FINDING OF NO SIGNIFICANT IMPACT

for Converting and Stationing an
Existing Brigade Combat Team (IBCT)
to an
Armored Brigade Combat Team (ABCT)

August 2018

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Finding of No Significant Impact
for Converting and Stationing an
Infantry Brigade Combat Team (IBCT) to an
Armored Brigade Combat Team (ABCT)

The National Environmental Policy Act of 1969 (NEPA) (42 U.S. Code Section 4321 et seq.) requires federal agencies to consider potential environmental impacts prior to undertaking a course of action. The Department of the Army (Army) prepared a Programmatic Environmental Assessment (PEA) in accordance with NEPA, the regulations issued by the Council on Environmental Quality (CEQ), 40 Code of Federal Regulations (CFR) Parts 1500-1508 (40 CFR § 1500-1508), and the Army's procedures for implementing NEPA, AR 200-2, Environmental Analysis of Army Actions (32 CFR Part 651),. This PEA is titled *"Programmatic Environmental Assessment for Infantry Brigade Combat Team (IBCT) Conversion to an Armored Brigade Combat Team (ABCT) and Stationing."* This PEA is incorporated by reference in this Finding of No Significant Impact (FNSI), and addresses environmental effects of the proposed conversion and stationing of an IBCT into an ABCT. The intent of the conversion is to increase the Total Army's ABCT capacity.

The PEA provided a broad and programmatic analysis to determine potential impacts on the environmental and socioeconomic areas of concern at each of the five installations under consideration. The PEA also considers the general capacity of each installation to support an ABCT given its existing baseline conditions. The programmatic approach is designed to allow for early planning, coordination, and flexibility throughout implementation of the Army's process of stationing an ABCT.

Since completing the PEA in May, Army Senior Leaders have continued to collect information and brainstorm solutions for creating and stationing the new ABCT in a complex, continually-evolving global strategic environment.

As explained in detail below, in addition to the alternatives analyzed in the PEA, Army Senior Leaders are now considering two additional courses of action (COAs). These COAs represent two different possible *paths* to the same outcome, with the same anticipated environmental effects, and so it is described herein as one single alternative. In both COAs, the end result would be the same: Fort Carson would have two SBCTs and one ABCT; Fort Bliss would lose its SBCT and have three ABCTs. Accordingly, the anticipated environmental impacts would be identical regardless of which path would be taken. This new alternative is described below in more detail as "Alternative 6."

Alternative 6 entails either converting or moving the existing SBCT at Fort Bliss. SBCTs are stationed at multiple installations across the country, and it would be possible to convert or reassign an SBCT from another installation. Fort Bliss is the lowest cost among all of the reasonable alternatives, and the highest in terms of military value. Therefore, it was identified in Alternative 6 to "donate" its SBCT and to receive the new ABCT.

The PEA itself did not analyze Alternative 6. As described below, existing NEPA documents have analyzed the anticipated environmental impacts from this new alternative. The Army anticipates that environmental impacts at Fort Carson and Fort Bliss will be similar, or even less adverse, than those identified in Alternatives 1 and 2 of the PEA. Implementation of Alternative 6 is not anticipated to have significant environmental impacts. Impacts at Piñon Canyon Maneuver Site

(PCMS) are expected to be within those identified in the 2015 PCMS Environmental Impact Statement (EIS), discussed below in section 4.2.

1 Proposed Action

The purpose of the Army's Proposed Action is to increase the Active Army's ABCT inventory by one brigade (from 10 to 11), increasing the Total Army's number of ABCTs from 15 to 16 (including Army National Guard units), and to station the ABCT at an existing installation in the United States. To achieve the increase, the original Proposed Action was to convert Fort Carson's 2nd IBCT (4th Infantry Division IBCT) into a sixteenth ABCT. This would occur by assigning the IBCT to one of five installations as identified in the alternatives, converting it to an ABCT, and stationing the ABCT at that installation. The Proposed Action does not include any acquisition of real property. As described briefly above, Alternative 6 would result in an additional ABCT, but would also involve realignment of an SBCT.

2 Alternatives

The PEA looked at five action Alternatives and a No Action Alternative. The original alternatives considered and analyzed in the PEA were:

2.1 No Action Alternative

The No Action Alternative is required by CEQ regulations and provides baseline conditions and a benchmark against which to compare environmental impacts from the Proposed Action alternatives (40 CFR § 1502.14(d)). Under the No Action Alternative, conversion of an IBCT into an ABCT would not occur. Force structure, personnel, and equipment would not change at any of these installations as a result of this initiative. Therefore, the No Action Alternative would not address the Army's needs for Brigade Combat Team (BCT) realignment, and no growth of an additional ABCT would occur.

2.2 Action Alternatives

The Proposed Action analyzed within the PEA was to convert Fort Carson's 2nd IBCT into the Total Army's sixteenth ABCT as described above. The conversion would meet current and projected future national security and defense requirements and take place in Fiscal Year 2019. The ABCT stationing would occur at one of the following installations: Fort Carson, Colorado (Alternative 1); Fort Bliss, Texas (Alternative 2); Fort Hood, Texas (Alternative 3); Fort Riley, Kansas (Alternative 4); or Fort Stewart, Georgia (Alternative 5). Alternative 6 would involve stationing the ABCT at Fort Bliss, similar to Alternative 2, and involve stationing of a second SBCT at Fort Carson. Implementation of the conversion (to include Alternative 6) at one of these locations would require unit stationing (e.g., unit realignment or inactivation); garrison construction and demolition; live-fire training; and maneuver training. The Proposed Action does not require or propose land expansion.

2.2.1 Alternative 1 – Convert Fort Carson, Colorado IBCT into ABCT

Implementation of Alternative 1 would take the assigned IBCT, convert it into an ABCT, and station the ABCT at Fort Carson. This would realign the BCT force structure, and result in one Stryker BCT (SBCT) and two ABCTs stationed at Fort Carson. Fort Carson's Soldier population would decrease by 21 Soldiers under Alternative 1. The existing facilities and infrastructure on

Fort Carson can accommodate the additional ABCT. To bring Fort Carson's facilities up to the current Army standard, however, some garrison construction for cantonment infrastructure improvements would be required including administrative, supply, and maintenance facilities for two battalion-sized elements.

2.2.2 Alternative 2 – Reassign Fort Carson, Colorado IBCT to Fort Bliss, Texas and Convert to ABCT

Under Alternative 2, the Army would reassign Fort Carson's IBCT to Fort Bliss, convert it into an ABCT, and station it at Fort Bliss. Implementation of Alternative 2 would increase the BCT force structure at Fort Bliss to one SBCT and three ABCTs. Fort Bliss' Soldier population would increase by 4,182 under Alternative 2. To assign the IBCT to the garrison, and convert the IBCT to ABCT at the installation, no new garrison construction would be required for the conversion process; however, facility and infrastructure improvements would be required to bring Fort Bliss's facilities up to the current Army standard for an ABCT. Construction of administrative, supply, and maintenance facilities for two battalion-sized elements would be required on Fort Bliss. New construction and improvements would predominantly occur within existing developed areas and areas of maintained landscaping.

Fort Carson would lose an IBCT under Alternative 2. This would result in a loss of 4,203 BCT Soldiers at Fort Carson.

2.2.3 Alternative 3 – Reassign Fort Carson, Colorado IBCT to Fort Hood, Texas and Convert to ABCT

Under Alternative 3, the Army would reassign Fort Carson's IBCT to Fort Hood, convert it into an ABCT, and station it at Fort Hood. Implementation of Alternative 3 would increase the BCT force structure at Fort Hood to one SBCT and four ABCTs. Fort Hood's Soldier population would increase by 4,182 under Alternative 3. The recent inactivation of the 85th Civil Affairs Brigade in 2018, as well as the previous inactivation of 4/1 Cavalry Division in 2013, provide facilities for the additional ABCT. To assign the IBCT to the garrison, and convert the IBCT to ABCT at the installation, no new garrison construction would be required for the conversion process; however, infrastructure improvements would be required to bring Fort Hood's facilities up to the current Army standard for an ABCT. Construction requirements include vehicle maintenance shops; barracks; company, battalion, and brigade Headquarters (HQs); unit storage, and classrooms. New construction and improvements would predominantly occur within existing developed areas and areas of maintained landscaping.

Fort Carson would lose an IBCT under Alternative 3. This would result in a loss of 4,203 BCT Soldiers at Fort Carson.

2.2.4 Alternative 4 – Reassign Fort Carson, Colorado IBCT to Fort Riley, Kansas and Convert to ABCT

Under Alternative 4, the Army would reassign Fort Carson's IBCT to Fort Riley, convert it into an ABCT, and station it at Fort Riley. Implementation of Alternative 4 would increase the BCT force structure at Fort Riley to three ABCTs. Fort Riley's Soldier population would increase by 4,182 under Alternative 4. To assign the IBCT to the garrison, and convert the IBCT to ABCT at the installation, no new garrison construction would be required for the conversion process; however, infrastructure improvements would be required to bring Fort Riley's facilities up to the current Army standard for an ABCT. Construction requirements include vehicle maintenance

shops; barracks; company, battalion, and brigade HQs; unit storage and classrooms; a tactical unmanned aerial vehicle (UAV) hangar; and petroleum, oil, and lubricant (POL) storage. Fort Riley would utilize new relocatable buildings as an interim stationing solution until new permanent facilities are constructed. No building removal would be required and new construction would predominantly occur within existing developed areas and areas of maintained landscaping.

Fort Carson would lose an IBCT under Alternative 4. This would result in a loss of 4,203 BCT Soldiers at Fort Carson.

2.2.5 Alternative 5: – Reassign Fort Carson, Colorado IBCT to Fort Stewart, Georgia and Convert to ABCT

Under Alternative 5, the Army would reassign Fort Carson's IBCT to Fort Stewart, convert it into an ABCT, and station it at Fort Stewart. Implementation of Alternative 5 would increase the BCT force structure at Fort Stewart to three ABCTs. Fort Stewart's Soldier population would increase by 4,182 under Alternative 5. To assign the IBCT to the garrison, and convert the IBCT to ABCT at the installation, no new garrison construction would be required for the conversion process; however, infrastructure improvements would be required to bring Fort Stewart's facilities up to the current Army standard for an ABCT. Fort Stewart would generally reutilize existing facilities for personnel and equipment, although two buildings would require renovation and relocation. Construction requirements include vehicle maintenance shops; barracks; company, battalion, and brigade HQs; unit storage and classrooms; a tactical UAV hangar; and POL storage. New construction would predominantly occur within existing developed areas and areas of maintained landscaping. To provide training support for three ABCTs, Fort Stewart requires a Targetry Range Automated Control and Recording upgrade to instrumentation and targetry; replacement of legacy Multipurpose Range Complex – Heavy; and an additional conduct of fire and call for fire trainer simulation facility.

Fort Carson would lose an IBCT under Alternative 5. This would result in a loss of 4,203 BCT Soldiers at Fort Carson.

2.2.6 Alternative 6: – Convert Fort Bliss, Texas SBCT to ABCT; Convert Fort Carson, Colorado IBCT to SBCT

Alternative 6 was not analyzed in the PEA, but its impacts have been analyzed previously under existing NEPA documentation. Under Alternative 6, the Army would convert an SBCT currently stationed at Fort Bliss, Texas, to an ABCT, leaving that ABCT stationed at Fort Bliss; the SBCT's equipment (vehicles, weapons, etc.) would be moved to Fort Carson, Colorado, and be used to convert the existing IBCT at Fort Carson to an SBCT. In a second possible pathway to the same end result, the Army would move the existing SBCT at Fort Bliss to Fort Carson and "reflag" (meaning, re-name) this SBCT a Fort Carson unit. The existing IBCT at Fort Carson would then be moved to Fort Bliss and converted to the new ABCT. Regardless of the path taken to do so, implementation of Alternative 6 would increase the BCT force structure at Fort Bliss to three ABCTs, and would result in Fort Carson's BCT structure being two SBCTs and one ABCT. Fort Bliss's Soldier population would go down by 51 under Alternative 6 because the SBCT it loses has 4,233 Soldiers and the ABCT it will gain has 4,182. Fort Carson's Soldier population would increase by 30 because the SBCT has 30 more Soldiers than the current IBCT (4,233 vs. 4,203). Facility and infrastructure improvements at Fort Carson would be the same as for Alternative 1. New construction and improvements would predominantly occur within existing developed areas and areas of maintained landscaping.

For reasons discussed below, implementation of Alternative 6 is anticipated to have fewer and less adverse environmental impacts on Fort Bliss than those already analyzed in the PEA within Alternative 2.

3 Summary of Environmental Effects

No significant impacts are anticipated as a result of implementing any of the alternatives proposed in this PEA. Each of the resource areas identified in the appendix to this FNSI was analyzed for potential impacts resulting from implementing the Proposed Action for each Alternative. Potential impacts were broken down into the following categories: beneficial impacts, no impacts, and potential adverse impacts (negligible, minor, moderate/ less than significant, or significant). These impacts are summarized in Table 1 (located in the appendix).

Impacts are anticipated to be minimized through avoidance, and the implementation of existing environmental protection measures. Avoidance strategies depend on the installation selected, the increase in the number of Soldiers at the installation, recent downsizing at the installations, modified plans or permits, and when construction activities are scheduled. Examples of environmental protection measures would include implementing erosion and stormwater control measures during construction; maintaining construction vehicles and equipment; and sustaining vegetation cover at the construction site. For the proposed action alternatives, no new mitigation measures are needed nor have any been identified. The Army will continue to adhere to legal and regulatory requirements, and continue to implement its approved management plans, standard operation procedures, and best management practices (BMPs).

As noted above, Alternative 6 was not analyzed expressly in the PEA; however, existing previous NEPA analyses have thoroughly analyzed the differences in anticipated impacts of stationing and operation of an ABCT and SBCT. The primary difference between the alternatives analyzed under the PEA and the new Alternative 6 is that Fort Carson would gain an additional SBCT, resulting in two SBCTs and one ABCT at Fort Carson. Alternative 1 would result in Fort Carson gaining an ABCT, and would produce a two-ABCT and one-SBCT scenario)

The 2014 EA for conversion of an ABCT to an SBCT at Fort Carson noted the following differences between the two main types of vehicles in the BCTs: "The Stryker, an eight-wheeled vehicle, weighs 22 Tons, considerably less than the 70-Ton Abrams main battle tank and the Bradley vehicle (33 tons). The Stryker is authorized to drive 2.5 times more miles than the Abrams and Bradley vehicle fleets, but gets 12 times better gas mileage." The relative comparison set out here remains the same and accounts for some of the differences discussed in more detail below.

With impact measured in Maneuver Impact Miles (MIMs), Alternative 6 has less impact than Alternative 1:

BCT Type	Fort Carson Today	Fort Carson Alt 1	Fort Carson Alt 6
SBCT	97	97	97x2
IBCT	65	-	-
ABCT	130	130x2	130
Total	292	357	324

In terms of fuel usage, the SBCT is authorized to use 48% less fuel per year than an ABCT, meaning that all emissions from combustion of this fuel, to include CO_2, would be less than analyzed in Alternative 1 of the PEA.

Traffic on public roads may be slightly higher with an SBCT, as there are more vehicles that would drive to PCMS for training as compared with an ABCT, which relies upon rail for transport of the larger tracked vehicles. In addition, wheel pressure – that is, the pressure of surface impacts from wheeled vehicles upon the ground as measured in pounds per square inch – can be higher for wheeled vehicles such as the Stryker than the M-1Abrams tank, the greater weight of which is spread out on its wide tracks, rather than six wheels. These slight differences do not change the fact that the SBCT would generally have less training impacts than the ABCT.

Alternative 6 assumes that training by the second SBCT at Fort Carson would be subject to the same training restrictions and requirements as is the current ABCT. These include the INRMP and ITAM programs (PEA 3.2.3.1.4) and the Fort Carson Regulation 350-10 (Maneuver Damage Control Program) (PEA section 3.2.3.2.2.1). This includes minimization of damages to natural resources. In terms of socioeconomics, even though the Alternative 6 population change is slightly different than that for Alternative 1, the conclusion of the PEA in section 3.2.7.2 remains the same: overall impacts would be negligible and barely perceptible in the larger region of influence. Traffic levels of service would also not be adversely affected. There would also be no differences in cumulative impacts between Alternative 1 and Alternative 6.

Alternative 6 would result in Fort Bliss gaining an ABCT; impacts from this gain would be generally similar to those already analyzed under the PEA within Alternative 2, in which Fort Bliss would also have three ABCTs. In fact, by losing an SBCT to Fort Carson under this new alternative, Alternative 6 would result in fewer MIMs and 4,233 fewer Soldiers at Fort Bliss than under Alternative 2. Other than this minor variation in Soldier-strength, the three-ABCT result at Fort Bliss is fully covered by the PEA's Alternative 2, which looked at a one-SBCT, three-ABCT scenario. The three-ABCT configuration would use 14% less fuel than the four-BCT strength studied in Alternative 2 of the PEA. The chart below shows the MIMs for Alternative 2 (the gain scenario for Fort Bliss) and Alternative 6. Clearly, loss of the SBCT would result in a substantial reduction of training impact at Fort Bliss described in Alternative 2.

BCT Type	Fort Bliss Today	Fort Bliss Alt 2	Fort Bliss Alt 6
SBCT	97	97	x
IBCT	-	-	-
ABCT	130x2	130x3	130x3
Total	357	457	390

4 Public Review and Interagency Coordination

The PEA and draft FNSI (not including Alternative 6) were made available for public, agency, and Tribal review on March 30, 2018 when a Notice of Availability was published in the Federal Register. That same day, electronic copies of the PEA and draft FNSI were made available for download from the United States Army Environmental Command (AEC) website at: https://aec.army.mil/index.php?cID=352. Comments were requested to be submitted at AEC, ATTN: Public Comments, 2450 Connell Road (Building 2264), Joint Base San Antonio-Fort Sam Houston, Texas 78234-7664, by email to: usarmy.jbsa.aec.nepa@mail.mil, or by phone at 210-466-1590 or toll-free 855-846-3940.

4.1 Introduction

The Army received comments from individuals, agencies, organizations, and institutions. Members of Congress, as well as state and local officials, also submitted comments. The Army received 72 comments, two of which were from regulatory agencies, as a result of the 30-day public comment period. A total of 62 commenters expressed their support for stationing the new ABCT at the commenter's garrison of interest, while nine commenters expressed their opposition. Of the five installations, Fort Carson received the greatest number of comments, expressing both support for and opposition to the stationing. The Army has carefully read and considered all comments received.

Some comments included specific areas of concern, in addition to expressing support or opposition. These comments are discussed in the following paragraphs.

The Army has taken another hard look at the public comments received in light of the new Alternative 6, and has determined that none of the concerns raised by commenters would be heightened by implementation of this new alternative; in fact, environmental impacts are anticipated to be either the same, or less adverse. In particular, the information about wildfires at Fort Carson applies to SBCT training in Alternative 6.

4.2 2015 Piñon Canyon Maneuver Site (PCMS) Training and Operations Environmental Impact Statement

Regarding the anticipated use of PCMS by the ABCT should Fort Carson be the chosen stationing location, a few commenters questioned the propriety of the PEA's reference to the 2015 *Piñon Canyon Maneuver Site Training and Operations Final Environmental Impact Statement* (2015 EIS) and associated Record of Decision.

The intent of the PEA in referencing the 2015 EIS was to explain that training by an additional ABCT at PCMS is covered by existing NEPA documentation, specifically the 2015 EIS. The Army took a hard look at the 2015 EIS and determined that it thoroughly analyzed the anticipated impacts of training an additional ABCT at PCMS. In a Record of Environmental Consideration (REC) dated 7 February 2018, the Army also concluded that there were no substantial changes in the Army's proposal to train a second ABCT at PCMS that are relevant to environmental concerns or which would produce a significant impact which has not already been considered by the 2015 EIS; and that there were no significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts regarding the affected environment at PCMS. Therefore no supplementation of the 2015 EIS would be required for the Army to train an additional ABCT at PCMS. The PEA's reference to the 2015 EIS is the type of tiering in a programmatic NEPA analysis anticipated and encouraged by CEQ regulation [at 40 CFR § 1502.20] and guidance [*Final Guidance on Improving the Process for Preparing Efficient and Timely Environmental Reviews Under the National Environmental Policy Act*, CEQ, 2012], and by the Army's own NEPA regulation [at 32 CFR § 651.14(c)].

In a second, separate REC dated August, 2018 and hereby incorporated by reference, the Army determined that an additional SBCT would be anticipated to have similar or less adverse environmental impacts at PCMS than the additional ABCT analyzed in the PEA as Alternative 1. The total number of MIMs for an SBCT is approximately 97,000 MIMs; far less than the 130,000 MIMs required to train an ABCT (considered in the February, 2018 REC).

The REC also considered some differences in operation of the SBCT (which contains wheeled vehicles) and the ABCT (which contains tracked vehicles). Even with these differences, the proposed addition of a second SBCT at Fort Carson, which would occasionally train at PCMS within previously analyzed limitations, would result in environmental impacts less adverse than anticipated by Alternative 1 analyzed in the PEA. The REC specifically looks at after-action reports two recent SBCT rotations to PCMS.

4.3 Preferred Alternative

One commenter wondered why the Army did not name a preferred alternative in the PEA or draft FNSI, and a few expressed the belief that the Army already reached a decision on ABCT stationing, and that the NEPA analysis was merely intended to "justify a decision already made." While CEQ and Army NEPA regulations generally require identification of a preferred alternative in a Final Environmental Impact Statement [40 CFR § 1502.14(e) and 32 CFR § 651.45(h); 32 CFR § 651, Appendix E, paragraph (b)(5)], no such requirement exists for an EA or FNSI. Accordingly, the Army did not identify a preferred alternative in the PEA, and does not do so in this FNSI. In fact, the Army has made no decision on the stationing location for the new ABCT. Prior to making a final stationing decision, the Army must complete a separate, ongoing military decision-making process. This decision process considers multiple stationing factors as specified in section 2.1.2 of the PEA, in addition to the environmental impacts analyzed in the PEA.

4.4 Wildfires at Fort Carson and PCMS

Several commenters voiced concerns about a major fire that occurred at Fort Carson in March, 2018. The fire spread off the installation boundary and destroyed some homes. The March fire began on a day when ammunition restrictions were in effect. For instance, tracer ammunition was not allowed. Required fire personnel were on site. Unfortunately, a helicopter-fired 2.75" rocket landed outside the designated target area, in an area of tall weeds. The resulting fire spread rapidly

and jumped firebreaks, to include the one at the installation's eastern boundary. The fire took several days to get under control. This was only the second time a fire had gone past the installation's boundary in 30 years. The cause of the fire may have been unusually high rainfall in 2017 that produced abundant vegetation, rather than drought discussed in Section 3.2.2.5.2.1 of the PEA.

Following this fire, Fort Carson ceased firing on ranges for four days. Fort Carson personnel cut more than 100 miles of new firebreak roads. The existing firebreaks on the eastern boundary of the installation were improved.

Another fire in April, 2018 started by accident, but was allowed to burn in order to reduce the plant fuel load. That fire did not leave the installation boundary and was under control.

Another commenter noted that "in recent years a major fire at PCMS also caused damage to surrounding property." The commenter may be referring to the 2008 Bridger Fire in PCMS and the nearby Comanche National Grasslands. This predates the 2015 PCMS EIS, which addresses wildfire at length and adequately covers the impacts anticipated from training required by the ABCT that would be stationed at Fort Carson under the proposed action. The EIS states: "The fire management program on PCMS focuses on containing and responding quickly to wildland fires. The program also uses prescribed fires to reduce potential fuel loads and thus the chances of catastrophic wildland fires."

The Fort Carson and PCMS Integrated Wildland Fire Management Plan lays out specific guidance, procedures, and protocols in the prevention and suppression of wildfires on all installation training lands with wildland fuels. Operation of this plan, together with the actions taken to improve firebreaks and reduce risks at Fort Carson after the March 2018 fire, mean that the risk of uncontrolled wildfire at Fort Carson and PCMS as a result of additional ABCT training would be less than significant.

4.5 Impact to Natural Resources

Concerns regarding impacts to natural resources such as groundwater, sensitive and breeding wildlife, and rare plant species were expressed.

The garrisons will continue to follow their Integrated Natural Resources Management Plans to reduce the potential for take (e.g., mortality or harm) of federally-protected species and impacts to state-protected species and migratory bird species. These measures include coordinating with military units, implementing land use controls such as the Maneuver Damage Control Program, Off-limit Areas (OLAs) and Limited Use Areas (LUAs). The specific minimization measures are based on conditions at each garrison. The garrisons undertake habitat improvement projects, conducting surveys to identify and avoid impacts to listed species sites. Under the Bald and Golden Eagle Protection Act, Bald and Golden Eagles and their nests are protected using buffer areas on the ground and in the air around active nests, including using Notices to Airmen (NOTAM). Some garrisons use prescribed burning to maintain open space for military training, reduce wildfire potential, reduce and suppress woody plant encroachment, and maintain wildlife resting and breeding cover. Garrisons will determine if additional consultation is necessary and will continue to comply with applicable Biological Opinions to minimize the potential impacts to listed species during activities.

In addition, Fort Hood's black-capped vireo (*Vireo atricapilla*) was removed from the endangered species list due to recovery, effective May 16, 2018. The species is still migratory and therefore has protections under the Migratory Bird Treaty Act.

4.6 Impact to Cultural and Archeological Sites

Several comments concerned impacts to cultural/archeological sites, with one commenter stating that Fort Carson was violating the National Historic Preservation Act (NHPA).

Fort Carson has complied with the NHPA, the intent of which is to ensure the responsible stewardship of historical and cultural sites, through the creation of historic preservation programs, designation of a historic preservation officer, development of a process for nominating properties to the National Register of Historic Places, and consideration of effects of its actions on historic properties. Since 2014, Fort Carson has maintained a Programmatic Agreement (PA) with the Colorado State Historic Preservation Officer and the Advisory Council for Historic Preservation, regarding military training and operational support. Fort Carson is not out of compliance with the NHPA or with the 2014 PA. As funding allows, Fort Carson proactively identifies and evaluates cultural resources under Section 110 of the NHPA. Fort Carson continues to review its cultural resources BMPs to avoid, minimize, or mitigate adverse effects on historic properties. Fort Carson completes any required NEPA documents before training exercises and conducts after action inspections of protected properties following those exercises. These results are reported within 90 calendar days of the training exercise.

4.7 Impact of Herbicide to Native Plants and Waterways

One commenter stated concerns that using a "highly toxic, experimental herbicide" will cause damage to native plants and waterways.

Each garrison's Integrated Pest Management Program (IPMP) is based on compliance with the Environmental Protection Agency's (EPA) regulations and Executive Order 13751, *Invasive Species*. The garrisons do not use pesticides that are not registered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). The herbicide named in the comment is registered with the EPA under FIFRA. Applications of pesticides, including herbicides, at the garrisons and training sites follow label directions for mixture, application, and waste disposal.

4.8 Impact to Remote Training Areas

Two comments raised a concern that PCMS was not included in the region of influence for the discussion in the PEA about Fort Carson. The comment stated that cumulative impacts discussion in the PEA did not adequately discuss the impacts associated with the proposed action at this remote training area.

Fort Carson and PCMS are about 150 miles apart. For the most part, the region of influence for impacts in the Fort Carson area does not include PCMS. This includes cumulative impacts. Where appropriate, the PEA looks at a broader scope that includes PCMS, such as in the discussion of greenhouse gases in section 3.2.2.5.2.1 of the PEA. Impacts at PCMS are covered in the 2015 PCMS EIS, as discussed above.

4.9 Other Comments

One commenter expressed concerns regarding the format and language of the PEA. The format and language used throughout the PEA meets NEPA regulations and adheres to CEQ guidance.

The Army continues to believe that the PEA, as written, accurately depicts the environmental consequences of stationing a new ABCT at each of the alternative installations. Furthermore, the Army reviewed all comments received, and determined that the PEA was prepared in accordance with the applicable NEPA regulations and that it is sufficient to serve as the basis for a FNSI. The analyses performed for this PEA apply to the conversion of an existing IBCT to an ABCT and stationing the ABCT at one of the five installations. The selected installation may tier from the PEA in looking at site-specific actions. Additional NEPA analysis may be required for a given proposed alternative once an installation has been selected and installation-specific planning occurs to finalize stationing at the chosen installation. In summary, no edits are needed to the PEA, dated March 2018, in response to the comments received.

5 Conclusion

Based on a careful review of the PEA, which is incorporated by reference, and comments received as a result of the March 2018 Notice of Availability publication, I have determined that no significant direct, indirect, or cumulative impacts to the human or natural environment are anticipated as a result of implementation of any of the Alternatives, including the new Alternative 6. The information in public comments and other new information discussed in section 4 do not constitute significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impact such that supplementation of the PEA would be required. I find that because the anticipated impacts are thoroughly covered by existing NEPA analyses and are anticipated to be similar or less adverse, but not significant, consideration of Alternative 6 would not require supplementation of the PEA. I have determined that there are not substantial changes in the proposed action that are relevant to environmental concerns and that there are not any significant new circumstances or information relevant to environmental concerns bearing on the proposed action or its impact. The Army's review indicates that the PEA's analysis is adequate and that its conclusion that there are no significant impacts from any of the alternatives is still valid. The Army concludes that the Proposed Action and Alternatives (including the new Alternative 6) are not major Federal actions that would significantly affect the quality of the environment within the meaning of Section 102(2)(c) of NEPA; an environmental impact statement is not required, and will not be prepared. My decision is based on potential environmental and socioeconomic impacts associated with the Proposed Action and alternatives. This decision complies with legal requirements and has been made after taking into account all submitted information and considering a full range of reasonable alternatives and all environmental impacts.

20 Aug 18

Lieutenant General Joseph Anderson, Date

Deputy Chief of Staff, G-3/5/7,

United States Army

Appendix

Table 1. Summary of the Potential Effects on the Evaluated Alternatives

Resource Area	No Action Alternative	Alternative 1: Fort Carson	Alternative 2: Fort Bliss	Alternative 3: Fort Hood	Alternative 4: Fort Riley	Alternative 5: Fort Stewart	Alternative 6: Forts Carson and Bliss
Air Quality and Greenhouse Gases	Negligible adverse impacts	Minor to moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Minor to moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Minor to moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Negligible to minor adverse impacts for training component Minor adverse impacts for construction component	Minor adverse impacts for training component Minor adverse impacts for construction component	Minor to moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component
Biological Resources	Negligible adverse impacts	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component

Resource Area	No Action Alternative	Alternative 1: Fort Carson	Alternative 2: Fort Bliss	Alternative 3: Fort Hood	Alternative 4: Fort Riley	Alternative 5: Fort Stewart	Alternative 6: Forts Carson and Bliss
Cultural Resources	Negligible adverse impacts	Minor adverse impacts for training component Negligible for construction component	Minor adverse impacts for training component Negligible for construction component	Minor adverse impacts for training component Negligible for construction component	Minor adverse impacts for training component Negligible for construction component	Minor adverse impacts for training component Negligible for construction component	Minor adverse impacts for training component Negligible for construction component
Geology and Soils	Negligible adverse impacts	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component
Socio-economics	Negligible adverse impacts	Overall negligible long-term	Long-term beneficial to receiving installation/ long term moderate adverse to Fort Carson	Long-term beneficial to receiving installation/ long term moderate adverse to Fort Carson	Long-term beneficial to receiving installation/ long term moderate adverse to Fort Carson	Long-term beneficial to receiving installation/ long term moderate adverse to Fort Carson	Overall negligible long-term

Resource Area	No Action Alternative	Alternative 1: Fort Carson	Alternative 2: Fort Bliss	Alternative 3: Fort Hood	Alternative 4: Fort Riley	Alternative 5: Fort Stewart	Alternative 6: Forts Carson and Bliss
Water Resources	Negligible adverse impacts	Moderate/ less than significant adverse impacts for training component Minor adverse Impact for construction component	Minor adverse impacts for training component Moderate/ less than significant adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Minor adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Moderate/ less than significant adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Moderate/ less than significant adverse impacts for construction component	Moderate/ less than significant adverse impacts for training component Moderate/ less than significant adverse impacts for construction component
Traffic and Transport	Negligible adverse impacts	Negligible adverse impacts	Moderate/ less than significant adverse impacts for training component	Minor to less than significant adverse impacts for training component	Minor adverse impacts for training component	Minor to moderate/ less than significant adverse impacts for training component	Moderate/ less than significant adverse impacts for training component
Cumulative	Negligible adverse impacts	Minor to less than significant adverse impacts Long-term negligible to socio-economic	Less than significant adverse impacts Long-term beneficial to socio-economic	Less than significant adverse impacts Long-term beneficial to socio-economic	Less than significant adverse impacts Long-term beneficial to socio-economic	Less than significant adverse impacts Long-term beneficial to socio-economic	Less than significant adverse impacts Long-term negligible to socio-economic