

Record of Decision

Conversion of an Armor Brigade Combat Team to a Stryker Brigade Combat Team at Fort Carson, Colorado

EXECUTIVE SUMMARY

The Army proposes to convert a Fort Carson-based, 4th Infantry Division Armor Brigade Combat Team (ABCT) to a Stryker Brigade Combat Team (SBCT). As the Army's Deputy Chief of Staff, G-3/5/7, I have reviewed the 2008 Final Programmatic Environmental Impact Statement for Permanent Stationing of the 2/25th Stryker Brigade Combat Team (2008 EIS). The 2008 EIS analyzed the conversion of an Infantry Brigade Combat Team (IBCT) at Fort Carson to an SBCT. The 2008 EIS adequately evaluates the potential environmental and socio-economic effects associated with the Army's proposal. This BCT conversion will align Army force structure with current and future projected mission requirements. The 2008 EIS, published in February, 2008, is incorporated by reference in this Record of Decision (ROD). Also incorporated by reference is the original ROD, signed 2 March, 2008.

This ROD discusses why Fort Carson has been selected as the home for this SBCT. The ROD expands on the decision made in 2008, as the Army takes measures to meet its changed needs and adjust to constantly evolving mission requirements. It also discusses whether there are differences in the affected environment and proposed action between 2008 and the present. Site-specific National Environmental Policy Act (NEPA) analysis will be prepared for both Fort Carson and Piñon Canyon Maneuver Site (PCMS) to look in detail at measures necessary to house and train the SBCT. This ROD also explains that supplementation of the 2008 EIS is not required.

BACKGROUND

The Army is entering one of its most comprehensive organizational changes since WWII as we transition from a force at war. The Army is reducing its Active Component end-strength by 80,000 Soldiers, from a FY10 peak of 570,000 to 490,000 NLT FY15.

In 2007, the Army prepared a Programmatic Environmental Impact Statement (PEIS) for Army Growth and Force Structure Realignment. This PEIS looked at the possible stationing of several types of Army units at Fort Carson, to include an SBCT. The PEIS determined that stationing an SBCT at Fort Carson could cause high or very high impacts to air quality, soil erosion, and facilities. The "facilities" analysis said that Fort Carson and Piñon Canyon Maneuver Site (PCMS) would have high impacts because of increased usage and construction requirements. The December, 2007 Record of Decision (ROD) made the following decision for Fort Carson:

The Army will retain an IBCT on a permanent basis as the Army's 43rd Active component combat BCT.... Fort Carson is being selected for this stationing action because it ranks favorably in possessing the capabilities and attributes the Senior Army Leadership has determined to be necessary to support this stationing action. Key capabilities the Army assessed as part of this stationing decision included the ability to support growth, training, Soldier and Family well being, and power projection. While most Army installations are experiencing considerable training land deficits, Fort Carson's deficit is smaller than a majority of installations in the Army inventory. This stationing action will provide the best support for additional training requirements of this IBCT. Fort Carson has the capability to support current and future operations of this IBCT, and has already demonstrated its capacity to support the IBCT requirements while supporting a train-up for operations in Southwest Asia. In addition, Fort Carson has a robust and modernized training range and training simulations infrastructure and the ability to handle increased communications traffic required to support military operations. The installation is also one of the most highly requested locations in the Army, has adequate schools and medical facilities, and supports a high quality of Soldier and Family life. These reasons make Fort Carson an ideal location to permanently station this IBCT.

For many of the same reasons, the ROD also selected Fort Carson for the stationing of a second IBCT. Because the Army did not have to grow as much as anticipated, this second IBCT never was established at Fort Carson. At the end of the process, there were four BCTs at Fort Carson: three ABCTs, and one IBCT.

The alternative of stationing an SBCT at Fort Carson was analyzed again, in greater detail, in the 2008 EIS, which also considered Schofield Barracks, Hawaii and Fort Richardson, Alaska as possible locations. The SBCT would have replaced Fort Carson's one IBCT, (4th BCT, 4th Infantry Division), which would move to Hawaii. The SBCT had 663 more Soldiers than the IBCT. The SBCT would have had 317 Stryker vehicles and 588 wheeled vehicles, compared to the 924 wheeled vehicles of the IBCT. The EIS described the facilities occupied by the IBCT, some of which were scheduled to be improved in 2013. The SBCT would occupy some of these existing facilities, but would also require some additional construction. The SBCT would use Fort Carson's Digital Multi-Purpose Range Complex rather than a Battle Area Complex. The EIS determined that there would be a slight overall increase in maneuver training at Carson and PCMS.

Section 5.4 of the 2008 EIS analyzed impacts of SBCT stationing at Fort Carson and PCMS. At Fort Carson, the EIS identified significant impacts in the areas of soil erosion, wildfire management, and air quality. At PCMS, the EIS found significant impacts could occur in the areas of soil erosion, wildfire management, and cultural resources.

Ultimately, the Army selected Schofield Barracks, Hawaii in the March, 2008 ROD, for the stationing of the SBCT, noting that Hawaii was best able to meet the Army's strategic defense and national security needs for the Pacific theater.

To help achieve spending reductions required by the Budget Control Act of 2011, the Army is decreasing the total number of Soldiers and civilian employees, while reorganizing the current force structure. The Army's Active Duty end-strength will decline from a fiscal year (FY) 2012 authorized end-strength of 562,000 to 490,000. This effort requires a substantial reduction in the number of the Army's Brigade Combat Teams (BCTs), the basic building block of today's Army. The Army analyzed the effects of this reduction in the Programmatic Environmental Assessment for Army 2020 Force Structure Realignment, completed in 2013.

On 25 June 2013, the Army announced that it was reducing the number of Active Army BCTs from 45 to 33 over the next several years.¹ Remaining BCTs in the continental United States will be reorganized to include an additional maneuver battalion (for IBCTs and ABCTs) and other units. At Fort Carson, this announcement included inactivation of an ABCT. Portions of this ABCT and an additional maneuver battalion from a BCT deactivating elsewhere will be added to remaining BCTs at Fort Carson, resulting in a net increase of one maneuver battalion.

As this overall reduction occurs, the Army is reorganizing the remaining BCTs to retain the required mix of Infantry, Armor, and Stryker BCTs. Each Brigade has special capabilities unique to its type, and all are required to meet the Army's world-wide responsibilities. For these reasons (more fully explained below), the Army must convert an ABCT to an SBCT. Also discussed below is why the Army has decided to implement this conversion at Fort Carson.

In a separate action, Fort Carson is gaining a Combat Aviation Brigade (CAB), with approximately 2,600 Soldiers. This action was based on a 2011 Department of the Army EIS and ROD. Fort Carson completed an EA for this action in 2012. The full complement of CAB Soldiers is expected to arrive by the end of FY 14.

In 2007, the Department of Defense approved a waiver in 2007 to allow the Army to consider acquisition of additional land at PCMS. On November 5, 2013, the Department of Defense approved the Army's request to withdraw its waiver request, formally ending the Army's land acquisition effort at PCMS.

PURPOSE AND NEED

The Army must adjust its end strength and realign its forces in accordance with Congressional authorizations to a size and configuration that are capable of meeting national defense and security objectives, implementing the 2010 Quadrennial Defense Review (QDR) recommendations, sustaining unit equipment and training readiness, and easing the deployment burden on the Army's Soldiers and Families. This proposed action will allow the Army to adjust the composition of its forces in order to accomplish its mission, at an installation well-suited for the conversion. This adjustment must be synchronized with unit deployment schedules so that changes occur after a unit has returned from overseas.

¹ The Army also noted the likelihood of the elimination of an additional BCT. The location of this BCT has not been announced.

Major objectives of the proposed action and this decision include:

Matching Army Force Capabilities with Mission Requirements. The Army must be able to meet the National Defense Strategy and National Security Strategy objectives while implementing recommendations of the QDR and Army Campaign Plan. The Army will address existing shortfalls and provide capabilities needed to sustain operations in a global security environment of persistent conflict.

Sustaining Force Readiness. Sustaining the force means ensuring the Army consists of enough Soldiers to support operational deployment requirements and home-station training and equipment maintenance activities. Achieving the proper balance of deployments with training and maintenance activities is critical to ensuring that a professional well-trained and well-equipped force can consistently meet unit readiness standards and successfully accomplish its national defense and security missions.

Preserving Soldier and Family Quality of Life and the All Volunteer Force. The Army must maintain a long-term sustainable balance between operational requirements and Soldier and Family quality of life. This reduces stresses placed on Soldiers and their Families and supports a higher quality of life at home-station. Taking care of Soldiers and their Families is an Army commitment and is essential to the maintenance and preservation of today's high-quality all-volunteer force.

As discussed above, on 25 June 2013, the Army announced that it was reducing the number of Active Army BCTs from 45 to 33 over the next several years. At the time, the Army noted that there would probably be some adjustments to the mix of BCTs. The Army would retain eight SBCTs, because of their capabilities, even as other types of BCTs were reorganized. One additional ABCT has to be eliminated to retain the correct mix. The Army has now decided to convert an ABCT to a SBCT at Fort Carson, Colorado, for reasons discussed below.

PROPOSED ACTION

The proposed action is to convert an ABCT at Fort Carson to an SBCT. This will not involve construction at either Fort Carson or PCMS. There will be some differences in training at Fort Carson and at PCMS, but it will be on existing ranges and maneuver areas.² As noted above, SBCT training was addressed in the 2008 EIS.

This action will not require any expansion of PCMS.

The changes in BCT strength at Carson from both Stryker conversion and BCT realignments are (with Soldier numbers in parentheses):

² Fort Carson requested funds for construction of an Infantry Platoon Battle Course (IPBC) well before the advent of the proposal to station an SBCT there. Although the IPBC is not required for the SBCT, SBCT Soldiers might train at the facility if it were built.

FY 13 Four BCTs:

ABCT (3757) ABCT (3757) ABCT (3754) IBCT (3523)

End of FY 15 Three BCTs:

SBCT (4454) IBCT (4296) ABCT (4655)

As a result, there will be 1,386 fewer Soldiers in Fort Carson's BCTs after these changes are made.³

At Fort Carson, the number of Soldiers in units other than BCTs increases slightly over the next four years as the CAB completes its stationing. The current Soldier strength at Fort Carson of about 23,800 will remain almost the same from 2013 to 2017, with a projected net loss of 17 Soldiers. The civilian employee population of 2693 (end of 2013) will decrease by about 100 over the same period. By way of comparison, in the 2008 EIS, Soldier-strength of Fort Carson was predicted to rise by 663 if Carson were chosen for SBCT conversion.

In several respects, the environmental impacts of the SBCT will be less than the ABCT it will replace, especially when viewed in the context of the overall reduction in ground maneuver units:

The amount of live fire for small arms qualification would decrease with the loss of 1,386 Soldiers at Fort Carson as part of the BCT reorganization. The net loss of only 17 Soldiers over the next four years, however, means that small arms live fire will decrease only slightly. A decrease in artillery weapons from 64 to 54 will result in a commensurate decrease in artillery training.

There will be more combat vehicles conducting maneuver training because there will be more Strykers (336) in the SBCT than M1 tanks (87) and Bradley Fighting Vehicles (81) in the ABCT configuration. Even with more Strykers training, however, the overall maneuver impact at Fort Carson will be less, meaning that less soil erosion and dust would occur. The Army measures maneuver impacts on the land by applying the training event mileage to the vehicle track or wheel specifications to determine the footprint on the ground, and then considering the weight to determine impact to the soil. This methodology results in "Maneuver Impact Miles" (MIMs), which provide a way of comparing relative impacts between different equipment and training

³ This means that even though the SBCT will have more Soldiers than the ABCT it will replace, the net BCT Soldier strength at Fort Carson will go down. This is because the existing Fort Carson ABCT will be converted to an SBCT before it reorganizes to a larger Soldier configuration. If the ABCT reorganization (i.e., gaining an additional maneuver battalion and other units) were to occur before SBCT conversion, the SBCT that replaced it would actually be 201 Soldiers smaller; under reorganization, no additional maneuver battalion is added to an SBCT.

scenarios. The eight-wheeled Strykers (about 20 tons⁴) are lighter vehicles than the M1 tanks (67.6 tons) and Bradley Fighting Vehicles (27.6 tons) they are replacing. Using the MIMs methodology, the maneuver impacts after SBCT conversion are anticipated to decrease by about 5%.⁵

The Stryker vehicle gets about 12 times better fuel mileage than the M1 tanks and Bradley Fighting Vehicles it will replace. Even though there are more combat vehicles in the SBCT than the ABCT, the amount of fuel consumed each year by the SBCT will be less. This will reduce emissions of both conventional fuel combustion products and greenhouse gasses.

Finally, the Main Gun System variant in the SBCT (27 vehicles) makes slightly less noise when firing its main cannon than the main gun of the M1 tank.

There are some minor ways in which the proposed action is different from what was studied in the 2008 EIS. Chapter 2 of the 2008 EIS described the personnel, equipment, and training requirements of the SBCT. The BCT has evolved: the SBCT had 4,105 Soldiers and 317 Stryker vehicles in 2008. Because of the BCT reorganization announced on June 25, 2013, a SBCT now has 4,454 Soldiers and 336 Stryker vehicles.

In the 2008 EIS, construction was required in the cantonment and range areas (section 2.7 of the 2008 EIS). Since that time, available facilities at Fort Carson have improved. The conversion will not require construction at either Fort Carson or PCMS.

The alternatives discussed in the 2008 EIS were Schofield Barracks, Fort Carson, and Fort Richardson, AK. Only Fort Carson remains a reasonable alternative of those analyzed in the 2008 EIS. Fort Richardson has limited cold weather deployment capability and there is already a SBCT in the state, at Fort Wainwright, near Fairbanks. Stationing an additional SBCT in Alaska would mean that two of the BCTs would be subject to cold weather deployment restrictions. Fort Richardson also has training restrictions during a part of the year at its main impact area. Schofield Barracks was selected for the SBCT in 2008; due to severe training/environmental (including cultural) restrictions, it could not support another SBCT.

In the 2008 EIS, the Army said it was not practical to exchange an SBCT for an ABCT (then referred to as a Heavy BCT) because that ABCT would not be able to train properly in Hawaii. The SBCT stationed in 2008 replaced an infantry brigade. Now, in light of the BCT

⁴ The various Stryker mission-variants have different weights. This is an average weight including the double-V hull variant. Fort Carson is likely to receive a new Stryker model with a different hull design than the one described in the 2008 EIS. This "double-V hull" is more resistant to roadside bombs. This model is 5,000 pounds heavier than the model considered in the 2008 EIS and is about three inches higher. The additional weight of this model was taken into consideration in the MIMs factors described above. Three variants are not receiving the new hull and will retain their current flat-bottom configuration: the M1127 Reconnaissance Vehicle, the M1128 Mobile Gun System, and the M1135 NBC Reconnaissance Vehicle.

⁵ This takes into account all BCT changes at Fort Carson: elimination of an ABCT, conversion of an ABCT to an SBCT, and making the remaining ABCT and IBCT larger.

reorganizations announced in June 2013, conversion of an ABCT is required in order to maintain the right balance among types of BCTs.

In addition, conversion of an ABCT to an SBCT at the same location is especially beneficial because the Army can take advantage of personnel and equipment common between these units. The ABCT's vacated facilities would provide most of the facilities required by the SBCT. Neither Fort Richardson nor Schofield Barracks has an ABCT.

In the 2010 Fort Bliss Stryker conversion ROD, the Army discussed why elimination of a Heavy BCT (now ABCT) at one installation and activation of an SBCT at another installation—e.g., eliminating an ABCT at Fort Stewart and standing up an SBCT at Fort Carson--was eliminated from consideration. Establishing an SBCT at an installation without replacing an ABCT would involve building a new brigade set of facilities at that installation, which would greatly increase costs, environmental impacts, and time needed to complete the action. An IBCT does not have many of the facilities or personnel that an SBCT needs, and would require more personnel transfers and construction. In these times of severely limited budgets, construction and Soldier relocation expenses must be minimized. Therefore, conversion of an IBCT to an SBCT would not be practical or feasible.

Conversion of an ABCT to an SBCT at the same installation can be completed quickly and allow the unit to be available for deployment again to support Army operational needs. As discussed above, the ABCT has Soldiers with the same specialties as the Soldiers in the SBCT, more so than would an IBCT. The maintenance facilities of an ABCT can accommodate the SBCT's equipment, while the facilities of an IBCT would not. An ABCT at Fort Carson will be able to provide Soldiers and equipment to the SBCT.

It is important to execute the conversion quickly so that the unit can resume its cycle of deployment. Deploying units return to their home station and integrate refurbished equipment and new Soldiers. In the case of an SBCT, new equipment training takes nine months. Following this, smaller units of the SBCT begin training, and then train together as larger elements. Finally, the whole BCT is able to train in a large exercise to certify that it is ready for deployment. New equipment must be fielded at the beginning of this cycle to avoid disrupting training. The unit would have to start at the beginning of the training process. If a BCT's training cycle were prolonged, it could cause other BCTs to deploy earlier than they otherwise would and perhaps before they were fully trained. The new SBCT at Carson will be able to conduct Stryker new equipment training at the very beginning of its deployment cycle.

Most Stryker vehicles from the SBCT being eliminated at JBLM will be shipped to the manufacturer for conversion into the double-V hull configuration.⁶ They must be shipped soon or the production cycle of the vehicles will be interrupted and it would be time-consuming and expensive to start up again. But this takes an SBCT out of the Army's inventory and another

⁶ As discussed above, a small number of JBLM Stryker vehicles, of the type that will not have the double-V hull, will go to Fort Carson.

BCT must be converted to an SBCT to maintain the proper mix of BCTs, as discussed above. There is a short timeframe for this action because the Army needs to have a replacement SBCT.

ENVIRONMENTAL CONSEQUENCES

There are no major changes between the affected environments at Fort Carson or PCMS as described in the 2008 EIS and the affected environment today. This is based on a review by Fort Carson personnel of the affected environment section of the 2008 EIS, affected environment sections of intervening Fort Carson and PCMS NEPA documents, and current conditions. Because this action involves the conversion of an ABCT (rather than an IBCT) to an SBCT, the net number of additional Soldiers training at Fort Carson and PCMS will be less than anticipated in the 2008 EIS, and the significant environmental impacts predicted for Fort Carson and PCMS in the 2008 EIS are not likely to occur.

Anticipating increased impacts from training exercises (Stryker combat vehicles replacing infantry), the 2008 EIS identified significant impacts in the areas of soil erosion, wildfire management, and air quality.

Impacts from soil erosion included the effects of construction of two new ranges; these ranges are no longer required for SBCT stationing. Significant soil erosion impacts were also anticipated from maneuver training. This was because the SBCT would intensify maneuver training by doubling the number of maneuver impact miles compared to the IBCT it would replace. As discussed above, following BCT conversion, elimination, and reconfiguration, Fort Carson will train with fewer MIMs. In addition, there will be one less BCT training at Fort Carson than analyzed in the 2008 EIS. With fewer MIMs and BCTs, it is expected that impacts for this resource will be less than significant and/or less than described in the 2008 EIS.

The 2008 EIS assumed a significant wildfire risk because of the increase in MIMs and an increase in the number of Soldiers firing on ranges. The SBCT will train with even fewer MIMs than would Carson's configuration of BCTs resulting from the 25 June 2013 decision (which meant two ABCTs and one IBCT remained at Fort Carson). The net number of Soldiers in Fort Carson BCTs will decrease as a result of reorganization and overall Soldier strength will decrease slightly. With fewer MIMs and BCTs, it is expected that impacts for this resource will be less than significant and/or less than described in the 2008 EIS.

The 2008 EIS also determined that there would be significant impacts to air quality from fugitive dust and increases in criteria pollutants. In part, this was based on an assumption that off-road vehicle use would double, since the SBCT would be replacing an IBCT. As discussed above, following BCT conversion, elimination, and reconfiguration, Fort Carson will train with fewer MIMs. The SBCT will also use less fuel than the ABCT it replaces. With fewer MIMs and greatly improved fuel mileage, combined with application of Fort Carson's Fugitive Dust Control Plan, it is expected that impacts for this resource will be less than significant and/or less than described in the 2008 EIS.

At PCMS, the 2008 EIS identified significant impacts associated with soil erosion, wildfire management, and cultural resources. The same mitigation factors reducing impacts at Fort Carson should also reduce these impacts at PCMS to less than significant. Fort Carson is still conducting mitigation programs identified in the 2008 EIS such as Integrated Training Area Management, the Installation Natural Resource Management Plan, Prescribed Burn Plans, the Installation Cultural Resource Management Plan, the Noise Management Plan, and PCMS convoy requirements.⁷ Nevertheless, Fort Carson will prepare site-specific NEPA documentation for Stryker training at PCMS. Until completion of the site-specific NEPA documentation, training will be limited to currently allowed periods as supported by existing NEPA documents, and all environmental restoration requirements (to include all designated in the 2008 EIS) will be met. Pending completion of the NEPA documentation, all current regulatory and program requirements will continue to be adhered to by Fort Carson.

DECISION

I have decided to convert the 1st BCT (ABCT), 4th Infantry Division at Fort Carson to an SBCT. As discussed above, this action will be more cost-efficient and timely if the installation chosen has an ABCT to convert to an SBCT. Converting an ABCT to an SBCT will also retain the proper balance of BCTs in the Army. Fort Bliss and Fort Hood both have an ABCT but also already have an SBCT, which allows SBCT and ABCT units to train together. This criterion makes Fort Bliss and Fort Hood less desirable choices because they already have SBCTs and training would not be enhanced by adding an additional SBCT. An SBCT at Fort Benning would face many of the same restrictions that the current ABCT has due to establishment of the Maneuver Center of Excellence, and the presence of the Red-cockaded Woodpecker (a federally-listed endangered species). Fort Riley and Fort Stewart have ABCTs and could support SBCT training, but their ABCTs would not be available to meet the short timeframe for this action. These ABCTs are in the middle of their deployment training cycles and would have to start all over again after nine months of Stryker new equipment training. Due to tight deployment and redeployment cycles of Army combat units, the timing of unit deployments was also a critical element of the decision. Only Fort Carson has an ABCT that will be at the right stage of the deployment cycle to begin the SBCT conversion process in the spring of 2014. This conversion is essential as we reorganize BCTs across the entire Army. Only Fort Carson is able to meet these criteria. Fort Carson will now have one of each kind of BCT, allowing for multi-BCT-type, training opportunities.

This action is the environmentally preferred alternative. It reduces M1 Tank and Bradley Fighting Vehicle maneuver use at Fort Carson. The Stryker vehicles use less fuel than the M1 tanks and Bradley Fighting Vehicles they are replacing. These factors will likely reduce dust, soil erosion, fuel usage, and air pollution.

⁷ Some of these plans have been updated since 2008, but none have been revised to provide less environmental protection.

MITIGATION COMMITMENTS

All practicable means to avoid or minimize environmental harm from the Fort Carson alternative identified in the 2008 EIS will be adopted, unless different or additional measures are developed and identified in the site-specific NEPA documents. As discussed above, programs such as Integrated Training Area Management, the Integrated Natural Resource Management Plan, Prescribed Burn Plans, and the Installation Cultural Resource Management Plan are still in effect, although some have been updated since 2008. A monitoring and enforcement program will remain in effect.

SUPPLEMENTATION OF THE 2008 EIS IS NOT REQUIRED

The Council on Environmental Quality (CEQ) NEPA regulation states at 40 CFR §1502.9(c):

(c) Agencies:

1. Shall prepare supplements to either draft or final environmental impact statements if:
 - (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or
 - (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.

The Army's NEPA regulation provides at 32 CFR §651.5(g):

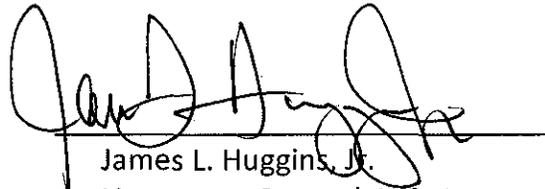
- (g) Army NEPA documentation must be periodically reviewed for adequacy and completeness in light of changes in project conditions.
 - (1) Supplemental NEPA documentation is required when:
 - (i) The Army makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impact.
 - (2) This review requires that the proponent merely initiate another "hard look" to ascertain the adequacy of the previous analyses and documentation in light of the conditions listed in paragraph (g)(1) of this section.

The changes in both the proposed action and affected environment are discussed above. In this situation, changes in proposed action will reduce the environmental impacts analyzed in the previous EIS. The action differs from the one analyzed in 2008 primarily because there will not be a net increase in maneuver impact or in Soldier strength at Fort Carson. To the extent changes in the proposed are relevant to environmental concerns, they mean that there will be *less* environmental impact. Therefore, these changes are not substantial and do not require supplementation.

As discussed above, there are no significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impact. The affected environments at Fort Carson and PCMS are very much the same as they were described in the 2008 EIS.

For these reasons, supplementation is not required.

Date: 13 Jan 2014

A handwritten signature in black ink, appearing to read "James L. Huggins, Jr.", written over a horizontal line.

James L. Huggins, Jr.
Lieutenant General, U.S. Army
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