Programmatic Environmental Assessment for Army 2020 Force Structure Realignment

Finding of No Significant Impact
Annex to Finding of No Significant Impact

April 2013

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FINDING OF NO SIGNIFICANT IMPACT (FNSI) FOR ARMY 2020 FORCE STRUCTURE REALIGNMENT, April 2013

The National Environmental Policy Act of 1969 (NEPA) requires federal agencies to consider potential environmental impacts prior to undertaking a course of action. NEPA is implemented through regulations promulgated by the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] Parts 1500-1508); and within the Army by 32 CFR Part 651, Environmental Analysis of Army Actions. In accordance with these requirements, the Army has prepared a Programmatic Environmental Assessment (PEA) to consider environmental effects to the Army's installations and training lands that could result from implementation of the Proposed Action to realign Army forces from Fiscal Year (FY) 2013 through FY 2020.

1.0 Title of the Action: Programmatic Environmental Assessment (PEA) for Army 2020 Force Structure Realignment.

2.0 Background Information: The PEA analyzes the potential environmental and socioeconomic impacts associated with realignment of the Army's force structure between FY 2013 and FY 2020 to field a force of sufficient size, capability, and configuration to meet the nation's current and projected future security and defense requirements. The PEA presents an over-arching perspective that provides decision-makers, as well as regulatory agencies and the public, with information on these potential impacts, enabling them to assess and compare those impacts. Decision-makers will be able to use this data to make better informed force structure decisions.

The Army is in a period of critical transition as the nation has concluded major combat operations in Iraq, assesses force requirements in Afghanistan and develops new strategy and doctrine for future conflicts. During this transition, the Army, as part of the Department of Defense (DoD), must identify prudent measures to reduce spending without sacrificing critical operational capabilities necessary to implement national security and defense priorities. To help achieve spending reductions, the Army is decreasing the current total number of Soldiers and civilians, while reorganizing the force structure. The Army's Active Duty end-strength will decline from a FY 2012 authorized end-strength of 562,000 to 490,000 and will include a reduction of at least eight Brigade Combat Teams (BCTs) from the current total of 45. The PEA evaluates a total potential Soldier population loss of about 126,000 Soldiers and Army civilians (together, military employees). These reductions obviously far exceed what is required to reach an end-strength of 490,000 active component Soldiers. The PEA analyzed the impact of the largest possible gains and losses that are anticipated under current fiscal, policy, and strategic conditions to ensure that senior leaders have a comprehensive understanding of options as they make decisions, now and over the next few years.

In order to meet national security and defense requirements, enhance Army operational effectiveness, and maintain training and operational readiness, while preserving a high quality of life for Soldiers and Families, all at sustainable levels of resourcing, the Army has identified the need to reduce and realign its force structure. This realignment will result in reductions to Army end-strength as well as changes in the configurations of Army units. The intent of force-rebalancing is to enhance operational readiness and the ability to respond to national defense and security challenges, while doing so in a fiscally-constrained environment. While the Army is reducing its authorized end-strength, there is also a proposal to restructure its basic building block, the BCT, by adding a third maneuver battalion and other elements. Implementation of such a proposal could result in a net growth in the number of Soldiers stationed at some locations evaluated in the PEA. The Army will also have to make some reductions to the civilian workforce so that it is aligned with, and properly supports, the future force structure.

3.0 Description of Proposed Action: The Army's Proposed Action is to conduct force reductions and realign existing forces from FY 2013 through FY 2020 to shape a force of a size and configuration that is capable of meeting current and future national security and defense requirements. The Army's Active Duty end-strength will decline from an authorized FY 2012 end-strength of 562,000 to 490,000. The Proposed Action will implement defense guidance and recommendations, sustain unit equipment and training readiness, and preserve a high quality of life for Soldiers and their Families. Army force realignment would allow for the adjustment of the composition of forces to meet requirements in high demand specialties while rebalancing the number and types of units in lower priority military occupational skill areas. The implementation of Army force rebalancing is necessary to operate in a reduced budget climate, while allowing the Army to field a smaller force that can meet the mission requirements of the current and future global security environment. The Army civilian workforce must also become smaller in tandem with the military force structure, but nevertheless must also meet its changing mission requirements.

The realignment must be consistent with Army transformation, sustain unit equipment and training readiness, preserve Soldier and Family quality of life, and reduce operational costs while maintaining critical capabilities. To implement the Proposed Action fully, units must be stationed at locations that will be able to accommodate unit requirements for training, garrison, and maintenance activities, and preserve Soldier and Family quality of life, while still supporting strategic guidance and national security requirements.

4.0 Alternatives: In addition to the No Action Alternative, two action alternatives have been formulated that take into account the Army's needs for Army 2020 Force realignment. Common elements to these alternatives include implementing force reductions and combat support unit realignments from FY 2013 through FY 2020. Both alternatives consider Grow the Army stationing actions that have occurred from FY 2008 to FY 2012 as part of the baseline condition for analysis. Under either alternative, the Army would reduce its end-strength to 490,000. Alternatives carried forward for full analysis are:

Alternative 1: Implement Force Reductions: Inactivate Brigade Combat Teams and Realign both Combat Support and Service Support Units between Fiscal Year 2013 and Fiscal Year 2020

Under this alternative, Army installations would experience end-strength losses through unit inactivations and unit realignments. As a result of the implementation of Alternative 1, the Army would make decisions to inactivate a minimum of eight BCTs and other support units. The structure of BCTs would not change. Table 1 depicts potential force structure reductions at each installation under consideration. These reductions are used as the maximum potential force reductions for the installations. For installations with no BCTs, Alternative 1 assumes a loss of 35 percent of the installation's Soldiers. For each installation with one BCT, Alternative 1 assumes the loss of that BCT (approximately 3,450 for Infantry BCTs (IBCT), 3,850 for Armored BCTs (ABCT), and 4,200 for Stryker BCTs (SBCT)), as well as 30 percent of the installation's non-BCT Soldiers. For installations with multiple BCTs, Alternative 1 assumes the loss of a BCT and up to 30 percent of an installation's non-BCT Soldiers, with a maximum possible loss of 8,000 military employees. For all installations, the PEA assumes a potential reduction of up to 15 percent in the civilian workforce.

As a result of the implementation of Alternative 1, no installation would experience a net gain of Soldiers, though some support unit realignments would occur. Soldier reductions would also include the loss of a corresponding number of Family members at the installation and in the surrounding community. Loss of civilian employees at the installation also might mean that some civilians and dependents would move out of the area.

Reductions at installations, other than those evaluated in the PEA, could occur as part of Army 2020 Force realignment, but they are not anticipated to exceed 1,000 Soldiers. Therefore, analysis of these reductions was not considered appropriate at the programmatic level and they are not discussed in the PEA.

In addition, the Army may have to adjust force structure of the Army Reserve Component, and reduce Army Reserve and Army National Guard Bureau end-strength to complement Active Duty force reductions. These changes also are beyond the scope of the PEA.

Table 1. Alternative 1: Force Reduction

Installation Name	Potential Population Loss to be Analyzed[1]	Fiscal Year 2011 Army Population[2]	Potential Fiscal Year 2020 Army Population
Fort Benning, Georgia	7,100	39,243	32,143
Fort Knox, Kentucky	3,800	13,665	9,865
Fort Polk, Louisiana	5,300	10,877	5,577
Fort Wainwright, Alaska	4,900	7,430	2,530
Joint Base Elmendorf-Richardson, Alaska	4,300	6,923	2,623
Fort Bliss, Texas	8,000	32,352	24,352
Fort Bragg, North Carolina	8,000	56,983	48,983
Fort Campbell, Kentucky	8,000	32,425	24,425
Fort Carson, Colorado	8,000	25,823	17,823
Fort Drum, New York	8,000	19,079	11,079
Fort Hood, Texas	8,000	47,437	39,437
Fort Riley, Kansas	8,000	20,009	12,009
Fort Stewart, Georgia	8,000	24,622	16,622
Joint Base Lewis-McChord, Washington	8,000	36,777	28,777
Schofield Barracks, Hawai'i	8,000	18,563	10,563
Fort Gordon, Georgia*	4,300	13,864	9,564
Fort Lee, Virginia*	2,400	16,257	13,857
Fort Leonard Wood, Missouri*	3,900	27,213	23,313
Fort Sill, Oklahoma*	4,700	22,444	17,744
Joint Base Langley-Eustis, Virginia*	2,700	9,899	7,199
Fort Irwin, California*	2,400	5,539	3,139

* Non-BCT installation
[1]Rounded to the nearest 100. More precise numbers used to calculate 'Potential Fiscal Year 2020 Army Population' are in the PEA.
[2]Populations include: Army military, Army students, Army civilians (excludes other military service personnel, contractors, and transients). Population reduction numbers include full-time military and civilian projections only.
Source of data is the *Army Stationing Installation Plan* (Feb 2012).

<u>Alternative 2: Reorganize BCTs</u>: Implement Alternative 1 Inactivate Additional BCTs and Restructure BCTs to include adding a third Combat Maneuver Battalion

Under Alternative 2, the Army would implement force reductions and realignments discussed as part of the implementation of Alternative 1. In addition, the Army would reduce further the total number of BCTs to provide the additional troops that would be added to the remaining BCT force structure. The implementation of Alternative 2 would result in the inactivation of more BCTs across the Army. The exact number of inactivations would depend on the final force structure designs, number of Soldiers added to each BCT, and number of BCTs that would

eventually implement the new force structure design concept. The Army also would restructure BCTs by taking combat maneuver battalions of inactivating ABCTs and IBCTs and adding them to existing ABCTs and IBCTs either at the same location or at other installations. Each realigned combat maneuver battalion would add approximately 700 additional Soldiers per BCT. This alternative would provide those Brigade Commanders with a third combat maneuver battalion to support their operations and enhance the combat power of each BCT. The addition of a combat maneuver battalion to the SBCT is not being considered, since the SBCT already has three combat maneuver battalions. As part of this alternative, the Army would also restructure its engineering units to add a Brigade Engineer Battalion to each ABCT, IBCT, and SBCT, which would add several hundred more Soldiers to the BCT. There may be other augmentations, such as additional indirect fires units, reconnaissance elements, and other combat support unit changes between now and 2020 based on the need to establish the optimum configuration for the BCT and its supporting elements. For planning purposes, and for purposes of analysis in the PEA, it is assumed that 1,000 Soldiers would be added to ABCTs and IBCTs and 500 Soldiers added to SBCTs. The actual numbers may vary slightly as the force structure analysis continues. The numbers used in the PEA reflect the upper range of possible changes. Table 2 depicts the potential force structure gains at each installation.

Table 2. Alternative 2: Installation Gains

Installation Name	Potential Population Gain to be Analyzed	Fiscal Year 2011 Army Population[1]	Potential Fiscal Year 2020 Army Population
Fort Knox, Kentucky	1,000	13,665	14,665
Fort Polk, Louisiana	1,000	10,877	11,877
Fort Wainwright, Alaska*	1,000	7,430	8,430
Joint Base Elmendorf-Richardson, Alaska	1,000	6,923	7,923
Fort Bliss, Texas	3,000	32,352	35,352
Fort Campbell, Kentucky	3,000	32,425	35,425
Fort Carson, Colorado	3,000	25,823	28,823
Fort Drum, New York	3,000	19,079	22,079
Fort Hood, Texas	3,000	47,437	50,437
Fort Riley, Kansas	3,000	20,009	23,009
Fort Stewart, Georgia	3,000	24,622	27,622
Schofield Barracks, Hawai'i*	1,500	18,563	20,063

*Stryker Brigade Combat Team
[1]Populations include: Army military, Army students, Army civilians (Excludes other military service personnel, contractors, and transients). Population gain numbers include full-time military and civilian projections only.
Source of data is the *Army Stationing Installation Plan* (Feb 2012).

Although this restructuring could occur at BCTs assigned to Fort Benning, Fort Bragg, and Joint Base Lewis McChord (JBLM), the projected number of Soldiers at those installations would not increase. Those BCT restructuring increases would be offset by other Soldier reductions. This is because of training area and/or cantonment limitations at those installations which make a net

population increase infeasible. Because there would be no increase in population, these installations are not analyzed under Alternative 2.

The PEA analyzed Fort Carson for a gain of up to 3,000 Soldiers, and Schofield Barracks for a gain of up to 1,500 Soldiers. With respect to both Fort Carson and Schofield Barracks, the Army finds no significant environmental impact as a result of Alternative 1, and is not making a finding at this time regarding environmental impacts of potential gains under Alternative 2. The Army appreciates the comments provided in response to this PEA related to Fort Carson (and Piñon Canyon Maneuver Site) and Schofield Barracks (and Hawai'i installations). These comments are part of the administrative record for this action and will be considered before any future decisions that would result in growth at either of these locations.

No Action Alternative:

The No Action Alternative would retain the Army at a FY 2012 end-strength of about 562,000 active duty Soldiers; 358,200 Army National Guard Soldiers; 205,000 Army Reserve Soldiers; and more than 320,000 Department of the Army civilians. The No Action Alternative assumes that units will remain where they are stationed at the end of FY 2012. Other than ongoing transformation initiatives, no additional units would be realigned. Implementation of the No Action Alternative would not meet the Army's needs for force reduction and realignment. Consideration of the No Action Alternative is required by CEQ regulations and also serves as a baseline against which environmental effects of the action alternatives can be compared.

5.0 Summary of Environmental Effects: The analysis of the potential environmental impacts is documented in the PEA for Army 2020 Force Structure Realignment. Tables 3 through 5 provide a summary of impacts. No significant environmental impacts are anticipated to occur in conjunction with the implementation of the Proposed Action; however, significant socioeconomic impacts could occur at many Army installations.

Table 3. Potential Environmental Impacts of the No Action Alternative

Valued Environmental Component	Air Quality	Airspace	Cultural Resources	Noise	Soil Erosion	Biological Resources	Wetlands	Water Resources	Facilities	Socioeconomics	Energy Demand and Generation	Land Use Conflict and Compatibility	Hazardous Materials and Hazardous Waste	Traffic and Transportation
Fort Benning	M	M	M	LS	LS	LS	LS	LS	M	B	M	LS	M	M
Fort Bliss	M	M	N	N	M	N	N	M	N	N	N	M	M	SM
Fort Bragg	M	M	N	M	SM	N	M	N	N	M	M	M	N	SM
Fort Campbell	N	N	N	N	M	N	N	M	N	M	N	N	N	N
Fort Carson/PCMS	LS/M	N/N	N/N	N/N	LS/LS	N/N	M/N	M/N	M/N	N/N	N/N	N/N	M/M	LS/N
Fort Drum	M	N	M	N	N	M	M	N	N	M	M	N	N	M
Fort Gordon	N	N	N	N	N	N	N	N	LS	N	N	SM	N	N
Fort Hood	M	N	N	N	M	M	N	M	N	M	N	N	N	N
Fort Irwin	M	M	M	N	M	M	N	LS	M	M	N	M	M	M
Joint Base Elmendorf-Richardson	LS	M	SM	M	LS	SM	LS	M	M	B	M	M	LS	LS
Joint Base Langley Eustis	M	N	M	N	N	M	M	N	M	M	M	N	M	LS
Joint Base Lewis-McChord	LS	LS	LS	S	N	LS	N	SM	LS	SM	N	M	M	S
Fort Knox	M	N	N	N	M	N	N	M	N	M	N	N	N	N
Fort Lee	N	N	M	N	N	N	N	N	N	B	N	N	N	N
Fort Leonard Wood	N	N	N	N	N	N	N	N	N	B	N	N	N	N
Fort Polk	N	N	N	N	M	N	N	N	N	N	N	N	N	N
Fort Riley	M	N	N	N	M	N	N	M	N	B	N	N	N	N
USAG-HI (O'ahu)/(PTA)	LS/LS	M/M	SM/SM	SM/SM	SM/SM	SM/SM	M/N	M/M	M/M	M/M	LS/LS	LS/LS	M/M	SM/LS
Fort Sill	B	N	LS	SM	N	N	N	N	N	M	N	N	N	M
Fort Stewart	M	M	N	N	M	N	M	M	N	N	N	N	N	M
Fort Wainwright	M	M	SM	M	M	M	M	M	N	M	N	M	N	M

KEY: B = Beneficial, LS = Less than Significant, M = Minor, N = Negligible/No Impact, S = Significant, SM = Significant but Mitigable

Table 4. Potential Environmental Impacts of Alternative 1: Force Reduction of Soldiers and Army Civilians at Installations

Valued Environmental Component	Air Quality	Airspace	Cultural Resources	Noise	Soil Erosion	Biological Resources	Wetlands	Water Resources	Facilities	Socioeconomics	Energy Demand and Generation	Land Use Conflict and Compatibility	Hazardous Materials and Hazardous Waste	Traffic and Transportation
Fort Benning	B	M	M	M	M	M	M	M	B	S	B	M	M	B
Fort Bliss	B	M	M	B	B	B	N	B	N	S	B	M	M	B
Fort Bragg	B	M	M	B	B	B	B	B	B	S	M	M	M	B
Fort Campbell	N	N	N	N	B	N	N	B	B	S	B	N	N	B
Fort Carson/PCMS	B/B	B/B	B/B	B/B	B/B	B/B	B/B	B/B	B/N	S/N	B/N	N/N	B/B	B/B
Fort Drum	M	N	M	N	N	M	B	N	B	S	B	N	N	M
Fort Gordon	N	N	N	N	N	N	N	N	LS	S	N	SM	N	B
Fort Hood	B	N	M	N	B	B	N	B	M	S	B	N	N	B
Fort Irwin	B	B	B	N	B	B	N	B	M	LS	B	M	M	B
Joint Base Elmendorf-Richardson	B	B	SM	B	M	M	B	B	M	S	B	M	LS	B
Joint Base Langley Eustis	B	N	M	B	B	M	B	N	B	S	B	N	M	B
Joint Base Lewis-McChord	M	N	M	LS	N	B	N	B	B	LS	B	B	LS	B
Fort Knox	B	N	M	B	B	N	N	B	M	S	N	N	M	B
Fort Lee	B	N	M	B	N	N	N	N	B	S	B	B	M	B
Fort Leonard Wood	N	N	M	N	N	N	N	N	B	S	B	N	M	B
Fort Polk	B	N	N	N	N	N	N	B	B	S	B	N	M	B
Fort Riley	B	N	M	B	M	B	N	B	M	S	B	N	M	B
USAG-HI (O'ahu)/(PTA)	B/B	B/B	SM/SM	B/B	B/B	B/B	M/M	M/B	B/B	S/N	B/B	B/B	B/B	B/B
Fort Sill	B	N	SM	B	N	N	N	B	B	S	B	B	LS	B
Fort Stewart	B	N	M	B	N	B	B	N	M	S	B	B	M	B
Fort Wainwright	B	B	SM	B	M	M	M	M	M	S	B	M	N	B

KEY: B = Beneficial, LS = Less than Significant, M = Minor, N = Negligible/No Impact, S = Significant, SM = Significant but Mitigable

Table 5. Potential Environmental Impacts of Alternative 2: Installation Gain of Combat/Combat Support Soldiers Resulting from Brigade Combat Team Restructuring and Unit Realignments

Valued Environmental Component	Air Quality	Airspace	Cultural Resources	Noise	Soil Erosion	Biological Resources	Wetlands	Water Resources	Facilities	Socioeconomics	Energy Demand and Generation	Land Use Conflict and Compatibility	Hazardous Materials and Hazardous Waste	Traffic and Transportation
Fort Benning	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fort Bliss	M	M	LS	M	M	M	N	LS	N	B	M	M	M	SM
Fort Bragg	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fort Campbell	N	N	N	N	M	N	N	M	LS	B	M	N	N	SM
Fort Drum	M	N	M	N	N	M	M	N	M	LS	LS	M	N	M
Fort Gordon	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fort Hood	M	N	M	M	M	M	N	M	M	B	M	N	N	M
Fort Irwin	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Joint Base Elmendorf-Richardson	LS	M	SM	LS	LS	SM	LS	LS	LS	B	M	LS	LS	LS
Joint Base Langley Eustis	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Joint Base Lewis-McChord	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fort Knox	M	N	N	M	M	N	N	M	LS	B	N	M	N	M
Fort Lee	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fort Leonard Wood	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fort Polk	M	N	N	N	M	N	M	M	LS	N	N	M	M	M
Fort Riley	M	M	M	M	M	M	N	M	M	B	M	N	N	M
Fort Sill	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fort Stewart	M	M	M	M	LS	M	M	M	LS	B	M	M	M	LS
Fort Wainwright	M	M	SM	M	M	M	M	M	M	B	M	M	N	M

KEY: B = Beneficial, LS = Less than Significant, M = Minor, N = Negligible/No Impact, S = Significant, SM = Significant but Mitigable

5.1 Impacts Anticipated as a Result of the Implementation of Alternative 1

Alternative 1 involves the reduction of BCTs and the realignment of both Combat Support and Service Support units. Impacts include:

Air Quality: There would be a beneficial impact to regional air quality from reduced stationary and mobile emission sources at most installations considered under this alternative. There would be less combustion and generation of air pollutants for which there are National Ambient Air Quality Standards (NAAQS) (e.g., ozone, sulfur byproducts, lead) and Hazardous Air Pollutants (HAPs) associated with military training. Construction-related impacts and impacts of facilities demolition, would be short-term in duration and would include an increase in dust mobile source emissions from construction vehicles and limited demolition activity. Long-term effects from implementation of Alternative 1 would include a decrease in stationary source emissions, such as from boiler units and generators used in new facilities and by units using transportable generators during training operations. Fewer privately-owned and fleet vehicles would decrease air pollutants (e.g., carbon monoxide and ozone) as there would be less traffic on and off post. A net reduction in greenhouse gas and fossil fuel use would occur.

Airspace: No increases in airspace designations would be required to implement Alternative 1. Some beneficial impacts to the National Airspace System may occur as reduced live-fire and airspace use would occur, requiring less frequent activation of Military Operational Areas to support training activities.

Cultural Resources: Alternative 1 would result in a reduction of training activities at installations, which would reduce the risk of impact on cultural resources. In the near-term, increased levels of demolition activities could have minor to significant but mitigable impacts. Installations would continue to manage cultural resources in accordance with Integrated Cultural Resource Management Plans (ICRMPs) to ensure that demolition, maintenance and routine actions, and training activities do not cause a significant impact to cultural resources. Before any action with the potential to affect an eligible or potentially eligible resource, the State Historic Preservation Officer (SHPO) would be consulted under Section 106 of the National Historic Preservation Act, as required.

U.S. Army Garrison Fort Wainwright, Alaska (USAG FWA), identified the potential for significant but mitigable impacts to the installation's Historic District (HD). Demolition of facilities within USAG FWA's current HD and/or National Historic Landmark (NHL) site may result in an adverse effect; therefore, Section 106 consultation would be required. Any demolition or repurposing activity occurring adjacent to the HD and/or NHL may also require additional consultation with the SHPO. USAG FWA would avoid potential impacts to cultural resources during planning for potential cantonment area modification. Joint Base Elmendorf – Richardson (JBER), Alaska; U.S. Army Garrison Hawai'i (USAG-HI), Hawai'i; and Fort Sill, Oklahoma, also may experience significant but mitigable cultural resource impacts as part of the implementation of Alternative 1.

Noise: There would be a beneficial impact from reduced levels of training. In the short-term, demolition of some buildings may have short-term minor impacts at some installations. Less firing and maneuver activity would reduce nuisance noise impacts for a beneficial impact**,** though some installations would experience short-term noise impacts from increased facility demolition activities.

Soil Erosion: There would be a beneficial impact from reduced levels of training. In the short-term, demolition of some buildings may have minor impacts by exposure of localized soils in specific areas at installation construction/demolition sites. These impacts would be reduced through best management practices (BMPs) and ensuring that exposed sites are seeded and

covered to limit exposed soils to potential erosion. Less firing and maneuver activity would reduce soils impacts for a beneficial impact.

Biological Resources: There would be a beneficial long-term impact from reduced levels of training to biological resources (e.g., vegetation and wildlife). In the short-term, demolition of some buildings may have short-term, minor impacts to wildlife. Less firing and maneuver activity would reduce biological resource impacts. There would be no significant impacts to threatened and endangered species anticipated because installations would continue to be able to implement conservation plans and measures in support of listed species.

Wetlands: Beneficial to minor impacts to wetlands are anticipated because of reduced levels of training.

Water Resources: Negligible to minor impacts to surface and groundwater are anticipated at all installations. Application of BMPs would ensure that during demolition of facilities, lead-based paint and asbestos are properly handled and disposed of, and that any hazardous waste does not enter ground or surface waters. Water demand and treatment requirements would decrease for a beneficial impact at most installations.

Facilities: Overall, beneficial impacts to facilities are anticipated at most installations. Some installations would experience minor adverse impacts. Alternative 1 would allow the Army to demolish older outdated, energy inefficient structures and re-evaluate facilities support plans to provide Soldiers and units with better facilities. This alternative would allow the Army to dispose of some temporary and relocatable facilities, while other facilities would be maintained at minimal operational costs for future use. Some installations may need to re-evaluate minimum water treatment capacity requirements of wastewater treatment plants to ensure facilities are functioning properly.

Socioeconomics: There could be significant adverse impact to the regional economies of a number of installations. Significant adverse regional economic impacts from force reduction, in terms of sales, employment, regional population and/or income would be anticipated at Fort Benning, Georgia; Fort Bliss, Texas; Fort Bragg, North Carolina; Fort Carson, Colorado; Fort Campbell, Kentucky/Tennessee; Fort Drum, New York; Fort Gordon, Georgia; Fort Hood, Texas; JBER, Alaska; Joint Base Langley Eustis, Virginia; Fort Knox, Kentucky; Fort Lee, Virginia; Fort Leonard Wood, Missouri; Fort Polk, Louisiana; Fort Riley, Kansas; Fort Sill, Oklahoma; Fort Stewart, Georgia; USAG-FWA, Alaska; and USAG-HI, Hawai'i. Less than significant economic impacts would occur in areas with more diversified economies, such as JBLM, Washington. At Fort Irwin, less than significant socioeconomic impacts are also predicted.

Socioeconomic impacts could include greater impacts on lower income populations that provide services to military employees and installations, or where job loss affects communities whose proportion of minority population is higher than the state average. Some school districts may need to re-evaluate staffing plans for schools that could lose military and Army civilian-related students as part of their student populations. In some areas, such as around JBLM, Fort Drum, and USAG FWA, the implementation of Alternative 1 would help to alleviate school crowding in some districts.

Energy Demand and Generation: Beneficial impacts are anticipated at most installations, as installation and regional energy demands would decrease. Some installations, such as Fort Bragg, have identified minor energy impacts.

Land Use Conflict and Compatibility: Beneficial impacts could occur as training land use decreases, allowing for more recreational activities. Fort Gordon has identified significant but mitigable impacts associated with potential land use conflicts.

Hazardous Materials and Hazardous Waste: Negligible to less than significant impacts would result. In the short-term, there would be an increase in the demolition of outdated and no longer needed facilities. This could increase the volume of hazardous waste generated, but it would be within the capacities of the installations' disposal facilities sites. In addition, an increase in asbestos and lead-based paint disposal due to facility reduction is anticipated. Construction workers and Army personnel would dispose of materials in accordance with applicable regulatory requirements, BMPs, standing operating procedures (SOPs), and installation management plans.

Traffic and Transportation: Beneficial impacts are anticipated, as traffic on and off post decreases. Delays at access points would decrease at some installations during morning and evening peak traffic hours. At certain installations such as USAG-HI, JBLM, Fort Bragg, and JBER, traffic back-ups from main gate access points to federal and state highways may be reduced during peak traffic hours. At Fort Drum, minor traffic impacts would occur.

5.2 Impacts Anticipated as a Result of the Implementation of Alternative 2

Alternative 2 includes the implementation of Alternative 1, and therefore, could have the impacts identified above. In addition, because Alternative 2 could lead to growth at some installations with the restructuring of BCTs, there could be additional impacts due to those population and training increases. These additional impacts include:

Air Quality: There would be minor to significant but mitigable impacts to regional air quality from increased stationary and mobile emission sources at the installation considered under this alternative. There would be more emissions of air pollutants for which there are NAAQS pollutants and HAPs associated with military training. Construction-related impacts and impacts of facilities demolition would be short-term and would include an increase in dust and mobile source emissions from construction vehicles and limited demolition activity. Long-term effects from implementation of Alternative 2 could include an increase in stationary source emissions such as from boiler units and generators used in new facilities, and by units using transportable generators during training operations, at installations with an overall increase in population. Similarly, more privately-owned and additional fleet vehicles would contribute air pollutants (e.g., carbon monoxide and ozone) as more traffic would move on and off post. Installations that may experience these impacts would re-evaluate terms and conditions of their operating permits to determine if they may exceed allowable limits in their generation of air pollutants for their facility. New permits may be needed or mitigation to limit air pollutants may be required.

A nation-wide net reduction in greenhouse gas emissions and fossil fuel use would still occur with the implementation of Alternative 2, as overall Army force structure would be reduced.

Airspace: No increases in airspace designations would be required. Some minor impacts may occur as more live-fire and Unmanned Aerial Systems training would occur in conjunction with unit stationing. Aviation unit stationing is not a major component of the Proposed Action; however, and an increase in the need for additional airspace to support aviation operations is not expected.

Cultural Resources: Alternative 2 would have minor to significant but mitigable long-term impacts from increasing training activities at Army installations that could increase the risk of damage to cultural resources. Increased levels of construction and training activities could have minor to significant but mitigable impacts at Army installations evaluated. Installations would continue to manage cultural resources in accordance with ICRMPs to ensure that demolition, maintenance, training, and routine actions do not cause a significant impact to cultural resources. Before any action with the potential to affect an eligible or potentially eligible

resource would be undertaken, the SHPO would be consulted as a part of the Section 106 process.

USAG FWA has identified the potential for significant but mitigable impacts to the installation's HD. Construction, demolition and/or repurposing of facilities within USAG FWA's current HD and/or NHL sites may result in an adverse effect. Section 106 consultation would be required. USAG FWA would avoid potential impacts to cultural resources during planning for potential cantonment area modification. JBER could have significant but mitigable impacts to yet-to-be discovered cultural resources from construction; however, measures to minimize or mitigate adverse impacts would be implemented.

Noise: There would be minor to less than significant adverse impacts from increased levels of training on installations experiencing overall population increases. Additional firing activity and maneuver activity would be projected to increase noise impacts, though aviation noise impacts would not be projected to increase.

Soil Erosion: There would be minor to significant but mitigable impacts to soils from increased levels of training on Army installations, as well as limited facilities construction. Additional firing activity and maneuver activity would be anticipated to increase soils impacts and localized exposure of soils to additional wind and water erosion in training areas and on construction sites. Installations would continue to repair maneuver damage by applying Land Rehabilitation and Maintenance programs and monitor land condition.

Biological Resources: Impacts to biological resources could be minor to significant but mitigable. Installations would continue to implement natural resource management programs to reduce biological impacts. In general, the types and frequency of training might increase on some Army installations.

Significant but mitigable impacts may occur as a result of an increase in wildfire-generating activities that could alter vegetation composition and local disturbance regimes at the landscape level. JBER training areas could experience significant but mitigable biological impacts. Measures outlined in the installation Integrated Natural Resources Management Plan (INRMP), in the Endangered Species Management Plan (ESMP), and as part of Biological Opinion agreements, would be implemented to reduce impacts to less than significant.

Wetlands: Impacts to wetlands would be less than significant at all installations. The Army does not anticipate any substantial or unpermitted loss of wetlands as part of the implementation of Alternative 2. Installations would continue to avoid wetlands impacts when planning, siting, and designing new facilities wherever possible and by applying measures to ensure protection of wetlands.

Water Resources: Minor to less than significant impacts to surface and groundwater are anticipated at all installations. Measures would be taken to make sure that during construction of facilities and training, BMPs and environmental management controls are in place to limit sedimentation impacts to surface waters. Water demand and treatment requirements are anticipated to increase but not exceed existing capacity.

Facilities: Overall, less than significant facilities impacts are anticipated at a majority of installations. Though some installations included in Alternative 2 have existing facilities capacity or could renovate facilities to meet requirements, other installations may need to add some additional new facilities capacity for additional Soldiers; these installations have buildable space.
Socioeconomics: The implementation of Alternative 2 would have beneficial impacts on the regional economies of installations that might have a net gain in military employees. Most installations would still have a net loss of military employment and, therefore, would experience the impacts described for Alternative 1.

Alternative 2 could add to crowding in school districts experiencing a gain in Soldiers and their dependent school-aged children. School districts that support these installations may need to plan for an increase in student population. At Fort Stewart and Fort Riley, a significant increase in the population of the region of influence is anticipated. At Fort Drum, impacts are anticipated to be less than significant.

Energy Demand and Generation: The implementation of Alternative 2 would result in negligible to less than significant impacts. Regional energy demand could increase slightly with the implementation of Alternative 2, but would not increase to the extent that it would exceed utilities' capability to provide additional energy. Furthermore, Army installations are striving to increase their energy efficiency and reduce energy consumption as part of their daily operations, so any increased demand will partially be offset by increased efforts to conserve energy.

Land Use Conflict and Compatibility: Minor impacts are anticipated as installations' requirements for training land use would increase slightly, which could mean less area for recreational activity. In Alaska, there could be minor impacts to subsistence activities of Native Alaskan tribes.

Hazardous Materials and Hazardous Waste: Negligible to less than significant impacts would result. Although there could be an increase in the volume of solid waste generated and in the handling of asbestos and lead-based paint, disposal of solid and hazardous waste would be in accordance with regulatory requirements, BMPs, SOPs, and installation management plans.

Traffic and Transportation: Negligible to significant but mitigable impacts would result from the implementation of Alternative 2. Delays at access control points could increase in duration during morning and evening peak traffic hours. At some installations, such as JBER, traffic back-ups from main gate access points to federal and state highways may increase. At all gaining installations, roadway improvements may be required based on the location of the new units' facilities and projected travel patterns.

6.0 Public Comments

As part of the process outlined in NEPA, the draft FNSI and PEA were made available for public review for 30 days following the publication of a Notice of Availability in the Federal Register on January 18, 2013. This is the final FNSI. In response to requests from Congress, members of the public and other key stakeholders, the Army agreed to extend the public review and comment period an additional 30 days, until March 21, 2013.

The Army received approximately 8,000 public comments. Comments were focused primarily on socioeconomic impacts. Many commenters expressed concern that the Army may have underestimated potential socioeconomic impacts for the regions surrounding some installations that would result from force reductions under Alternative 1, and that these impacts could be substantially worse than initially identified. Some of these commenters provided detailed suggested corrections to the Army's data and criticized the Army's economic modeling methodology. The PEA concludes that, for most installations, force reductions would result in significant socioeconomic impacts. For this PEA, "significant" is the highest possible qualitative rating. The Army has concluded that, taken as a whole, these comments, suggested corrections, and proposed re-calculations of the socioeconomic analysis contained in the PEA would not change the PEA's overall conclusion of "significant." The Army appreciates the valuable public feedback on the socioeconomic analysis contained in the PEA, and will consider these comments carefully prior to making any force reduction/unit realignment decisions.

None of the comments identified any significant environmental impacts, for any resources except socioeconomic. The Army received no new information that would require revision or supplementation of the PEA.

In addition to members of the public, the Army received comments from Congressional members, state and local legislators, and government officials, but none required revision of the PEA. Nearly all of the commenters expressed concern about the socioeconomic impact of force reductions on communities surrounding potentially affected Army installations. As noted in Section 5.1 above, the Army determined that there could be significant adverse impact to the regional economies of a number of installations. Those comments that are general and not particular to any specific installation are discussed below. Installation-specific public comments and Army responses are summarized in the attached Annex.

The vast majority of comments opposed force reductions. Many commenters expressed support for gains at their respective communities' installations. There were two exceptions. The majority of comments concerning Fort Carson and Piñon Canyon Maneuver Site were strongly in favor of force reductions, and were opposed to any gain. The same is true for the one comment the Army received regarding potential gain at USAG-HI. As stated in Section 4.0 above, the Army is not making a finding at this time regarding environmental impacts of potential gains under Alternative 2 for either Fort Carson or USAG-HI. The Army appreciates the comments provided in response to this PEA related to Fort Carson (and Piñon Canyon Maneuver Site) and Schofield Barracks (and Hawai'i installations). These comments are part of the administrative record for this action and will be considered before any future decisions that would result in growth at either of these locations.

Thousands of commenters expressed concern about state, local, and private investments (for example, roads, schools, and businesses) in communities surrounding Army installations now being considered for force reductions. Some of these commenters feared that the force reductions could lead to a diminished relationship between the Army and the communities surrounding those installations. Thousands of commenters also expressed concern about substantial DoD funds invested in facilities and infrastructure on those installations. Though these do not involve environmental impacts, the Army considers these issues of critical importance and will carefully weigh these considerations prior to making any force structure decisions.

Some comments raised environmental concerns that were highly detailed and installation-specific. A programmatic NEPA document is intended to be a broad environmental analysis when similar actions are taken at multiple locations. The intent is that subsequent NEPA analyses can tier off this original document and analyze those impacts specific to that location. This is in accordance with the CEQ and Army NEPA regulations (40 CFR 1502.20 and 32 CFR 651.14). Once a decision is made as to which installation will undergo force reductions and/or realignments, additional NEPA analysis and documentation may be needed at some of the installations. This analysis could provide for additional public comment periods. The Army will ensure concerns about specific installations that were received during the PEA review period will be considered in future tiered, site-specific NEPA analyses. Therefore, as indicated above, these site-specific comments, while helpful, are not addressed in detail in the PEA or this FNSI.

Several commenters suggested that overseas forces should be cut first. Over the past several years, the Army has cut forces overseas and aggressively reduced costs and the facility footprint in both Europe and Korea. The Army will be eliminating two BCTs from Germany in FY2013 and by FY2017 will have reduced forces in Germany to less than half of what they were in 2001. In Korea more than 10,000 troops have been eliminated since 2006. The Army cannot

abandon its overseas mission, but continues to make strides in shaping our forces overseas to reduce costs while meeting mission requirements.

Commenters also suggested that additional installations should have been included in this analysis since force restructure may impact all Army installations. The PEA notes that all Army installations, even the smallest, will likely have reductions in Soldier and/or civilian strength between now and 2020. The 1,000 Soldier/civilian threshold was chosen because it represents a level of increase or reduction that could produce significant environmental or socioeconomic impacts. (This is also the numerical threshold used by Congress in 10 USC § 993 for requiring the reporting of planned reduction of members of the armed forces at military installations.)

Many commenters raised questions about the Army's ability to meet its mission after force structure decisions are made. Some commenters felt our national security was at risk due to required reductions. Consistent with the national military strategy, the Army will reshape its force structure to operate in the current reduced budget climate. Less funding means a smaller force must be used to meet the mission requirements of the current and future global security environment. The Army is currently preparing a report to Congress that, among other things, evaluates the adequacy of the proposed force for meeting the goals of the national military strategy of the United States. This is in compliance with the FY 2013 National Defense Authorization Act §1066.

A few commenters expressed concern that a reduction in the number of Soldiers would worsen the problem of multiple deployments of Soldiers, resulting in reduced dwell time (time at home station between deployments), especially if the nation again finds itself in several simultaneous conflicts. One commenter highlighted the issue of suicide.

The resilience of our Soldiers is a high priority to Army leaders. The Army is committed to building physical, emotional, and psychological resilience in our Soldiers, their Families, and Army civilians. The Army is addressing the problems seen with decreased dwell time and increased deployments. In addition, the cessation of operations in Iraq and the continuing drawdown of troop levels in Afghanistan have already reduced the burden of multiple deployments on our Soldiers and increased the amount of time Soldiers spend at home station to facilitate rest, recovery, and training.

Please see the attached Annex for a summary of installation-specific comments from the public.

7.0 Conclusion: Implementation of the proposed action has environmental impacts to air quality, airspace, cultural resources, noise, soil erosion, biological resources, wetlands, water resources, facilities, socioeconomics, energy demand, land use, hazardous materials and waste, and traffic and transportation. Continued adherence to SOPs, BMPs, and existing installation management plans (e.g., ITAM, INRMP, ICRMP, and ESMP) would ensure no significant impacts, other than socioeconomic impacts, from the Proposed Action. Under either alternative, no specific mitigation measures are needed to reduce the anticipated impacts to less than significant. Appropriate supplemental NEPA analysis and documentation may need to be prepared at the installation level as more details on implementing the Proposed Action become available at a project planning level.

At many installations, the PEA has determined that the socioeconomic impacts to the surrounding communities could be significant. These impacts are of particular concern to the Army. CEQ regulations state that economic or social impacts are not intended by themselves to require preparation of an Environmental Impact Statement (EIS). Therefore, in accordance with Army and federal regulation, the Army is not preparing an EIS. Even though an EIS will not be prepared, the PEA has a comprehensive analysis of the socioeconomic impacts, which will be carefully considered before any decisions are made.

No decision has been made as to which alternative will be implemented, or which force structure changes will result. The information in the PEA will be used to support decisions regarding how the force is to be reshaped. Those decisions will be made based on an analysis of mission-related criteria, each of which is affected by various factors. Some of these factors were described in Section 1.6.1 of the PEA, and include, but are not limited to, Soldier training, power projection, well-being, mission expansion, and geographic distribution, in addition to costs, command and control, unit alignment, feasibility, and national strategic priorities.

Based on a careful review of the PEA, which is incorporated by reference, and all of the public comments received by the Army, I have concluded that no significant environmental impacts, other than socioeconomic impacts, are likely to result from the implementation of the Proposed Action under either of the alternatives analyzed. Therefore, an EIS is not required, and will not be prepared.

Appropriate supplemental NEPA analysis and documentation may need to be prepared at the installation level as more details on implementing the Proposed Action become available.

4 APRIL 2013

James L. Huggins, Jr.
Lieutenant General, U.S. Army
Deputy Chief of Staff, G-3/5/7

Date

Annex - Summary of Public Comments and Army Responses, by installation

Annex to Finding of No Significant Impact (FNSI) for Army 2020 Force Structure Realignment, April 2013

Summary of Public Comments and Army Responses

The Army recognizes the potential impacts from force structure decisions to the regional economies surrounding many of our installations, and greatly appreciates the time and effort so many took in participating in the National Environmental Policy Act (NEPA) process and providing input to the Draft FNSI and underlying Programmatic Environmental Assessment (PEA). Not all comments were specifically pertinent to the PEA analysis, and therefore are not summarized in this annex. They will, however, be provided to and considered by the decision-makers who must review many factors, in addition to environmental and socioeconomic impacts, before making force structure decisions. Though some commenters provided additional information in their comments, there are no substantial new circumstances or information that would require revision or supplementation of the PEA.

Below are summaries of the public's concerns received during the public review and comment period from January 18 through March 21, 2013. These summaries include comments from state and local legislators, federal and state agencies, and government officials, as well as the general public. The summaries also include comments from Congressional members, which were either addressed directly to senior Army leaders or sent to the PEA point of contact for consideration.

The comments in this annex are listed by installation, in the order presented in Chapter 4 of the PEA. Army responses are preceded by **R:**. The Army did not respond to every issue raised in the summarized comments below, because many comments were informational, or required no response. Lack of an Army response does not mean the Army will overlook these comments; as noted above, all comments will be considered by Army leadership prior to making force structure decisions.

Fort Benning, Georgia

The Army received approximately 1,100 comments regarding the impacts of the proposed action at Fort Benning. The overwhelming majority of comments opposed force reductions. Comments also focused on socioeconomic impacts, environmental justice, support for reductions, community investment, military investment, Army/community relationship, loss of trust, environmental impacts, capacity for growth, mission/readiness/training, veteran impacts, and Base Realignment and Closure (BRAC), as well as some miscellaneous impacts and information.

<u>Socioeconomic Impacts</u>

One commenter expressed the opinion that the PEA underestimates the socioeconomic impacts on the Fort Benning Region of Influence (ROI).

R: Under Alternative 1, Fort Benning could experience significant socioeconomic impacts. Section 4.0.4 of the PEA describes the analytic methodology used in

determining impacts for each environmental media area, including socioeconomics. For socioeconomics, modeling and forecasting were used to provide potential intensity and impacts of the proposed action to the economy (including sales, income, employment, and population). Two modeling systems were used to validate the potential economic impacts. Implementation of some force structure decisions may require site-specific follow-on NEPA analysis. Although further analysis may determine differences in impact intensity, the overall impacts to the Fort Benning ROI would still be significant.

Environmental Justice

Many commenters felt that force reductions would have a disproportionate impact on low-income families, children, and/or minorities.

R: Section 4.1.11.2 of the PEA concluded that force reductions would not have a disproportionate impact on low-income families, children, and/or minorities within the ROI, even though the ROI itself has a higher minority population than the state as a whole. The PEA also states that the higher minority population of the ROI could mean a disproportionate adverse impact to minorities and low-income families if viewed at the state level. This impact is not expected to be substantially adverse.

Support for Reductions

A few commenters were in support of force reductions at Fort Benning. One commenter expressed the opinion that Fort Benning lacks the training and range areas to train all of the units now stationed there. Another commenter supported reductions at Fort Benning because “sufficient training land will be available for the Infantry and Armor schools without the expensive purchase of 88,000 additional acres as ‘woodpecker sanctuary set-aside.’

R: The Army has been considering the need for expansion of Fort Benning over the last several years. On May 13, 2011, the Army published a Draft Environmental Impact Statement analyzing the potential environmental and socioeconomic impacts of the Fort Benning Training Land Expansion Program (TLEP), which included the acquisition of up to 82,800 acres for additional training lands. While it is true that training restrictions imposed for the protection of the endangered Red Cockaded Woodpecker exist within the current boundaries of Fort Benning, the proposed expansion would not create a woodpecker sanctuary. These lands would be used for training. As explained in Section 4.1.16 (cumulative impacts) of the PEA, force reductions at Fort Benning would result in the Army having to re-evaluate the need for land acquisition as proposed in the TLEP. With the loss of an Armor BCT, the competition for training facilities such as heavy maneuver land would be reduced. The re-evaluation may indicate that either a smaller TLEP acquisition of approximately 25,000 acres would be needed, or may result in no land acquisition being pursued under TLEP for the foreseeable future. For now, the Army has paused in its consideration of land acquisition under Fort Benning’s TLEP in light of several factors, including the pending force structure decisions and the current fiscal uncertainty.

Community Investment

Many commenters voiced their concern about the substantial state, county, local, and private investments in the surrounding communities to support the installation. Several commenters specifically enumerated state and local investments, such as: the $51 million interchange into Fort Benning; the $19 million widening of I-185 from a four- to a six-lane road leading into Fort Benning's main entrance; the passage of a transportation special purpose local option sales tax to build road infrastructure that includes widening a four-lane highway to six lanes; improvements to one interchange into Fort Benning; the addition of a new interchange to support defense contractors locating in the region; and the passage of an educational special purpose local option sales tax to raise $223 million to provide for additional schools for the children of Soldiers, Army civilian employees, and defense contractor families relocating into the region. Other comments noted the many new apartments, hotels, and other businesses created as a result of recent growth at Fort Benning. One commenter stated a portion of this investment was wasted, as not all of the Soldiers expected as a result of the relocation of the Armor School actually came to Fort Benning.

Several commenters expressed worry about the loss of tax revenue, and the resulting impacts on local governments' and schools' ability to provide services.

R: The Army notes the investment by the state, local governments, and surrounding communities, as well as the potential loss of tax revenue to the state and local governments. The Army will carefully consider these comments prior to making any force structure decisions.

Military Investment

Many commenters expressed concern about the investment by the Army (taxpayer dollars) in Fort Benning. Some pointed to the Army's $3.5 billion cost for improvements to the infrastructure at Fort Benning in advance of the relocation of the Armor School from Fort Knox, Kentucky, and in support of the creation of Fort Benning's Maneuver Center of Excellence. Several commenters cited specific costs to the Army for improvements to Fort Benning, such as: a rail-loading site for rapid deployment of units to the ports of Savannah and Jacksonville; 19 new firing ranges; six new training areas; maneuver force modeling and simulation equipment; approximately 20,000 acres reshaped on Fort Benning; an addition of 8.6 million square feet of facilities to Fort Benning's 20 million square feet; the addition of 140 additional miles of new roads/trails; the addition of 13 new bridges, each with the capacity to support 70-ton tanks; a new 75-bed, 750,000 square foot, $300 million Martin Army Community Hospital; and a new 860-room $100 million lodge/hotel.

R: The Army notes its investment in facilities and other improvements to Fort Benning and will carefully consider these investments prior to making any force structure decisions.

Army/Community Relationship

Many commenters expressed their overall support of the Army, our mission, our Soldiers, and Fort Benning. Several commenters cited specific examples of the close and enduring relationship between Fort Benning and the surrounding communities.

A few commenters expressed concern that force reductions would impact the quality of the relationship between the Army at Fort Benning and the surrounding communities. These commenters noted the close bond between the military organizations at Fort Benning and the civilian community. One commenter gave the "Facebook Group Fort Benning Area Guide" as a prime example of local citizens providing helpful information to newly arriving Soldiers, mentioned the fact that Fort Benning Soldiers support local business and enroll in local colleges and universities, and noted the many friendships developed. Another commenter highlighted the fact that local churches have sponsored Wounded Warrior picnics, and that the Infantry Museum was both well attended and well supported by local volunteers.

Loss of Trust

Some commenters regarded potential force reductions at Fort Benning as a breach of trust by national leaders and the Department of Defense (DoD), in light of past investments by the community. For example, one comment stated: "the paramount issue is trust. Our national leadership assured us we would experience growth as a result of the BRAC 2005 decision and, because of this trust, our state, region and its communities invested significant funds from small, minority, large, and non-profit businesses to enhance the quality of life for the arriving Soldiers, DoD civilians, and defense contractors and their families. This single action by the DoD will diminish the value of these investments made on behalf of the expected growth."

Environmental Impact

A few commenters stated they were in support of force reductions at Fort Benning specifically because they hoped fewer Soldiers would result in less noise from small arms, mortars, and pyrotechnic training devices. One commenter criticized the Fort Benning "noise mitigation process," stating that he complained to the Fort Benning public affairs office about noise from ranges near his residence without result, and that some ranges seem to fire "24/7."

R: The Army anticipates that noise levels at Fort Benning would decrease with a force reduction. Section 4.1.5.2 of the PEA explains that, while noise generated from firing ranges and maneuver areas is not anticipated to change current noise zone contours, the anticipated decrease in operational tempo would result in less frequent large caliber weapons fire associated with armored brigade training activities, and may decrease the frequency of night-time training activities.

Capacity for Growth

In addition to expressing concern about potential force reduction, a few commenters expressed the opinion that the Fort Benning community would actually welcome a growth in military presence. These commenters also pointed to the less-than-expected

growth of Fort Benning after the last BRAC in 2005 as an indication of Fort Benning's additional capacity.

Mission/Readiness/Training

Several commenters expressed concern that force reductions would impact Soldier training, overall readiness, and ultimately, national security. These commenters highlighted the unique training opportunities afforded at Fort Benning; in particular, one commenter emphasized the critical importance of Fort Benning's Maneuver Center of Excellence "for which there is no equal in regards to infantry and armor training." Several others had similar comments. One commenter noted although Fort Benning was primarily a training post, "it is essential to have a war-fighting, deployable force … Fort Benning has the airfields, railheads and highways built for these reasons."

One commenter mentioned the additional costs of recruiting and training Soldiers after the reductions, should the nation decide that greater numbers of Soldiers were again required to support national defense.

R: The Army is committed to ensuring the readiness of our Soldiers, and acknowledges the important role of Fort Benning in providing our Soldiers high-quality training. As noted in Section 1.1 of the PEA, the Army must field a force of sufficient size, capability, and configuration to meet the nation's current and projected future security and defense requirements, within budget constraints. To do so, the Army must reduce the size of its forces, and do so in a way that does not compromise the Army's ability to achieve its mission. This PEA provides Army leaders the flexibility to reduce and realign forces in an informed and environmentally responsible manner. In addition to environmental and socioeconomic considerations, Army leaders will consider many other factors prior to making force structure decisions, including the military value of Fort Benning as a point of embarkation for deployable forces.

Veteran Impacts

A few commenters either mentioned directly or alluded to the potential impact of force reductions on veterans who live and work at Fort Benning and the surrounding communities.

BRAC

A few commenters expressed fears that force reductions or realignments could ultimately result in the closure of Fort Benning.

R: The closure of Fort Benning or any installation is not under consideration as part of this or any other action at this time.

Miscellaneous

A few commenters wondered about the impact of force reductions on the affected military Families; specifically, the loss of family income, and resulting impacts on military children.

One commenter expressed concern about the impacts of force reductions on local charities, as well as the United Way and Combined Federal Campaign. This commenter

noted reductions would "impact spending at all levels of business throughout the region, which in turn means people have less to give to help those that need their help the most." In addition, the commenter stated the Chronicle of Philanthropy recently ranked Columbus, Georgia, as the 28th most generous community out of 366 metropolitan areas, in part because of the strong military presence.

A few commenters assumed that the Army is considering moving a brigade from Fort Benning to Fort Stewart, Georgia.

R: No decisions regarding force structure realignments of units have been made at this time.

Fort Bliss, Texas

The Army received approximately 10 comments regarding the impacts of the proposed action at Fort Bliss. All the comments were opposed to force reductions. Comments also focused on community investment, military investment, capacity for growth and miscellaneous advantages of Fort Bliss and the surrounding area.

Community Investment

Those who commented about the proposed action and its effects on Fort Bliss were concerned with the investment of both private and public funds on the Fort Bliss installation and community that would be wasted if the installation were designated for the reductions identified in the PEA. Commenters stated Fort Bliss communities have invested heavily to provide needed infrastructure to support Soldiers and their Families. Commenters cited $1 billion in highway projects; an additional $400 million public/private highway project that flows through east Fort Bliss providing military and civilian employees ease of access on and through the installation; a recently approved $700 million quality of life bond for parks, sports complexes, museums, and zoo expansion; a desalination plant capable of producing 27.5 million gallons of potable water per day; and more than $1 billion to construct schools, a children's hospital and other quality of life amenities.

Commenters noted the University of Texas at El Paso, New Mexico State University, and El Paso Community College are among the most affordable, quality post-secondary institutions in the country. Commenters noted El Paso is building a new Community College campus on East Fort Bliss that will also house branch locations for the other regional institutions of higher education improving access for military families seeking to complete their post-secondary degrees.

Military Investment

Commenters were also concerned about the Army's investment in the installation, since the BRAC 2005 recommendation was made and implemented, and felt the Army would be unable to receive any return on investment if the installation underwent the reductions identified in the PEA. The commenters cited $5 billion invested into expansion and growth at Fort Bliss alone.

Capacity for Growth

Commenters noted that Fort Bliss and its surrounding communities have the infrastructure to support growth without the need to dedicate additional resources. The commenters also cited a cost of doing business that is 23 percent below the national average and a cost of living that is 5 1/2 percent below the national average.

Miscellaneous Advantages of the Area

Commenters noted El Paso has an ideal climate that ensures an average of 340 days of weather suitable for training missions. According to one commenter, in February, El Paso was recognized for the third year in a row as the safest large city in the country.

Fort Bragg, North Carolina

The Army received approximately 40 comments regarding the impacts of the proposed action at Fort Bragg. The comments focused on socioeconomic impacts, opposition to force reductions, community investments, Army/community relationship, Soldier resiliency, and BRAC.

Socioeconomic Impacts

Economic impacts were of concern to many commenters. One commenter expressed concerns that the worst-case scenario in Alternative 1 would have a catastrophic blow to the local economy, contrary to the minor impact determination in the PEA. Commenters noted the greater Fayetteville region relies heavily on the defense industry to sustain the economy, and stated nearly 40 percent of the gross domestic product is generated through defense spending or its ancillary benefits, which would be affected. A commenter pointed out that cuts under Alternative 1 would remove from the local economy annually some $335 million in direct salaries, $390 million in salaried income, and $450 million in lost sales volume (4 percent of the local economy). The commenter further noted that the total population reduction would be nearly 20,000 people, representing a loss of an estimated 10,600 jobs, including 8,000 direct and 1,650 indirect jobs. Commenters expressed concern that a decision to remove a brigade combat team (BCT) or other combinations of cuts at Fort Bragg would be a significant economic setback to the region, which continues to be economically depressed, and has some of the poorest counties and highest unemployment in the state.

R: Although elements of the socioeconomic modeling were determined to be non-significant in the PEA, the overall socioeconomic impact determination is significant. The Army notes the serious socioeconomic impacts to the communities surrounding Fort Bragg. The Army will consider these comments prior to making any force structure decisions.

A number of commenters indicated that significant adverse socioeconomic impacts offset any environmental benefits in certain resource areas. The commenters explained that the beneficial environmental impacts from force reductions are less important to the majority of the population, than the economic impacts of this action. One commenter emphasized the benefits to Fort Bragg traffic, facilities, and other environmental

components are welcomed, but not at the expense of jobs and families in the community. Commenters questioned the beneficial impacts of schools from force reduction and the net decrease in student-to-teacher ratio. Commenters also stated there would be decreased state and federal funding for hiring teachers and less aid to both non-military and military students.

Opposition to Force Reductions

Commenters expressed their concern with force reductions under Alternative 1, with the worst-case scenario of 8,000 Soldier and civilian reductions matching the largest cuts nation-wide in this option. One commenter pointed out under both alternatives there exists a possibility of losses. The commenter was concerned that Alternative 2 would result in the loss of a second BCT at Fort Bragg (because a gain at another installation due to force restructuring might result in a loss to Fort Bragg). Another commenter indicated that they would prefer changes in the BCT structure under Alternative 2 if this would mitigate overall force reduction losses. A commenter urged officials to not consider Alternative 1 as a viable option. The commenter concluded by asking that the decision makers to keep any cuts at Fort Bragg to a minimum as to keep from crippling the local economy (Fayetteville and the surrounding region).

Community Investment

Some commenters noted the substantial state, county, local, and private investments in the surrounding communities, as well as the Army's investment at Fort Bragg. Commenters felt there was significant state and local government infrastructure investment to support mission sustainability and recent installation growth. Commenters reported that in recent years the state spent or is in the process of spending $446 million on transportation projects directly related to Fort Bragg, with another $145 million currently programmed for transportation infrastructure. Commenters pointed out local and state funding was secured to support closing certain routes to non-military traffic for antiterrorism and force protection, while an alternative route was developed to provide additional capacity. According to commenters, federal, state, and local resources are being used to identify and expedite construction of off-post regional transportation options. Commenters warned that federal investments at Fort Bragg should not be wasted but prudently utilized. One commenter suggested that the military consider reviewing its method for construction change orders as a means to save significant funds, and felt pre-construction review and redesign with selected contractors would eliminate change orders and the associated costs.

Army/Community Relationship

Commenters expressed their overall support of the Army, our mission, our Soldiers, and Fort Bragg, citing examples of the close and intertwined relationship between Fort Bragg and the surrounding communities. One commenter stressed how vital Fort Bragg is to Fayetteville and how vital Fayetteville's military support is to Fort Bragg. Another commenter disapproved of the reductions in force and called for increased training expertise and improved facilities to support operational effectiveness and maintain operational readiness. The commenter supported U.S. Army Reserve Command's, and

Forces Command's BRAC relocation at Bragg; recognized state and local resource contributions to meet national security requirements; and commended the efforts of the community to support a high quality of life for Soldiers and their Families.

Soldier Resiliency

Commenters had concerns with the very high operational tempo (rate of deployment) of units at Fort Bragg, and the negative effects these deployments are having on the mental and physical well-being of the Soldiers and Families. One commenter wondered if reducing the force structure would only exacerbate this situation and increase the incidence of mental health issues, such as post-traumatic stress disorder.

BRAC

Some commenters referred to BRAC. The commenters discussed the 2005 BRAC action, and pointed out that the cuts would result in loss of area population and sales and other revenue, and call into question the millions of dollars spent by state and local governments and local investors in response to the recent BRAC 2005 growth. Commenters reported that surrounding counties have completed capital expenditures and related capital projects or are in the process with additional projects to address BRAC growth. One commenter discussed future BRAC actions and expressed support for another round of BRAC. The commenter was concerned that the current environment of forced budget cuts and sequestration has resulted or may result in a military not prepared to accomplish its mission. The commenter stated he had confidence that the BRAC process will result in a streamlined military capable to meet future challenges, only if the BRAC process were to indicate a reduction at Fort Bragg and determine there would be no impact to military readiness. The commenter concluded by stating that any "restructuring" should be done in a manner that does not put Soldiers in danger or national security at risk.

R: Reductions analyzed in the PEA are not part of any BRAC action, but represent the Army's effort to shape the force to meet its mission within budget constraints. Final decisions as to which installations will see reductions or unit reshaping have yet to be made. The Army will consider all the points raised prior to making force reduction decisions affecting Fort Bragg.

Fort Campbell, Kentucky

The Army received a comment letter containing extensive comments which pertain to both Fort Campbell and Fort Knox, Kentucky. The comments focused on socioeconomic impacts, Army/community relationship, and military value.

Socioeconomic Impacts

The commenter provided two pages of detailed, proposed corrections/substitutions to the PEA itself. These consist of corrections or suggested revisions to the text, as well as corrections to some of the data provided in the PEA. For example, the commenter provided an updated estimated regional impact of Fort Knox ($2.8 billion, rather than $2.5 billion as stated in the PEA), corrected the housing occupancy numbers in

privatized military family housing on Fort Knox, and provided the correct number of attendees at the Fort Knox DoDEA schools.

Army/Community Relationship

The commenter pointed out Kentucky is proud to have the fourth largest Army presence among the states, with 9 percent of the active duty personnel nation-wide. The commenter emphasized the support and close relationship between the Commonwealth of Kentucky and the Army, and highlighted the $251 million in transportation improvements by the state in direct support of growth related to BRAC actions.

Military Value

The commenter provided specific inputs supporting both Forts Campbell and Knox on each of the factors listed in Section 1.6.1 of the PEA that will be considered, in addition to the environmental considerations presented in this PEA, prior to force structure decisions by the Army. For the operational factor, the commenter pointed out both Forts Campbell and Knox: have excellent infrastructure and ample range/training lands; host a variety of different types of training (and that Fort Knox has the Army's only domestic live-fire riverine training site); are able to, and have, deployed brigades by rail and air; have no incompatible development at installation borders; and have appropriate oversight and leadership present at both installations (division headquarters at Fort Campbell and two-star headquarters at Fort Knox). For the cost factor, the commenter noted the installations have modern facilities and low energy costs, with both installations ranking above 70 percent of Army installations when measuring unit energy costs. The commenter stated both installations have made great progress in cost savings and avoidance and are located in low cost-of-living areas. For the strategy and geographic distribution factors, the commenter pointed to both installations' central location and excellent force projection capabilities. For the Soldier and Family quality of life factor, the commenter highlighted the installations' award-winning housing and popular schools, on-post hospitals, and state and community investment and support.

R: The Army will consider both the proposed corrections/substitutions to the PEA, and the attributes listed above in support of Forts Campbell and Knox prior to making any force structure decisions.

Fort Carson, Colorado

The Army received approximately 200 comments regarding the impacts of the proposed action at Fort Carson. Comments focused on socioeconomic impacts, the Army/community relationship, and supported force reductions.

Many commenters expressed opposition to force gains at Fort Carson under Alternative 2. These commenters were particularly concerned with possible impacts to Piñon Canyon Maneuver Site (PCMS), resulting from increased training for additional Soldiers stationed at Fort Carson. These commenters raised a number of issues, including: inadequate analysis of the fragile environmental and cultural resources at PCMS; the

fact that the Army did not include communities surrounding PCMS in the ROI in the socioeconomic analysis, and the Army's decision to prepare an EA rather than an EIS.

R: As stated in Section 4.0 of the FNSI, with respect to Fort Carson, the Army is not making a finding at this time regarding environmental impacts of potential gains under Alternative 2. The Army appreciates the comments provided in response to this PEA related to Fort Carson (and Piñon Canyon Maneuver Site). These comments are part of the administrative record for this action and will be considered before any future decisions that would result in growth at either of these locations.

Socioeconomic Impacts

A few commenters disagreed with the PEA's conclusion that a force reduction would result in an overall negative impact upon socioeconomics in the Fort Carson ROI. These commenters cited a recent online poll conducted by the Colorado Springs Business Journal, which found 77 percent of respondents favored diversifying the Colorado Springs economy, rather than building up the military sector.

R: The Army concluded the force reduction under Alternative 1 would result in significant socioeconomic impacts for the population within the ROI of Fort Carson. This conclusion, set forth in Section 4.5.11.2 of the PEA, is based upon the Economic Impact Forecast System (EIFS) analysis. As explained in Section 4.0.4 of the PEA, EIFS is a computer-based economic tool that accounts for a variety of factors, and can estimate impacts from various scenarios. The Army did not study the potential for diversification of the Colorado Springs economy, as that is beyond the scope of this PEA.

Many commenters criticized the Army for failing to include the communities surrounding PCMS in the ROI for the purpose of socioeconomic impacts analysis.

R: The Army did not analyze socioeconomic impacts to the region surrounding PCMS because Soldiers training at PCMS do so only for a short period of time, a matter of a few days or weeks. Family members do not accompany Soldiers to PCMS. Since there will be no population change in the PCMS region as a result of PEA stationing implementation, the analysis regarding PCMS is considerably shorter.

One commenter questioned why the Army's socioeconomic calculations did not include the 2011 decision to implement stationing of a Combat Aviation Brigade (CAB) at Fort Carson, with the accompanying increase of approximately 2,750 Soldiers.

R: After appropriate NEPA analysis, the Army decided to implement stationing of a CAB at Fort Carson; however, construction of the CAB facilities is an ongoing action, and while some CAB Soldiers have arrived at Fort Carson, the majority are not expected until later this year. At the initiation of the PEA, the Fort Carson population was 24,865; the population is expected to rise to approximately 27,760 by the end of fiscal year (FY) 2014, in part due to arriving CAB Soldiers. The Army does not believe the additional CAB Soldiers will substantially alter the socioeconomic analysis. The cumulative impacts of future actions at Fort Carson, including the stationing of CAB Soldiers, are discussed in Section 4.5.16 of the PEA.

Support for reductions

A few commenters stated a force reduction at Fort Carson under Alternative 1 would benefit the socioeconomic conditions in the communities surrounding PCMS because it would reduce the threat of PCMS land expansion, thereby reducing anxiety within the communities surrounding PCMS about the probability of expansion, and reassuring them of the economic stability and security of the region.

One commenter provided extensive comments setting forth reasons that a force reduction would benefit the PCMS environment in certain resource areas, and why a force gain would harm the PCMS environment for these same resource areas. The commenter concluded: “our findings lead us to support Alternative 1 as it would definitely ensure sustainability of [the PCMS] eco-system, and allow for coexistence of our wildlife and their habitat with the necessary training of our military men and women.”

Army/Community Relationship

A few commenters stated force reductions would result in an improvement in the relationship between the Army and the local communities within the Fort Carson/PCMS regions.

Fort Drum, New York

The Army received approximately 10 comments regarding the impacts of the proposed action at Fort Drum. Comments focused on socioeconomic impacts, community investments, military investments, military/community investment, Army/community relationship, capacity for growth, military value, off-post development, and request for EIS.

Socioeconomic Impacts

All commenters indicated the Army had underestimated the socioeconomic impact on the region.

One commenter pointed out the area continually has higher unemployment rates (10.4 percent, Dec. 2012) than the statewide average (8.2 percent, Dec. 2012), and is concerned about the long-term impacts on the socioeconomic viability of the North Country with the loss of up to 8,000 jobs.

One commenter believed the ROI should have been more targeted (limited to Jefferson County), which would make the results even more negative than reflected in the PEA, as it will cause a statistically significant decline in population, resulting in increased vacancy in rental housing units with associated declining rents, decreased real estate values and a diminished market activity, empty classrooms, reduced teachers and staff in schools, and underutilized medical facilities. The commenter was concerned a loss of troops would create an "environment of doubt" among the development community and cause the financers to feel the North Country would pose too many risks for future development.

One commenter provided comparative information for Jefferson, Lewis, and St. Lawrence counties to illustrate most of the impacts of any reductions at Fort Drum would be to Jefferson County, in which Fort Drum is mainly located, and where the most growth related to the installation has taken place. The commenter stated it is commonly accepted that the bulk of economic impact resulting from housing, commerce, education, health care, etc., is generally concentrated within a 30-mile radius of the installation's main gate. The three county region stated in the Fort Drum ROI is much larger than that, according to the commenter. The commenter pointed out Fort Drum exceeds levels considered significant for all four of the model indicators (sales volume, income, employment, and population) for Alternative 1.

R: The Army's initial analysis showed the socioeconomic impacts under reduction scenarios already were assessed as 'significant.' In this PEA, 'significant' is the highest possible qualitative rating. The Army re-evaluated the socioeconomic ROI for Fort Drum, adopted the commenters' corrected ROI by limiting it to Jefferson County, and re-calculated the impact of force reduction under Alternative 1 for Fort Drum. The result of this re-analysis was a determination of "significant" socioeconomic impacts resulting from force reductions. In other words, the overall results were identical to the original socioeconomic analysis contained in the PEA and summarized in Section 5.1 of the Executive Summary. The new analysis, limited to Jefferson County, concluded that there would be significant impacts for sales volume, income, employment, and population in the new ROI, which is exactly the same as the original socioeconomic analysis, set forth in the PEA under Section 4.6.7.2. The Army has added this corrected socioeconomic analysis to the administrative record, and will consider the corrected analysis prior to making any force structure decisions.

While the data from the comments will not change the results of this PEA, the public feedback on socioeconomic impacts is valuable and will be used during the subsequent phase of the Army's force structure decision processes.

Community Investment

One commenter was concerned about the loss of investments made by the community in support of Fort Drum. The commenter pointed out North Country communities have taken on long-term debt to support Army community requirements while the state continues to invest increasingly scarce resources into ensuring Fort Drum's needs are fully met.

One commenter discussed state initiatives to improve Soldier and military Family quality of life in the area, including housing, education, health care, and transportation. He cited $77 million in housing aid and tax credits through the New York State Division of Housing and Community Renewal in support of Fort Drum and the creation of new housing units since 2005, and another $10 million in housing initiatives related to Fort Drum through the state's economic development agency, as well as support provided by local communities. The commenter noted an increase of more than 3,200 new multi-family rental units constructed or currently under construction on the base and in the local area and another 1,342 units in the construction and planning phases. The commenter cited the significant capital investment by North Country school districts to

serve the Fort Drum K-12 student population. Another commenter cited building expansion in one district to support Fort Drum totaled $140 million and noted an increase in staff and bus fleet was also accomplished to support Fort Drum growth. Commenters noted that Jefferson Community College is building a $19 million resident hall which allows military students to remain in the area after their parents have relocated, is creating a classroom annex on the installation, and has a significant outreach effort on the installation and now Fort Drum Soldiers and Families comprise 35 percent of the student body.

Two commenters pointed out that New York State and local communities have continually invested in Fort Drum's expansion with significant contributions to transportation and other public infrastructure to support the base. One cited $57 million for a 4.8 mile, four-lane interstate highway (I-781) connecting I-81 to Fort Drum's North Gate, which included four new bridges, the rehabilitation of an existing bridge, two full interchanges with innovative designs to promote safety and efficiency, advanced signage, and traffic monitoring systems. The commenter noted the highway will be named the Paul Cerjan Memorial Highway, in honor of the Army general who helped form the modern Fort Drum. Another lists major road projects, such as I-781, NYS Route 11, NYS Route 3, New York State Route 3 and 12 downtown, State Street infrastructure improvements including new sidewalks, curbs, signs, streetscape amenities, traffic signals, water lines, and center two-way left turn lanes at various locations, and stated the projects total $107.4 million in local-, state-, and federal-sponsored improvements.

Military Investments

Two commenters noted millions of dollars in improvements to the Watertown International Airport and for a rail spur to improve Fort Drum’s rapid deployment capability. One commenter cited a $2 million cost for the rail project that provided a double siding for Fort Drum. Another commenter cited specific improvements to the airport, including extended runway and parallel taxiway to serve large aircraft, renovations and expanded terminal building, improved and expanded passenger space, expanded free parking, expanded and renovated rescue and firefighting facility with state-of-the-art equipment, as well as other improvements, and cited a total capital investment of $20 million since 2006, with an additional $22 million for planned improvements over the next five years. One commenter stated there has also been significant improvement to water, sewer, waste, and recycling efforts of Fort Drum and $6.7 million was invested to improve broadband service in the vicinity of Fort Drum.

Army/Community Investments

Two commenters pointed out the community partnership joins the Army's medical treatment facility with local community healthcare providers, and offers quality, cost-effective care to Soldiers, military families, and the civilian population. Both cited a community investment of $100 million in master-planned upgrades at the five hospitals in the Fort Drum health service area, which incorporate expanded emergency departments, surgical facilities, mental health care, and diagnostic and imaging services. The commenters both noted New York State has also committed $500,000

annually to specifically address expanding behavioral health needs in the area. The commenters also cited $19 million in technology infrastructure upgrades to connect area hospitals and clinics, received from state and local partners, and an additional $4 million investment in recruiting physicians and allied health professionals, and stated 97 percent of the local physician base is TRICARE credentialed. The commenters noted the Fort Drum Regional Healthcare System is establishing Patient Centered Medical Homes in 23 primary care practices around Fort Drum to complement the Army Medical Home. The commenter also wanted to note air medical service was reestablished in 2012 following the loss of the Military Assistance to Safety and Traffic service in 2007.

Army/Community Relationship

Comments were all very supportive of Fort Drum, acknowledging the great relationship between the Army and the North Country communities. One was concerned about a "hollowing-out" of the force and the ability of the Army to maintain a combat ready fighting force. All were against the cuts at the installation and supported further growth.

Capacity for Growth

All the commenters advocated for growth at Fort Drum. One commenter noted "Past success is the best indicator of future success. For the past eight to nine years all community efforts have been directed toward meeting military demand with Soldier end strength at current levels. The community has already figured out the incentives necessary to spur further development. "We [Fort Drum communities] stand prepared to do more of the same if needed." Another commenter provided a similar comment regarding the ability and commitment of New York State to support growth. Another commenter noted Fort Drum is a master-planned installation currently hosting three Infantry Brigade Combat Teams (IBCTs) of the 10th Mountain Division. The division's fourth IBCT is stationed at Fort Polk, Louisiana The commenter stated Fort Drum is fully capable of having all four IBCTs of the 10th Mountain Division stationed on the installation. This commenter wanted to note that since the early 1990s, the 10th Mountain Division has been one of the most deployed divisions in the U.S. Army.

Military Value

Two commenters pointed out the value of Fort Drum to the military including unencumbered ground and airspace training areas, state-of-the-art airfield, and 24-hour rail operations capability, providing an ability for a division to be ready for movement within 24 to 36 hours. The commenter noted the Army is currently working a multi-phased construction project for an Army National Guard and Reserve Operations Readiness and Training Center for total force training at Fort Drum.

Off-post Development

One commenter noted a growth management plan that outlined efforts to preserve and ensure no future incompatible development. The commenter stated 10 of the towns and villages in the immediate ROI of Fort Drum have completed extensive and comprehensive development plans for their communities. A particular focus has been to preserve the long-term viability of Fort Drum by compatible land use planning.

One commenter noted many of the most sensitive areas of development have been designated to remain undeveloped through the Army Compatible Use Buffer (ACUB) program. The commenter stated the program is endorsed by local and county officials, along with a local program, Jefferson County Purchase of Development Rights, to help ensure Fort Drum remains a premier training facility.

Another commenter also pointed out the communities' support of limiting incompatible development through the ACUB program, and cited New York State's legislative and regulatory initiatives from 2012 that preclude the placement of wind farms that would be detrimental to the conduct of military flight operations. Another commenter noted that in 2010 three parcels were secured under easements, protecting 717 acres, which will sustain natural habitats and protect the installation's accessibility, capability, and capacity for Soldier training and testing.

Request for EIS

One commenter requested a site-specific Environmental Impact Statement (EIS) to assess thoroughly the significant negative impacts that would be created in the North Country Region if Fort Drum is selected to receive cuts outlined in Alternative 1. Commenters urged the Army to be prepared to conduct a more intensive environmental and public review of its rationale, data, and socioeconomic impact if Alternative 1 receives further consideration.

Another commenter stated that according to the data in the PEA, the Fort Drum region would be the fifth most impacted community in terms of income and employment if a troop reduction were to occur at the installation. The commenter believed under Alternative 1, cumulative adverse socioeconomic impacts would likely be long lasting and significant in nature. It is the commenters' view given the enormous impact such a personnel reduction would have on Fort Drum and the surrounding region, an environmental assessment fails to meet the standards of NEPA, necessitating a robust EIS review instead.

R: The PEA concluded that there are no significant environmental impacts, other than socioeconomic, with implementation of the proposed action under either of the alternatives analyzed. These significant socioeconomic impacts are of particular concern to the Army; however, in accordance with Council on Environmental Quality NEPA regulations, significant socioeconomic impacts by themselves do not require preparation of an EIS.

Fort Gordon, Georgia

The Army received one comment regarding the impacts of the proposed action at Fort Gordon. The comment focused on the lack of encroachment at Fort Gordon.

Off-post Development

The commenter pointed out although there has been significant growth in the counties that border Fort Gordon, the growth is adjacent to the main cantonment area and is compatible with military activities taking place on Fort Gordon (no encroachment). All

the members of the Central Savannah River Area Regional Commission that agreed to limit growth in the 2005 Joint Land Use Study have done so. The population and household growth rates along the southern and western boundaries have been minimal and the growth rates for the surrounding areas have not changed, according to the commenter. The commenter also wanted to note the four counties having direct boundaries with Fort Gordon conduct a very close evaluation of any requests for zoning changes, new developments, or expansions within the areas surrounding the training areas of the installation to limit incompatible development.

R: At Fort Gordon, the growth partnership developed in 2005 has been beneficial to both Fort Gordon and the counties that surround it. This ongoing partnership promotes development in the area while protecting Fort Gordon's missions and operating environment within a coordinated and flexible planning environment.

Fort Hood, Texas

The Army received a few comments regarding the impacts of the proposed action at Fort Hood. Comments focused on socioeconomic impacts and environmental impacts.

Socioeconomic Impacts

A commenter criticized the ROI used for the socioeconomic analysis for Fort Hood. This commenter believed that the Army should have included Lampasas County in the installation's ROI because many more of Fort Hood's Soldiers reside there, whereas few reside in McLennan or Falls County.

Environmental Impacts

This same commenter provided details on a number of other resource areas, suggesting a number of corrections to the PEA's sections on airspace, air quality, cultural resources, soils, biological resources, water resources, traffic and transportation, and cumulative effects. Many of these comments highlighted extraneous or unclear information in the PEA, which the commenters wished to correct. For example, the commenters pointed out the discussion of air quality waivers for Red River Army Depot and the Oxbow Calcining Facility in Port Arthur is irrelevant to the analysis, and recommended this discussion be deleted from the PEA. Commenters also wanted the PEA to state that Fort Hood prevents bivouac in culturally-sensitive areas (in Section 4.8.3, the PEA stated force gains under Alternative 2 could potentially increase the use of bivouac areas adjacent to ranges). As a final example, commenters pointed out not all of the species listed in Section 4.8.6 of the PEA necessarily occur on Fort Hood.

R: Section 4.8.9.1 of the PEA analyzed Bell, Coryell, McLennan, and Falls counties as the ROI for Fort Hood. As noted above, some commenters believed the Army should have substituted Lampasas County for McLennan and Falls, because more Soldiers reside in Lampasas than in McLennan or Falls counties. Fort Hood staff considered and concurred with this conclusion. As a result, the Army re-evaluated the socioeconomic ROI for Fort Hood, adopted the commenters' corrected ROI, and re-calculated the

impact of force reduction under Alternative 1 and of force reduction and force gains under Alternative 2, for Bell, Coryell, and Lampasas counties. The result of this re-analysis was a finding of "significant" socioeconomic impacts resulting from force reductions, and "beneficial" impacts resulting from force gains under Alternative 2. In other words, the overall results were identical to the original socioeconomic analysis contained in the PEA and summarized in Section 4.22. The Army has added this corrected socioeconomic analysis to the administrative record, and will consider the corrected analysis prior to making any force structure decisions. The Army appreciates the comments and corrections on the other environmental resource areas; while none of these affect the PEA's impact conclusions for these resource areas, the Army will add them to the administrative record.

Fort Irwin, California

The Army received no comments.

Joint Base Elmendorf-Richardson, Alaska

The Army received three comments concerning both Joint Base Elmendorf-Richardson (JBER) and Fort Wainwright, Alaska. Please see comments under the heading of Fort Wainwright below.

Joint Base Langley-Eustis, Virginia

The Army received a few comments regarding impacts of the proposed action at Joint Base Langley-Eustis (JBLE). The Army also received a number of comments that pertained to both JBLE and Fort Lee, Virginia. The comments below pertained only to JBLE and focused on socioeconomic and environmental impacts, as well as regulatory requirements.

Socioeconomic Impacts

One commenter recommended that the DoD analyze the cumulative socioeconomic impacts of change to military and contract employment on the region's economy. The commenter recommended this analysis be incorporated in the individual assessment or other planning documents.

R: These socioeconomic impacts were factored into the modeling done in the PEA. Section 4.11.7.1 explains that the PEA analyzes reductions to the number of Soldiers and Army civilian employees, but that the joint base also has Airmen (Air Force service members) and Air Force civilian employees, which the PEA does not include in its analysis because Air Force plans for reductions in its workforce are not yet known. Section 4.11.7.2 explains that the EIFS model predicts that 376 military contract jobs would be lost as a direct result of force reductions, and that another 567 would be lost as an indirect result of reductions.

One commenter asked how many of the approximately 2,700 military employees would be eligible for and may take early retirement as a result of the force reduction as this would have economic effects on the county. The commenter was concerned that there will be some local, regional, and state socioeconomic impacts as a result of the decrease, and that while difficult to determine the extent of the force reduction on the county specifically, the study seems to focus on the impacts to another county. Impacts to the specific county would include decreased local tax revenue, changes to the housing market, and increased competition for area jobs according to the commenter. The commenter made the point that while a force reduction of 2,700 people may not in and of itself have a significant county impact, there is more broad concern with potentially greater or compounded effects by similar force reduction in other military branches. The commenter noted ripple effects of additional force reduction would be felt strongly by military contractors that employ county residents and businesses who serve as support for the personnel and their families. Finally, the commenter asked for additional information on the broader impacts of a larger reduction in the force.

R: The Army appreciates these comments. Final decisions as to which installations might experience reductions or unit reshaping or the magnitude of these changes have yet to be made. The Army is unable to provide an estimate of the numbers of employees potentially eligible for early retirement. Other services' plans for force reductions are not clear at this time.

Environmental Impacts

A number of commenters identified regulatory and procedural requirements for the Army to follow with implementation of the Proposed Action. Commenters advised the Army to consider the applicability of the federal review requirement under the Coastal Zone Management Act (CZMA), as well as preparation of installation-specific NEPA and planning documents for specific sites and specific projects. The commenter noted that because this is a programmatic document, many of the comments were general in nature and outlined requirements and procedures the Army must follow when project specifics are known. The following resource areas should be considered for evaluation for potential impacts: wetlands and water quality, air quality to include fugitive dust, solid and hazardous waste management, historic structures and archaeological resources, wildlife resources to include terrestrial and aquatic sensitive and endangered species, natural heritage resources, and subaqueous lands (shoreline encroachment and applicable federal and state regulatory and coordination requirements), wildlife resources and natural heritage resources, air pollution control, solid and hazardous waste management, erosion and sediment control and storm water management, historic structures and archaeological resources, water quality and wetlands, and federal consistency under the CZMA.

R: The Army appreciates these comments. Final decisions as to which installations might experience reductions or unit reshaping have yet to be made. The Army will consider the need for site-specific NEPA analysis and other federal and state of Virginia environmental compliance requirements after force structure decisions are made.

Joint Base Lewis-McChord, Washington

The Army received one comment on impacts to Soldier reductions at Joint Base Lewis-McChord (JBLM). The commenter focused on community investment, military investment, and strategic benefit.

Community Investment

The commenter pointed out the significant community investment in transportation and education with more to come, including upgrading or building new schools and roads. The commenter stated business and non-profit organizations have made major investments to provide military Families a desirable quality of life. The commenter believed JBLM is a major driver of the regional economic activity and a loss of service members and Families will negatively affect businesses and tax revenues, which will cause reduced local government and educational services, as well as declining property values, which will aggravate a fragile housing market recovery.

Military Investment

The commenter expressed concern with the significant investment of DoD and Army at the installation since BRAC 2005. The commenter cited nearly $4 billion in infrastructure and related improvements for relocated units and the addition of the 7th Infantry Division and 16th CAB.

Strategic Benefit

The commenter stated JBLM units are positioned to initiate and promote DoD strategy for a renewed focus and strategic approach to global security in the Asian-Pacific region.

Fort Knox, Kentucky

The Army received one comment that pertained to both Fort Knox and Fort Campbell, Kentucky. Please see the comment summary under the heading of Fort Campbell above.

Fort Lee, Virginia

The Army received a few comments regarding the impacts of the proposed action at Fort Lee. The Army received two comments that pertained to both Fort Lee and JBLE, Virginia. The comments focused on socioeconomic impacts, opposition to force reductions, community investment, Army/community relationship, environmental impacts, as well as some miscellaneous comments.

Socioeconomic Impacts

Economic impacts and future financial obligations were of concern to commenters. Commenters noted Fort Lee accounts for one-seventh of the region’s total economy, reflecting its importance to the economic health of the surrounding localities. Commenters believed there is a significant relationship between the regional economy

and the installation's permanent and transient personnel strength and direct economic contribution through procurement of goods and services. The commenters noted the community, through private and public investment, has expended significant and scarce fiscal resources to support Fort Lee mission and personnel. The commenters pointed out that direct and indirect consequences of reducing the installation end strength could include adverse implications for emergency response services, health care for those least able to provide for themselves, and countless other programs. The commenters noted these programs depend upon the economic vitality developed in reliance upon the Army's continued need for Fort Lee at its present level of activity. The commenters stated economic implications will produce a direct and adverse impact upon the human environment. The commenters noted localities in the region have "right sized" to support Fort Lee, with financial obligations that will not disappear when downsizing occurs. These same commenters believed obligations constitute an irretrievable commitment of resources, will become a disproportionate drain on community resources, and will result in dire consequences for those governmental responsibilities that are not contractually protected.

R: The Army appreciates these comments. Final decisions as to which installations may experience reductions or unit reshaping have yet to be made. The Army will consider all the points raised prior to making force structure decisions affecting Fort Lee.

Commenters requested that document preparers and decision-makers consider data presented in the study "The Economic Impact of Fort Lee" published by Crater Planning District Commission in August 2012. Commenters noted the study is the most recent applicable and publicly accepted economic analysis and supports planning related to population fluctuation on Fort Lee. Commenters felt that the data in Table 4.14-7 (School Capacity 2008) and related narrative was outdated and provided more recent school data: as of January 2013, 1,990 out of 6,432 students enrolled in Prince George County Public Schools are military-connected; Prince George Public Schools receive significant Federal Impact Aid based on the population of military-connected students enrolled ($3,550,000 for the 2011-2012 school year). Commenters noted Prince George County Public Schools funding and operations could be significantly impacted by reduced impact aid if fewer military children are enrolled. Commenters also recommended that the following information be included in the Affected Environment, Family Support Services Section (4.14.3.1): 881 individuals assigned to Fort Lee are enrolled in the Exceptional Family Member Program. Commenters disagreed with the statement in the PEA that facility impacts would be beneficial (Section 4.14.1.2). Commenters suggested that personnel losses with the proposed reduction could adversely impact installation space utilization and believed a lack of funding for renovations and modifications could force the installation to leave facilities vacant. One commenter pointed out the impact to Land Use and Compatibility (Section 4.14.1.2) cannot be definitively stated until completion of a joint land use study in late 2013.

R: The Army appreciates these comments, and will consider the comments and informational material provided prior to making force structure decisions. None of the comments identified any changes to the significance determinations for the resource

areas. The Army will consider the need for additional, site-specific NEPA analysis at Fort Lee, after force structure decisions are made, and ensure that these comments are carefully considered.

Commenters did not agree with the PEA cumulative socioeconomic impact determination of less than significant. The commenters noted the cities of Petersburg and Hopewell ranked third and thirteenth, respectively, for fiscal stress scores in the state. The commenters believed that because the area immediately surrounding Fort Lee is economically stressed, the proposed 2,400 military and civilian personnel reduction would have a significant adverse cumulative socioeconomic impact. Commenters requested that economic modeling be revisited to only include the southern tier of Chesterfield County, historically considered economically linked to Fort Lee. The commenters noted the economic model analysis in the PEA included all of Chesterfield County, which could skew model results by diluting the impacts of the proposed reduction on the local economy.

R: The PEA analyzed Chesterfield, Dinwiddie, and Prince George Counties, and the Cities of Hopewell, Colonial Heights, and Petersburg, as the ROI for Fort Lee. Overall socioeconomic impacts were found to be significant. Commenters believed the ROI should be re-evaluated to only include the southern tier of Chesterfield County. Fort Lee staff concurred with this evaluation. The Army ran the socioeconomic model using a smaller geographical ROI (Chesterfield County and not only the county southern tier). The results were similar with a socioeconomic impact determination of significant, as reflected in the PEA. The re-run socioeconomic analysis will be added to the administrative record.

The commenters disagreed with the PEA's assumption that Soldiers attending temporary training have limited impacts on the community. Commenters believed temporary duty (TDY) and advanced individual training (AIT) students provide a major impact to the economy both on and off post. They noted AIT students and Families spend $2.6 million locally on food and lodging annually; TDY students spend $31.5 million per year locally. Commenters requested analysis of the anticipated 10 percent reduction in TDY students and the impact on the local hotel industry, considering the recent opening of Fort Lee's 1,000-room lodge. Commenters stated about 2,400 TDY students stay daily at the installation, spending $54.12 million on lodging annually. Commenters believe that TDY student reduction could result in significant socioeconomic impacts to the off-post community and layoffs of lodging personnel.

R: The principal factors affecting socioeconomics at Army installations are: construction project expenditures; salaries (Soldier, civilian, and contractor); procurement of goods and services locally and regionally by Soldiers, civilians, and their Family members; and employment changes. TDY and AIT students impact the local economy to a lesser degree. Most Soldiers attending TDY training are not accompanied by Family members, reducing their economic impact. The Army appreciates these comments, and will consider the comments prior to making force structure decisions.

Opposed to Force Reduction

One commenter discouraged implementation of Alternative 1 with its force reduction of Soldiers and Army civilians, as well as additional reductions in student and temporary trainees. While the commenter did not dispute that there were negligible or beneficial impacts under the no action alternative or Alternative 1, the commenter felt anticipated socioeconomic impacts of Alternative 1 would likely be substantially more negative. The commenter noted economic models in the PEA predict a reduction of economic activity in the ROI for all elements. While the models described the anticipated reduction as minimal, the commenter noted they are reductions nonetheless. The commenter concluded by discouraging implementation of any alternative that would result in any negative socioeconomic impacts to the county.

R: The PEA found that there would be significant socioeconomic impacts under Alternative 1. The Army ran the socioeconomic model using a smaller geographical ROI (Chesterfield County and not only the county southern tier). The results are still similar with socioeconomic impacts as reflected in the PEA. The re-run socioeconomic analysis will be added to the administrative record. Final decisions as to which installations might experience reductions or unit reshaping have yet to be made. The Army will consider the need for appropriate site-specific NEPA after firm decisions are made.

Community Investment

Commenters noted more than $30 million was secured for construction upgrades at no expense to the military. The commenters pointed out that surrounding localities deferred their local priority transportation projects for five years to ensure that the required Fort Lee road improvements were completed in a timely manner to meet BRAC 2005 requirements. The commenters also pointed out the surrounding county (Prince George) built a new elementary school to accommodate the increased student load coming from Families living on the installation, at the expense of other projects.

Army/Community relationship

Commenters expressed their opinion that an excellent working and integrated governing relationship exists between the surrounding communities and cities and the leadership of Fort Lee. The commenters felt the relationship between the military and civilian communities has fostered mutual benefit to the military's leaders and service personnel in the region. The commenters stated the BRAC implementation at Fort Lee showed the mutual benefit and excellent working relationship between the military and surrounding communities. Commenters noted under BRAC 2005, the surrounding localities worked with installation officials to prioritize a variety of transportation upgrades to improve gate access.

Environmental Impacts

A number of commenters addressed regulatory and procedural requirements for the Army to follow with implementation of the proposed action. Commenters advised the Army to consider the applicability of the federal review requirement under the CZM as well as preparation of installation-specific NEPA and planning documents for specific sites and specific projects. Commenters noted that because this is a programmatic

document, many of the comments were general in nature and outlined requirements and procedures to follow when project specifics are known. Commenters requested the following resource areas be considered for evaluation for potential impacts: wetlands and water quality, air quality to include fugitive dust, solid and hazardous waste management, historic structures and archaeological resources, wildlife resources to include terrestrial and aquatic sensitive and endangered species, natural heritage resources, and subaqueous lands (shoreline encroachment), federal and state regulatory and coordination requirements including wildlife resources and natural heritage resources, air pollution control, solid and hazardous waste management, erosion and sediment control and stormwater management, historic structures and archaeological resources, water quality and wetlands, and consistency under the CZMA.

R: The Army acknowledges and appreciates these comments. Final decisions as to which installations might experience reductions or unit reshaping have yet to be made. The Army will consider the need for site-specific NEPA analysis and other applicable federal and State of Virginia environmental compliance requirements after force structure decisions are made.

Miscellaneous

A commenter was confused as to why Fort Lee was included in the PEA. The commenter noted the PEA states the focus of Army realignment and potential reductions will be in its operational forces and not AMC depots and arsenals, reserve centers, and major training centers, which do not have large operational unit concentrations. The commenter pointed out Fort Lee does not host a BCT; and is the Army's sustainment think tank for logistics and premier learning institution, producing game-changing professionals and solutions. The commenter felt that the reason for Fort Lee's existence is to ensure that units can attain high levels of training proficiency to prepare for future missions and deployment abroad. The commenter noted aside from the discussion on BCTs, the PEA does not specifically discuss how the population numbers relate to mission, sustainment, function, training, or supporting and protecting the "generating force."

R: Installations without BCTs may also be affected by Army stationing reductions. As the end-strength is reduced, the Army must preserve a strategic mix of unit types and capabilities across the Army. This PEA analyzes impacts to those Army BCT and non-BCT installations that have the potential to lose 1,000 or more full-time military employees (Soldiers and civilian employees) from FY 2013 to FY 2020. Lee meets these criteria.

A commenter noted the authorized active duty end strength would be reduced from 562,000 to 490,000, with the reduction of at least eight BCTs. The commenter questioned why the PEA evaluates an additional reduction of Soldiers and Army civilians for a potential population loss of 126,000.

R: The larger number of 126,000, which represents the upper boundary of potential cuts if every installation analyzed were to be cut the maximum amount studied, provides flexibility to decision-makers over the next several years as conditions change.

Commenters indicated that the method for arriving at the proposed 2,400 reduction number is not apparent from the analysis. The commenter felt it was not consistent with the PEA statement that the reduction could be 35 percent military, 15 percent civilian personnel, and 10 percent TDY and AIT student population. Given the reduction percentage, this would equal 1,484 military, 373 civilian, and 953 students, for a total reduction of 2,810 personnel. The commenter noted any significant reduction in training cadre or support personnel will prevent Fort Lee from meeting Army training standards and will impact military readiness around the globe.

R: The force reduction numbers analyzed in this PEA provide an upper-bound loss estimate for each analyzed installation subject to force reductions, including both Active Component Soldiers and Army civilian employees. Section 3.2.1 of the PEA states that "[f]or an installation with no BCTs, Alternative 1 assumes a loss of 35 percent of the installation's Soldiers, as well as a loss of up to 15 percent of civilian employees." The Army did not study impacts to military readiness or the ability to meet training standards as these are outside the scope of the PEA. The information from the commenter is still valuable and will be used during the subsequent phase of the Army's force structure decision process.

One commenter disagreed with the conclusion in the FNSI for Fort Lee. The commenter stated a flawed approach was followed in the PEA analysis, applying an across-the-board decrement to personnel strength of an installation, without regard for differences in missions and functions at the various installations. The commenter felt this was a short-sighted and dangerous approach and ignored the fundamental mission of the military to prepare for and defend the country's national security interest. The commenter's concern with this Army evaluation process is that there is no consideration of combat readiness and responsiveness to the threat. The commenter concluded that this Army approach in the PEA was to arrive at a FNSI determination that did not require preparation of an EIS. The commenter felt if the Army conducted a more proper approach and analysis where the shortfall is not evenly distributed, impacts upon various communities will be disparate and increase the likelihood that a FNSI determination will be unattainable. The commenter further stated Fort Lee is a major training center with no concentration of operational units and felt the installation is not a proper target for this analysis. The commenter believed the draft FNSI is defective, and Fort Lee needs to be removed from the FNSI and any other consideration concerning Army 2020.

R: The Army's intent is to reduce and reshape forces in a manner that preserves the Army's mission capabilities with the proper mix of forces within budget constraints. To achieve this end, the Army carefully considered appropriate screening criteria to determine the installations subject to force reductions. As Section 3.4.1 of the PEA explains, Fort Lee meets the Army's screening criteria for analysis in this PEA because, although it is not home to a BCT, Fort Lee is one of six installations that support major

training schools or Combat Training Centers and is subject to a potential reduction of 1,000 Soldiers/civilian employees. The Army did not study impacts to combat readiness or the ability to respond to threats to national security as these are outside the scope of the PEA. The Army will carefully consider these comments prior to making any force structure decisions. The information from the commenter is still valuable and will be used during the subsequent phase of the Army's force structure decision process.

Fort Leonard Wood, Missouri

The Army received more than 2,000 comments regarding the impacts of the proposed action at Fort Leonard Wood. Comments focused on socioeconomic impacts, community investments, Army/community relationship, capacity for growth, other service reductions, sequestration, and some miscellaneous comments.

Socioeconomic Impacts

The overwhelming majority of these commenters expressed alarm at the potential socioeconomic impacts of force reductions to the state and surrounding communities.

Many commenters stated the Army is incorrect in finding that there is no significant impact as a result of force reductions under Alternative 1 at Fort Leonard Wood and the surrounding ROI, and that the economic impact would be devastating. Several commenters pointed to the fact that Fort Leonard Wood is one of the largest employers in the state, and that force reductions would have an impact on the entire state of Missouri.

R: The PEA concluded that there would be significant socioeconomic impacts from force reductions under Alternative 1. Section 4.15.3.2 concluded that while sales volume and income would not be significantly impacted, there would be significant socioeconomic impacts for population and employment in the ROI as a result of a force reduction at Fort Leonard Wood. The Army acknowledges that socioeconomic impacts resulting from force reductions could impact the entire state.

Commenters felt that since most of the impact would be felt in Pulaski County, the analysis should have provided separate, focused study on that county. Also, commenters believed that Texas County, to the south of Fort Leonard Wood, would be severely affected by force reductions, yet was not included in the analysis.

R: The Army recognizes the importance of the impacts of force reductions on Pulaski County, and agrees that additional, socioeconomic analysis for the county and the entire ROI may be appropriate in a future, site-specific analysis. This shift in analysis would still leave the impact as significant, and therefore would not make a difference at the programmatic level. Section 4.15.3. of the PEA analyzed Pulaski, Phelps, and Laclede counties as the ROI for Fort Leonard Wood. As noted above, some commenters believed the Army should have included Texas County in the ROI. As a result, the Army re-evaluated the socioeconomic ROI for Fort Leonard Wood, adopted the commenters' corrected ROI by including Texas County, and re-calculated the impact of force reduction under Alternative 1 for Pulaski, Phelps, Laclede, and Texas

counties. The result of this re-analysis was a determination of "significant" socioeconomic impacts resulting from force reductions. In other words, the overall results were identical to the original socioeconomic analysis contained in the PEA and summarized in Section 5.1 of the Executive Summary. The new analysis, with inclusion of Texas County, concluded that there would be significant impacts for population and employment in the new ROI, but that there would be no significant impacts for sales volume or income. These conclusions are identical to those of the original socioeconomic analysis, set forth in the PEA under Section 4.15.3.2. The Army has added this corrected socioeconomic analysis to the administrative record, and will consider the corrected analysis prior to making any force structure decisions.

Many commenters expressed concern about the impact of force reduction on schools. Commenters also pointed to the potential for a significant decrease in the Waynesville R-VI School Districts, because the student population within these districts is comprised of 60 percent military family members and 15 percent were children of civil service employees.

Community investments

Commenters also highlighted the school districts' large investments in new schools (including a new high school, career center, early childhood center, sixth grade center and elementary school), both to enhance the educational environment and to provide for continued growth. A few commenters also emphasized the importance of the school districts as the second-largest employer in the state.

R: The Army acknowledges the investments made by local school districts to accommodate military dependant students, and the potential impact force reductions at Fort Leonard Wood may have on local schools. Section 4.15.3.2 of the PEA concludes that the proposed reduction could have significant impacts to schools with a high population of military and civil service Family members. Schools would be negatively impacted by a loss of federal impact aid received for supporting the education of children from military and Army civilian families. As the numbers of these students were reduced, it would likely have a serious negative financial impact on Pulaski County, and in other school districts in surrounding communities, such as the Plato school district in Texas County.

Army/Community Relationship

One commenter emphasized the close and mutually-beneficial relationship between Fort Leonard Wood and the state university system, allowing for both educational opportunities for Soldiers assigned to the installation, and research opportunities for the university in areas of mutual interest. The commenter also highlighted the creation of the University of Missouri Technology Park at Fort Leonard Wood, the first private technology park built on an Army installation. The commenter expressed concern that reduction of military personnel on the installation would have negative ramifications to the development and growth of the alliance between the installation and the university system, as well as the economy of the region.

R: The Army acknowledges the close relationship between Fort Leonard Wood and the university system, and will consider it along with other community support information prior to making force structure decisions.

Capacity for Growth

Comments mentioned several factors which establish Fort Leonard Wood as an important asset for the Army and DoD, including the synergy in collocating Forces Command and Training and Doctrine Command maneuver enhancement/support elements at the same installation; the strategic value of the installation's location in the middle of the country, and its ability to respond to floods, a New Madrid fault earthquake, or other natural or man-made disaster in the mid-west, and excellent air, rail, and road connectivity; the multi-billion dollar investment by the Army in new infrastructure, and the low operating costs of the installation; the high quality of life and low cost of living, and good educational opportunities for children; the general support and pro-military outlook of the local community; and that there are no significant incompatible development issues. They noted Fort Leonard Wood is a large installation with room for growth.

R: The Army will consider all of these factors prior to making force structure decisions.

Other service reductions

Commenters considered the PEA's failure to include specific numbers of potential loss of other services' positions a major deficiency in the analysis.

R: The Army lacks sufficient information about what other services might do to reduce and/or realign their own forces to include it in this analysis. Reduction in other services at Fort Leonard Wood are identified in section 4.15.5 as possibly having cumulative socioeconomic impacts. Given budget uncertainty, we still do not have specific information that would enable us to produce a more complete picture.

Sequestration

One commenter linked the proposed force reductions to sequestration.

R: This action was not caused by sequestration. The Army is reducing the authorized end strength for active duty from a war-time high of 570,000 to 490,000, as a result of the discretionary caps outlined in the Budget Control Act of 2011. This reduction in end strength is necessary regardless of whatever happens with sequestration.

Miscellaneous

Some commenters believed the analysis was flawed in that it seemed to treat reductions in high-density urban environments the same as reductions in very rural communities, and the commenters believe downsizing in rural communities creates a more significant impact than in places where the Army is not the largest employer.

R: The Army agrees that impacts to the largely rural communities surrounding Fort Leonard Wood from force reductions could be more severe than similar reductions would be in other parts of the country with a more diverse economy and/or a larger population. As an example, Section 4.15.3.2 of the PEA explains that significant impacts

on the Fort Leonard Wood ROI would result from force reductions for population and employment, but not sales volume or income. For comparison, Section 4.2.9.2 found that impacts from even greater proposed reductions to Fort Bliss, Texas (located next to the city of El Paso), would be significant only for population, but not sales volume, income, or employment. Section 4.15.5 of the PEA discusses the importance of the installation for the entire regional economy.

One commenter suggested cutting the senior civilian staff at Fort Leonard Wood by 60 percent, calling the civilian installation staff “bloated” and “redundant.”

Fort Polk, Louisiana

The Army received approximately 4,000 comments regarding the impacts of the proposed action at Fort Polk. Comments focused on socioeconomic impacts, community investment, military investment, combined military/community investment, Army/community relationship, capacity for growth, mission/readiness/training, off-post development, and miscellaneous advantages.

Socioeconomic Impacts

Many commenters felt the physical and economic data concerning Fort Polk and the surrounding communities contained in the PEA was dated and thus left out years' worth of infrastructure improvements and investment made by the state and local communities in preparation for growth at Fort Polk.

R: The Army recognizes that the data used was from FY 2011, which in some cases was prior to some major changes due to BRAC 2005; however, the analysis of potential impacts in the socioeconomic component were determined to be ‘significant.’ In this PEA, 'significant' is the highest possible qualitative rating. Were the Army to change the data to the most current information, the evaluation of significant impact would not change. The Army will consider the additional data before final force structure decisions are made.

Other commenters wanted to ensure the Army included the recent land purchase of 14,000 acres. Commenters felt the PEA did not clearly demonstrate Fort Polk’s lower cost of operation, modernized and expanded infrastructure, and the recently acquired unlimited use training land that make it even more valuable to the Army for expansion by the re-location of troops from other overcrowded posts that lack the current capacity to appropriately house and train Soldiers.

Several commenters expressed their appreciation for the Army’s efforts to conduct force reductions in a thoughtful way and asked the Army to consider two extensive and detailed reports prepared by economic consulting firms retained by the Louisiana Department of Economic Development and representing the Fort Polk surrounding communities. The issues raised by these reports were exclusively directed to the PEA’s socioeconomic analysis and impact of Alternative 1, force reductions, on the Fort Polk ROI. The main thrust of the reports was the assertion that the PEA grossly underestimated the socioeconomic impacts to the Fort Polk community, for the following

reasons: the ROI was too narrow, encompassing only five parishes, and failed to analyze impacts to the entire state; the "multiplier" – a number that quantifies the additional effects of an action beyond those effects that are immediately measurable, taking into account direct and indirect effects – was overly low, resulting in an underestimation of the impact; the PEA failed to include the loss of local tax revenue that would result from force reductions; and for various reasons, the PEA underestimated the total impact to the state treasury from loss of income taxes, excise taxes, and other revenues. In addition, the reports criticized the socioeconomic model used by the Army in the PEA, and provided reasons for the superiority of an alternative model. The reports included comments that identified several areas of perceived weakness in the Army's analysis, alleging that the PEA failed to consider Fort Polk's ongoing land expansion program; failed to identify National Guard training facilities available to Fort Polk Soldiers; failed to properly identify and consider the federal, state, local government, and community investment in Fort Polk and in the surrounding community in support of the installation (including adequate off-post housing); failed to adequately consider potentially disproportionate impacts on minorities and low income populations; failed to consider energy costs; failed to portray accurately traffic and transportation issues; and failed to identify and consider past, present, and future projects. One report also discussed many factors in favor of Fort Polk's military value, including the availability of training lands and growth under the land acquisition program, the already-sunk costs of new facilities at Polk, the installation's strategic location, the accessibility of England Airpark/ Alexandria International Airport, state and local investment in the surrounding community to support the installation, and quality of life for Soldiers and Families. This report also made the point that, due to the location of the Joint Readiness Training Center (JRTC), Fort Polk is an ideal installation to demonstrate and validate new approaches to combined arms maneuvers, wide area security operations, and peace support operations.

R: The PEA concludes that force reductions under Alternative 1 would result in "significant" socioeconomic impacts to the Fort Polk ROI (please see Table 4.16-2). If the Army were to use all the commenter's suggestions, additions, and corrections to revaluate the socioeconomic impacts, it could result in a determination of significance for socioeconomic factors such as sales volume or income, which Section 4.16.7.2 of the PEA concludes would not be significantly impacted by force reductions; however, in this PEA "significant" is the highest qualitative rating. While the Army has concluded that, taken as a whole, these comments, suggested corrections, and proposed re-calculations of the socioeconomic analysis contained in the PEA would not change the PEA's overall conclusion of "significant," the Army acknowledges the serious socioeconomic impacts for the counties and communities surrounding Fort Polk and the possibility that these impacts could be even more severe than identified in the PEA. The Army will consider all of comments raised in the reports, including the factors highlighting Fort Polk's military value, such as proximity to the airport, in subsequent phases of the force structure decision process.

One commenter noted the adverse impact on people with vision impairment. They claimed the proposed force reduction would adversely impact the Louisiana Association

for the Blind's Base Supply Center, likely resulting in its closure. They stated this is an 86-year-old community service provider that provides ready access to supplies needed on deployments and training missions, as well as office supplies needed in conducting the administrative functions of the post. The commenter noted the closure of the Base Supply Center is expected to result in lost jobs for 54 people with serious visual impairments, a population that already has 70 percent unemployment. Commenters stated every job lost among this population results in an increase of tax users and a loss of tax payers and felt that job opportunities for people with blindness are so few that jobs lost often result in the affected person turning to Social Security disability income.

Several commenters expressed concern that the PEA failed to fully describe the status and benefits of Fort Polk's ongoing land expansion program.

R: Table 4.16-2 of the PEA stated Army and Forest Service real property acreage on Fort Polk totals 198,174 acres. The current size of the installation is 211,499 acres, which includes two new land purchases in 2012. This new land is already being used for training, although some required studies and surveys must be completed before the land is fully prepared for unrestricted maneuver training. It is anticipated that the installation will grow to 223,008 acres with two more purchases in 2013. At the time the PEA was prepared, there was no way of knowing the amount of land that would be purchased by the time the PEA process concluded. The current acreage will be taken into account in the force structure decision process.

Another issue commenters felt was not considered was the loss of federal funding for schools and public safety that would be loss due to the reduction in population. Commenters felt this would put an additional burden on an already failing economy in the area.

R: These factors were considered. The PEA states on page 4.16-21 under the heading Schools and Public Health and Safety: "Fort Polk anticipates the potential for significant adverse impacts to the Vernon and Beauregard Parish schools as a result of the implementation of Alternative 1 … Fort Polk anticipates less than significant impacts to public health and safety under the Proposed Action."

<u>Community investment</u>

Those who commented about the proposed action and its effects on Fort Polk were concerned with the investment of both private and public funds to the Fort Polk installation and community that would be wasted if the installation received the reductions identified in the PEA. Commenters stated the Leesville and entire Vernon Parish communities have been working for the past five years to enhance the quality of life for our Soldiers and to ensure the growth of Fort Polk. Commenters cited off-base local investments in schools, roads, airports, and infrastructure for the direct support of Fort Polk as totaling over $400 million.

Commenters cited specific investments by the city of Leesville, which include $16.9 million for renovation and expansion of its water system; $850 thousand sewer upgrade; Leesville High School renovations to increase the school by 30,000 square feet and stated construction is now in process at a cost of $21.5 million, funded by a local bond

issued by the Vernon Parish School Board. The commenter also noted the New South Fort Elementary School will be constructed at a cost of $21 million, to be funded 90 percent by OEA, 5 percent by Louisiana Economic Development, and 5 percent by the local school board. Commenters also brought up the transportation study, a $650,000 investment to study all state and federal roads parish-wide and to seek ways to alleviate traffic congestion between Entrance Road and the city of Leesville, funded by Louisiana Department of Transportation and Development.

Commenters noted other nearby areas' investments including 10 hotels/motels located in close proximity to Fort Polk, three of which opened in 2012, with an additional hotel on Entrance Road opening this year, and another hotel planned for the near future. Commenters also noted four lanes of U.S. Highway 171 between Leesville and Fort Polk are now complete; U.S. Hwy 171 now connects Lake Charles to Shreveport – providing the only north-south artery in west Louisiana. Commenters also note the Department of Veterans Affairs has established a Veterans Cemetery near Fort Polk, which is approximately 204 acres in size, with 27.6 acres ready for use over the next 10 years, and a VA Clinic that is located on Hwy 467. Reconstruction of Highway 171 North- and South-bound from Entrance Road to the City of Leesville will begin in March 2013, at a cost of approximately $15.1 million. The commenter also noted the city will begin construction of a new sheriff's office and detention center, at a cost of $7.5 million, to be funded by a bond issuance by the Vernon Parish Police Jury; between 2008-2012 through grant and local funding, the Vernon Parish Police Jury has invested over $34 million dollars into Vernon Parish, through construction projects for new facilities, repairs and renovations, road overlay, and road improvement. Commenters also noted the Louisiana Association for the Blind has a no-cost service contract with Fort Polk to provide supplies to permanent party troops and troops going through deployment training through the "U.S. Ability One Program" and has invested $1.7 million to construct a facility on Fort Polk to provide this service. Commenters believe reduction in forces and JRTC mission would dramatically impact the organization financially because of the inability to recover these investments.

Military Investment

Commenters were also concerned with the Army's investment in the installation that would also be lost if the installation received the reductions identified in the PEA. Commenters stated since 2005, the Army has invested over $1 billion in expansion and facility modernization at Fort Polk.

Military/Community Investment

Commenters were concerned that DoD and community investments (some completed and more planned) in the England Airpark/Alexandria International Airport (AEX) would be wasted. Commenters noted AEX has served as the APOE for Fort Polk since August 1993 and recently completed a number of projects such as a new fuel farm, runway/taxiway rehabilitation, ramp replacement, lighting, construction of a Passenger Processing Facility, Ammunition Holding Area, three Hot Pads, and an additional ramp which makes AEX MOG 23 C5/747 aircraft. Commenters noted AEX is capable of deploying a fully combat loaded BCT in 80 hours. Commenters stated $191 million has

been spent in this public/public partnership to improve aviation at the Fort Polk APOE with another $28 million in non-DoD funds expected to be invested over the next two years. Initial engineering and land acquisition is now underway to lengthen runways to 12,000 ft. and 8,500 ft. in the beyond two year timeframe, according to one commenter.

Army/Community Relationship

Commenters noted six years ago Senator Mary Landrieu asked the community to improve the quality of living for Soldiers at Fort Polk, both those living on the installation and those living in the community. The commenter stated this request has become the critical criterion in every project that the community considers--both structural and cultural. The commenter cites a Veterans' Park the community created and dedicated. They also made note of a reunion held locally for veterans for the last four years and that General Russel Honoré was the first Grand Marshal. In six years, the community has opened eight new restaurants. A children's spray park will open May 15, another children's park is scheduled to open August 1 and two treasure mountains – a climbing experience for children- are scheduled to open May 1. The commenter noted the city has purchased an art gallery and began sponsoring a culinary festival four years ago, opened by the Commanding General of Fort Polk.

Additionally, one commenter cited the symbiotic relationship between the Army and the Fort Polk community. Commenters explained that both need each other to survive and the reduction in force threatening the military would threaten not just the livelihood of the community, but also its way of life, which in turn would be damaging to the support the Army receives from the community in the future.

Capacity for growth

Commenters wanted to note that Fort Polk is uniquely situated to not only grow, but to accommodate a variety of training and power projection that is essential for our military to continue to be a force of strength in defending democracy on the world stage. They cited the area's low cost of living and low cost to do business as further incentives for growth.

Commenters stated Fort Polk is the only installation in the Army now acquiring additional training lands for growth and that this growth is with full community support. Commenters pointed out how the community investments and Army investments position Fort Polk to accept a gain in mission rather than a loss. Commenters cited nearly $1 billion in improvements to Fort Polk that provide additional capacity, efficiency, and effectiveness. Finally, commenters noted Fort Polk has the unique ability to unite the assets of Fort Polk, England Airpark/AEX, Camp Beauregard, Camp Minden, Camp Shelby, and Gulf Coast facilities to meet the wide ranging air, sea, and ground training scenarios of the future.

R: The Army notes the support it has received from the Fort Polk community on training land purchases. The Army notes the investment by the state, local governments, and surrounding communities, and will carefully consider these comments prior to making any force structure decisions.

Mission/Training/Readiness

Some commenters were concerned with the ability of the Army to accomplish its mission and the impact that might have on our nation's security. One commenter suggested the United States may no longer be the driving force that helps keep peace around the world, and even more importantly, that keeps our own nation safe. Another commenter identified Fort Polk as the premiere training center for the types of conflicts our country currently faces and will face in the coming decades. That commenter believed Fort Polk provides the most cost effective training experience, which is even that much more critical given the fiscal challenges our country is now facing.

Off-Post Development

Commenters wanted to ensure the Army knew that Fort Polk does not have the problem of encroachment on drop zones like other installations. At Fort Polk, local planning bodies work with installation staff to prevent incompatible development, according to commenters.

Other benefits

One commenter wanted to point out Fort Polk's lower cost of operation and modernized and expanded infrastructure.

Fort Riley, Kansas

The Army received one comment letter regarding the impacts of the proposed action at Fort Riley. This commenter focused on community investment, military investment, military/community investment, other benefits and request for EIS.

Community Investment

In addition to the Army investment in the installation, the commenter pointed to the support provided by the state and local communities, particularly through the Governor's Military Council, which resulted in over 4,500 housing units built in local communities.

In addition, the commenter noted local communities have authorized over $32 million for new schools or renovation of existing school facilities. The commenter also stated that nearly $60 million in federal and state funding has been committed for the improvement of roads near the installation. In addition, the commenter pointed out the Governor's Military Council facilitated the use by Fort Riley Soldiers of 35,000 acres of training space at the Kansas Air National Guard's Smoky Hill Range/Great Plains Joint Training Center.

The commenter pointed out a number of bills passed by the state legislature that improve the quality of life for service members in Kansas.

Military Investment

The commenter also noted over $1.6 billion in military construction has been spent on Fort Riley since 2005, including a new division headquarters, new operations facilities,

new Soldier and Family facilities, a new Mission Training Complex, and the new Irwin Army Community Hospital.

Military /Community Investment

In addition, the commenter cited instances of cooperation between the state and Fort Riley, including the Intra-Governmental Support Partnership, to achieve cost savings in common services as authorized by the 2013 NDAA, and the state's efforts to work with the installation to implement the ACUB program.

Other benefits

The commenter highlighted several facts about the installation, including that Fort Riley has a large maneuver training area and easy access to the Great Plains Joint Training Center; no incompatible development; and airspace suitable for Gray Eagle (unmanned aerial vehicle) training.

Request for EIS

Finally, the commenter urged the Army to conduct a site-specific EIS if the Army considers a force reduction at Fort Riley.

R: The Army will consider all of the points raised above prior to making force structure decisions affecting Fort Riley. The Army's NEPA regulations do not require an EIS when the socioeconomic impacts are significant, but no other environmental resources are significantly impacted. The Army may prepare follow-on, site-specific NEPA analysis after force structure decisions are made, as appropriate.

Schofield Barracks and U.S. Army Garrison Hawai'i

The Army received one comment letter regarding the impacts of the proposed action at Schofield Barracks and U.S. Army Garrison Hawai'i.

The commenter described a number of shortcomings of the PEA with respect to stationing Soldiers under Alternative 2 at Schofield Barracks. These included the alleged failure to consider specific construction and training needed, failure to substantiate claims that the additional Soldiers would not cause significant impact, and failure to demonstrate that mitigation would reduce impacts to less that significant.

R: As stated in Section 4.0 of the FNSI, with respect to Schofield Barracks and other Hawai'i installations, the Army is not making a finding at this time regarding environmental impacts of potential gains under Alternative 2. The Army appreciates the comments provided in response to this PEA related to Schofield Barracks (and Hawai'i installations). These comments are part of the administrative record for this action and will be considered before any future decisions that would result in growth at either of these locations.

Fort Sill, Oklahoma

The Army received no comments.

Fort Stewart, Georgia

The Army received a few comments regarding the impacts of the proposed action at Fort Stewart. Comments focused on socioeconomic impacts and mission/readiness/training.

Socioeconomic Impacts

Commenters were concerned that the PEA did not include in its socioeconomic impact analysis the fact that the communities surrounding Fort Stewart suffered losses as a result of the Army's cancellation of the 5th BCT. The Army had planned to station the 5th BCT at Fort Stewart, but cancelled the stationing of the 5th BCT in 2009. These commenters provided an extensive report detailing the economic losses to the surrounding communities resulting from investment to support the gain of the cancelled BCT.

R: The Army will consider the material and information provided about the community investment made in anticipation of arrival of a new BCT at Fort Stewart in 2009 prior to making any force structure decision.

Mission/Readiness/Training

One commenter expressed the opinion that past BRAC actions have left the military "crunched," that is, stationed at fewer installations with reduced access to available training lands. This commenter stated in his experience at Fort Stewart, once-valuable training land is unavailable due to overcrowding and congestion. This commenter appeared to be concerned that an increase in the Soldier population at Fort Stewart would worsen this situation, thereby impacting Soldier training.

R: As noted in Section 4.20.13.2 of the PEA, the addition of up to 3,000 Soldiers under Alternative 2 would be expected to result in an increased need for management and balancing of training priorities, such as unit live-fire and maneuver training activities.

Fort Wainwright, Alaska

The Army received approximately 10 comments regarding the impacts of the proposed action at Fort Wainwright. A few comments also referred to JBER, Alaska, and are included here. Comments included socioeconomic impacts, community investment, military/community investment, capacity for growth, mission/readiness/training, military value, request for EIS, and request for public meetings.

Socioeconomic Impacts

Most commenters were concerned about the socioeconomic impacts related to Alternative 1. One commenter stated one in every four persons in interior Alaska are either active duty, civil service, retired, veteran, family member, contractor, or supplier/vendor. Another commenter stated the PEA fails to address accurately the socioeconomic impact by severely underestimating this factor on the Fairbanks North Star Borough. This commenter stated the Army comprises 20 percent of the Fairbanks economy with a total military economic impact of 38 percent. A loss of 75 percent of the

assigned Soldier strength at Fort Wainwright would result in a community economic loss of 15 percent and would devastate local schools, businesses, and community organizations. The commenter requests that the Army review the economic modeling conducted for this analysis and reconsider the impact based on local factors and total remuneration Soldiers receive.

R: The PEA concludes that force reductions under Alternative 1 would result in "significant" socioeconomic impacts to Fort Wainwright. Although further analysis may determine differences in impact intensity, the impacts would still be significant. In this PEA, "significant" is the highest possible qualitative rating of the impacts of an action. While the Army has concluded that, taken as a whole, the comments, suggested corrections, and proposed re-calculations of the socioeconomic analysis contained in the PEA would not change the PEA's overall conclusion of "significant," the Army notes the serious socioeconomic impacts for the community surrounding Fort Wainwright. The Army will consider these comments, including the factors highlighting Fort Wainwright's military value, prior to making any force structure decisions.

Community Investment

One commenter noted the state of Alaska invested almost $90 million to build a bridge over the Tanana River to provide reliable access to Joint Pacific Alaska Range Complex (JPARC). This commenter noted the state is also working to increase Army access and is putting forward efforts to deliver affordable energy to interior Alaska which will also help efforts to improve air quality in the Fort Wainwright area. The commenter pointed out implementation of Alternative 1 would reduce the state's ability to sustain capital investments and improvements like the Tanana Bridge and natural gas financing packages.

Military/Community Investment

In addition to the community investment, one commenter noted the Army has invested millions in Alaska installation infrastructure improvements and Power Projection Platform facilities in recent years.

Most commenters pointed out the support of the community for the military and the great relationship they share. One commenter noted the Fairbanks North Star Borough has a robust Joint Land Use Study process to mitigate potential military-community conflict, the military's active Native Liaison program ensures the continuation of positive relationships with over 60 tribal communities, and the Alaska state government is active in passing legislation in support of military operations.

Capacity for Growth

Another commenter suggested that Fort Wainwright could accommodate a minimum of two BCTs and recommended increasing rather than decreasing BCT assets there. A few commenters also requested the Army consider the new training elements that can be utilized at JBER and Fort Wainwright. The commenter noted the addition of a Military Operations in Urban Terrain range at JBER would provide live, virtual, and constructive training for environments the 4th BCT would likely face when deployed. These commenters suggested the Army consider creation of a National Training Center for

Arctic Conditioning at Fort Wainwright, to ensure Soldiers are well prepared to face threats in the Arctic and other cold areas of the Pacific Theater. The commenters noted establishment of an associated facility at Fort Wainwright for storing and maintaining the center's equipment will greatly reduce the costs associated with bringing in Army units for this critical Arctic training. Another commenter suggested Fort Wainwright could act as a mobilization and demobilization center in future contingencies.

All the commenters noted this is a critical time in our military to take advantage of opportunities to position additional forces at Fort Wainwright. One recommended that as excess infrastructure is dismantled, repositioning systems and forces to interior Alaska will achieve a more attractive economy of scale.

Mission/Readiness/Training

One commenter was concerned that Alternative 1 would impact the readiness of our military forces and wanted to advocate strongly for Alternative 2. The commenter suggested that the Army reorganize BCTs and place a minimum of 1,000 additional Soldiers at Fort Wainwright.

Military Value

Most commenters pointed out BCTs in Alaska support the national military strategy for the Pacific Rim. One commenter noted early warning, missile defense and maritime assets, as well as well-trained, well-equipped maneuver units in subarctic Alaska that are both strong and tough, as benefits of maintaining BCTs in Alaska. The commenter also pointed out that the location provides short notice response capability to many “hot spots” throughout the world.

One commenter noted Fort Wainwright is the closest military installation to the Arctic Ocean and is critical to maintaining America’s place in the Arctic’s future. Another commenter stated “The Army's bases in Alaska continue to be the best option for maintaining forward-deployed, yet home-based facilities that support rapid response to the nation's Pacific area of responsibility, and via the over-the Pole route, to the European theater as well.”

One commenter pointed out Fort Wainwright is thousands of miles closer to Beijing, Honolulu, and Pyongyang than military facilities on the U.S. west coast. Another commenter provided a chart that compares the distance from Fort Wainwright to Beijing, Pyongyang, Seoul, Vladivostok, Severomorsk, and the North Pole with five other military installations in the region. This commenter also noted Alaska is only “9.5 hours from 90 percent of the industrialized world.”

R: While the Army agrees the distance from Fort Wainwright to Beijing or Pyongyang may be less than other U.S. West Coast military facilities, that is not the case to Hawai’i. The distance from Fairbanks, Alaska, to Honolulu, Hawai’i, is approximately 3,038 miles, while the distance from Fort Lewis, Washington, to Honolulu, Hawai’i is approximately 2,803 miles, and even less from Seattle.

One commenter felt the uncertainty in the Asian region made Fort Wainwright and JBER optimally located to position forces for a quick and flexible response focused in

the Pacific Rim. One commenter wanted to remind leaders that Alaska has the only Airborne BCT and the only Arctic Stryker BCT in the Pacific theater.

A couple of commenters stated because of the size of Alaska, location of Fort Wainwright, local climate, surrounding terrain and varying light conditions throughout the year, the training opportunities available are some of the most diverse, unique, and significant anywhere in the world.

Most commenters noted an abundance of unrestricted training area, citing 1.6 million acres of range and training land, and stated the JPARC is the largest training area on the globe for joint and combined operations. One commenter noted it provides more than 60,000 square miles of unencumbered land, air, and sea military training space. Another commenter stated it was the only place in the U.S. where all four branches of the military can simulate the most complex joint maneuvers that prepare our Soldiers for battle.

Another commenter noted the training grounds for infantry maneuver forces are unmatched, able to accommodate long range weapon systems and freedom of movement for air and ground maneuver units. One commenter noted military land, housing areas, cantonment, impact areas, firing ranges and airspace are virtually unimpeded by incompatible development.

A few commenters stated Alaska offers one of the few environments where joint training can occur across land, sea, and air terrains spanning across hundreds of miles with limited restrictions and constraints. A few commenters suggested that this environment cannot be replicated anywhere else in the world. One commenter suggested that this offers the Army an ability to train and build the capacity of partner nations whose home states lack critical training land and facilities to fight the global war on terror and protect the nation’s security.

Another commenter pointed out the robust infrastructure of Fort Wainwright including a road system, connected to a rail-belt, adjacent to a pipeline, near a fuel refinery. The commenter also noted Fort Wainwright is self-sufficient with a power plant providing low cost electricity to heat the entire installation.

One commenter pointed out some of the new modern facilities including: Bassett Army Community Hospital, Post Exchange/Commissary, child care, chapel/religious services, on-post housing, morale, welfare and recreation services, and educational institutions.

Request for EIS

A few commenters requested the Army conduct a site-specific EIS to assess thoroughly the impacts that would be created in the areas surrounding Fort Wainwright, JBER, and the entire state of Alaska. Some requested this before implementation of Alternative 1 and some requested this for Alternative 2.

R: The PEA concluded that there are no significant environmental impacts, other than socioeconomic, with implementation of the proposed action under either of the alternatives analyzed. These significant socioeconomic impacts are of particular concern to the Army; however, under Council on Environmental Quality NEPA

regulations, significant socioeconomic impacts by themselves do not require preparation of an EIS. The Army will consider further site-specific NEPA analysis after making force structure decisions.

Request for Public Meetings

One commenter strongly encouraged Army representatives to visit Fairbanks and conduct public sessions with the community, similar to what occurs during an Environmental Impact Statement process. The commenter felt it is only through this process that the Army can truly understand the importance of Fort Wainwright to the Fairbanks community, the support the community provides to the installation and the Army, and their collective importance to the nation.