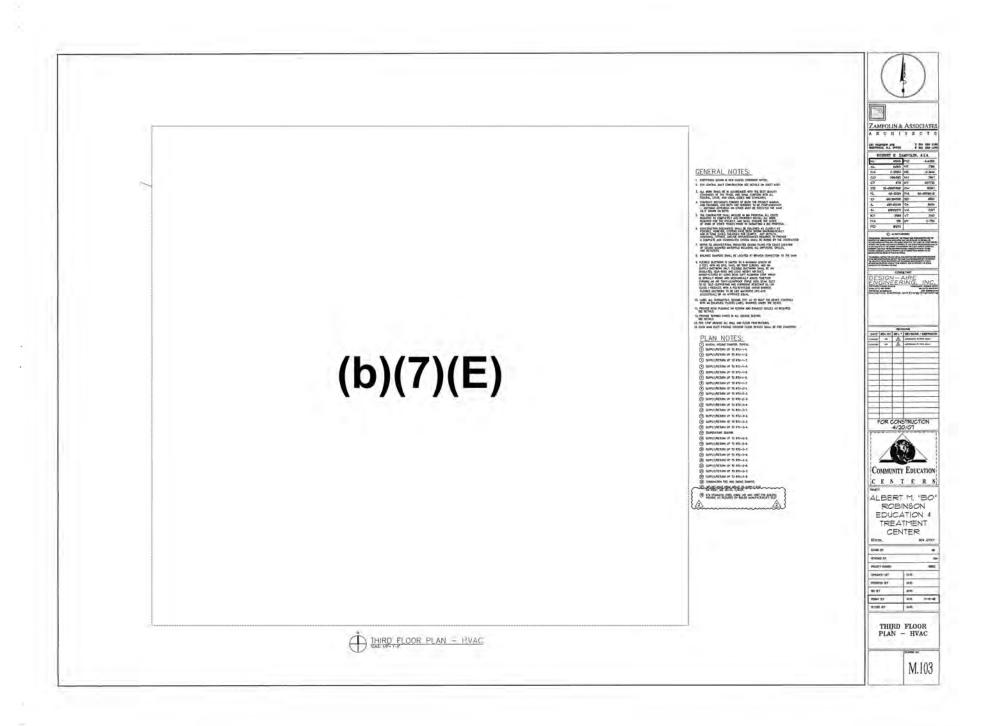


ALBERT M. "BO"
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SECOND FLOOR PLAN - HVAC

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ZAMPOLIN & ASSOCIATES

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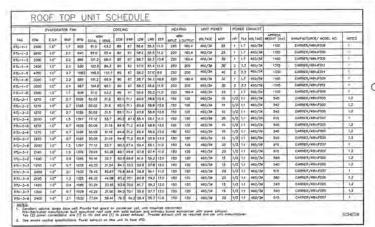
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ROOF PLAN - HVAC

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ROOF PLAN - HVAC



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tr-2	100	0.57%*	5024	1778	95	1/5	120/14	×	Theoretica by AC. When by EC.	POHI/DX110	1	
CF-3.	2473	0.375*	-éeto'	1300	87	1/2	120/18	5	time case by EC. Wine by EC.	PENY/briss	1	
17-4	1475	0,375*	4590	1300	47:	1/2.	120/16	-	Time coins by EC. Wind by EC.	PENN/DATES	3	
UF-5	1425	0.375*	1650	1300	4.7	1/2	120/14	-	Ties dook by EC, Wed by EC	Ppoybnis	1	
-	wa	2375	J482~	1200	122	12	1200/A	~	DESCRIPTION OF THE PERSON OF T	EDWARDE	m	~~~~
17-7	450	0.375*	3656	1165	Fee.	1/8	120/1#	-	Time slock by EC, Wied by EC	PEMIL/SKRSTA	.3	7
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		PAN DAT	TA			- 1	MOTOR DATE			
ian.	-	Line	39	-	NO.	-	wine.	he.	JAMES STREET	AUTE
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2-1	4000	en.	1934	75e -	15.5	1/2	120/1/90	-	#HOOF HIS HERES ST-1/2	G
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GRILLE AND DIFFUSER SCHEDULE

MATES	VENNEZ	HAMIFACTURER/ MODEL NO	MICK GAMPER T / N	MOX SZE	WE.	LOW	166
1,2	SUPPLY, SUPPLICE	ANENOSTAT POT-411A4	N .	17	220	AD	4
1,2	SUPPLY, SUPPLY	ANEMOSTAT POF-STIAF	. 41	174	12)	15.86	
1,5	SEPPLY, SEPTACE	MENOSTAT POF-BINA		8'4	25	286	C.
1.3	MINTLY, SURFACE	4MEN/05787 PDF+152244	N .	10"#	36	Me	3
1,3	SUPPLY, BUTTACK	ANDROSTAT POP-1232A4	.0	12'9	- (2)	350	
5.4	HETURN, BURFACE	HINDOSTAT 30	-H-	10" X 10"	.76	450	7
1,4	HETUPING SURFACE	ANDMOSTAT DE	19.	16" 6 16"	74	. VS0	0.7
1,4	RETURN, SURFACE	ANDMOSTAT 50	. 61	HE'K HOT	14	1400	79
1.)	SEPPLY LATIN	AMERICSTR 1 (%-622A4	4	174	Ni -	125	4.
13	SHOPLY, LANSING	84E46074F PSL-09244	-tr: -1	40	23	791	**
13	SHAFA TYLING	AWEMOSTAT NO1022A4	W.	10'#	20	380	4
.10	SHIPLY, LAN-OF	PHENOSTAT POL-1002A4	- Br 1	1214	25	-550	
1.1	HETLANG LAY-NY	ANEMOSTAT JPE	100	10" x 22"	24	1990	H -
2.0	DETURN, LAST-RY	AMENOSTAT SPC	- No.	22° x 22°	74	1400	P
1.4	ENHAUST, SURFACE	ANEMOSTAT DA	.00	Ext.	24	150	
14	DHAUST, SURFACE	AMEMOSTAT 3P	N:	12" × 12"	24	150	
1.4	SHALL BUANT.	AMENDETAT SZINI	81.	12" X 12"	24	550	9.1
38	SHIPLE BURNET	AMEMOSTAT DV	- R	34" 8 34"	30	4000	1
1.4	MINT, SHINE	AMENDITAT AP	Tr.	46" X '20"	50	4000	41 .

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CABINET HEATER SCHEDULE point to be comi-represed in our provide for all in required and and removal discovered, parties (constraint, and thermostat). Come as selected by weathers.

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FOR CONSTRUCTION 4/20/07

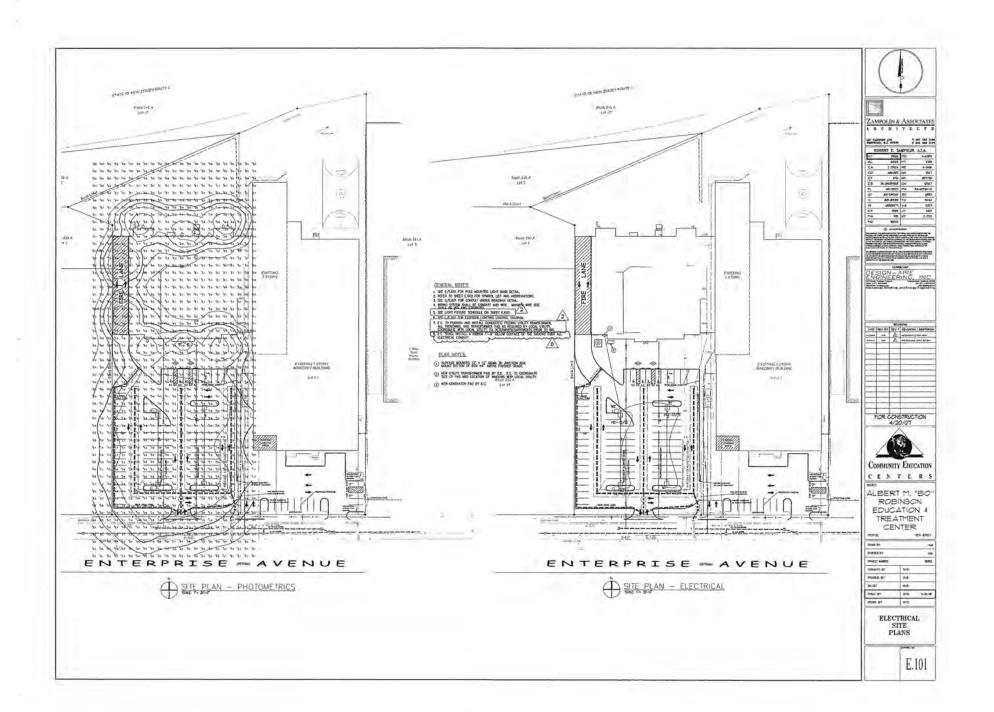


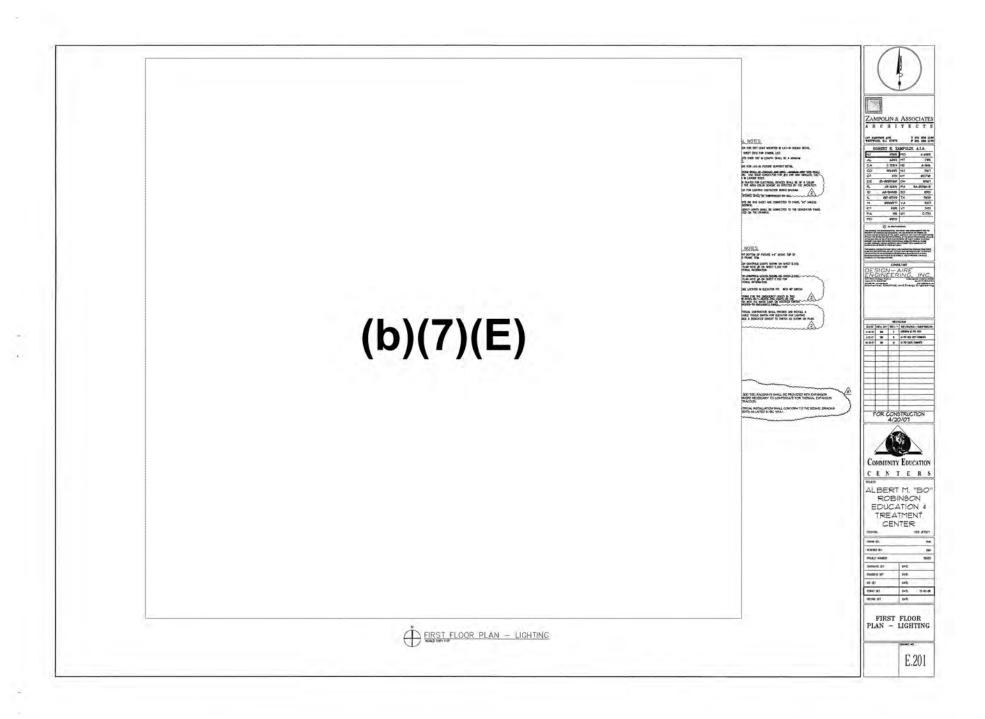
ROBINSON EDUCATION 4 TREATMENT

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SCHEDULES

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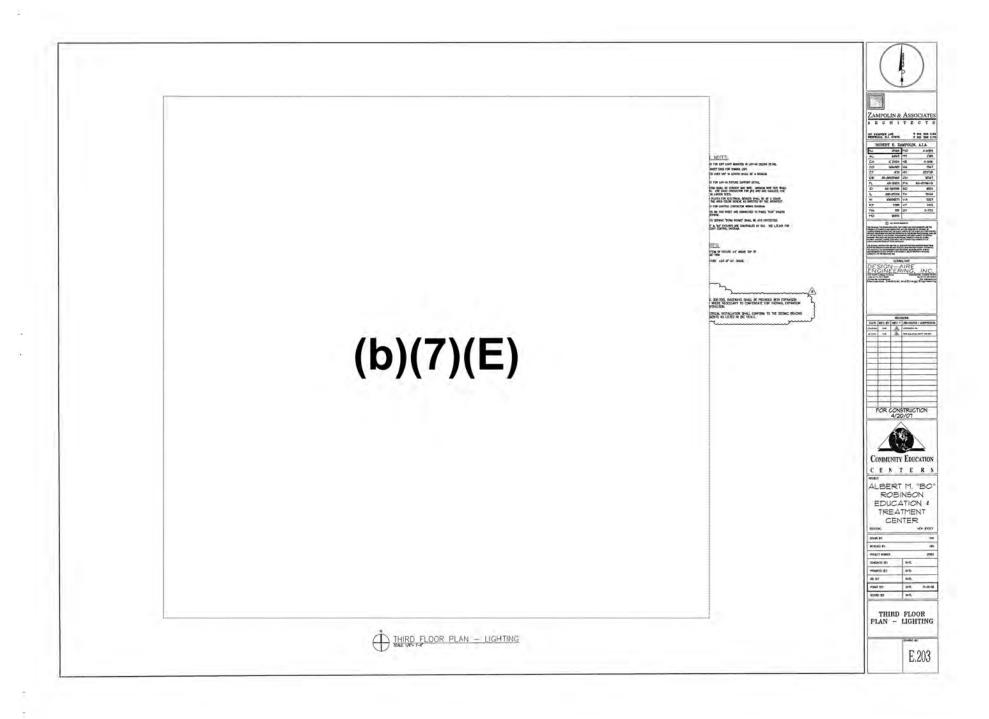
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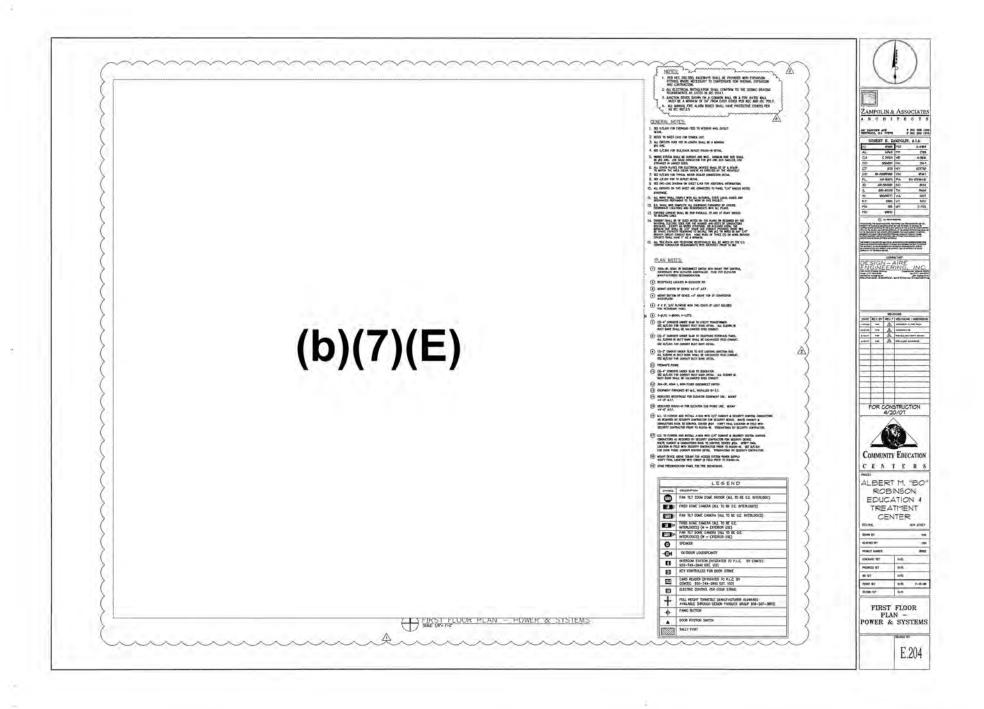
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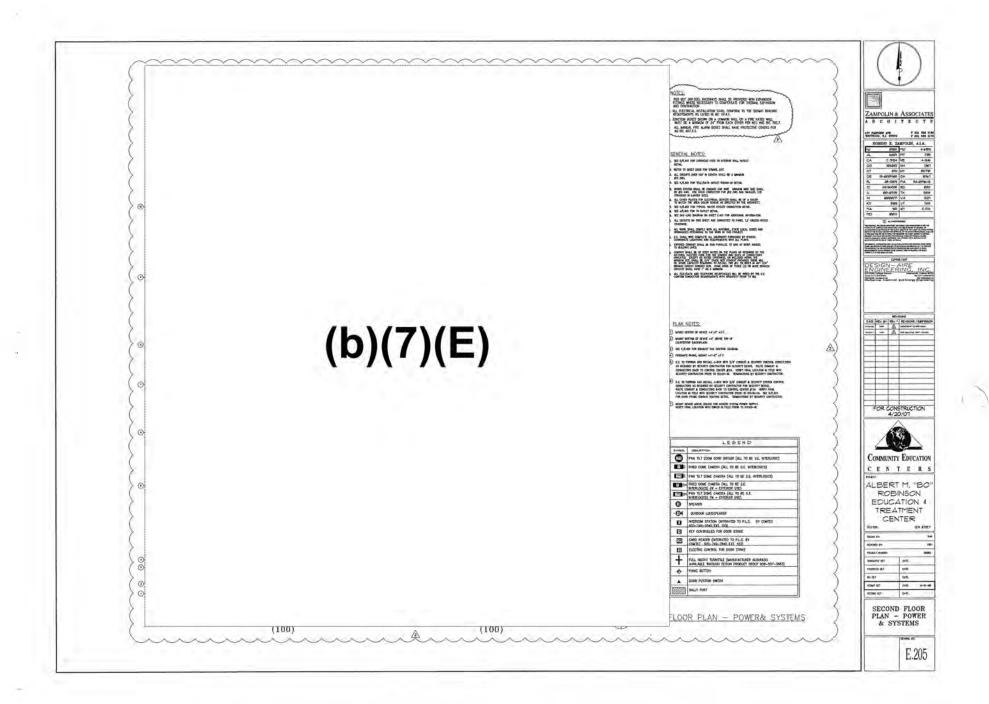
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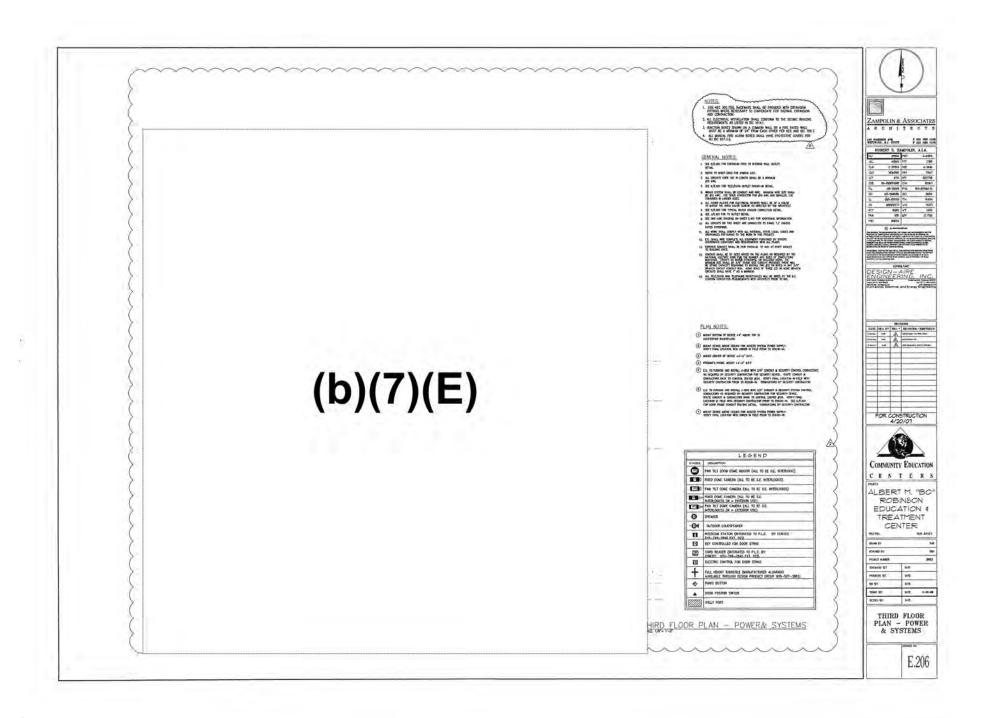
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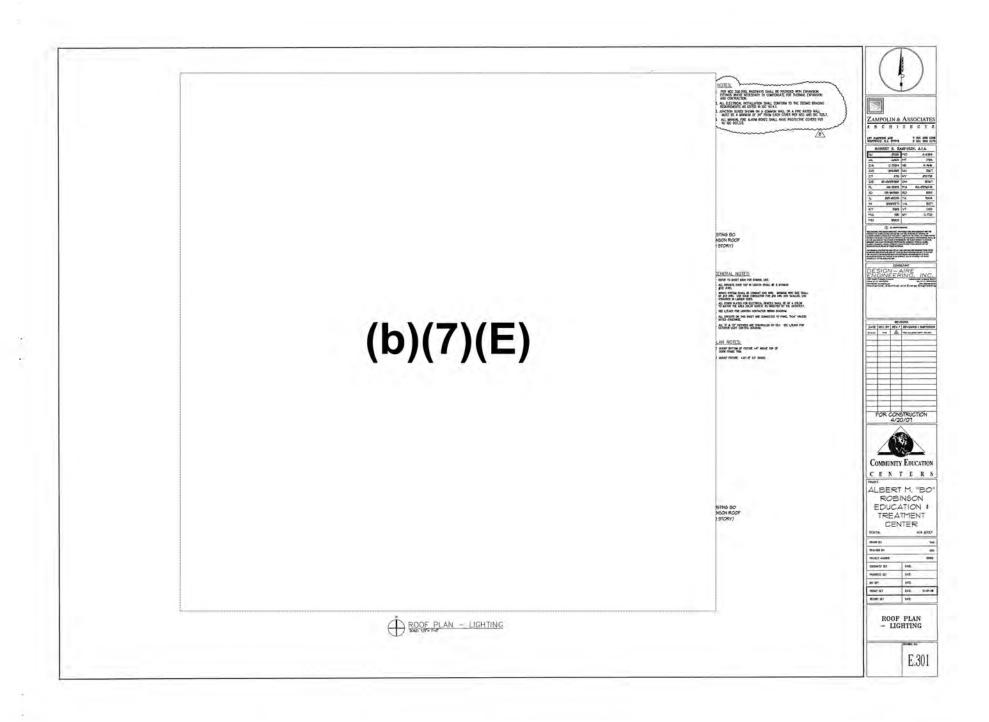
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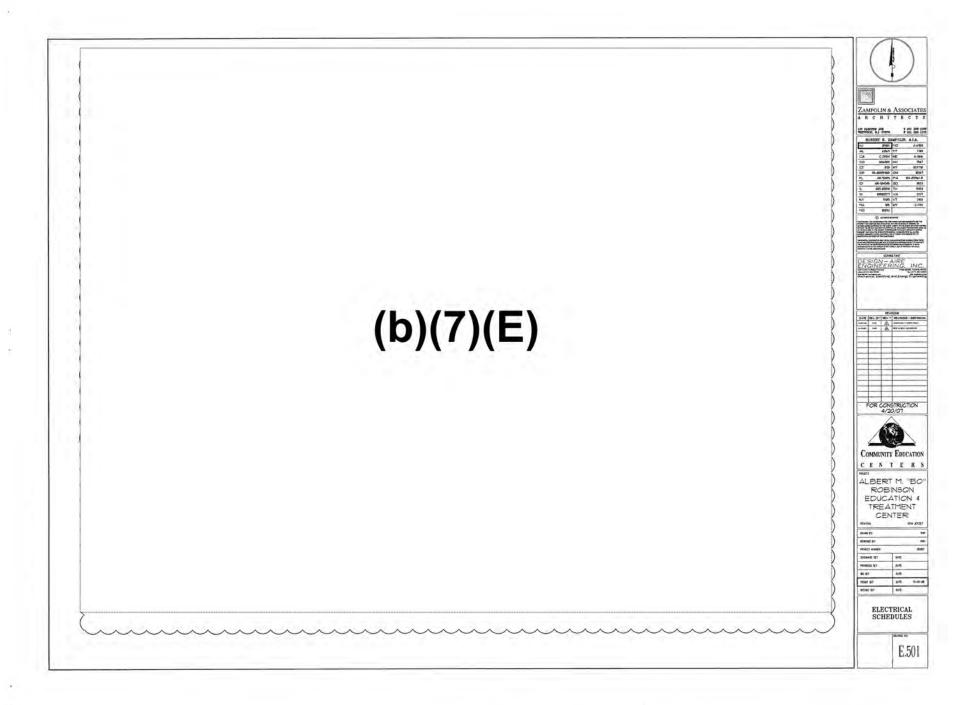
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ROBINSON
EDUCATION 4
TREATMENT
CENTER ONE-LINE DIAGRAM



ZAMPOLIN & ASSOCIATES (b)(7)(E)ALBERT M. "BO" EDUCATION 4 TREATMENT CENTER ELECTRICAL SCHEDULES E.502

(b)(7)(E)ALBERT M. "BO"
ROBINSON
EDUCATION &
TREATMENT
CENTER ELECTRICAL DETAILS E.601

		LIG	HT FIXTURE	SCHEDULE		
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STARKE	LOCATION	DESCRIPTION	HANDFACTURER.	CATALOS II	LAMPS	REMARKS
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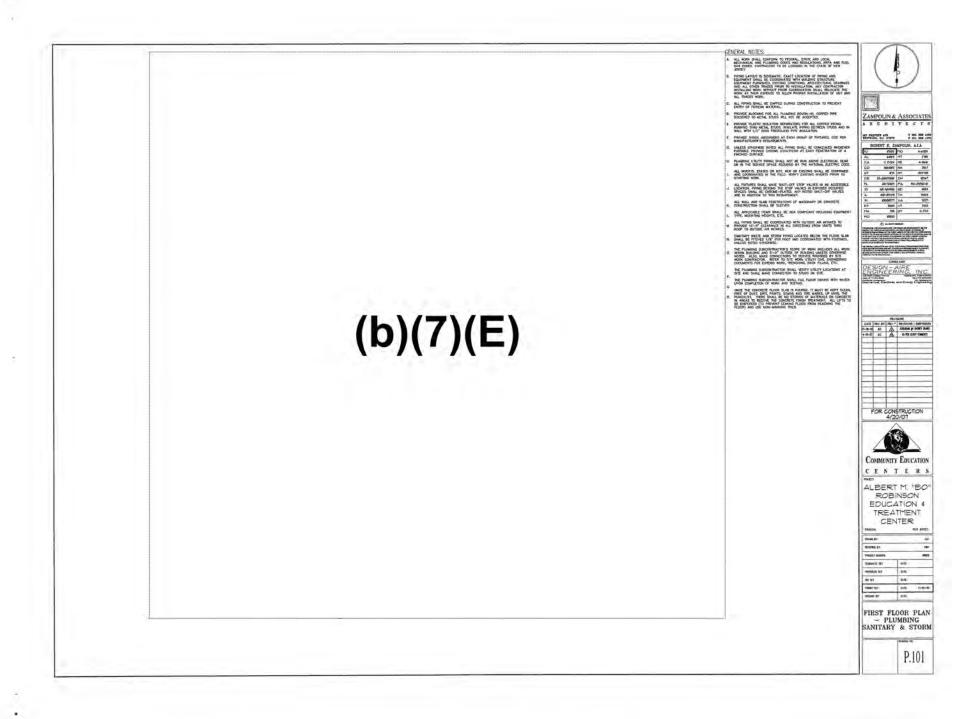


			ELECTRICAL S	YMBOL	LEGEND		
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	FEATH FLIDS IDVILET		SURFACE/RECESSES (+ 4 FLURESCENT LIGHT FINTURE)	0	PHOTO DETECTOR: PHOTO ELECTRIC:	- ×	MARIE CALL SATELLITE EMPYOR LAB
9*	HELPHADE, BIPLEX - WEI		BANFACE/RECESSES 8 . 4 FLARESCENT LIBIT FINTERE	10	PALL STATON	() See	MARIE CALL, INTELLITE POVER SUPPLY
92	DECEPTACLE, RAPLEX - MERCATES	0	EXIT LIGHT FEXTURE CELLING HOLIFTED	d	STRONE (ANT	-	HURSE CALL HASTER POVER SUPPLY
9	PECEPTAGLE, SIMILE	ю	EXIT LIGHT FIXTURE WALL HOLHTED	0	FIRE MARK IDECENTION DUCT DETECTOR	- m	MURDE CALL POWER SUPPLY
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9	RESPIREMENTAL SPEE	p.g	PRACTIONAL DISCUSSIONAL PROPERTY AND PROPERTY.	113,000	FIRE ALARM CONTROL PANEX.	(a) M. M.	NURSE CALL TONE LIGHT, SINGLE LIMIT
9	RESEPTACLE MADELEY	-0	FOLE MONTES LIGHT FENTURE - LINGLE FEAS	cased	FIRE HLARH MINLINGSTER PANEL	₩.Ac	MARIE CALL, SOME LIGHT, SUAL LAW?
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Divis.	SECEPTAGLE/SWITCH COMMISSATION	123	KILLAPS LIGHT FIXTURE	Eld	HOMM STRUKE	-	HARDE CALL, CENTRAL EQUIPMENT CARDIET
⊠ +.	DEDRHELL PURH MUTTON	OI	FLOCO LIGHT GROWN HOWITCH	13	THE MAIN SPENCE	. Hos	MAPSE CALL EISE BLIE BUFTON
D	BOX BOY CHOK	1383	LIGHTING CONTROL PANGL	094	FINE ALAIM, SPEAKER STREET	•	MARIE CALL PATIENT STATION
T.v	TRANSFERMEN, AND TO LOV VOLTAGE	1000	LIDHING CONTROL ROLAY PANEL	-	-E-3-UT-1-1-1	- E	MANUE CALL STATE STATION
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•	SCOUNTY SOON LOCK MILEASE - ELECTRIC STRIKE	\$	EVITOR SINGLE POLE	CHEC	REMO'S SENSIATUR CONTROL/ALARM PANEL	100	MARKE CALL FOR DEPARTED CALL SYCHOL
DK	SECURITY NOTES SETECTOR	20	SALLOY JIMES-ANA				VIKE
		54	SYSTEM, FEUR-WAY			10	HOICHIN
O,	ECCUPITY ALARM SOLL		SWIFOIL BOWER		coexisication	-	VIRING CONCEALED IN CERENG OR VIRL
_	DECURITY TELEVISION CAMERA	See	PALIDE SON PETRALIA		TELEPHONE COVER PLATE		Ather constricts rates to in troop.
0	CLOCK BUTLET	\$	SALLOF YEATS	-	TELEPHONE DUTLET HOW, HID CONTO PLATE PUBLIC	47	VIVING ENCHANCE
0,	CLOCK DUILET WITH CONTROL STATION		SMITCH, FILET CIDIT		TELEPHONE SUITLET FLIER HOW WITH GILVER PLATE	A.F	A- DIBUND, 2- NEUTRALI S- HIT
64	TOLEVELOW DUTLET	5.	SMITCH, COMPRIATING FEMTHERS MAKES WITH &	v	TELEDATA DUTLET	-	VENUE TURNED UP
0	JACTEM BOX 4 18/16 × 4 18/16 × 8 1/8*	51	SALLON COMMENCED ACCOUNTS AND A SALLON AT		TELESATA CUTLET FLOOR BOX WITH COVER PLATE.	-	VIRING TURNES BOWN
700	MAIN SESTIMENTED ON POWER PARELEDAMOS	Ser.	TT SYLLOR FOR HOLDES SYSNE DR SHALLDE	V	DATA DUTLET	1-1	VINDALS WENCES HATE SENDICT THE
-	TORFACT MOUNTED PARKULBOATS	επ (i)	FUTH BUTTON CONTROL STATEM	0	SPEMER, PLACH CELING KENTER		CABLE 19A1
-	FLUSH HOWITZ PANELSONS	100		+0	SPEAKON, WALL HOUSES		HEAT TIMES SABLE
0	ELECTRICAL HOTER CONCETION - VENEY HP, MIT PHATE		PUDH BUTTON APPEQUINGER	+600	SPEAKER HOIN TIPE, WALL HOUSES	_	Ann mad pales
D	SESCURACE EVITOR FOR HUMBS DADS 1/25-P	В	PARCE BUTTON	FA	SOME STATEM MACHINE		
Ø	HOTOS CONTROLLER WITH AUX CONTACTO HEA. FO.	TX.	NOTEN SCIENTER	E9	Section Straight the edition	_	ALC SHEELS MY NOT ME VOTS





A. M.L. MORE SHALL CONTONN TO FEDERAL, STATE AND LOCAL MEDICANICAL AND PLUMERSO CODES AND REGULATIONS, NITTA AND FUEL CAS CODES, CONTRACTOR TO BE LICENSED IN THE STATE OF NEW ARMSTY. C DALES PROPRIES NOTED ALL PRINCE SHALL HE CONCEALD IMPROVES ADDRESS HOUSE ESCUTIONS AT CACH PRINTED BY A FRANCE MARKET M ALL APPLICABLE ITEMS SHALL BE ATA COMPLIANT WOLLDING CONFINENT (b)(7)(E)COMMUNITY EDUCATION ALBERT M. "BO" ROBINSON EDUCATION & TREATMENT CENTER THE STATE OF UNDERSLAB FLOOR PLAN - PLUMBING SANITARY & STORM



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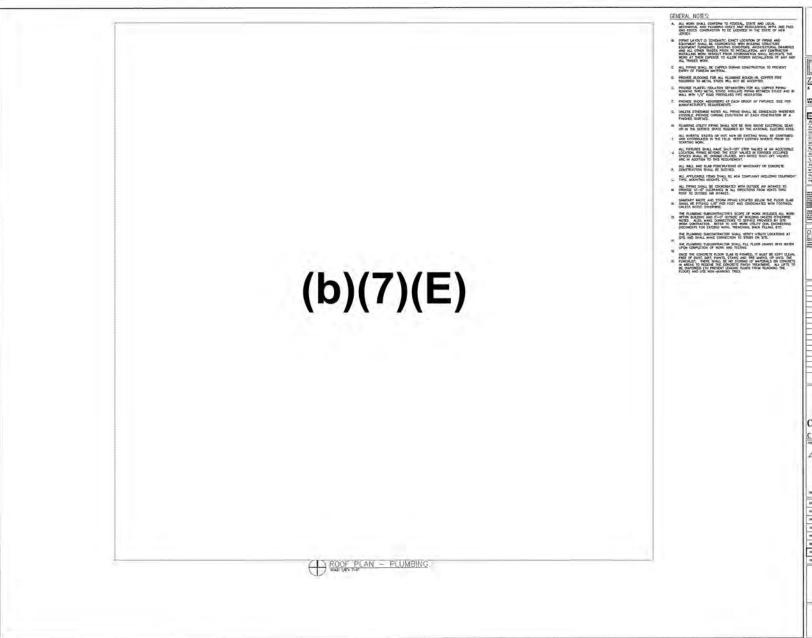


ALBERT M. "BO" ROBINSON EDUCATION 4 TREATMENT CENTER

SECOND FLOOR PLAN - PLUMBING SANITARY & STORM

SECOND FLOOR PLAN PLUMBING SANITARY & STORM

PRINTER BLOCKING FOR ALL PLINING ROUGH-IN CORPER HIPE. SOLDERED TO METAL STUDS WILL NOT BE ACCEPTED. UNICES OTHERWISE NOTED ALL PIPING SHALL BE CONCEALED MICHIGHES PROSERVE PROVIDE CHICAGO EXPORTED AT EACH PENETRATION OF A PROVIDE SUPPLIES. (b)(7)(E)COMMUNITY EDUCATION ALBERT M. "BO" ROBINSON EDUCATION 4 TREATMENT CENTER total monda PLUMBING SANITARY & STORM THIRD FLOOR PLAN
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ZAMPOLIN & ASSOCIATES

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FOR CONSTRUCTION 4/20/01

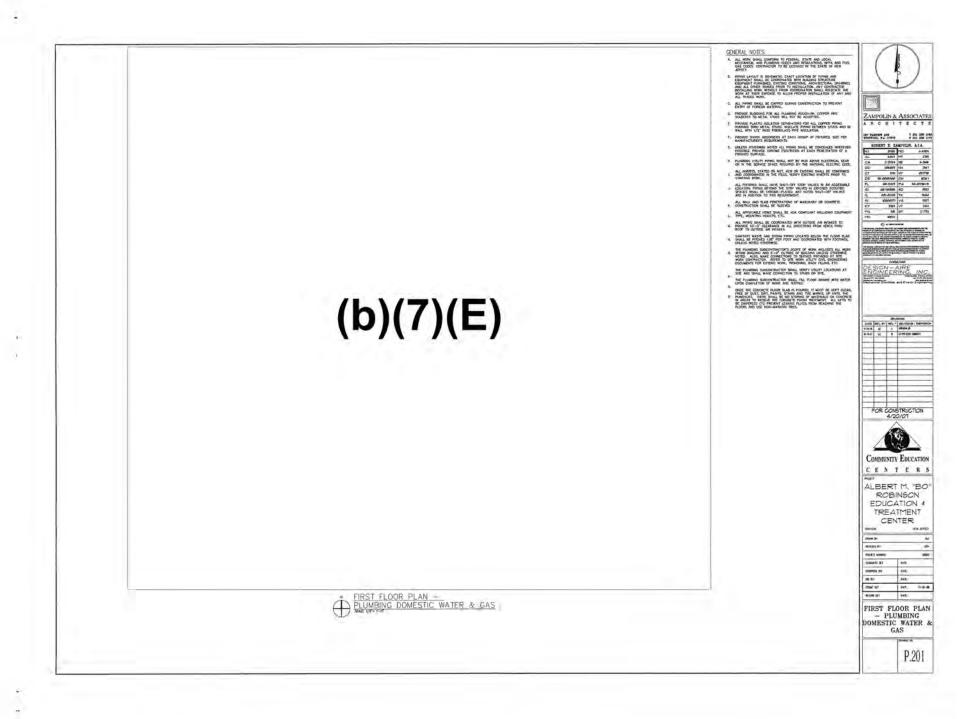


ALBERT M. "BO" EDUCATION 4 TREATMENT CENTER

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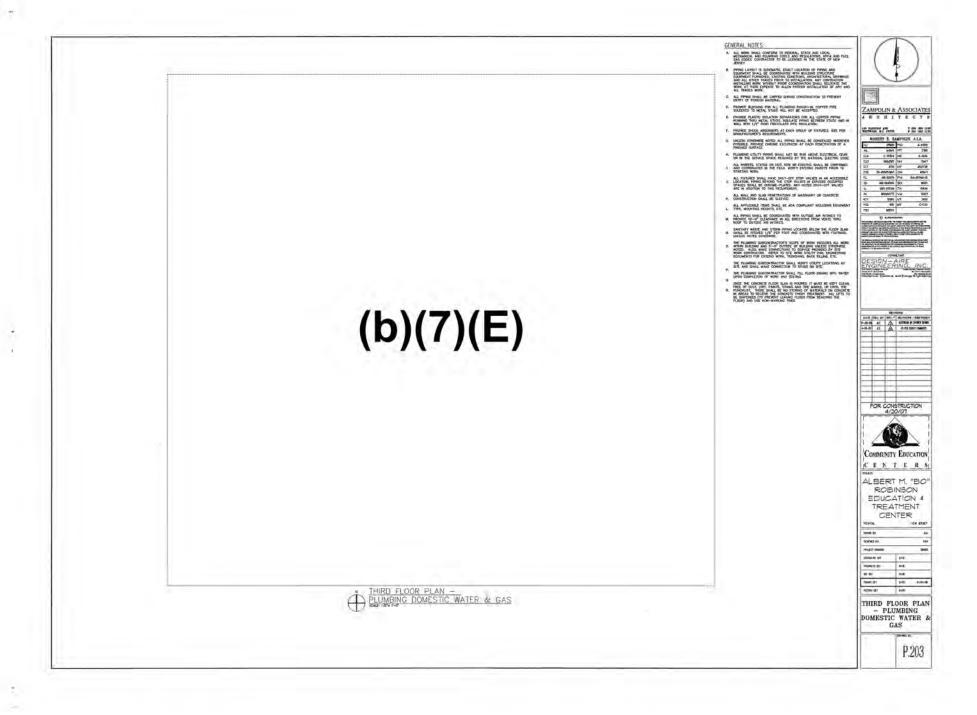
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GENERAL NOTES: PROMOS BLOCKING FOR ALL PLUMBING POSIGN-IN, COPPER PARE SOLDERED TO NETAL STUDS WILL HOT BE ACCOMED. ZAMPOLIN & ASSOCIATES NOT PARTY AND THE T DOE NOT LINE VALUE OF LINE AND LINE A ALL APPLICABLE HEWS SHALL BY ADA COMPLANT BYCLEWIG STAFFACES L. THYE, MOUNTING HEIGHTS, ETC. THE PLANNING SUBCOMPLICATION SHALL FILL PLOOF SHANE WITH WATER LIFTH COMPLETION OF HOME AND TESTING. (b)(7)(E)CENTERS ALBERT M. "BO" ROBINSON EDUCATION 4 CENTER SECOND FLOOR PLAN —
PLUMBING DOMESTIC WATER & GAS HADM SECOND FLOOR PLAN - PLUMBING DOMESTIC WATE & GAS



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CENERAL NOTE

 ALL MORE SHALL CONTOIN TO FEDERAL STATE AND LOCAL HEDMANDAL AND PLEASURE COOLS AND REQUEATIONS, MIPA AND FUEL GAS COORS. CONTRACTOR TO BE LICENSED IN the STATE OF HEM.

B PURPL LAYOUT IS SCHEART, EXACT LOCATION OF THIRD AND EXCHINATIONAL RECOMMENSATION FROM THE REAL PROPERTY EXCHINATION FUNDED FROM THE REAL PROPERTY OF THE EXCHINATION FROM THE PURPL TO DEVIALATION, ANY CONTRICTS INSTALLING WORK WINDOWS PROPE CONTRICTS SINAL RESOURCE WORK AT THESE DUPPLES TO ALLOW PURPLES INSTALLATION OF ANY

C. ALL PRING SHALL BE CAPPED DURING CONSTRUCTION TO PRESENT ENTRY OF FOREIGN MARSHALL

D. PROVIDE BLOCKING FOR ALL PLUMENG BOUGH-IN. CORPER PRIS. SOLDERED TO METAL STUDY WILL NOT BE ACCEPTED.

E. PROVING THEM SEEMS SEPARATURE FOR ALL COPPER WITHIN RUNNING THEM METAL STACE. INSULATE PRIVING INTEREST STACE AND A MILL WITH 1/2" BIGG PRIVING AND ROSE AND A WORL.

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UNIXED OTHERWISE ROTED ALL PRINCE SHALL SE CONCEALED MISREVER POSSIBLE PROVIDE OFFICIAL ESCURBION AT EACH PENETRATION OF A

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AND COORDINATED IN THE FELL. VENITY EXISTING INVESTS PRICE TO STATEMED WORK.

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ALL WALL AND SLAW PENETRATIONS OF MASSMARY DR CONCRETE N. CONSTRUCTION SHALL BE SLEEVED.

ALL APPLICABLE PERS SHALL BE AGA COMPLANT INCLIONG EQUIPMENT
L. THE MOUNTAIN HIGHEL LTC

SANTARY MASTE AND STORM PAYING LOCATED BELOW THE FLOOR SEA

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ZAMPOLIN & ASSOCIATES

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DESIGN - AIRE ENGINEERING, INC

FOR CONSTRUCTION 4/20/01



COMMUNITY EDUCATION

CENTERS

THEO

ALBERT M. "BO"

EDUCATION 4

TREATMENT

CENTER

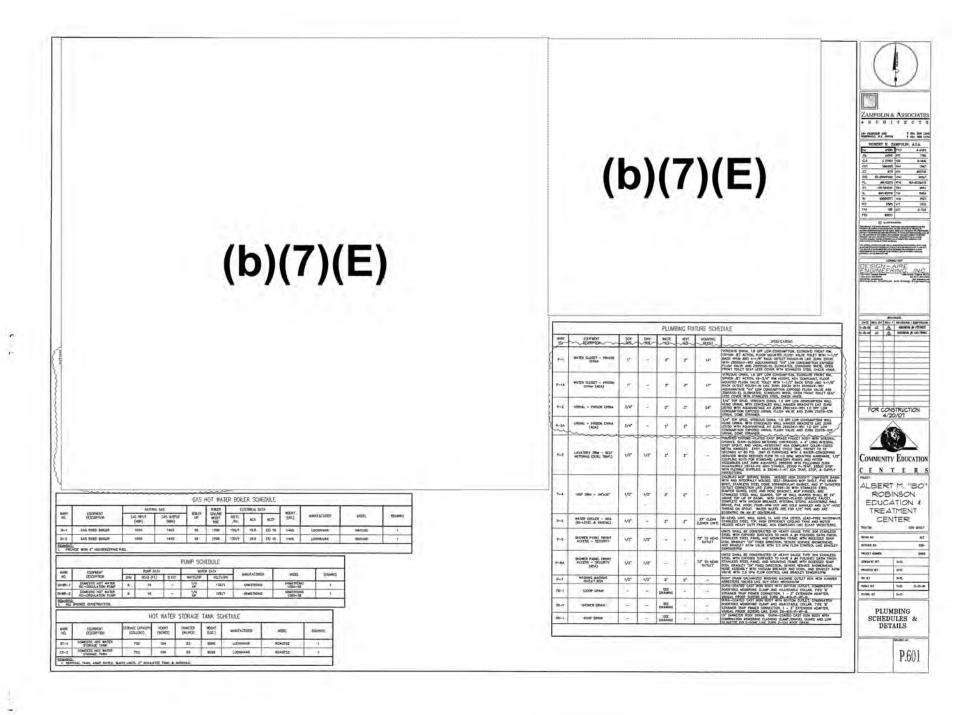
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P.501



ALBERT M. "BO" ROBINSON EDUCATION & TREATMENT CENTER

FIRE PROTECTION NOTES AND SPECIFICATIONS

I. GENERAL

REQUIREMENTS

- A. The sprokler contractor shall be licensed, authorized installer of aprinkler systems and shall have a minimum of five years experience in the installation of sprinkler systems.
- B. Before submitting his bid, the spirioble contractor shall fully familiarize invened with all architectured clawwings of the proposed building. Contractor shall perform this open of the submitted file proposed building. Contractor shall perform this open of the contractor file proposed to cause the contractor has been made, and later claims will not be recognised for each above, equipment or material required securate of difficulties encountered which could frave been foreseen had such an examination been made.
- C. Upon review of surrelate drawings, prior to elaborating his proposal, the sprivite contraction that distribute to accelerate anythme of any elaboratement of the sprivite contraction of the sprivite contracting the intent of the plants and specifications to previously concerning the intent of the plants and specifications to provide a complete sponkley installation. Later claims will not be recognized for wide allows, requipment or maintaints choical stock procodume not be used to be provided and the spriving that the provided in the provided provided and the provided provided and the provided provided
- The scheduling of the sprinkler work shall be coordinated with the building owner, the other contractors and client.

1.1 WORK INCLUDED

- A. Work shall include all sprakter work furnished and revised. All work shall comply with the requirements of IBC 2000 (New Jessey Edition) and NFPA 13 (1999 Edition) as well as state building code and local
- B. Sprinkler head layout shall be based on the approximated locations varicisted on these preferriespy plans. The sprinkler coninactor shall coordinate the worst with the entating cooldings and the work of all other contractors. The contractor shall notify the engineer in writing of any conflicts between tracks before shallship or disprinker system.
- C. Summary of Sprinkler work shall be as follows:
 - Installation of automatic sprinkler system in the new building known as "Albert M. "Bo" Robinson Education & Treatment Center", as detailed.
- D. These drawings are diagrammatic and indicate the general location of work. The engineer reserves the right to change the location of heads, valves, nocities, reparation, set to a researched review of at the busing conditions may detailed prior to their restallation without extra cost to the owner. Any dimensions not shown about the owner control of the contr
- E. The building owner/occupant shall remain responsible for heat in required area's to prevent freezing in the enclosed space.
- F. The chosen contractor must verify all drain ferminations. Assurance must be made that no demage could occur to building/contents when trains discharge.

13 SHOP DRAWINGS AND DATA

- The chosen contractor shall submit for approval, fully coordinated shop drawings stated by a licensed professional engineer. The shop drawings shall include but not limited to include the following:

 - Pipe and fittings Sprinker heads Hangers and supports Sprinker and piping layout.

 - Equipment / manufacturer out sheets
- B. A water flow test was performed on December 19, 2005 with a recorded static pressure of 70 psi reduced to a residual pressure of 59 csi white flowing 1,100 ppm. An estimated flow of 2,492 gpm at 20 psi can be provided by the public water system.
- C. Sprinkliv system is to be designed in accordance with NFFA 12 (1999). Edition as follows:
- Well Pipe: Dorm Rooms: Gymnasium, Lecture Hall: Dining Room Seating Areas or equiv. (Light Hazard)
- Wet Pipe: Storage Rooms; Kitchen Service Aleas (OH-1).
- Standbige sylem to be in accordance with (BC 2000 (NJ Edition) Section 905.

1.4 BUILDING CEPARTMENT FILING, PERMITS AND CERTIFICATES

- A. The sprinter contractor shall file all required drawings and specifications with the authority having jurisdiction and be responsible.
- B. Arrange for inspections and tests of any and at parts of the work as required by authorities having jurisdiction and pay all charges for

2 MATERIALS

- A. The opiniber system shell be tramplete with all pipe fidings, valves, prininge system and varies, apriniber heads, hangers and supports also miscettamous work flown sich as sign as required, vivile lags, etc., and all other related experience, apparatus and material farms necessary for compilers satisfiedury operating and experienced type.

- A. Piping for sprinklers systems shall be welded or snamless steel pipe in accordance with ASTM A120 or ASTM A795 and designed for a working pressure of 175 pst.
- H. All pige to be steel, with black cast/multisable iron fittings with joint as per NIPA. Steel pige shall be minimum schedule 10 wall thickness for pressure up to 300e when joined by wetting or relied glove connection.
- C. Pipe shall be as per the following scheduler: Line Piping Scheduler 40. Standard Yold (1 2 in); X-Main & Riser Piping Scheduler 30 Thin wall (2.5 8 in.). All dimensions shown are center to centle, but must be verified in the field for coordination, with other building.

All sprinkler heads installed to be quick response type. Heads shall be UL listed as follows:

LOCATION	TYPE	TINGH	WANTE ACTURER	MODEL
Drop Ceiling Dorm Rooms. Coursel Hooms Offices. Compore Lecture Hall. Shall showpe come, etc.	Rec-Parel	White	Reliable or Equiv	GFR ar equiv
Open Ceiling Gymnasium	Upright	Bronze	Reliable or Equit	GFR or equiv

- A Wiring, alarm bells, and any further supervision are by others or as indicated in agreed terms by the installing contractor. Tampe switches will be provided on all valves.
- B. Elevator must have a sprinkler head at the bottom of the elev way. Further, a coordinated shunt trip configuration pursuant to the AJ Uniform Construction Code and ASME A17.1 will be required. Per NFPA 13, sprinklers are not required at tops of noncombusible elevator shafts when the elevator car inside ASME A17.1.

3. INSTALLATION

A. Do all cutting necessary for the installation of sprinteer work. Accurately lay out work for which outing is required, so as to avoid unnecessary large openings. Cutting of beams, joins, foots or wish of the building will not be permitted except effer meaning approved of

3.2 SEISMIC PROTECTION

A. Seismic protection for fire protection systems shall be in accordance with NFPA 13.5—5.4.3.

3.3 INSERTS, HANGERS, ETC.

- A. All sprinkler piping shall be statistantially supported and shall comply with the standards of NFFA 13 for the installation of sprinkler systems and as required by local and state codes.
- Hangers and their components shall be ferrous. Hangers shall be adjustable, flat iron type or clievis type.
- C. Sprinkler piping or hangers shall be substantiatly supported from the pullding structure which must support the added load of the water filled pipe plus a minimum of 250 bis, applied at point of hanging
- D. Sprinkler piping of hangets shall not be used to support non-system
- E. Sprinkler pring shall be supported independently of the calling sheathing.
- F. When aprinkler piping is installed below ductwork, piping shall be substantially supported from the building structure, not from ductwork.

Provide escutcheons on all exposed ploing passing through walls, partitions, floors and ceilings. Escutcheons shall be held in place by invernal tension or set screw.

3.5 INSPECTIONS AND TESTING

- A. The sprinkler system shall be inspected and hissed in accordance with NFPA 13 and requirements of local and state building codes.
- B. All flushing and testing operations shall be in accordance with NFPA
- C. The sprinkler system strall be subjected to a hydrostatic pressure less for a period of teo hours at a pressure of at least 200 psi or 50 psi in excess of the mointum pressure to be meintained when the ma pressure in the system is in excess of 150 psi as per NFPA 13

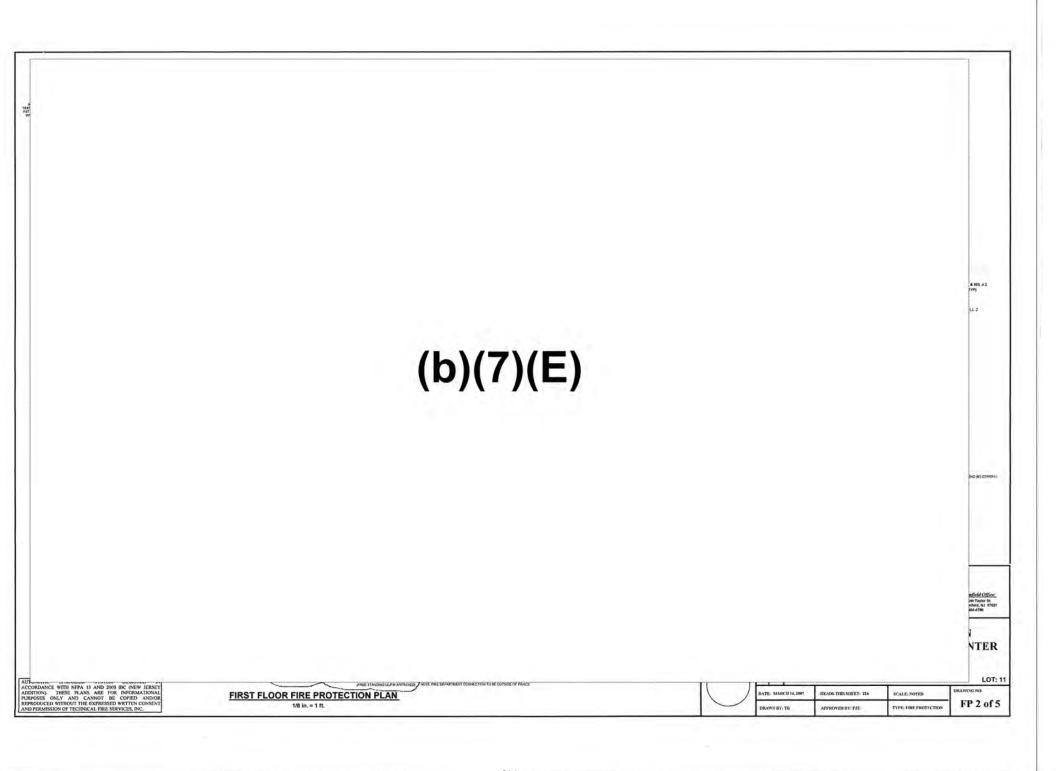
Courantee for a perso of one (1) year from the data of acceptance by the owner. All mediatals, agrantum and continuanche, while the owner. All mediatals, agrantum and continuanche personal to the continuance of the subcontractors. Replace or require in a manner agrowed by the artifact endrice engines, without any cost to the owner; any part or parts of the work which may prove defective or unastifactory within the portion of the guarantee.

FOR CONTRUCTION 4/20/07

REVISION	DESCRIPTION
A	FIX: TO BE KNOX STORZ CAP MODEL AND A PHARM AND GRAD ALLASTING
Δ	ALDED SPRINKLER HEADS TO SHOWERS RELOCATED FDC AT SUBCODE REQUEST
A	ADDED STANDEDE SYSTEM AT SUBCORE REQUEST REVISED NOTES AND ADDED STANDER IN THREE STAIRWELLS

Abirdeen Office 155 Footban Circy - Agenage, M. GTAI (727) 441-400	Fire Pro	INICAL FIRE SE		Herpersfield Office 2: South Taylor St. Surgentino. M. 17621 (201) MA-195
PHOPERSIONAL REVIEW FOR THE PROTECTION DESIGN ONLY PATRICK J. EGAN PROPERSIONAL ENGINER Largue Vo. 39781	9 30497	EDUCATION & 375 EN	"BO" ROBIN TREATMENT TERPRISE AVE. DN, NEW JERSEY	CENTER
	DATE MARCHIA	APPROVED BY: PAR	SCALE NOTED TYPE ONE PROTECTION	FP 1 of 5

AUTOMATIC SPRINKLER SYSTEM DESIGNED IN ACCORDANCE WITH NFRA 13 AND 2000 IBC NEW JERSEY ADDITION, THESE PLANS ABLE FOR BHORMATIONAL PURPOSES ONLY AND CANNOT BE COPIED ANDOR REPRODUCCED WITHOUT THE EXPRESSED WATTEN CONSENT AND PERMISSION OF TECHNICAL FIRE SERVICES, INC.



(b)(7)(E)FOR CONTRUCTION 4/20/07 TECHNICAL FIRE SERVICES, INC. Fire Protection Design Engineering, Testing and Consulting Services Hergenfield Office: 21 South Taylor St. Bargantists, NJ 17821 (201) 384-4780 ALBERT M. "BO" ROBINSON **EDUCATION & TREATMENT CENTER** 375 ENTERPRISE AVE. TRENTON, NEW JERSEY SECOND FLOOR FIRE PROTECTION PLAN AUTOMATIC SPRINKLER SYSTEM DESIGNED IN ACCORDANCE WITH NIPA 13 AND 2000 BIC NEW YERSEY ADDITION). THESE PLANS ARE FOR INFORMATIONAL PURPOSES ONLY AND CANNOT BE COPIED AND/OR REPRODUCED WITHOUT THE EXPRESSED WRITTEN CONSENT AND PERMISSION OF TECINICAL FIRE SERVICES, INC. LOT: 11 HEADS THIS SHEET: 196 NEALE: NOTED FP3 of 5 TYPE: FIRE PROTECTION

(b)(7)(E)FOR CONTRUCTION 4/20/07 TECHNICAL FIRE SERVICES, INC. Fire Protection Design Engineering, Testing and Consulting Services Bergenfield Office: 21 South Taylor St. Bergenfield, NJ 07624 (201) 384-4780 PROFESSIONAL REVIEW FOR FIRE PROTECTION DESIGN ONLY ALBERT M. "BO" ROBINSON **EDUCATION & TREATMENT CENTER** 375 ENTERPRISE AVE. TRENTON, NEW JERSEY THIRD FLOOR FIRE PROTECTION PLAN AUTOMATIC SPRINKLER SYSTEM DESIGNED IN ACCORDANCE WITH NIPA 13 AND 2000 IBC OREW JERSEY ADDITION, HIESE PLANS ARE FOR INFORMATIONAL PURPOSES ONLY AND CANNOT BE COPIED ANDOR REPRODUCED WITHOUT THE EXPRESSED WRITEN CONSENT AND PERMISSION OF TECHNICAL FIRE SERVICES, INC. BLOCK: 211A LOT: 11 DRAWING NO: HEADS THIS SHEET: 154 FP 4 of 5

(b)(7)(E)FOR CONTRUCTION 4/20/07 TECHNICAL FIRE SERVICES, INC. Fite Protection Design Engineering, Testing and Consulting Services Hergenfield Office: 21 South Tayor St. Bergenfield, NJ 27921 (201) 384-4710 ALBERT M. "BO" ROBINSON **EDUCATION & TREATMENT CENTER** 375 ENTERPRISE AVE. ROOF (TOP OF STAIRWELL)
FIRE PROTECTION PLAN TRENTON, NEW JERSEY BLOCK: 211A LOT: 11 AUTOMATIC SPRINKLER SYSTEM DESIGNED IN ACCORDANCE WITH NIPA 13 AND 2000 BIC (NEW JERSEY ADDITION). THISSE PLANS ARE FOR INFORMATIONAL PURPOSES ONLY AND CANNOT BE COPED ADDOR REPRODUCED WITHOUT THE EXPRESSED WITTEN CONSENT AND FERMISSION OF TECHNICAL FIRE SERVICES, INC. FP 5 of 5

APPENDIX E: ADMINISTRATIVE RECORD INDEX

Environmental Assessment - Contract Award for Comprehensive Detention Services - Newark, New Jersey Area of Responsibility Albert M. "Bo" Robinson Center - Trenton, New Jersey

Document Name/Title	Author	То	Date	Document Description	Record #
Consulting Agency Correspondence, U.S. Army Corps of Engineers	(b)(6),(b)(7)(C), Senior Vice President, WSP	U.S. Army Corps of Engineers, New York Regulatory District	July 11, 2024	Correspondence confirming the absence of wetlands and waters of the U.S. within the Albert M. "Bo" Robinson Center property.	1
Consulting Agency Correspondence, U.S. Fish and Wildlife Service	(b)(6),(b)(7)(C), Senior Vice President, WSP	(b)(6),(b)(7)(c) , Field Office Supervisor, U.S. Fish and Wildlife Service, NJ Ecological Services Field Office	July 11, 2024	Correspondence seeking concurrence on findings regarding threatened and endangered species within/near the Albert M. "Bo" Robinson Center property.	2
Consulting Agency Correspondence, NJ Department of Environmental Protection	(b)(6),(b)(7)(C), Senior Vice President, WSP	(b)(6),(b)(7)(c), P.G., Director NJ Department of Environ- mental Protection, Office of Permit and Project Navigation, Environmental Review Unit	July 11, 2024	Correspondence seeking concurrence on the absence of wetlands and waters of the U.S. and threatened and endangered species habitats within/near the Albert M. "Bo" Robinson Center property.	3
Consulting Agency Correspondence, U.S. Fish and Wildlife Service	(b)(6),(b)(7)(C) Endangered Species Program/Conservation Planning Assistance U.S. Fish and Wildlife Service, NJ Ecological Services Field Office	(b)(6),(b)(7)(C), Senior Vice President, WSP	July 15, 2024	No Effect letter from U.S. Fish and Wildlife Service concerning endangered species affecting the Albert M. "Bo" Robinson Center property.	4
Environmental Assessment with Appendices - Proposal to Award a Contract for Operation and Management of the Albert M. "Bo" Robinson Center – Trenton, New Jersey	(b)(6),(b)(7)(C) , Senior Vice President, WSP	(b)(6),(b)(7)(C) , Managing Member, 375 Enterprise Avenue LLC	July 16, 2024	Environmental Assessment regarding proposal to award a contract for comprehensive detention services as required by ICE's Enforcement and Removal Operations field office in Newark, New Jersey in compliance with National Environmental Policy Act	5