

# FINDING OF NO SIGNIFICANT IMPACT

## Supplemental Programmatic Environmental Assessment for Army 2020 Force Structure Realignment



October 2014



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## FINDING OF NO SIGNIFICANT IMPACT FOR ARMY 2020 FORCE STRUCTURE REALIGNMENT

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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 United States (U.S.) Department of the Army (Army) by 32 CFR Part 651, *Environmental Analysis of Army Actions*. In accordance with these requirements, the Army has prepared a Supplemental Programmatic Environmental Assessment (SPEA), which is incorporated by reference, to consider environmental effects on installations that could result from implementation of the Proposed Action to realign Army forces from Fiscal Year (FY) 2013 through FY 2020. The SPEA was prepared to supplement the Army's 2013 Programmatic Environmental Assessment (PEA) due to changes to the Purpose and Need and the Proposed Action described in the previous document.

### 1.0 Title of the Action

Supplemental Programmatic Environmental Assessment for Army 2020 Force Structure Realignment.

### 2.0 Background Information

In 2013, to analyze the potential environmental and socioeconomic impacts associated with the initial realignment targets, the Army prepared a PEA titled *Programmatic Environmental Assessment for Army 2020 Force Structure Realignment* (2013 PEA). The 2013 PEA analyzed a proposed action consisting of a reduction in active Army end-strength from 562,000 to 490,000. While the 2013 PEA analyzed reductions beyond those required to reach an end-strength of 490,000, the 2013 PEA indicated that analyzing the numbers studied provided flexibility to decision makers over the ensuing years as conditions change, including fiscal, policy, and security considerations that were beyond Army control. In April 2013, a Finding of No Significant Impact (FNSI) was signed based on the 2013 PEA analysis.

As discussed in the 2013 PEA, the Army's proposed action (Army 2020 realignment) was to conduct force reductions and force realignments to a size and configuration that was capable of meeting national security and defense objectives, implement the 2010 Quadrennial Defense Review (QDR) recommendations, sustain unit equipment and training readiness, and preserve a high quality of life for active component Soldiers and their Families. The Army's civilian workforce would also be reduced. Army 2020 realignment also allowed for the adjustment of forces to meet requirements in high demand military occupational specialties, while rebalancing the number and types of units in lower priority military occupational specialties. Implementation

of Army 2020 realignment, as assessed in the 2013 PEA, enabled the Army to reduce its operational costs by maintaining a smaller force that still could meet the mission requirements of the then-current and future global security environment. Reductions and realignments were required to achieve the savings specified in the 2011 Budget Control Act. To achieve these savings, the Army proposed to reduce the size of its force from a post-9/11 peak of about 570,000 in 2010 to 490,000. In June 2013, the Army announced the inactivation of 10 Regular Army Brigade Combat Teams (BCTs) in the continental U.S. Five of these BCTs were inactivated in FY 2014, and five more will be inactivated in FY 2015. In addition to BCT reductions on U.S. installations, reductions were achieved through the elimination of Soldiers in temporary, wartime over-strength categories and the drawdown of overseas forces, the last of which reduced the impact of these force reductions on U.S. installations.

Since the 2013 PEA was completed, Department of Defense (DoD) fiscal guidance has continued to change, and the future end-strength of the Army must be reduced even further than the 490,000 considered in the 2013 PEA. This came about primarily because the second part of the 2011 Budget Control Act, commonly referred to as sequestration, came into effect. The 2014 QDR (supersedes the 2010 QDR in effect when the 2013 PEA was prepared) states that the active Army will reduce from its war-time high of 570,000 to 440,000–450,000 Soldiers. The 2014 QDR also states if sequestration-level cuts are imposed in FY 2016 and beyond, active component end-strength would need to be reduced to 420,000. These further potential reductions require a supplemental environmental and socioeconomic impact analysis of approximately two times the reductions analyzed in the 2013 PEA. In other words, the 2013 PEA analyzed reductions totaling approximately 72,000 (reducing the Army's end-strength from 562,000 to approximately 490,000); these new developments require analysis of further reductions of 70,000 (reducing the Army's end-strength from 490,000 to 420,000). As a result, the Army has prepared the SPEA, building on the information and analysis contained in the 2013 PEA, to assess the environmental and socioeconomic impacts of a substantial increase in potential reductions. This does not mean that these losses will actually occur to the full extent analyzed or even that each installation analyzed will incur losses. The Proposed Action for the SPEA is very similar to Alternative 1 in the 2013 PEA but is both broader in scope and allows for deeper potential reductions. The Army recognizes that cuts down to 420,000 Soldiers could have serious impacts to the installations and communities that host the Nation's force, and this document is intended to determine and disclose those impacts.

The SPEA analyzes the potential environmental and socioeconomic impacts associated with the reduction and realignment of the Army's force structure between FY 2013 and FY 2020 to a force best able to protect and advance U.S. interests and would sustain U.S. leadership within the fiscal constraints of decreased DoD funding. It should be noted that the SPEA is an analysis of the environmental and socioeconomic impacts of future Army force structure decisions. The SPEA is an analysis—not the force structure decision itself. The SPEA is just one input among many that will help inform Army senior leaders to make the force structure decisions described

in the Army's Proposed Action. The NEPA analysis, encompassing the SPEA and the public comments on the document, constitutes one of many elements in the force structure decision process. As it did in 2013, the Army's force structure decision process will again include community listening sessions at various locations across the country to afford the public an opportunity, outside of this NEPA process, to provide input on force structure decisions. The Army will consider both the environmental and socioeconomic impacts analyzed within the SPEA and the information provided by SPEA commenters, along with input from these listening sessions and a wide variety of other factors, as part of the overall force structure decision process.

In making these force structure decisions, the Army must consider how best to make trade-offs between programs and operations, while strategically moving forward to preserve mission capabilities and modernize the force to meet future threats. The SPEA presents an overarching perspective that provides decision makers, as well as regulatory agencies and the public, with information about the potential environmental and socioeconomic impacts, thereby enabling them to assess and compare those impacts. Decision makers will be able to take those impacts into consideration as they select where to reduce existing force structure or realign units.

### **3.0 Description of Proposed Action**

The Army's Proposed Action is to reduce and realign its forces, both active component Soldiers and Army civilian employees, to best meet current and future national security and defense requirements within fiscal constraints as outlined in the 2014 QDR. The implementation of Army 2020 realignment with the resulting lower Army end-strength, as indicated in the 2014 QDR, will be necessary to operate on a reduced budget and maintain readiness in the remaining force.

### **4.0 Alternatives**

In addition to the No Action Alternative, one action alternative has been formulated that considers the Army's needs for Army 2020 realignment.

#### **Alternative 1—Implement Force Reductions**

Under Alternative 1, the Army would reduce its end-strength to as low as 420,000 as indicated in the 2014 QDR (assuming sequestration-level cuts are resumed in FY 2016).<sup>1</sup> Table FNSI-1 presents the potential active component Soldier and Army civilian employee reductions that could occur at each of 30 locations considered under Alternative 1. These reductions are used as the maximum potential force reduction thresholds for each installation, thereby providing force structure decision makers with options as they select units and locations for reductions

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<sup>1</sup> As noted in the SPEA, Section 1.2, the Bipartisan Budget Act of 2013 provided some relief from sequestration cuts, but these cuts are set to resume in FY 2016 unless Congress acts to stop them.

**Table FNSI-1. Alternative 1—Force Reductions**

Installation Name	Fiscal Year of Baseline Population	Baseline Permanent Party Soldier and Army Civilian Population <sup>a</sup>	Potential Population Loss Analyzed in the 2013 PEA	Potential Population Loss Analyzed in SPEA <sup>b</sup>	Lowest Potential Fiscal Year 2020 Baseline Permanent Party Soldier and Army Civilian Population
Aberdeen Proving Ground, Maryland	2013	12,335	--	4,300	8,035
Fort Belvoir, Virginia	2013	9,721	--	4,600	5,121
Fort Benning, Georgia	2011	17,501	7,100	10,800	6,701
Fort Bliss, Texas	2011	31,380	8,000	16,000	15,380
Fort Bragg, North Carolina	2011	52,975	8,000	16,000	36,975
Fort Campbell, Kentucky	2011	32,281	8,000	16,000	16,281
Fort Carson, Colorado	2011	25,702	8,000	16,000	9,702
Fort Drum, New York	2011	19,011	8,000	16,000	3,011
Fort Gordon, Georgia	2011	8,142	4,300	4,600	3,542
Fort Hood, Texas	2011	47,190	8,000	16,000	31,190
Fort Huachuca, Arizona	2013	5,841	--	2,700	3,141
Fort Irwin, California	2011	5,539	2,400	3,600	1,939
Fort Jackson, South Carolina	2013	5,735	--	3,100	2,635
Fort Knox, Kentucky	2011	13,127	3,800	7,600	5,527
Fort Leavenworth, Kansas	2013	5,004	--	2,500	2,504
Fort Lee, Virginia	2011	6,474	2,400	3,600	2,874
Fort Leonard Wood, Missouri	2011	9,161	3,900	5,400	3,761
Fort Meade, Maryland	2013	6,638	--	3,500	3,138

Installation Name	Fiscal Year of Baseline Population	Baseline Permanent Party Soldier and Army Civilian Population <sup>a</sup>	Potential Population Loss Analyzed in the 2013 PEA	Potential Population Loss Analyzed in SPEA <sup>b</sup>	Lowest Potential Fiscal Year 2020 Baseline Permanent Party Soldier and Army Civilian Population
Fort Polk, Louisiana	2011	10,836	5,300	6,500	4,336
Fort Riley, Kansas	2011	19,995	8,000	16,000	3,995
Fort Rucker, Alabama	2013	4,957	--	2,500	2,457
Fort Sill, Oklahoma	2011	11,337	4,700	6,800	4,537
Fort Stewart, Georgia	2011	18,647	8,000	16,000	2,647
Fort Wainwright, Alaska	2011	7,430	4,900	5,800	1,630
Joint Base Elmendorf-Richardson, Alaska	2011	6,861	4,300	5,300	1,561
Joint Base Langley-Eustis, Virginia	2011	7,382	2,700	4,200	3,182
Joint Base Lewis-McChord, Washington	2011	36,222	8,000	16,000	20,222
Joint Base San Antonio-Fort Sam Houston, Texas	2013	12,256	--	5,900	6,356
USAG Hawaii (Fort Shafter), Hawai'i	2013	7,431	--	3,800	3,631
USAG Hawaii (Schofield Barracks), Hawai'i	2011	18,441	8,000	16,000	2,441

Note: These reductions are used as the maximum potential force reduction thresholds for each installation, thereby providing force structure decision makers with options as they consider what best serves the Nation's defense prior to determining units and locations to be affected by reductions. As with the 2013 PEA, the total maximum potential reduction numbers presented in this table far exceed what is needed to meet the Proposed Action.

<sup>a</sup> Populations include: Army military and Army civilians (excludes Army students and other military service personnel, contractors, and transients); population reduction numbers include full-time military and civilian employees only. Source of data is the Army Stationing Installation Plan (February 2012 for FY 2011 data and October 2013 for FY 2013 data). Where baseline populations differ from that in the 2013 PEA, differences represent corrections to data (e.g., removal of student populations because they are not part of the permanent party population). The population numbers do not include non-appropriated fund personnel.

<sup>b</sup> Potential population losses to be analyzed in the SPEA are inclusive of the numbers previously analyzed in the 2013 PEA.



(for purposes of this analysis, unit refers to both Soldier and civilian personnel). The 30 locations were studied because they have the potential to lose 1,000 or more active component Soldiers and Army civilian employees. Twenty-one locations were analyzed for potential reductions in the 2013 PEA. The studied reductions for all 30 locations, if added together, would reduce the Army's active force to well below 400,000. Such deep reductions are not envisioned, but analyzing the highest potential reductions at each of the 30 locations will provide Army leaders flexibility in making future decisions about how and where to make cuts to reach the necessary end-strength as dictated by fiscal, policy, and strategic conditions.

The further reduction in active component Army Soldiers to 420,000, as indicated in the 2014 QDR, is approximately double that analyzed in the 2013 PEA (142,000, compared to 72,000) assuming the same baseline. For analysis in the SPEA, the Army generally is doubling the maximum reduction scenarios as presented in the 2013 PEA to achieve the increase in force reductions under current fiscal, policy, and strategic conditions. For each installation with two or more BCTs in FY 2012, the SPEA assumes the loss of two BCTs (approximately 3,450 Soldiers for Infantry BCTs; 3,850 for Armored BCTs; and 4,200 for Stryker BCTs), as well as 60 percent of the installation's non-BCT Soldiers and 30 percent of the Army civilian workforce. For installations with only one BCT, the SPEA assumes a loss of one BCT and 60 percent of the installation's non-BCT Soldiers and 30 percent of the Army civilian workforce. For installations with no BCTs, the SPEA assumes a loss of 70 percent of the installation's active component Soldiers and 30 percent of the Army civilian workforce. Because it is unlikely that any one installation would be selected to sustain a force reduction of more than 16,000 Soldiers and Army civilian employees, the potential reduction was capped at 16,000.

In addition, the Army may have to adjust force structure of the Reserve Component, and reduce Army Reserve and Army National Guard (ARNG) end-strength to complement active component force reductions. Those Reserve and ARNG changes are beyond the scope of the SPEA.

The Army is also aware that other branches of the military are experiencing their own budget cuts, and will be experiencing their own manpower and/or program reductions. Many of the installations in the SPEA are home to service members and civilian employees from the Air Force, Navy, or Marine Corps, in addition to the Army. The Army does not have specific information on the proposed reductions in military or civilian populations by these "sister services" at these locations. However, in general, their population numbers at the installations are relatively small, especially in comparison to the active Army; any possible future reductions by the "sister services" would not likely change the impact conclusions in the SPEA.

### **No Action Alternative**

As described in the 2013 PEA, the No Action Alternative would retain the Army at a FY 2012 authorized end-strength of about 562,000 active component Soldiers and more than 320,000



Army civilians. The No Action Alternative generally assumes that units would remain where they were stationed at the end of FY 2012. Under the No Action Alternative, no additional Army personnel would be realigned or released from the Army to balance the composition of Army skill sets to match current and projected future mission requirements or to address budget requirements. No BCT restructuring would occur as proposed under Alternative 2 of the 2013 PEA, and no unit inactivations would occur.

While no longer realistic because force reductions and restructuring have occurred since FY 2011, which was the baseline year of populations extracted from the Army Stationing and Installation Plan (ASIP) data of February 2012, the inclusion of the No Action Alternative within the SPEA provides the same baseline as the PEA it supplements against which to compare the potential environmental and socioeconomic impacts of the Proposed Action and is required by CEQ regulations. Further, the No Action Alternative would require the Army to retain large numbers of units for which funding would be insufficient to maintain minimum readiness standards. The Army cannot deploy improperly trained Soldiers for dangerous missions.

## **5.0 Summary of Environmental Effects**

The analysis of the potential environmental impacts is documented in the SPEA for Army 2020 realignment. Tables FNSI-2 and FNSI-3 provide a summary of impacts that are anticipated to result under the No Action Alternative and those that would result from implementing Alternative 1, respectively.

### **Additional Information**

The Army received a considerable amount of information during the public comment period. Much of the information dealt with socioeconomic effects and indicated that the impacts of Alternative 1 would be worse than described in the SPEA. The Army took this into account in determining whether to reach this FNSI; however, if significant impacts were already determined in the SPEA in one or more of the socioeconomic categories (sales, income, employment, or population), as analyzed by the Economic Impact Forecast System (EIFS) model, the Army did not recalculate economic impacts based on this additional information to see whether the significance thresholds for the remaining categories were exceeded. An increase in the number of “significant” socioeconomic categories would not have affected the SPEA’s original overall significance rating or affect the FNSI. Because it is a NEPA document, the SPEA did not use an additional impact characterization of “extreme” or “severe” significance. Installation sections in the Annex have more detailed discussions.

***Military Health Care System Review***—DoD conducted an internal review of the Military Health System (MHS), referred to as the MHS Modernization Study. The Study was based on assessment of medical performance metrics and the need for appropriate levels of patient workload essential to sustainment of clinical skills and military medical readiness. The

review was not based on, and was independent of, the Army force reduction analysis in the SPEA. No force structure decisions have been made as a result of the Study.

The SPEA included a discussion of installation hospitals (when applicable) and the provision of medical services, both on- and off-post. The SPEA noted that demand for care at the facilities could decline if there were reductions in population under Alternative 1. This could, in turn, lead to an analysis of whether on-post health care facilities continue to be viable. While it is possible that patients may experience some additional inconvenience if health services needed to be accessed off-post, the Army is committed to ensuring that medical care requirements for Soldiers and their Families are met, regardless of whether an installation hospital or clinic were to be downsized.

It is possible some on-post health services jobs could be lost if the Army were to reduce the provision of on-post health services, but such jobs could also move to off-post providers, which would experience an increase in demand. As stated above, the Army is committed to ensuring that the necessary health services are available for their Soldiers and their Families, whether provided on-post or found in the community.

If an installation force structure is reduced, the Army will review the need for medical services and the best way of meeting those needs.

**Errata**—The comments also revealed a consistent mistake in the SPEA. In the last paragraph of each installation cumulative impacts discussion in Chapter 4, the SPEA refers to “the loss of approximately [XXX] Soldiers....” This number, however, represents the approximate number of Soldiers *and* civilian positions that could be lost. This FNSI takes the correct number into account.

**Population Decline**—Commenters also noted that the SPEA assumed for purposes of estimating population decline that all Soldiers, Army civilian employees, and Family members would leave the area if the position to which they are connected were eliminated. At least some of these people would choose to remain in the area, and this means that the population loss could be overestimated. There is no way to estimate the percentage of affected people who would remain in the regions affected, so the SPEA made a conservative assumption that all would leave. There were only three installations for which population was the only socioeconomic factor with a significant rating: Aberdeen Proving Ground, Fort Lee, and Fort Rucker. The overall socioeconomic significance rating for these installations will be kept with the assumptions on population loss taken into account.

## Review of Beneficial Impacts

One commenter raised the question of whether there were any significant, beneficial impacts that would require preparation of an environmental impact statement (EIS). Table FNSI-3 indicates that every installation would have some beneficial impacts under the action alternative. Table 4

of the FNSI for the 2013 PEA, which the SPEA supplements, made a similar finding for Alternative 1. Neither analysis made a determination of whether any of these beneficial impacts would be significant. The Army therefore reviewed the beneficial impacts identified in the SPEA and determined that none of the beneficial impacts would be significant and that their cumulative beneficial impact also would not be significant. In part, this is because operations that cause environmental impacts at installations are expected to continue, even under the maximum numbers identified in Alternative 1. Given this, an EIS is not required on this basis.

### **Impacts Anticipated as a Result of the Implementation of Alternative 1**

Alternative 1 would involve the reduction of active component Soldiers and Army civilians to achieve an active component end-strength of 420,000 Soldiers by reducing those forces at the 30 locations shown in Table FNSI-1. The valued environmental components (VECs) and impacts are:

**Air Quality:** There would be a beneficial impact to regional air quality from reduced stationary and mobile emission sources at all installations considered under this alternative. There would be less combustion and generation of air pollutants for which there are National Ambient Air Quality Standards (e.g., ozone, sulfur byproducts, lead) and hazardous air pollutants associated with military training. Long-term effects from implementation of Alternative 1 would include a decrease in stationary source emissions, such as from boiler units 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) because there would be less traffic on and off installations; however, for installations in, near, or within reasonable commuting distance to more urban areas, many of those vehicles would likely still be traveling within the same airshed. A net reduction in greenhouse gases (GHGs) 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 because there would be less frequent activation of Special Use Airspace (SUA) to support training activities.

**Cultural Resources:** Alternative 1 would result in a reduction of training activities at installations, which would reduce the risk of impacts on cultural resources. Installations would continue to manage cultural resources in accordance with applicable legal requirements. Before any action with the potential to affect an eligible or potentially eligible resource, the State Historic Preservation Officer would be consulted under Section 106 of the National Historic Preservation Act, as required, or under existing agreements.

Under Alternative 1, Fort Wainwright, Joint Base Elmendorf-Richardson, and U.S. Army Garrison (USAG) Hawaii (including both Fort Shafter and Schofield Barracks) identified the potential for significant but mitigable impacts to cultural resources. The effects of this alternative

are similar to those analyzed in the No Action Alternative—the reduction of forces would not alter the existing conditions at these installations, which are analyzed under the No Action Alternative.

**Noise:** There would be a beneficial impact from a reduced frequency of training. Fewer weapons firing and less training and maneuver activity would generally reduce nuisance noise impacts, resulting in beneficial impacts to overall noise levels. Some installations would continue to experience adverse, although reduced, noise impacts from ongoing mission activities, but those would be less than significant.

**Soils:** There would be a beneficial impact from reduced frequency of training. Less firing and maneuver activity would reduce soil disturbances for a beneficial impact.

**Biological Resources:** There could be some beneficial, long-term impacts to biological resources (e.g., vegetation and wildlife) from reduced training activities. In this case, less firing and maneuver activities 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, adverse impacts to wetlands are anticipated because of reduced training activities.

**Water Resources:** Negligible to minor impacts to surface water and groundwater are anticipated at all installations due to reduced sedimentation, disturbance, or spills from training and testing activities. Application of best management practices would ensure that pollutants 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, minor, adverse impacts to facilities are anticipated at all installations. Personnel reductions associated with Alternative 1 would reduce requirements for facilities and affect space utilization across all installations. Depending on the missions associated with the population reductions at a given installation, the facility effects would either create additional excess capacity or shrink existing capacity shortfalls. Occupants of older, underutilized, or excess facilities may be moved to newer facilities; in some cases this could require modification of existing facilities. Construction projects that had been programmed in the future may not occur or could be down-scoped. Force reductions would reduce the Army's demand for utilities and housing units; therefore, the government could incur costs for not meeting any guaranteed minimum quantities required by existing privatization agreements. While excess facility capacity would be created in the aggregate across the Army's installations, as noted in Section 1.3 of the SPEA, reductions that could result in underutilization of training areas and facilities to the point

that these training areas and facilities would become excess is not reasonably foreseeable at this time for purposes of NEPA.

**Socioeconomics:** The level of significance was determined by the EIFS model, which produces thresholds for assessing the significance of impacts based on deviations relative to historical averages. The EIFS model evaluates changes in sales, income, employment, and population. A summary of these potential impacts is provided in Table FNSI-4. If the EIFS model predicted one or more of these indicators as significant, the overall rating for socioeconomics was determined to be significant (Table FNSI-3).

The Army has maintained, updated, and used the EIFS model for the past 20 years. The EIFS model assesses potential impacts to the four most critical elements of the local economy: sales, income, employment, and population. The EIFS model draws information from a tailored database for every county in the U.S., and that database extracts data from the best sources available, including the Economic Censuses (wholesale, retail, services, and manufacturers), Census of Agriculture, the Bureau of Economic Analysis employment and income time series, the Bureau of Economic Analysis labor force time series, and the County Business Patterns.

There could be significant, adverse impacts 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 are anticipated at Aberdeen Proving Ground, Fort Benning, Fort Bliss, Fort Bragg, Fort Carson, Fort Campbell, Fort Drum, Fort Gordon, Fort Hood, Fort Huachuca, Fort Jackson, Fort Knox, Fort Leavenworth, Fort Lee, Fort Leonard Wood, Fort Polk, Fort Riley, Fort Rucker, Fort Sill, Fort Stewart, Fort Wainwright, Joint Base Elmendorf-Richardson, Joint Base Langley-Eustis, Joint Base Lewis-McChord, and USAG Hawaii. Less than significant economic impacts would occur in Regions of Influence (ROIs) with more diversified economies at Fort Belvoir, Fort Irwin, Fort Meade, and Joint Base San Antonio-Fort Sam Houston.

Under Alternative 1, no environmental justice issues are expected because there would not be disproportionately high or adverse human health, safety, or environmental effects on minority or low-income populations or children.

**Energy Demand and Generation:** Beneficial impacts are anticipated at all installations because installation and regional energy demands would decrease.

**Land Use Conflict and Compatibility:** Beneficial impacts could occur as a result of reduced training activities and an associated decrease in the use of land for training. Depending on the installation, this could reduce adverse impacts associated with incompatible uses with areas surrounding the installation, reduce the impacts of installation noise on surrounding land uses, or allow for more use of installation land for recreational activities in lieu of training activities.

**Hazardous Materials and Hazardous Waste:** Negligible to less than significant impacts would result. Remediation activities are not expected to be affected by the reduced numbers of Soldiers and support personnel. It is expected that the potential for spills would be reduced during training and maintenance activities. Waste collection, storage, and disposal processes would remain mostly unchanged, although the quantities are expected to be reduced. Violations of hazardous waste regulations or hazardous waste permits are not anticipated to increase as a result of force reductions.

**Traffic and Transportation:** Beneficial impacts are anticipated because traffic would decrease on and off the installations. Delays at access points would decrease at some installations during morning and evening peak traffic hours. At certain installations such as Fort Belvoir, Fort Bragg, Fort Meade, Joint Base Elmendorf-Richardson, Joint Base Lewis-McChord, and USAG Hawaii, traffic back-ups from main gate access points to federal and state highways may be reduced during peak traffic hours.

**Table FNSI-2. Potential Environmental Impacts of the No Action Alternative**

Installation Name	Valued Environmental Component													
	Air Quality	Airspace	Cultural Resources	Noise	Soils	Biological Resources	Wetlands	Water Resources	Facilities	Socio-economics	Energy Demand and Generation	Land Use Conflicts and Compatibility	Hazardous Materials and Hazardous Waste	Traffic and Transportation
Aberdeen Proving Ground	M	N	M	M	M	M	M	M	N	B	M	M	M	M
Fort Belvoir	M	N	N	N	M	N	N	M	N	B	M	M	M	LS
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	B	N	M	M	SM
Fort Bragg	M	M	N	M	SM	N	M	N	N	B	M	N	N	SM
Fort Campbell	M	N	N	N	M	N	N	M	N	B	N	N	N	N
Fort Carson	LS	N	N	N	LS	N	M	M	M	B	N	N	M	LS
Fort Drum	M	N	M	N	N	M	M	N	N	B	M	N	N	M
Fort Gordon	M	N	N	N	N	N	N	N	LS	B	N	SM	N	N
Fort Hood	M	N	N	N	M	M	N	M	N	B	N	N	N	N
Fort Huachuca	M	N	M	M	M	M	M	M	N	B	M	M	M	N
Fort Irwin	M	N	M	N	M	M	N	LS	M	B	N	M	M	M
Fort Jackson	M	N	N	N	M	M	M	M	N	B	M	M	M	N
Fort Knox	M	N	N	N	M	N	N	M	N	B	N	N	N	N
Fort Leavenworth	M	N	M	N	M	M	N	M	N	B	M	N	M	M
Fort Lee	M	N	M	N	N	N	N	N	N	B	N	N	N	N
Fort Leonard Wood	M	N	N	N	N	N	N	N	N	B	N	N	N	N
Fort Meade	M	N	N	N	N	N	N	N	N	B	M	N	M	M
Fort Polk	N	N	N	N	M	N	N	N	N	B	N	N	N	N
Fort Riley	M	N	N	N	M	N	N	M	N	B	N	N	N	N
Fort Rucker	M	N	N	LS	M	N	M	M	N	B	M	LS	M	LS
Fort Sill	M	N	N	SM	N	N	N	N	N	B	N	N	N	M
Fort Stewart	M	N	N	N	M	N	M	M	N	B	N	N	N	M
Fort Wainwright	M	M	SM	M	M	M	M	M	N	B	N	N	N	M
Joint Base Elmendorf-Richardson	LS	N	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	B	M	N	M	LS
Joint Base Lewis-McChord	LS	S	LS	S	N	LS	N	LS	LS	B	N	M	M	S
Joint Base San Antonio-Fort Sam Houston	M	N	M	N	M	N	M	M	N	B	M	N	M	N
USAG Hawaii—Schofield Barracks and Fort Shafter	N-M	M	M-SM	LS-SM	N-SM	N-SM	M	M	N-M	B	N	N	M	N

Notes: B – beneficial, N – negligible/no impact, M – minor, LS – less than significant, SM – significant but mitigable, S – significant



**Table FNSI-3. Potential Environmental Impacts of Alternative 1—Implement Force Reductions**

Installation Name	Valued Environmental Component													
	Air Quality	Airspace	Cultural Resources	Noise	Soils	Biological Resources	Wetlands	Water Resources	Facilities	Socio-economics	Energy Demand and Generation	Land Use Conflicts and Compatibility	Hazardous Materials and Hazardous Waste	Traffic and Transportation
Aberdeen Proving Ground	B	N	M	M	B	B	B	B	M	S	B	M	M	B
Fort Belvoir	B	B	M	N	B	B	B	B	M	LS	B	N	M	B
Fort Benning	B	N	M	M	B	B	N	M	M	S	B	M	B	B
Fort Bliss	B	M	M	B	B	B	B	B	M	S	B	M	M	B
Fort Bragg	B	M	M	B	B	B	B	B	M	S	B	N	M	B
Fort Campbell	B	N	N	B	B	N	N	B	M	S	B	N	N	B
Fort Carson	B	B	B	B	B	B	B	B	M	S	B	N	B	B
Fort Drum	B	N	M	N	B	M	B	N	M	S	B	N	N	B
Fort Gordon	B	N	N	B	N	N	N	N	M	S	B	B	N	B
Fort Hood	B	B	M	B	B	B	N	B	M	S	B	N	N	B
Fort Huachuca	B	B	M	B	B	B	B	M	M	S	B	M	M	B
Fort Irwin	B	B	B	B	B	B	N	B	M	LS	B	M	M	M
Fort Jackson	B	B	N	B	B	B	B	B	M	S	B	B	M	B
Fort Knox	B	N	M	B	B	N	N	B	M	S	B	N	M	B
Fort Leavenworth	B	N	M	B	B	B	B	B	M	S	B	N	M	B
Fort Lee	B	N	M	B	N	N	N	N	M	S	B	B	M	B
Fort Leonard Wood	B	N	M	N	N	N	N	N	M	S	B	N	M	B
Fort Meade	B	N	N	N	N	N	N	N	M	LS	B	N	M	B
Fort Polk	B	N	N	N	N	N	B	B	M	S	B	N	M	B
Fort Riley	B	N	M	B	N	B	N	B	M	S	B	N	M	B
Fort Rucker	B	N	N	B	B	B	B	B	M	S	B	B	M	B
Fort Sill	B	N	M	B	N	N	N	B	M	S	B	B	LS	B
Fort Stewart	B	N	M	B	N	B	B	B	M	S	B	B	M	B
Fort Wainwright	B	B	SM	B	N	M	M	M	M	S	B	B	N	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	M	S	B	N	M	B
Joint Base Lewis-McChord	B	N	M	B	N	B	N	B	M	S	B	B	LS	B
Joint Base San Antonio-Fort Sam Houston	B	N	M	B	B	B	B	B	M	LS	B	N	M	B
USAG Hawaii—Schofield Barracks and Fort Shafter	B	B	M-SM	B	B	B	M-B	M-B	M	S	B	B	M	B

Notes: B – beneficial, N – negligible/no impact, M – minor, LS – less than significant, SM – significant but mitigable, S – significant

**Table FNSI-4. Potential Socioeconomic Impacts of Alternative 1—Implement Force Reductions**

Installation	Sales	Income	Employment	Population
Aberdeen Proving Ground	LS	LS	LS	S
Fort Belvoir	LS	LS	LS	LS
Fort Benning	LS	LS	LS	S
Fort Bliss	LS	LS	S	S
Fort Bragg	LS	LS	S	S
Fort Campbell	LS	LS	S	S
Fort Carson	LS	LS	S	S
Fort Drum	S	S	S	S
Fort Gordon	LS	LS	LS	S
Fort Hood	LS	LS	S	S
Fort Huachuca	LS	LS	S	S
Fort Irwin	LS	LS	LS	LS
Fort Jackson	LS	LS	LS	S
Fort Knox	LS	S	S	S
Fort Leavenworth	S	S	S	S
Fort Lee	LS	LS	LS	S
Fort Leonard Wood	LS	S	S	S
Fort Meade	LS	LS	LS	LS
Fort Polk	LS	S	S	S
Fort Riley	S	S	S	S
Fort Rucker	LS	LS	LS	S
Fort Sill	S	S	S	S
Fort Stewart	S	S	S	S
Fort Wainwright	LS	LS	S	S
Joint Base Elmendorf-Richardson	LS	LS	S	S
Joint Base Langley-Eustis	LS	LS	S	S
Joint Base Lewis-McChord	LS	LS	LS	S
Joint Base San Antonio-Fort Sam Houston	LS	LS	LS	LS
USAG Hawaii—Schofield Barracks and Fort Shafter	LS	LS	S	S

Notes: LS – less than significant, S – significant

## 6.0 Public Comments

The draft FNSI and SPEA were made available for public review on June 26, 2014, when a Notice of Availability (NOA) was published in the *Federal Register*. Although the Army's NEPA regulations only require a 30-day public comment period, the public comment period for the draft FNSI and SPEA was 60 days. The Army received more than 111,000 public comments. Commenters constituted a broad spectrum of people, businesses, organizations, and institutions. In addition to members of the public, the Army received comments from members of Congress, state and local officials, Tribal governments, regulators, other government officials, special interest groups and non-profit organizations, civic groups, public service organizations, academia, and private businesses. The Army sincerely thanks the many commenters whose detailed submissions provide greater perspective to Army decision makers as they work through the process to make these difficult force structure determinations.

Attached is an Annex that provides a more detailed summary of comments received, to include installation-specific comments and responses. The following paragraphs provide an overview of a number of the comments received during the public review period and the Army's responses.

The majority of the public's comments focused on socioeconomic impacts. Many commenters expressed concern that the Army may have underestimated potential negative socioeconomic impacts for the regions surrounding a number of the installations analyzed for force reductions under Alternative 1. Some commenters provided detailed criticisms of the Army's EIFS model and suggested corrections. Economic impact assessments based on other models that produced different results were submitted for the regions encompassing Fort Drum, Fort Huachuca, Fort Jackson, Fort Polk, Fort Wainwright, and Joint Base Lewis-McChord. The Army appreciates this input and the effort involved to provide additional information.

The SPEA concluded that force reductions would result in significant socioeconomic impacts for all but four installations (Table FNSI-3). The comments indicated that, in many cases, economic impacts could be more adverse than described in the SPEA. In the SPEA, as with all NEPA analyses, "significant" is the highest possible qualitative rating; there are no varying degrees of significance. The Army has concluded that these comments, suggested corrections, and proposed re-calculations of the socioeconomic analysis contained in the SPEA would not change the SPEA's overall conclusion regarding the significance of the potential socioeconomic impact for any of the analyzed installations. They also would not change the conclusion that less than significant economic impacts would occur in ROIs with more diversified economies at Fort Belvoir, Fort Irwin, Fort Meade, and Joint Base San Antonio-Fort Sam Houston. Even though no impact ratings were changed, all of the public comments and additional information will be made part of the administrative record and will be carefully considered prior to making force structure decisions.

Nearly all of the commenters expressed concern about the socioeconomic impact of force reductions on communities surrounding the assessed Army installations. Although commenters were concerned about impacts on many different elements of their local economies, the concerns raised by most commenters related to schools and health care services and facilities. The loss of tax base and federal aid supporting these programs and facilities, staff reductions, the potential for school and hospital closings, and increased emergency medical response times were frequently stated. As noted in Section 5.0 of this FNSI, the Army determined that the regional economies of a number of installations could experience significant, adverse impacts. The Army acknowledges that some school districts may need to re-evaluate staffing plans for schools that could lose Soldier- and Army civilian-related students as part of their student populations. The Army also acknowledges that these impacts have the potential to significantly affect individuals and families who live and/or work in the affected communities.

The issue of potential impacts to the health care of Soldiers, their Families, and other beneficiaries was also expressed as a concern. The Army acknowledges that reductions in medical inpatient capabilities may impact convenience; however, access to quality health care would be available in the local community.

Many commenters expressed concern about investments on installations and in communities surrounding those installations. The DoD and Army made substantial investments on some installations to accommodate Army growth needed as a result of increased overseas combat operations and to implement the Base Realignment and Closure (BRAC) 2005 decisions and other major stationing actions. State, local, and private investments made to support the Army generally included off-post infrastructure improvement, school system expansion, health care service and medical facility improvement, business development, and various other efforts in support of the installation and its Soldiers and Families. Some commenters conveyed concerns about public financing obligations for off-post infrastructure undertaken by local communities to support these increased populations. Commenters expressed concern about impacts that may result if utility infrastructure is underutilized (e.g., wastewater treatment plants), buildings and residences are underutilized or vacant, recently expanded businesses and other organizations lose a substantial portion of their client base, and loan payment and bond payoff capabilities are reduced or lost as a result of lower revenue streams. These commenters pointed out those financial obligations would continue, even though force reductions could mean a reduced tax base and less need for these investments. The Army acknowledges the substantial investments made by many communities in support of their local installations. The Army is now faced with a set of difficult decisions and will carefully consider this community input, along with other factors, prior to making final force structure decisions.

Many commenters highlighted the close relationship between the Army or joint base installations analyzed in the SPEA and the surrounding communities. The Army acknowledges and

appreciates the relationship between installation leadership, staff, and military Families and the surrounding communities.

Many commenters expressed confusion about the Army's force structure decision process and how the SPEA fits into that process. The force structure decision process and its relationship to this analysis are generally described in Section 1.6 of the SPEA. The NEPA analysis, encompassing the SPEA and the public comments on the document, constitutes one of many elements in the force structure decision process. The NEPA analysis focuses on analyzing and disclosing the environmental and socioeconomic impacts associated with the proposed force reductions. As it did in 2013, the Army's force structure decision process will again include community listening sessions at various locations across the country to afford the public an opportunity, outside of this NEPA process, to provide input on force structure decisions. The Army will consider both the environmental and socioeconomic impacts analyzed within the SPEA and the information provided by SPEA commenters, along with input from these listening sessions and a wide variety of other factors, as part of the overall force structure decision process. Army leadership will carefully consider all of these inputs prior to making final force structure decisions.

Many commenters expressed concern about the risk to U.S. security and the Army's ability to conduct its mission, including readiness for contingencies abroad and the quality of Soldier training, after force structure decisions are made and end-strength is reduced. As explained in Section 2.0 of this FNSI, the Proposed Action represents the Army's effort to meet the intent of the 2014 QDR, which is focused on rebalancing the force to protect U.S. interests during a period of increasing fiscal constraint brought on by the Budget Control Act of 2011 and the sequestration process it imposed. The 2014 QDR demands that the Army meet its national security mission with reduced levels of funding and personnel. It also highlights the risk that sequestration-level cuts pose to the DoD's ability to project power and win decisively in future conflicts. It is important to remember that the SPEA looks at the environmental and socioeconomic impacts associated with any potential reductions; consideration of security and readiness impacts will be part of the force structure and mission analysis. The critical factor in making force structure decisions is how the Army can be shaped to meet mission requirements in an era of reduced appropriations.

Many commenters stated that the proposed force reductions were not the result of any reduction in the level of threat to the U.S., but merely the result of required budget cuts under sequestration. They were against any reductions. As explained in Section 1.2 of the SPEA, the Budget Control Act of 2011 instituted both a 10-year, \$487 billion cut in spending and an additional sequestration mechanism requiring additional cuts of about \$50 billion annually. Many other cost reduction measures have been implemented, but budget cuts of this magnitude compel the Army to reduce its force. In addition, force reductions are necessary to rebalance the Joint Force. Threats to the U.S. change continually over time. While there has been a drawdown

of forces required for combat operations in Iraq and Afghanistan, new challenges like the renewed conflict in Iraq and Syria and the Ebola virus situation in West Africa have arisen. Force structure decisions must consider both current and future world conditions.

Any proposed reductions of active component Army forces below 490,000 are based on fiscal realities. Failing to reduce the size of the force under the current and projected budget caps will put the Army out of balance—readiness and modernization would have to be reduced to such an extent that it would result in unacceptable risks to accomplishment of Army missions.

Some commenters raised issues about the NEPA process itself. Concerns cited included the limited number of alternatives analyzed in the SPEA (e.g., not including an alternative reduction to 440,000 to 450,000), the selection of the installations analyzed, the lack of significant environmental impacts, and the decision not to prepare an EIS in spite of potentially significant socioeconomic impacts. The SPEA supplements the previous 2013 PEA and incorporates that existing analysis, while adding additional analysis. The Army did not analyze a reduction alternative of 440,000 to 450,000 Soldiers as a separate alternative because that reduction scenario would have provided little additional environmental and socioeconomic information. The socioeconomic model used by the Army in both the 2013 PEA and the 2014 SPEA is generally linear and scalable for the range of population reductions assessed. Reductions that are less than the reduction analyzed for a given installation will translate into proportionately lower socioeconomic impacts.

Moreover, the reductions will be made on a unit or organizational basis at individual installations. The SPEA analyzes the impacts associated with maximum anticipated reductions at each installation included in the assessment; this analysis will support an unrestricted number of potential decisions, all different permutations of reductions at any of the 30 installations analyzed. The Army now has before it a complete suite of options for which the environmental and socioeconomic consequences have been analyzed for each installation. The SPEA analysis would be the same, regardless of the ultimate endpoint of the Army-wide drawdown.

The 1,000 Soldier/Army civilian threshold for determining which installations were analyzed represents a level of reduction at a majority of installations that warrants analysis at the programmatic level, represents a number that Army planners thought could potentially produce significant impacts, and is a threshold established by Congress in 10 U.S.C. §993 for reporting of planned reductions of members of the Armed Forces at military installations.

Some commenters identified as potentially significant certain second-order impacts that could occur as a result of force reductions (such as underuse of training areas, facilities, or housing). As noted in Section 1.3 of the SPEA, these impacts are too speculative to be analyzed prior to force reduction decisions and therefore are outside of the scope of the SPEA, but could be the subject of future, site-specific, follow-on NEPA analysis, as applicable and appropriate. The Army will continue to implement required environmental compliance obligations and meet

health and safety requirements. The Army will also monitor the impacts of reductions on its environmental programs and will make staffing adjustments as necessary to ensure that these cuts do not adversely affect the Army's compliance with environmental requirements.

Although the SPEA concludes there would be significant socioeconomic impacts resulting from the proposed force reductions for most of the installations analyzed, CEQ regulation 40 CFR 1508.14 states that significant socioeconomic impacts alone do not require the preparation of an EIS. Nevertheless, the SPEA provides the same socioeconomic modeling and level of detailed analysis that the Army would present in an EIS.

The Army received some general comments that the SPEA process was legally insufficient and not prepared in accordance with NEPA regulations. These comments raised issues such as whether the SPEA took a hard look at the impacts; whether the SPEA examined reasonable alternatives to the Proposed Action; whether the SPEA examined the cumulative effects of the Proposed Action; and whether the conclusion is arbitrary and capricious. The Army reviewed these issues, which are addressed more fully in the FNSI Annex. The Army determined that the SPEA was prepared in accordance with applicable NEPA regulations and that it is sufficient to serve as a basis for the FNSI.

Although some comments raised environmental concerns that were highly detailed and installation-specific, the Army received no significant new information relevant to environmental concerns and bearing on the Proposed Action or its impact that would require revision or supplementation of the SPEA. Consequently, the Army concludes, based on the SPEA, that socioeconomic impacts would be significant for all but four of the installations analyzed, as noted in Table FNSI-3, and that environmental impacts for all other VECs would be less than significant as a consequence of Alternative 1—Implement Force Reductions.

## **7.0 Conclusion**

Based on a careful review of the SPEA, which is incorporated by reference, I have concluded that no significant environmental impacts, other than socioeconomic impacts, are anticipated to result from the implementation of the Proposed Action under the alternative analyzed. Therefore, an EIS is not required. Environmental impacts associated with the implementation of the Proposed Action could occur to air quality, airspace, cultural resources, noise, soils, biological resources, wetlands, water resources, facilities, socioeconomics, energy demand, land use, hazardous materials and waste, and traffic and transportation. Beneficial impacts could occur to some resource areas, but these would not be significant. Significant but mitigable impacts could occur under the Proposed Action to cultural resources, but measures to reduce impacts to less than significant are currently in place and would continue under the Proposed Action. After force structure decisions are made, it is possible that additional site-specific NEPA analyses would be conducted, as appropriate, to implement the decisions.



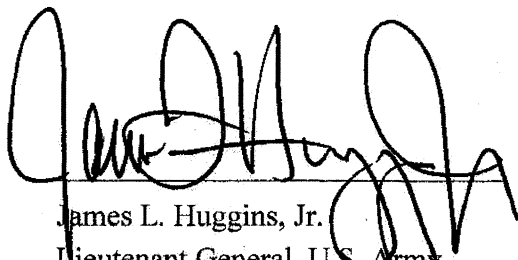
The SPEA has identified that socioeconomic impacts could be significant at many installations. These impacts are of particular concern to the Army. CEQ and Army regulations state that economic or social impacts are not intended by themselves to require preparation of an EIS. Therefore, in accordance with these federal regulations, the Army is not preparing an EIS. Even though an EIS will not be prepared, the SPEA contains a comprehensive analysis of the socioeconomic impacts, which will be carefully considered before final force structure decisions are made.

The Army has not completed the decision process for unit realignment and inactivations. The information in the SPEA will be used to support a series of decisions in the coming years regarding how the force is to be realigned. As discussed above, and in Section 1.6 of the SPEA, those decisions will be made based on mission-related criteria and other factors, in addition to potential environmental and socioeconomic impacts identified in the SPEA and any future environmental analysis needed to support Army realignment decisions.

The Army sincerely appreciates the participation of the public in the SPEA. All of the public's comments will be made a part of the administrative record and will be carefully considered by the Army prior to making final force structure decisions covered under this analysis.

Please see the attached Annex for a more detailed summary of comments received, to include installation-specific comments.

An NOA of this FNSI will be placed in the *Federal Register*. Requests for further information concerning this FNSI and the SPEA should be sent to: U.S. Army Environmental Command, ATTN: Public Affairs Office, 2450 Connell Road (Building 2264), Joint Base San Antonio-Fort Sam Houston, TX 78234-7664 or emailed to [usarmy.jbsa.aec.nepa@mail.mil](mailto:usarmy.jbsa.aec.nepa@mail.mil).



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

10 NOV 2014

Date

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**Annex to the October 2014 Finding of No  
Significant Impact for Army 2020 Force Structure  
Realignment Supplemental Programmatic  
Environmental Assessment**

**Summary of Public Comments and Army  
Responses**

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## Annex to the October 2014 Finding of No Significant Impact for Army 2020 Force Structure Realignment Supplemental Programmatic Environmental Assessment

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### Summary of Public Comments and Army Responses

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#### Introduction

The Army recognizes the potential impacts from force structure decisions to the regions surrounding installations, especially to their economies, and greatly appreciates the time and effort so many took in participating in the NEPA process by providing input to the draft FNSI and underlying SPEA.

Below are summaries of concerns received by the Army during the public review and comment period of June 26 through August 25, 2014. These summaries include comments from members of Congress; state and local elected officials; federal, tribal, and state agencies; local business owners; regulators; other government officials; and special interest organizations, as well as the general public. Not all comments were specifically pertinent to the SPEA analysis; however, all were taken into consideration prior to the FNSI being signed. All comments will be made part of the administrative record for this action. Additionally, all comments received from this NEPA process will be made available to Army decision makers who must review many factors, in addition to environmental and socioeconomic impacts, before making force structure decisions. Although some commenters provided additional information in their comments, there were no substantial new circumstances or information that would require revision or supplementation of the analysis. The SPEA is first and foremost a document intended to comply with the requirements of NEPA and its implementing regulations; accordingly, the Army primarily focused on environmental and socioeconomic considerations during the SPEA process.

The comment summaries in this Annex are listed by installation in the order presented in Chapter 4 of the SPEA. 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 only or required no response. Additionally, with more than 111,000 comments received, similar comments for each installation were grouped together and provided with a single 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.

The Army sincerely thanks the tens of thousands of commenters whose detailed submissions documented concerns and provided additional information about the potential impacts of the proposed reductions. All of the comments will provide greater perspective to Army decision makers as they begin the process of making difficult force structure determinations.



## Universal Issues and Concerns

The Army received many comments that raised issues and concerns applicable to many or all of the analyzed installations. Some were issues raised by many commenters. A few were issues raised only by one or a handful of commenters, but they questioned fundamental assumptions, methodologies, or facts presented in the SPEA. For reader convenience, summaries of these issues are provided below rather than within individual installation sections. The Army acknowledges and appreciates these comments, and responds to them generally as follows:

### 1. Force Structure Decision Process

Many commenters expressed concern about the Army's force structure decision process, and how the SPEA fits into that process.

**R:** The force structure decision process and its relationship to this analysis are generally described in Section 1.6.1 of the SPEA. Although critically important, the NEPA analysis, encompassing the SPEA and the public comments on the document, constitutes one of many elements in the force structure decision process. The process is complex and will encompass a broad range of considerations, some quantitative and others qualitative. The Army will carefully weigh various "attributes" for each installation as part of this process. For all installations, the Army will consider both the environmental and socioeconomic impacts associated with the proposed force reductions as analyzed and disclosed within the SPEA along with a wide variety of other factors, such as strategic considerations, cost and efficiencies, readiness impact, mission command, statutory requirements, feasibility, and community input. The Army updated the MVA model to incorporate recommendations made by the Government Accountability Office in its December 2013 report<sup>2</sup> and will use the model to analyze four categories of attributes: training, power projection, well-being, and expansibility at installations that currently host one or more BCTs, as it did in 2013. "Training" includes attributes such as available maneuver land, range sustainability, training facilities, airspace, and indirect fire areas. "Power projection" includes surface deployment infrastructure, air deployment infrastructure, deployment support infrastructure, and geographic distribution. "Well-being" includes access to medical care, quality of life facilities, Family housing, and brigade complexes. "Expansibility" includes developable area within the current installation boundaries, population impacts (from encroachment or incompatible development), and connectivity (information technology capacity and infrastructure).

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<sup>2</sup> U.S. Government Accountability Office. 2013. Army Brigade Combat Teams Inactivations Informed by Analysis, but Actions Needed to Improve Stationing Process. Publication No. GAO-14-76. December 2013.

As it did in 2013, the Army's force structure decision process will include community listening sessions at various locations across the country to afford the public an opportunity to provide input on force structure decisions. All input from these listening sessions also will be considered carefully by Army leadership prior to final force structure decisions.

## 2. Additional Alternatives

A few commenters criticized the limited number of alternatives in the SPEA and wondered why the Army did not analyze additional action alternatives, particularly one that would have considered the reduction of troops to between 440,000 and 450,000. Commenters noted that this range was discussed in the 2014 QDR as an alternative preferable to the lower 420,000 that could be required if sequestration-level cuts resume in FY 2016.

**R:** Alternative 1, which is assessed in the 2014 SPEA, is for a reduction down to 420,000 Soldiers. That analysis encompasses impacts at higher end-strengths (e.g., 440,000 to 450,000 Soldiers). The studied reductions for all 30 locations, if added together, would reduce the Army's active force to well below 400,000. Such deep reductions are not envisioned, but analyzing the maximum potential reductions at each of the 30 locations will provide Army leaders flexibility in making future decisions about how and where to make cuts to reach the necessary end-strength as dictated by fiscal, policy, and strategic conditions. Moreover, the reductions will be made on a unit-by-unit basis at individual installations. The SPEA analyzes the impacts associated with maximum anticipated reductions at each installation included in the assessment. This analysis will support an unrestricted number of potential decisions, all different permutations of reductions at any of the 30 installations analyzed. The Army now has an environmental and socioeconomic analysis for each installation to present to decision makers. The NEPA analysis would be the same, regardless of the ultimate endpoint of the Army-wide drawdown. The socioeconomic model used by the Army in both the 2013 PEA and the 2014 SPEA is generally linear and scalable for the range of population reductions assessed. Reductions that are less than the lower bound scenario will translate into proportionately lower socioeconomic impacts. Adding another "action alternative" would have provided little additional environmental and socioeconomic information. The SPEA analysis supplements the 2013 PEA, in which two action alternatives were analyzed. Actions resulting from the selected alternative continue to be implemented, including the Army's continuing efforts to reduce the end-strength down to 490,000.

### **3. Installations Analyzed**

Some commenters questioned the Army's focus on the 30 installations analyzed in the SPEA and asked why more installations (or, in some cases, why not fewer) were analyzed.

**R:** As noted in Section 1.2 of the SPEA, installations analyzed were those where a cut of 1,000 or more Soldiers and Army civilian employees combined may occur. As explained in detail in Section 1.4 of the 2013 PEA and as discussed in Section 1.2 of the SPEA, the 1,000 Soldier/Army civilian threshold was chosen for several reasons: it represents a level of reduction at a majority of installations that warrants analysis at the programmatic level, represents a number that Army planners thought could produce significant impacts, and is a threshold established by Congress in 10 U.S.C. §993 for reporting of planned reductions of members of the Armed Forces at military installations. As noted in Section 3.4 of the SPEA, most Army depots, arsenals, ammunition plants, and test and evaluation installations were excluded from the analysis because they did not reach the threshold for inclusion. Although the SPEA only assessed 30 installations, all installations should expect to be affected by reductions.

### **4. Army/Community Relationship**

Many commenters highlighted the close relationship between the Army or joint base installation analyzed in the SPEA and the surrounding communities.

**R:** The Army acknowledges and appreciates the close relationship between installation leadership, staff, and military Families, and the surrounding communities. The Army is very concerned about the potential impact of force reductions on these critical relationships.

### **5. BRAC**

Many commenters raised the issue of whether the Proposed Action analyzed in the SPEA was related to a potential future BRAC process.

**R:** As explained in Section 1.3 of the SPEA, the Army has not been granted authority by Congress to pursue a new round of BRAC. The proposed force reductions analyzed in the SPEA are in response to future budget restrictions resulting from the Budget Control Act of 2011 and related legislation (also known as "sequestration"). This analysis is not in support of any proposed BRAC action.

### **6. Capacity for Growth**

Many commenters expressed their opinion that the installation in their community had existing, substantial capacity for growth, both in terms of increased numbers of Soldiers and expansion of

mission, and asked the Army to consider growth capacity before making any force structure decisions.

**R:** The Army will carefully consider installation capacity for growth prior to making final force structure decisions. As noted in Section 1.6 of the SPEA and described in more detail in the response to universal comment 1, above, force structure decisions will be made based on a variety of attributes, including installations' capacity for growth. For example, for installations with BCTs, the Army will consider, during the force structure decision process, "expansibility," which includes an installation's development potential, that is, a measure of the space available to build additional facilities on an installation if needed to support the mission. For all installations, the Army will consider factors such as strategic considerations and readiness impacts.

## **7. Community Investment**

Many commenters highlighted the substantial investment their communities have made in support of their local installation. These investments included infrastructure improvements, school system expansion, medical facility improvements, business development, and various other efforts in support of the installation and its Soldiers.

**R:** The Army acknowledges the substantial investments made by communities in support of their local installation and will carefully consider these comments prior to making final force structure decisions. The Army also recognizes that the community return on investment could be diminished if the Soldier population were to be reduced.

## **8. Loss of Trust**

Many commenters expressed their belief that the proposed reductions would cause the public to lose trust in the Army. For some commenters, this potential loss of trust results from the substantial investments made by surrounding communities in anticipation of expected growth of installations and/or to support and sustain the existing military population, which is now threatened by force reductions.

**R:** The public's trust is of vital importance to the Army. Nevertheless, the Army is required to operate within the budget constraints imposed by elected representatives. Army decision makers will consider these comments prior to making final force structure decisions.

## **9. Environmental Impact**

Many commenters stated that force reductions would result in unused facilities both on and off the installations, unused residential housing, and/or closed businesses, thereby creating potential environmental impacts (possibly resulting from, for example, future demolition of these now-unnecessary facilities and residences). One such comment pointed to the reductions leading to a decreased tax base, thereby adversely impacting state and local environmental programs.

**R:** The Army acknowledges the potential effects of force reduction decisions on facilities and the environment. As noted in Section 1.3 of the SPEA, these impacts are too speculative to be analyzed prior to force reduction decisions and are outside of the scope of the SPEA but could be the subject of future, site-specific, follow-on NEPA analysis, as applicable and appropriate.

## **10. Military Investment**

Many commenters listed the substantial investments made by the DoD and the Army in their local installation, such as investment in new facilities, roads, and other infrastructure improvements, and modernized ranges and training areas. These commenters often raised the point that the proposed reductions would lead to this investment being wasted.

**R:** The Army will carefully consider these comments prior to making final force structure decisions. Much of this facility investment was required to accommodate Army growth needed to train Soldiers for combat operations and to implement the BRAC 2005 recommendations and associated re-stationing actions as well as other major stationing actions. The Army is now faced with difficult decisions, and facility investment is part of those deliberations. Consideration of military investment is built into the Army's force structure decision process. For example, the Army will consider facilities investments under the "Well-being" and "Training" categories of attributes described in the response to universal comment 1, which includes consideration of an installation's access to medical care; quality of life facilities (such as fitness centers and child development centers); the quality, quantity and functional assessment of operations and training facilities, maintenance facilities, and barracks; the quality and quantity of on-post military Family housing; and an assessment of ranges, training lands, and training support centers based on an installation's mission.

## **11. Mission/Readiness/Training**

Many commenters expressed concern over the impact of the proposed reductions on the Army's ability to conduct its mission, including readiness for contingencies abroad and the quality of Soldier training and that the sheer magnitude of the proposed reductions poses a risk to the security of the U.S.

**R:** As explained in Section 1.1 of the SPEA, the Proposed Action represents the Army's effort to meet the intent of the 2014 QDR, which is focused on rebalancing the force to protect U.S. interests during a period of increasing fiscal constraint brought on by the Budget Control Act of 2011. As noted in Section 1.2 of the SPEA, the 2014 QDR demands that the Army meet its national security mission with reduced levels of funding and personnel. The site-specific reductions listed in the SPEA are estimates used for the Proposed Action required to meet the intent of the 2014 QDR. The QDR states that budget reductions inevitably reduce the military's margin of error in dealing with risks, and a smaller force

strains the ability of the U.S. to simultaneously respond to more than one major contingency at a time. The DoD can manage these risks under the President's FY 2015 Budget Plan, but the risks would substantially increase if sequester-level cuts return in FY 2016, if proposed reforms are not accepted, or if uncertainty over budget levels continues.

## **12. Budget Control Act of 2011 and Sequestration**

Many commenters stated that the proposed force reductions were not the result of any reduction in the level of threat to the U.S., but merely the result of required budget cuts under sequestration. These commenters were generally against the proposed reductions for this reason.

**R:** As explained in Section 1.2 of the SPEA, the Budget Control Act of 2011 instituted both a 10-year, \$487-billion cut in spending and an additional "sequestration" mechanism requiring additional cuts of about \$50 billion annually. Many cost reduction measures have been implemented, but budget cuts of this magnitude do require the Army to reduce its force. In addition, force reductions are necessary to rebalance the Joint Force. Although threats to the U.S. continually arise and change over time, the operations tempo has been reduced by the drawdown of forces that were required for combat operations in Iraq and Afghanistan.

## **13. Socioeconomic Impacts**

The vast majority of commenters expressed concern about the economic impacts of the proposed force reductions on their communities. Most commenters addressed the potential for devastating impacts to the local population and resulting economic impacts. Some of these comments specifically mentioned the potential impacts to local and/or small businesses, which could be severely impacted or even closed due to sizable force reductions. Others pointed to the potential loss of housing value in the local market caused by vacancies resulting from force reductions. A few expressed concern about other potential socioeconomic impacts, such as a reduced tax base and its impact on local populations, reduction in tourism/recreational travel, reduction in business travel, and the potential for increased crime.

**R:** The Army recognizes the potentially devastating impact that substantial personnel reductions would have on many communities surrounding U.S. installations. The EIFS model takes into consideration potential impacts to population, employment, income, and sales volume. Many of the additional potential impacts cited by commenters are too speculative to be analyzed prior to force reduction decisions and are outside of the scope of the SPEA but could be the subject of future, site-specific, follow-on NEPA analysis, as applicable and appropriate.

### **(a) Significance**

Many commenters questioned the justification for an EA and asked why an EIS was not being prepared, given that the SPEA concludes there would be significant socioeconomic impacts resulting from the proposed force reductions for most of the installations analyzed.

**R:** As explained in Section 1.5 of the SPEA, CEQ regulation 40 CFR 1508.14 states that significant socioeconomic impacts alone do not require the preparation of an EIS. The SPEA provides the same socioeconomic modeling and level of detailed analysis that the Army would present in an EIS. The Army's EIFS model, described in detail in Section 4.0.4 of the 2013 PEA and in Section 4.0.2 of the 2014 SPEA, projects an estimated total change in population, employment, income, and sales volume and generates a quantitative conclusion regarding the significance of a proposed action in each of these four impact areas, as illustrated in Table 4.30-4 of the SPEA. If the EIFS model indicated that any *one* of the four impact areas (sales, income, employment, and population) would be significantly impacted by the analyzed reduction number for that installation, the Army concluded that the overall impact rating was significant and reflected that overall significant rating in Table 4.30-2 of the SPEA.

### **(b) Alternative Economic Models and Analyses**

Several communities and organizations submitted extensive comments on economic impact, to include economic models and analyses that were different from the Army's EIFS model used in the SPEA. In many cases, these models/analyses indicated that economic impacts could be worse than those indicated in the SPEA's analysis.

**R:** The Army appreciates the tremendous efforts of these commenters and will consider this additional information carefully. The Army acknowledges that there are other economic impact models, such as IMPLAN, that have different assumptions than the EIFS model. The Army has maintained, updated, and used the EIFS model for the past 20 years and has relied on its results to help guide Army decisions; it is considered a reasonable model. In all but four instances where an alternate model concluded the economic impacts could be worse than the EIFS model's conclusions, the overall socioeconomic rating for the installation was already significant. As explained in Section 4.0 of the SPEA, overall significant socioeconomic impacts would be indicated if such impact was found in any of four categories: sales, income, employment, or population. As significant impacts were already determined in one or more of these four categories, the Army did not recalculate economic impacts based on additional information provided by commenters to see whether the significance thresholds for the remaining categories were exceeded. This information would not change the overall significance rating and would not affect the overall findings in the FNSI.



### **(c) Region of Influence**

Some commenters disagree with the ROI selected by the Army for their local installation, stating either that to fully capture potential impacts the ROI should have been expanded to include a greater geographic area or contracted to focus on a smaller one.

**R:** Selection of the ROI requires judgment and careful consideration. Selection of too large an ROI can artificially dilute socioeconomic impacts, whereas selection of too small an ROI can cause the analysis to miss serious impacts to a neighboring county outside of the ROI. The Army selected an ROI for each installation most likely to be impacted, based on available population data, input from installation staff, and experience gained from the 2013 PEA socioeconomic analysis.

### **(d) Schools**

Many commenters highlighted the potentially serious impacts to local schools that would be caused by force reductions, due to the loss of students associated with the military, and the resulting reduction in federal impact aid and teachers and staff. Some commenters conveyed concerns about public financing obligations undertaken by local communities to support their previously growing installation populations. These comments noted the substantial, binding financial obligations undertaken by the community to fund new school facilities, staff, and equipment to support the previous/anticipated growth of Army and joint base installations. These commenters pointed out that these financial obligations would persist in spite of the fact that force reductions could lead to both a reduced tax base, and a reduced need for these investments.

**R:** The Army acknowledges the potential for serious impacts to schools on and near installations, as well as the financial burdens undertaken by some local communities to support military Families. These concerns will be considered by the Army as part of the force structure decision process.

### **(e) Public Services**

Many commenters highlighted the potentially serious impacts on public services such as police, fire, and health/medical services as a result of force reductions, to include the reduction of tax revenues used to support and maintain public services and facilities. In particular, most commenters seemed concerned with the potential impacts on health care services and medical facilities that would be caused by force reductions, the potential for hospital closings, and increased emergency medical response times.

**R:** The Army acknowledges the potential for serious impacts on public services, particularly health care services and medical facilities. These concerns will be considered by the Army as part of the force structure decision process.

**(f) Military Health System**

Many commenters expressed concern over the impacts of force reductions on military health care, particularly the potential downsizing or closure of military medical facilities, and the resulting impact on the availability, quality, and convenience of care for Soldiers, eligible former service members, and their Families.

**R:** DoD conducted an internal review of the MHS, referred to as the MHS Modernization Study. The Study was based on assessment of medical performance metrics and the need for appropriate levels of patient workload essential to sustainment of clinical skills and military medical readiness. The review was not based on, and was independent of, the Army force reduction analysis in the SPEA. No decisions have been made as a result of the Study.

The SPEA included a discussion of installation hospitals (when applicable) and the provision of medical services, both on- and off-post. The SPEA noted that demand for care at the facilities could decline if there were reductions in population under Alternative 1. This could, in turn, lead to an analysis of whether on-post health care facilities continue to be viable. While it is possible that patients may experience some additional inconvenience if health services needed to be accessed off-post, the Army is committed to ensuring that medical care requirements for Soldiers and their Families are met, regardless of whether an installation hospital or clinic were to be downsized.

If an installation force structure is reduced, the Army will review the need for medical services and the best way of meeting those needs.

**(g) Cumulative Nationwide Impact**

Several commenters asked why the Army analyzed potential impacts on each installation's ROI individually and whether the Army failed to consider the cumulative, nationwide impact that the proposed force reductions could have on the U.S. as a whole. Commenters also questioned why the SPEA's cumulative effects analysis did not include any actions by other federal and non-federal entities within the ROI for all 30 installations.

**R:** While the Army acknowledges that there would be some cumulative economic impact to the country as a whole, the Army does not anticipate significant cumulative effects nationwide, for the reasons explained in Section 4.32.1.2 of the SPEA. Analysis of a nationwide "ROI" would serve only to dilute the impacts. For this reason, the SPEA focuses on the regions surrounding installations with the potential to lose 1,000 or more Soldiers and Army civilian employees. The Army did attempt to include actions by other federal agencies and non-federal entities in the SPEA's cumulative effects analysis, to the extent that information was available at the time of the SPEA analysis.

#### **14. Strategic Benefit**

Many commenters emphasized the strategic benefits of their local installation, often highlighting the power projection capability (how quickly forces can deploy) and the relative importance of its mission when compared with national strategic priorities.

**R:** The Army will carefully consider the strategic benefits of each installation prior to making final force structure decisions. As noted in Section 1.6 of the SPEA and described in more detail in the response to universal comment 1 above, force structure decisions will be made based on a variety of attributes, including the installations' strategic benefit, power projection capabilities, and other similar factors.

#### **15. Veteran Impacts**

Many commenters expressed concern about the potential impacts of the proposed reductions on veterans and their benefits, particularly reduced access to health care and other services. Some of these commenters stated that the reason they lived near an installation was access to services, which would be reduced if personnel were reduced, or cut entirely if the installation were to be closed.

**R:** As explained in the Army's response to universal comment 5, closure of installations is not part of the Proposed Action; the Army has not been granted authority by Congress to pursue a new round of BRAC.

Furthermore, the Army takes its commitment to eligible former service members very seriously, as exemplified by the Army's "Soldier for Life" program. The Army remains committed to supporting lifelong success for our Soldiers by providing them and their Families with opportunities for employment, education, and health care after military service. Consistent with this promise, the Army will carefully consider these comments as part of the force structure decision process.

#### **16. Overseas Cuts**

Some commenters questioned why the Army is not considering cuts to forces overseas or cuts that do not affect manpower.

**R:** As discussed in the SPEA, substantial reductions have already been implemented at overseas installations. Additional cuts are being considered. The Army has also implemented many other cost reduction measures, but because manpower is the largest component of the Army's budget, further force reductions are required to meet the requirements of the Budget Control Act of 2011 and, therefore, reductions of Soldiers at U.S. installations must be considered.

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## Aberdeen Proving Ground, Maryland

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### Environmental Impacts

Multiple commenters stated that the assumptions made in the SPEA to justify not preparing an EIS are invalid because they do not consider the availability of workforce and capabilities after the reductions to ensure no negative impacts to the VECs. The commenters further stated that, because the SPEA does not assess the missions regarding the specific personnel to be reduced, it seems shortsighted to assume that resources would continue to be available to maintain the level of positive environmental stewardship and the positive environmental impacts anticipated in the SPEA under Alternative 1.

**R:** The Army has found that an EA is sufficient under CEQ and Army NEPA regulations. The SPEA takes a hard look at the affected environment and potential impacts to the VECs. Similar concerns were raised by commenters from a number of installations, and they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 1 regarding Force Structure Decision Process and universal comment 11 regarding Mission/Readiness/Training and the Army's response for each.

Multiple commenters noted that there would be a cumulative, adverse impact to the region due to proposed reductions at both Aberdeen Proving Ground and Fort Meade. Although both actions are evaluated in the SPEA, the cumulative effects on the affected communities and the state of Maryland should be analyzed if the proposed workforce reductions for both Aberdeen Proving Ground and Fort Meade were implemented. The commenters pointed out that these installations are only 50 miles apart and have some workforce, residential, and economic communities in common and that any impact to either installation will have, at minimum, a socioeconomic impact on the other installation. The commenters stated that the interactions between the regions surrounding these two installations also have not been assessed. The commenters stated that the cumulative socioeconomic impact on the regional economy and housing could be significant, rather than minor, with a higher number in the population being unemployed and potentially in danger of the loss of their residence through eviction or foreclosure.

**R:** The Army acknowledges the potential cumulative impact to socioeconomic resources if reductions were to occur at both installations and stated so in Section 4.32.1.2 of the SPEA.

Multiple commenters stated that the air quality discussion in the SPEA regarding PM<sub>10</sub> emissions at certain vehicle testing tracks could be inconsistent with the fact that Aberdeen Proving Ground added the ATEF, the only Army test track permitting vehicle testing at high speeds over extended periods during the period being assessed. The commenters stated that the ATEF was originally opened in 2010 with its capabilities expanded over the subsequent 2 years and, despite the increased use of vehicle testing tracks at Aberdeen Proving Ground, PM<sub>10</sub> emissions went from 4.19 in 2009 to 1.91 in 2013.

**R:** As noted in Section 4.1.3.1 of the SPEA, the Army acknowledges that PM<sub>10</sub> emissions at certain vehicle testing tracks are typically considered to be a problem; however, overall, the PM<sub>10</sub> emissions at Aberdeen Proving Ground actually have been reduced, as is shown in Table 4.1-2 of the SPEA.

Commenters stated that force reductions would likely result in increased traffic congestion on existing roads or create congestion in new locations not previously observed because the reductions would result in the workforce from Aberdeen Proving Ground seeking employment in the surrounding regions.

**R:** As noted in the SPEA, beneficial impacts would be greatest at intersections and roadways closest to Aberdeen Proving Ground because fewer people would be traveling to the installation. While people from Aberdeen Proving Ground may seek employment in surrounding regions, it is speculative to conclude increased congestion or new congestion on existing roads would occur as people would seek employment in multiple locations. The roads used and the LOS of those roads is unknown, and they could very well handle any increases in traffic.

### **Socioeconomic Impacts**

One commenter disagrees with preparation of a FNSI, stating that economic impacts will affect the environment because the health of the environment relies on revenue and taxes to provide for local and state government programs. The commenter also believes that a drop in the housing market would increase the number of abandoned structures, which would result in an adverse impact to public health.

**R:** Potential environmental impacts would result from the economic effects of force structure decisions; however, the magnitude of any such impacts is too speculative to be analyzed at this time. Preparing a FNSI was the appropriate decision because the EA did not find any significant environmental impacts and, therefore, CEQ regulations do not require the Army to prepare an EIS. The Army has determined that the EA process, with an extended comment period and the same socioeconomic analysis that would be included in an EIS,

provided the decision maker with sufficient information to reach a FNSI. Regarding abandoned structures, since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 9 regarding Environmental Impacts and the Army's response.

Multiple commenters expressed concern regarding the negative economic impacts that could occur in the community surrounding Aberdeen Proving Ground.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

Multiple commenters noted that the Aberdeen Proving Ground workforce lives and has an economic impact beyond the Maryland counties noted in the SPEA, including the city of Baltimore and the states of Delaware, Pennsylvania, and New Jersey. Because of this, the commenters stated that these jurisdictions should also be analyzed for socioeconomic impacts, though to a lesser extent than for the Maryland counties noted in the SPEA.

**R:** Based on data provided by the installation, small percentages of the total Aberdeen Proving Ground workforce reside in the city of Baltimore and the states of Delaware, Pennsylvania, and New Jersey. Also, since similar ROI concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(c) regarding ROI and the Army's response.

Commenters stated that the SPEA vastly understates the impacts on the housing market, which is still recovering from the impact of actions taken in support of BRAC 2005, with numerous communities under construction. Commenters noted that there are school children of Aberdeen Proving Ground employees beyond the identified schools in Harford County; they are in schools in other jurisdictions including Cecil and Baltimore counties, as well as Delaware. These other school systems that would likely be impacted were not listed in the SPEA.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and universal comment 13(d) regarding Schools and the Army's response for each.

Multiple commenters expressed concern with the assumption in the SPEA that the reduced Soldiers and civilians from Aberdeen Proving Ground would be readily absorbed within the regional area. They stated that the scenario is highly unrealistic because much of the Aberdeen

Proving Ground workforce has highly specialized expertise and qualifications that would not be readily translated to the commercial workforce. The commenters pointed out that given continued challenges to the federal budget and the national job market in the present economy, such a reemployment assumption should be supported in the SPEA and a comparison of the workforce composition against likely employment availability should be made.

**R:** The ability of Soldiers and civilians to find alternative employment within or outside of the specified ROI is beyond the scope of the SPEA. There are too many additional, individual factors, such as education, age, and family situation, that make such an estimate pure speculation.

### **Mission/Readiness/Training**

Multiple commenters expressed concern that the elimination of 20th CBRNE Command, the Army's only command that combats chemical, biological, radiological, nuclear and explosive threats and the uniquely trained Soldiers assigned to the U.S. Army Public Health Command would eliminate years' worth of training and experience that could not be readily replicated. The commenters expressed concern that the proposed cuts would leave Aberdeen Proving Ground with effectively zero military troop strength and stated that it is difficult to understand how certain personnel reductions could be made at Aberdeen Proving Ground, particularly in regard to Soldiers, that would not result in these activities simply moving instead of being eliminated entirely. The commenters stated that in order to achieve the proposed Soldier reductions, there would be complete loss of the 20th CBRNE Command, the only FORSCOM unit at Aberdeen Proving Ground. The commenters pointed that while the RDTE mission is largely executed by civilian scientists and engineers, it is the military leadership and mix within the workforce that provides operational context to the RDTE performed uniquely at Aberdeen Proving Ground and that effective Army acquisition takes a balanced military and civilian workforce approach.

**R:** As noted in Section 1.3 of the SPEA, the 2013 PEA focused on installations with operational forces. Because the 2014 QDR calls for additional cuts, the Army must consider more than operational forces for reductions; therefore, more installations, including Aberdeen Proving Ground, now fit into the 1,000-person threshold than did for the reduction alternative in the 2013 PEA. Additionally, Section 1.3 of the SPEA notes that the future force structure decision process is where the Army will identify specific units and organizations to be affected by reductions. Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 1 regarding the Force Structure Decision Process and universal comment 3 regarding Installations Analyzed and the Army's response for each.

Multiple commenters stated that contractor personnel may be procured to fill in required staffing shortages if missions are not reduced in line with assessed Aberdeen Proving Ground workforce

reductions. Commenters noted that, due to some of the critical missions that Aberdeen Proving Ground conducts in support of C4ISR and CBRNE requirements worldwide, it is conceivable that missions may continue to be funded despite the anticipated workforce reductions and thus, the potential positive environmental impacts due to an overall reduction of personnel and activities at Aberdeen Proving Ground might not come to pass. One commenter suggested that Army civilian and contractor reductions should occur at Aberdeen Proving Ground to complement the Army military reductions so that the reduction does not only affect the service members.

**R:** Since similar concerns were raised by commenters from a number of installations they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 11 regarding Mission/Readiness/Training and the Army's response.

### **National Security**

Two commenters stated that Aberdeen Proving Ground has unique capabilities in R&D that spread far beyond the immediate region, noting that the work is critical to the safety and security of the Nation.

### **BRAC**

Two commenters expressed frustration that the same personnel who were reduced or relocated under the 2005 BRAC action would be included in additional force reductions. One commenter stated that Aberdeen Proving Ground provides major support to the warfighter and future combat operations and recommended that the government "start at the top" for reductions (meaning that the Army should reduce number of higher ranking personnel first), not with the people who are supporting the effort.

### **Other Comments**

One commenter questioned why the Army did not pursue an additional alternative of reducing forces at overseas installations.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 16 regarding Overseas Cuts and the Army's response.

Many commenters were concerned that Aberdeen Proving Ground was included in the SPEA as an exception to the Army's guidance and that the Army did not explain the rationale regarding the selection.

**R:** Aberdeen Proving Ground was not included in the evaluation as an exception to the Army's guidance. Aberdeen Proving Ground was included as one of the installations for potential reductions according to the criteria identified in Section 1.2 and Section 3.4 of the



SPEA, the same process that was used to identify the other installations evaluated in the document.

A substantial number of commenters were concerned that the formula used to determine the potential reduction at Aberdeen Proving Ground was inappropriate due to the low Soldier to Army ratio.

**R:** The formula was used strictly to determine the limit of reductions that could occur at Aberdeen Proving Ground and does not represent the actual ratio of Soldiers to Army civilians that would be lost. The Army recognizes the workforce population dynamic at Aberdeen Proving Ground and will take this into consideration prior to making final force reduction decisions.

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## Fort Belvoir, Virginia

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### Environmental Impact

One commenter generally supported the reduction in personnel at Fort Belvoir and its associated environmental benefits but asked whether any consideration has been given to the use of temporary structures/roadways for future development until the 2020 reduction in staff has occurred so as to reduce the long-term effect of additional impervious surfaces in the environment.

**R:** Because of the programmatic nature of the SPEA, consideration of project-specific possibilities, such as using temporary structures for future development, are outside the scope of this analysis.

### Socioeconomic Impacts

In reviewing the SPEA, one commenter wanted to know how many of the approximately 4,200 military employees would be eligible for and would be estimated to take early retirement as a result of the force reductions because this could impact the economic effects of the force reduction on the ROI.

**R:** The Army appreciates the commenter's concerns; however, decisions on what units and individuals will be a part of the force reductions have not yet been made and are beyond the scope of the SPEA. There are too many additional, individual factors (such as age, education, and family situation) that make such an estimate pure speculation.

### **Cumulative Reductions from Other Services**

One commenter expressed concerns about the potentially greater or compounded effects by similar force reductions in other military branches. The commenter indicated the ripple effects of additional force reductions would be felt strongly by military contractors that employ area residents and by businesses within the area who serve as support for the personnel and their dependents.

**R:** The Army acknowledges the concern about cumulative impacts. Cumulative impacts arising from force reductions at multiple installations in proximity to Washington, D.C., are addressed in Section 4.32.1.2 of the SPEA. As discussed in Section 1.3, information pertaining to the personnel reductions of other military services was not available for inclusion in the cumulative effects analysis in the SPEA. Additionally, Section 1.3 of the SPEA also indicates that changes to the number of Army contractors and contract support as a result of force reductions are unknown and therefore not able to be analyzed quantitatively. Section 4.2.12 of the SPEA has an extensive economic analysis and addresses contract service jobs and induced employment loss for the Fort Belvoir ROI.

### **Community Investment**

Two commenters noted that state and local resources were invested in improvements for the benefit of Soldiers, their Families, and the military and civilian workforce. These included road improvements, school construction, public transportation initiatives, and utility upgrades. The commenters noted that this year Virginia's FACT Fund, a grant program available to prevent or mitigate encroachment issues around military facilities, made \$4.3 million available for these efforts.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Mission/Readiness/Training**

Two commenters questioned how potential cuts to forces at Virginia installations, including Fort Belvoir, and the impacts analyzed for those cuts could be done without taking into consideration the training loads and student population at the installations, as well as the Army's mission. The commenters stated that addressing the proposed personnel cuts without considering the ultimate training and pipeline needs of the service limits the usefulness of the analysis. They noted that two major Army commands are headquartered on Fort Belvoir and that the installation is home

to numerous other Army organizations and agencies. With respect to all three installations in Virginia, the commenters stated that it is important to consider these pipelines of Army doctrine, resources, and personnel when considering how to implement what will be one of the most difficult current military drawdowns of our time.

**R:** As noted in Section 1.3, changes to the number of Army trainees, transients, holdees, and students as a result of force reductions are unknown; therefore, any analysis can only be discussed generally and qualitatively in the SPEA. Additionally, until final decisions are made as to where force reductions will be made, the TRADOC cannot make any decisions about training loads or the frequency of training conducted at installations with major Army training missions. However, as part of the overall force reduction decision making process, the mission of the installations will be carefully considered.

### **Other Comments**

Virginia DHR requested that the Army continue to consult directly with Virginia DHR, as necessary, pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, which require agencies to consider the effects of their undertakings on historic properties.

**R:** The Army will continue to consult with Virginia DHR when appropriate. Because of the programmatic nature of the SPEA, no specific actions affecting archaeological or historic resources are identified. Once decisions are made regarding where force reductions will occur and to what magnitude they will be, if specific actions are needed, such as demolition of vacated buildings, to accommodate the force reductions, follow-on NEPA analysis and any necessary Section 106 consultation with Virginia DHR will be undertaken by the specific installations affected in Virginia.

A commenter expressed concern that the Army's force reductions were being distributed across the installations, to include Fort Belvoir, in a manner that lacks the reasoned, mission-oriented evaluation that national defense requires.

**R:** The Army has not completed the decision process for force reductions. The information in the SPEA will be used to support a series of decisions in the coming years regarding how the force is to be realigned. Please see universal comment 1 regarding the Force Structure Decision Process and the Army's response.

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## **Fort Benning, Georgia**

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many

installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Socioeconomic Impacts**

Several commenters stated that implementing Alternative 1 would result in extensive economic fallout, including the loss of real estate values, loss of tax revenue, decrease in new construction, and lack of patronage to local businesses. Commenters noted that these conditions will increase the hardships and difficulties for both families and businesses in the community. Additionally, a commenter noted they believe the force reductions will create a phenomenal disruption to private economic stability.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

### **Army/Community Relationship**

Numerous commenters stated that the Soldiers at Fort Benning make valuable contributions to their communities and that the communities support the installation's training mission. Many commenters believe that the communities and Fort Benning are so closely linked that the reduction of forces would hurt both. Commenters noted that young Soldiers are present everywhere and that Columbus, Georgia, and Phenix City, Alabama, support that military presence. Another commenter noted that service members from the installation assist and provide services to local schools.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding the Army/Community Relationship and the Army's response.

### **Loss of Trust**

Many commenters indicated that the Army's plan for reductions is a breach of trust. Commenters explained that military leadership assured the communities that Fort Benning would experience growth as a result of the BRAC 2005 decision. Because of their trust in the Army, significant private and public funds were invested to enhance the quality of life for the anticipated arriving Soldiers, DoD civilians, defense contractors, and their Families. Some of these commenters added that with the Army's "turnabout," the Proposed Action will diminish, and almost negate, the value of the investments.

## Community Investment

Several commenters believe that the Fort Benning region, including Columbus and Phenix City invested heavily to accommodate the BRAC buildup. A commenter stated that local land owners have donated 30,000 acres into the ACUB program. Commenters cited local investments of greater than \$3.2 billion supporting Fort Benning's mission growth. Real estate developers built thousands of apartment units and single-family residential homes, which created a wide variety of service and trades jobs. Commenters noted that commercial stores, restaurants, and other service businesses started or expanded, creating many jobs and stimulating the local economy. Commenters noted that school systems expanded classrooms and hired more teachers and support staff to serve the active-duty Soldiers and Army civilian personnel who were brought to the area because of the BRAC actions. One commenter stated that the relatively recent National Infantry Museum was built primarily with local community contributions, is now the number one tourist attraction in the Columbus area, and whose attached parade grounds and covered bleachers is now the site for graduations. The commenters explained that local governments and utilities expanded roadways, stormwater facilities and water, sewer, power, gas, and communications infrastructure to support the BRAC-associated growth with the expectation that local tax and utility fee revenues from new residents/customers would cover expansion and operation and maintenance costs.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

## Military Investment

Commenters noted that the Army made major investments in Fort Benning to establish it as a power projection platform. Many commenters expressed concern that the Army's investment would be wasted if reductions were to occur, indicating that the Army spent \$3.5 billion on infrastructure construction and modernization of facilities before relocating the Armor School and creating the Maneuver Center of Excellence. Commenters also mentioned other investments and improvements in support of Fort Benning's recent mission growth, including a rail-loading site for rapid deployment of units to the Ports of Savannah and Jacksonville, Maneuver Force Modeling and Simulation Facility, the newly constructed Martin Army Community Hospital, range improvements, barracks improvements, and transportation improvements. Multiple commenters believe that the military should maintain the current force levels at Fort Benning.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 10 regarding Military Investment and the Army's response.

## **Mission/Readiness/Training**

Multiple commenters noted that Advanced Individual Training and Officer Candidate School occur on Fort Benning and the commenters believe this training is vital to the Nation's defense, which is becoming more threatened every day. A commenter provided the opinion that there are currently not enough Soldiers to train troops properly and that if the troop level is dropped even further, the Army will not be able to train incoming troops to the standards necessary to defend the country. A commenter remarked upon the donation of land by local land owners into the ACUB program and on the restricted airspace over Fort Benning, uses that support the Army's ability to train.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 11 regarding Mission/Readiness/Training and the Army's response.

One commenter supported reductions at Fort Benning and recommended that the 3rd Brigade be returned to Fort Stewart, closer to 3rd Infantry Division headquarters, so the division would all work, live, and train in one location.

**R:** Issues of command and control will be taken into account in the force structure decision processes but are outside the scope of the SPEA.

## **National Security**

Multiple commenters stated that Fort Benning is an elite training facility for the U.S. military and believe that Army force reductions would put the U.S. at risk for terrorist actions.

Commenters believe that reducing the force of the military across the U.S. would hinder the Nation's ability to serve as a global leader and would increase the risk of attack on American soil. Some commenters believe that force reductions at Fort Benning would result in the U.S. no longer having the best trained Army in the world.

## **Sequestration**

Multiple commenters believe that force reductions are not the result of a diminished world threat but, rather, are due to the DoD budget reductions stemming from sequestration.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 12 regarding the Budget Control Act of 2011 and Sequestration and the Army's response.

## **Other Comments**

One commenter recommended the Army accomplish reductions by reducing U.S. force levels overseas, especially in Europe.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 16 regarding Overseas Cuts and the Army's response.

Another commenter favored reductions and believes that Fort Benning military and civilian reductions can be absorbed by early retirements, which would lessen the economic consequences on the communities. The commenter also believes that good performers affected by the proposed reductions will be able to find jobs elsewhere if they are ineligible for retirement.

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## Fort Bliss, Texas

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Socioeconomic Impacts**

Commenters noted that the DoD previously proposed a net gain of more than 20,000 troops to Fort Bliss, which led to an overall increase in El Paso's population by 60,000 to 80,000. Commenters believe that force reductions will have a detrimental effect on the economy of the entire region and future operations at Fort Bliss. Commenters specifically noted that new home construction and the rental housing industry would be affected by population reductions. Commenters also addressed the local education and healthcare facilities and the detrimental effects that force reductions would have on such facilities.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and universal comment 13(f) regarding the Military Health System and the Army's response for each.

One commenter stated that the SPEA did not provide a complete quantitative look at the economic impact of potential reductions and does not fully account for local economic conditions stating that a lack of meaningful analysis will make it difficult for decisions on reductions in forces to be made and for local communities to plan accordingly. The commenter stated that the approach and model used in the SPEA failed to thoroughly examine all parts of

the economy that might be affected such as the potential impact to housing and other real estate value and school funding amounts.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and universal comment 13(d) regarding Schools and the Army's response for each.

One commenter stated that the analysis in the SPEA used a broad-brush approach to determine impacts rather than taking into account local economic conditions, especially reductions in state revenues. The commenter pointed out that while the SPEA indicated that an estimated 16 percent of sales would be subject to local and state sales tax, historical sales tax collection data shows a much higher rate of gross sales subject to sales tax in the El Paso MSA—27.8 percent of gross sales in 2013.

**R:** The Army acknowledges that the commenter may have more specific data on local and state sales tax information than was available to the Army at the time of the analysis and that the impact may be higher for sales tax than what was estimated. The overall socioeconomic impact for Fort Bliss is significant, and recalculations based on the new information would not change that. While the data do not change the overall conclusion in the SPEA for the Fort Bliss ROI, the Army thanks the commenter for the additional information, which will be made a part of the administrative record and taken into consideration during the force structure decision process.

### **Army/Community Relationship**

Many commenters stated the community and its leaders rallied to work toward providing the proper infrastructure to accommodate growth at Fort Bliss and to welcome Soldiers and their Families. Commenters provided examples of the Army/community relationship at Fort Bliss, including the R&R opportunities and the core mission of the University of Texas at El Paso to provide broad access to an affordable, high quality education. Commenters believe the community understands the decision to reduce the size of the Army but requested that force reductions occur in other communities that have not invested in, or embraced, the troops as heavily as the El Paso community has.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding the Army/Community Relationship and the Army's response.

### **Community Investment**

Commenters provided specific examples of the community investments made in support of Fort Bliss, including \$1 billion in highway projects, \$700 million in quality of life bonds, and plans to



build an \$80 million water purification plant in early 2015. Additional examples included spending more than \$1 billion to construct new schools, housing, a children's hospital, museums and other quality of life amenities and expansions of college facilities. Also, the community has been an integral partner in the Joint Land Use Study funded through the DoD to identify common interests such as economic growth, more efficient infrastructure, healthier environments, improved quality of life, and the protection of DoD and civilian investments and missions. Commenters also noted investments by nearby communities in New Mexico that also support Fort Bliss Soldiers, Families, and civilians. The commenters believe that it is in the best interest of Soldiers and the tax payers that the Army utilize the critical assets and resources at Fort Bliss and the surrounding community to their fullest.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Military Investment**

Commenters noted that the DoD has invested \$6 billion in expanding Fort Bliss, making it the most modern center for training and modernization testing, and stated that MEDCOM is currently constructing a new \$1 billion William Beaumont Army Medical Center to meet the growing medical needs of the military, dependent, and retiree populations.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 10 regarding Military Investment and the Army's response.

### **Mission/Readiness/Training**

Commenters believe that implementing force reductions at Fort Bliss, the largest Army training facility in the U.S., would be detrimental to the Army's military readiness, partnership with White Sands Missile Range, and the Army's Brigade Modernization Command, noting that the Army's most important missions will be severely affected by force reductions at Fort Bliss. Commenters noted that impacts would reach beyond Fort Bliss, stating that Fort Hood and its operational testing, Aberdeen Proving Ground and the Army Test and Evaluation Command rely on the Brigade Modernization Command located at Fort Bliss to provide critical support. Commenters stated that the Network Integration Exercises conducted several times a year at Fort Bliss and White Sands in partnership with many U.S. allies have become essential to joint readiness.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 11 regarding Mission/Readiness/Training and the Army's response.

## Capacity for Growth

Commenters stated that Fort Bliss has been able to absorb the recent population increase and also has the capacity to sustain future growth, allowing the Army to build on the existing investment. Commenters encouraged the Army to consider, when deliberating any additional missions, the capabilities of Fort Bliss and White Sands, along with Holloman Air Force Base, for further expansion and growth that is unencumbered by encroachment.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 6 regarding Capacity for Growth and the Army's response.

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## Fort Bragg, North Carolina

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### Socioeconomic Impacts

A number of commenters stated that force reductions at Fort Bragg would undermine the local economy. One commenter believes the SPEA underestimates the severity of the socioeconomic impact to the community and stated that the analysis should have demonstrated that Fayetteville and Cumberland County would be affected considerably more than the other jurisdictions in the ROI. This commenter pointed out that substantial reductions in force over a 3- to 5-year period is too rapid for communities to mitigate with appropriate planning and that involuntary discharges increase the probability of increased unemployment in the local community because former Soldiers will not have planned for an alternative future. The commenter suggested that the SPEA should consider the impact of the pace of force reduction and that various aid and programs should be modified to enable communities to mitigate the impacts.

**R:** The EIFS model used by the Army does not allow the determination of impacts within only portions of a selected ROI. It also does not have a time variable so the predicted impacts are all assumed to occur simultaneously, not over a period of time. This would be worse than distributing the reductions over a 3- to 5-year period. The Army will consider the pace of reductions during the force structure decision process. In addition, the funding levels and requirements of other government agencies are not within the purview of the Army and are

outside of the scope of the SPEA. Also, since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comments 13 regarding Socioeconomic Impacts, 13(a) regarding Significance, and 13(c) regarding Region of Influence and the Army's response for each.

## **National Security**

One commenter stated that force reductions would affect national security from multiple international threats.

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## **Fort Campbell, Kentucky**

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### **Socioeconomic Impacts**

Multiple commenters believe that force reductions at Fort Campbell would adversely affect communities, reduce jobs, and impact the local economy, including small businesses, the real estate market, and utility providers. Commenters stated that local public schools, universities, and even roads and other local infrastructure would be affected through the loss of federal aid, and taxpayers would experience a subsequent increase in property taxes. Many commenters used the term "catastrophic" to describe what they believe the economic impacts would be for the region should the proposed force reductions be implemented.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

One commenter provided specific mitigation recommendations to offset significant impacts to the ROI. These recommendations included making Fort Campbell a "purple suit" base (station other military services' units on Fort Campbell), establishing service schools, encouraging other federal agency use of the installation for training and conferences, and developing international training programs for allies.

**R:** The suggested mitigation measures to offset the significant adverse socioeconomic impacts at Fort Campbell are beyond the scope of the SPEA and Army authority. However, the Army appreciates the suggestions.

Many commenters disagree with the counties that were used to define the ROI for Fort Campbell. Commenters identified more counties that they recommended for inclusion in the ROI, stating those additional counties would also be affected by the reduction in forces at Fort Campbell.

**R:** Since similar ROI concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(c) regarding Region of Influence and the Army's response.

A commenter suggested the Army reconsider the census data used to inform the socioeconomic analysis, stating that it does not accurately capture those Soldiers living in the area that are deployed during the census. One commenter expressed concern that deployed Soldiers were not appropriately counted because they are deemed to be living at their home of record. As a result these commenters stated that the socioeconomic impact is understated in the SPEA.

**R:** In the analysis, the number of Soldiers and dependents living on and off the base originated from the Army's ASIP, not the census data. The ASIP accounts for Soldiers' permanent duty station installations, not their home of record. While the census data citing the overall population in the ROI may be slightly underestimated due to deployed Soldiers, the overall conclusion of the SPEA is that the ROI for Fort Campbell would experience a significant socioeconomic impact from the reduction in forces (see Table 4.6-1), and "significant" is the highest qualitative rating for impacts of an action when analyzed under NEPA. While the Army has concluded that the proposed recalculations of the socioeconomic analysis contained in the SPEA would not change the overall conclusion of significant, the Army acknowledges the serious socioeconomic impacts for the ROI surrounding Fort Campbell and the possibility that these impacts could be even more adverse than identified in the SPEA. The Army will consider all of the comments raised in subsequent phases of the force structure decision process.

### **Army/Community Relationship**

Multiple commenters stated that the Clarksville region is a top choice for current and retired personnel to reside and work and that Clarksville embraces Fort Campbell. The commenters believe that force reductions would harm the installation and the community, including the local school district. In support of recent growth actions, one commenter stated that local business and community organizations partnered to host hundreds of civilian employees and their families who were considering the move to Kentucky. Commenters noted that the area has two

institutions of higher learning that are committed to Soldiers by creating programs geared toward serving the Families of Soldiers. One commenter noted that Fort Campbell has one of the highest reenlistment rates in the Army, further magnifying the positive interactions between Fort Campbell and the region. One commenter noted that if forces were cut at Fort Campbell, it would decrease church attendance, school attendance, and participation in athletics. Several commenters noted that the community has a strong relationship with the Army, provides veterans with jobs and discounts to active duty military, and hosts many military appreciation events. Many commenters stated that they believe the region goes above and beyond the communities of all other installations to create a great environment for service members and their Families

**R:** Since similar concerns were raised by commenters from a number of installations regarding their communities, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army's response.

### **Community Investment**

Multiple commenters noted that the City of Clarksville and Montgomery County are military-friendly and stated that they want to do their part to make lives better. The commenters believe that many schools, parks, trails, and other recreational areas have been built to support the community and are based on the needs of the local population. Several commenters stated that Kentucky committed \$251 million in new schools, roads, and other needed infrastructure investments to accommodate the anticipated growth. Those commenters also stated that colleges and universities established new curriculum to ensure local job seekers were prepared to fill any vacancies within the new commands.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Strategic Benefit**

Multiple commenters stated that Fort Campbell is strategically located to quickly deploy equipment and personnel by way of land, air, and water, noting that the installation has a large railway and runway and is located adjacent to Interstate 24.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 14 regarding Strategic Benefit and the Army's response.

### **Mission/Readiness/Training**

A few commenters noted the importance of the mission at both Kentucky installations—Forts Campbell and Knox—analyzed in the SPEA, stating that they host some of the Army's most

essential commands. Two commenters stated that the 101st Airborne Division was one of the first to be mobilized for the current and previous wars and that because of its central location, Fort Campbell also serves as a safe haven during hurricanes for equipment and personnel from installations on the exterior of the contiguous U.S. until those installations can be deemed safe. Commenters noted that Fort Campbell also has the resources the Army will need to train new forces and support future missions, having 26,000 acres of impact space and 64,000 acres for maneuvering and being located less than 60 miles from the Wendell H. Ford Regional Training Center, which provides an additional 12,000 acres of training space. Commenters noted that Fort Campbell is home to the largest AAF in the U.S. and can accommodate any aircraft in the U.S. Fleet.

### **Veteran Impacts**

Many commenters noted that Fort Campbell has a low cost of living and affordable housing, which attracts veterans to live in Clarksville. Commenters noted that the area is also close to the VA hospital in Nashville and that veterans benefit from the proximity of the PX and commissary. Commenters believe that force reductions would cripple home prices for years to come and decimate the job market for veterans living in the area. One commenter noted that force reductions would limit the entitled benefits available to veterans from Fort Campbell facilities and services.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 15 regarding Veteran Impacts and universal comment 13 regarding Socioeconomic Impacts and the Army's response for each.

### **National Security**

Several commenters stated that a strong military is the number one need of the Nation, and Army forces should not be reduced, specifically at Fort Campbell. Commenters believe that proposed reductions in the level of military presence both at home and abroad would make the U.S. vulnerable to attack, weaken the U.S. presence in other countries that rely on the U.S., and serve to make the U.S. appear weak and unprotected, even if Americans are not attacked on U.S. soil.

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## **Fort Carson, Colorado**

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installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Environmental Impact**

One commenter stated that the SPEA and draft FNSI are inadequate, and because they preclude meaningful public comment and analysis, the documents must be revised and then recirculated for a second round of public review and comment. The commenter stated that failure to do so will result in the Army not having a legally defensible basis for reaching a decision on its Proposed Action. The commenter stated that the analysis in the SPEA does not provide “hard look” at environmental impacts required by NEPA. The commenter attached comments on the final SPEA and stated that the Army did not provide specific responses to those same comments on the 2013 PEA, specifically regarding Piñon Canyon’s unique and sensitive shortgrass prairie ecosystem, fragile soil conditions, water quality issues, wetlands, sensitive species, and historic resources. The commenter stated that the SPEA did not include a full range of “reasonable and appropriate” alternatives and the Army needs to revise the SPEA to include at least one of the additional alternatives that links force reductions to environmental protection. The commenter stated that the use of a “no action” alternative in the SPEA as an environmental baseline does not reflect actual conditions. The commenter stated that the thresholds of significance in the SPEA are flawed and must be revised so that the significance of those consequences can accurately be assessed.

**R:** In general, the Army believes that the 2013 PEA and the SPEA have sufficient data and analysis for a programmatic NEPA document. The issue of alternatives is addressed more fully in universal comment 2, Additional Alternatives. The Army believes that the significance thresholds it set out were appropriate. It should be noted that installations could find significant impacts based on different thresholds as a matter of context and intensity. It is correct that some of the significance thresholds are based on regulatory standards, while others represent a combination of regulatory standards and a thorough consideration of site conditions. For instance, the threshold for biological resources is based on loss or impairment of habitat as well as the “take” prohibition of the ESA. For air quality, the threshold is exceedance of a permit standard. If a proposed action were to involve such exceedance, it would not mean that the Army would commit an illegal act; rather, the installation would seek to modify its permit. The threshold for water resource unpermitted discharges should be read the same way. For land use, the threshold makes clear that the 5,000-acre measure would vary according to the context and intensity of the situation. The Proposed Action does not include major changes in land use. For traffic and transportation, the term LOS is a term of art that measures the flow of traffic at major intersections. Again, the Proposed Action would not result in any significant increases in traffic.

One commenter stated that Fort Carson is a nuisance to its neighbors, takes away productive ranch lands, causes overpopulation in the area, and drains the area of its natural resources. Another stated that young Soldiers trash the Pike National Forest and do not obey local laws and customs. The commenter believes that a small reduction of 16,000 Soldiers would benefit the local environment. Another commenter noted that beneficial impacts to air quality, airspace, cultural resources, noise, soils, biological resources, wetlands, water resources, energy demand and generation, hazardous materials and waste issues, and traffic and transportation concerns in eastern Las Animas County (where Piñon Canyon Maneuver Site is located) could be realized if Alternative 1 is selected. This commenter is in favor of force reductions.

### **Socioeconomic Impacts**

Multiple commenters requested that the Army consider the economic impact on the community, noting that local businesses that rely on troops' patronage and civilian jobs that support the local military would also be lost.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

Two commenters stated that the growth of Fort Carson and other nearby military bases in the Colorado Springs area has had a detrimental effect on the local economy. Another commenter pointed out that, according to the Colorado Springs Regional Business Alliance in the Gazette newspaper, a cut this size would actually save taxpayers (and the Pentagon) \$1 billion. Another noted that the loss of 234,000 acres at the Piñon Canyon Maneuver Site affected agriculture and the local government through the loss of tax revenues. This commenter supports force reductions and desires the return of land at Piñon Canyon to Las Animas County. Another commenter believes that the U.S. is spending too much money on armed forces and supports force reductions in order to reduce spending.

### **Army/Community Relationship**

Commenters stated that the Fort Carson community provides Soldiers and their Families access to top quality medical care and a broad range of outdoor activities. They noted that the Pikes Peak Region routinely ranks high in quality of life. Commenters stated that the community demonstrates support for the military through the various organizations dedicated to helping Soldiers, and numerous organizations and the support they provide were cited. One commenter highlighted the remarkable skill and courage of Fort Carson's 4th Infantry Division Soldiers as they assisted in firefighting efforts during the Black Forest Fire, and the rescue of 1,000 Coloradans trapped by historical flooding just a few months later. That commenter also remarked on honor walls built by students and business owners to pay tribute to our fallen friends and neighbors in uniform. Commenters noted that Fort Carson regularly sits near the top of the



retention charts and most requested assignments for the Army; they requested that the Army maintain a strong military presence at Fort Carson.

### **Community Investment**

Several commenters stated that more than \$100 million has been spent in local and state funds to address transportation and congestion issues on roads and highways surrounding and leading directly into Fort Carson.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Military Investment**

Commenters requested no force reductions at Fort Carson, noting that the military has made a multi-billion dollar investment in new infrastructure at the installation.

### **Strategic Benefit**

Many commenters believe that Fort Carson is centrally located, allowing for rapid troop deployment to any area of need. Between the 26,000 Army troops stationed here with their Families at Fort Carson and the 24,000 Air Force members and their Families at the U.S. Air Force Academy, Air Force Space Command, Schriever Air Force Base, NORAD/USNORTHCOM, Cheyenne Mountain Complex, and Peterson Air Force Base, it is one of the strongest locations in the U.S., offering unique capabilities not found anywhere else in the U.S.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 14 regarding Strategic Benefit and the Army's response.

### **Mission/Readiness/Training**

Multiple commenters believe that Fort Carson's main post possesses great training ranges in support of small unit maneuvers and live fire and combined arms exercises. Commenters noted that the Piñon Canyon Maneuver Site in southeast Colorado allows light and heavy unit maneuvers. The commenters believe that the Mountain Post sits in an ideal location for high altitude aviation training because the Rocky Mountains are just west of Fort Carson and the High Altitude Aviation Training Site in Eagle County is northwest. Several commenters believe that the mountainous terrain is critical in preparing troops who will be deployed in mountainous regions. One commenter recommended moving all of SMDC/ARSTRAT to Peterson Air Force Base or moving the entire command to Huntsville. Another commenter believes that the proximity of Fort Carson to the U.S. Air Force Academy and other military installations and command organizations is critical to the mission.

## **Capacity for Growth**

Multiple commenters noted that Fort Carson's location provides room for future expansion.

## **National Security**

Multiple commenters stated that force reductions and the weakening support for critical military bases, including Fort Carson, makes the U.S. as whole vulnerable to attack.

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## **Fort Drum, New York**

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## **Socioeconomic Impacts**

Most commenters agree with the SPEA conclusion that the Proposed Action would have a significant, adverse impact on the region's economy. Many commenters noted that the socioeconomic impacts resulting from force reductions at Fort Drum were the highest adverse impacts compared to all of the other installations for employment and population, and the second highest for sales and income. Commenters pointed out that of the 30 installations analyzed, only 5 of those showed significant, adverse impacts to all socioeconomic categories. Fort Drum was one of those 5.

Multiple commenters stated that the proposed personnel reductions at Fort Drum would have adverse economic impacts to the area. They believe that reducing the Army workforce at Fort Drum would lead to a decrease in demand for housing and could result in reduced median home values and other impacts to the real estate market, including foreclosures. Many commenters believe that the force reductions would result in vacant housing inventory and lost investment. Many commenters are concerned that excessive vacancies in housing complexes would lead to excessive defaults of debt financing.

Commenters believe that no other economic activities or prospects in the area would replace the payroll and jobs associated with Fort Drum because of its rural location. Many commenters noted that there are no other industries in the region that could offset the loss at Fort Drum. Multiple commenters noted that the economies of many communities around Fort Drum are heavily tied to Fort Drum. Commenters are concerned about the effect that the Proposed Action

would have on sales and property taxes. Many commenters noted that Jefferson County has one of the highest unemployment rates in New York and that the force reductions proposed for Fort Drum would not only exacerbate this effect but also lead to additional disinvestment of private industry.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's responses.

Many commenters are concerned about the effect the Proposed Action would have on the education institutions of the region. One commenter noted that educational facilities around the installation have been improved in recent years and any reduction would destroy these educational opportunities. Commenters stated that a reduction of the Fort Drum Army workforce would affect the financial stability of school districts in the area, resulting in the lack of a basic education for students. One commenter indicated that the Proposed Action would result in a loss of more than 2,000 students, a reduction of approximately 50 percent from the current enrollment in the Indian River School District, noting that this would equate to a loss of 206 teachers and more than \$13 million in salary and benefits, along with associated losses of 123 support staff at almost \$4 million and 49 contracted positions for bus services at \$1.5 million.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and universal comment 13(d) regarding Schools and the Army's response for each.

Many commenters are concerned that the proposed cuts would lead to reduced access to health care and that the resulting population base would be insufficient to support key medical services. One commenter provided additional analysis regarding impacts to the regional health care services and believes there would be a significant effect on the availability of health care. The commenter believes that a reduction of 80 percent of the current military spending on the regional health care system would result in the loss of inpatient volume of 3,450 annual discharges with an annual in-patient revenue decrease of \$16.36 million. The commenter believes that one hospital would no longer remain viable and would close. Other commenters stated they believe the health care and public services (public transportation, communications, and airport services) in the communities in northern New York would suffer adverse consequences as a result of force reductions.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts,

universal comment 13(e) regarding Public Services, and universal comment 13(f) regarding the Military Health System and the Army's response for each.

Multiple commenters provided input regarding significant effects at Fort Drum. Many commenters believe that the EIFS economic model understated the real loss of jobs, both direct and induced. One commenter questioned that a significant impact was not assessed further by level of degree or magnitude, which can understate the ultimate significant impact.

**R:** As explained and defined in Sections 4.02 and 4.04 of the SPEA, "significant" is the highest possible qualitative rating for impacts of an action when analyzed under NEPA. The Army appreciates the comment and acknowledges the serious socioeconomic impacts for the communities surrounding Fort Drum, and will consider these comments prior to making final force structure decisions.

### **Army/Community Relationship**

Many commenters stressed how closely Fort Drum and the local communities are tied together and how much they support one another. Another commenter recommended that wherever the Army decides to sustain troop strength at existing levels, it should assess the level of commitment from the local community regarding veteran employment, employee support to the ARNG and Army Reserve (to include veteran re-employment), and training with government programs. The commenter suggested that communities providing the most support should be able to avoid force reductions.

Multiple commenters noted the pressure the community experienced when Fort Drum expanded in 2004, resulting in challenges for schools, hospitals, and housing; however, commenters believe the community met this challenge and, in so doing, has helped the military meet its mission to defend the country. Multiple commenters noted in the community surrounding Fort Drum, military and civilian Families live, work, and recreate alongside each other and believe that a significant reduction in Soldiers at Fort Drum would jeopardize the standard of living and the valued relationship with the military, whose off-post community was described by another commenter as a community life-blood dressed in Army green. Commenters believe the community supports Fort Drum through a local hospital that meets Soldier health needs, school districts to provide a quality education, recreational opportunities, varied social programs, and many other support systems.

**R:** Since similar concerns were raised by commenters from a number of installations regarding their communities, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army's response.

One commenter noted that civil/military interaction is vital and was concerned that reductions in Soldiers would unduly isolate the northeast population of the U.S. from military culture.

**R:** Geographic distribution of U.S. installations is an attribute of the force structure decision process; specifically, the Army considers the importance of keeping the Army relevant to the American people and the operational benefits achieved through its presence in distributed communities. As indicated in the Army's response to universal comment 5 regarding BRAC, this action will not result in the closure of any installations. The Army acknowledges and appreciates the relationship with local communities and is concerned about the potential impact of force reduction on these relationships.

### **Community Investment**

Multiple commenters stated that the community was encouraged by the military to build more housing for incoming troops and that significant investment was made in improving the local housing inventory. The commenters believe that the force reductions would result in vacant housing inventory and lost investment.

Multiple commenters noted that the SPEA did not recognize the significant debt incurred by local schools, governments, and developers to provide the facilities and infrastructure to sustain past growth at Fort Drum.

One commenter specifically noted that Champion studied the need for a public water system and wastewater treatment facility in support of Fort Drum, and Fort Drum subsequently invested \$4.5 million in water infrastructure and \$6.6 million in wastewater infrastructure, stating that the capacity of the new systems was determined by the level of personnel stationed at Fort Drum. The commenter believes that a reduction in the level of personnel would seriously affect the systems and result in excess capacity.

One commenter pointed out that New York State's FY 2014–2015 budget includes \$1 million for Fort Drum's ACUB program, double the 2013 amount, which is expected to leverage acquisition of an additional 2,500 acres of buffer.

A commenter highlighted some of the community transportation improvements that support Fort Drum, including the \$57 million Fort Drum Connector (Interstate 781) between Interstate 81 and the North Gate of Fort Drum and a new \$1.9 million access road at the Port of Ogdensburg that increased the ability of units at Fort Drum to deploy quickly.

Another commenter indicated that local communities would not be able to sustain much of the existing infrastructure, including hospitals, schools, retail establishments, and professional services if Fort Drum were to be reduced to the levels analyzed in the SPEA. Another commenter noted that Samaritan Medical Center had expanded its staff and services to meet the needs of Fort Drum.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Military Investment**

Multiple commenters believe that millions of dollars have already been spent on Fort Drum.

### **Strategic Benefit**

One commenter stated that Fort Drum provides training for a light infantry force that is capable of fighting in any weather condition and believes that without Fort Drum, the Army would be without the only large light force unit stationed consistently in cold weather within the continental U.S. Another commenter noted that these troops represent the future of the U.S. military, which is able to rapidly respond to new global threats and challenges the U.S. military faces. Many commenters noted that Fort Drum is a strategic power projection platform and an important component in supporting the Army's REDI, specifically the 10th Mountain Division. It has high military value due to un-encroached training areas, rapid deployment capabilities, and unrestricted airspace. Commenters were concerned that this information was not included in the introduction section of the Fort Drum analysis.

**R:** The Army acknowledges the role Fort Drum serves in the Nation's defense and will consider this along with the other factors in the force structure decision-making process. Since similar concerns were raised by commenters from a number of installations they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 1 regarding Force Structure Decision Process and universal comment 14 regarding Strategic Benefit and the Army's response to each.

### **Mission/Readiness/Training**

Multiple commenters stated that training capabilities at Fort Drum are valuable to the Army and noted the base is large enough to accommodate field artillery training; it is suited to desert training because the soil content varies from sand dunes to clay; and the temperature ranges from 80+ degrees to 35 degrees below zero, providing Arctic weather training. One commenter stated that Fort Drum is a premier all-weather training facility capable of urban operation, digital/virtual, and theater-based training, noting that the regional assets, supporting facilities, infrastructure, air spaces, and equipment make Fort Drum and Wheeler Sack Army Air Field one of the best training area locations in the Army.

Another commenter noted that Fort Drum is the only regional military installation with ranges large enough for live-fire of high-mobility rocket systems. This commenter praised the quality of the specialized Fort Drum mountain warfare training and noted the importance of the Bridgewater-Vaccaro Medical Simulation Center, which provides state-of-the-art training for military medical professionals.

One commenter noted that Fort Drum provides regional accessibility for Massachusetts ARNG units wishing to exercise simulated movements through convoys from their home stations and stated that the range and firing capabilities at Fort Drum allow significant access to artillery and high explosive ordnance training that is otherwise difficult to achieve. Another commenter noted that without Fort Drum as a regional resource, the New Hampshire National Guard would spend millions of extra dollars annually to transport units to training opportunities at other installations. Another commenter noted that in addition to providing training opportunities for the New York, Massachusetts, and New Hampshire National Guard, National Guard units from Maine, Vermont, Rhode Island, Connecticut, New Jersey, Pennsylvania, Ohio, and Delaware also use Fort Drum's facilities.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 11 regarding Mission/Readiness/Training and the Army's response. Please also see universal comment 4 regarding Army/Community Relationship and the Army's response.

### **National Security**

Multiple commenters believe that the Army is proposing troop reductions that could mean significant cuts at Fort Drum and that these cuts could have an impact on the long-term security of the U.S. This commenter urges the Army and military leaders to reject any reductions in troop strength or operations at this installation.

### **Veteran Impacts**

One commenter stated that Fort Drum hosts the only Warrior Transition Unit in the northeast and provides critical support to Wounded Warriors.

**R:** The Army acknowledges the value of Warrior Transition Units. The northeast U.S. also contains a Warrior Transition Unit in Concord, Massachusetts. For a map of Warrior Transition Unit locations, please see <http://www.wtc.army.mil/wtc/wtuMap.html>.

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## **Fort Gordon, Georgia**

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all

installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Army/Community Relationship**

Several commenters noted that Fort Gordon is a successful installation surrounded by communities that are welcoming and supportive. Another commenter noted that there is no finer example of community support than that found in the region around this installation.

### **Community Investment**

Commenters noted that the local government in partnership with the CSRA Alliance, the CSRA Regional Commission, and the area's other local municipalities have been orchestrating growth planning efforts for over a year to deal with increases in population at the installation associated with Army Cyber Command. A commenter noted that many of the initiatives identified to support the growth, such as road improvements and new or expanded schools, require taxpayer dollars and, therefore, taxpayer support for added sales taxes to support these initiatives. Another commenter stated that the SPEA is sending a mixed message to the community regarding force reductions at Fort Gordon and other actions on-going regarding growth.

**R:** The Army acknowledges that the recent stationing of Army Cyber Command to Fort Gordon increases the installation's population and that community investments are occurring as a result. Additionally, in Section 1.3 of the SPEA, the Army acknowledges that Fort Gordon potentially faces additional gains at the installation, an action that is reasonably foreseeable even though Fort Gordon is also being considered for reductions under the SPEA. Fort Gordon is just one example of an installation whose future force size is unknown and may include growth or reduction.

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## **Fort Hood, Texas**

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Socioeconomic Impacts**

Commenters believe that the impact of reducing 16,000 Soldiers and Army civilians would be significant at Fort Hood, where the Armed Forces are the largest source of employment in



Coryell County and the second largest source of employment in Bell County. Commenters were also concerned about potential reductions in housing values, to include rental markets, and requested greater analysis be completed.

One commenter concurred with the conclusion that the reduction of troops at Fort Hood would lead to a decrease in the demand for housing; however, the commenter states that this is not certain to lead to an increase in the availability of housing on the installation due to the conditions in Fort Hood's Residential Communities Initiative partnership agreement. This commenter stated that injecting an additional 2,600 to 5,000 homes for sale on the market would result in 15 to 25 months of inventory and the value of these homes would plummet, putting Soldiers in fiscal jeopardy.

A commenter stated that the SPEA did not provide a complete quantitative look at the economic impact of potential reductions and does not fully account for local economic conditions. The commenter also stated that a lack of meaningful analysis will make it difficult for a decision on reductions in force to be made and for local communities to plan accordingly. Some commenters believe the approach and model used in the SPEA failed to examine thoroughly all parts of the economy that might be affected, such as the potential impact to housing and other real estate value, school funding amounts, and reductions in state revenues. Two commenters noted that while the SPEA indicated that an estimated 16 percent of sales would be subject to local and state sales tax, historical sales tax collection data show a much higher rate of gross sales subject to sales tax in the Killeen-Temple-Fort Hood MSA—23.4 percent of gross sales in 2013. One of the commenters also pointed out that the sales tax rate should have been 8.25 percent rather than 8.2 percent, and stated that applying the 8.25 percent sales tax rate to 23.4 percent of gross sales would result in a decrease in sales tax receipts of \$15.86 million rather than the estimated \$10.7 million in the SPEA.

**R:** The Army acknowledges the serious socioeconomic impacts for the counties and communities surrounding Fort Hood, including the potential for a reduction in housing values and the possibility that these impacts could be even more adverse than identified in the SPEA. Since similar concerns were raised by commenters from a number of installations regarding economic impacts to their regions; they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and universal comment 13(d) regarding Schools and the Army's response for each.

Additionally, the Army acknowledges that commenters may have more specific data on local and state sales tax information than the Army had at the time of the analysis. Assuming the commenters' figures are correct throughout the ROI, the Army agrees that the loss of sales tax revenue would be approximately \$15.86 million and that this impact would be approximately 50 percent greater than the \$10.7 million estimated in the SPEA.

The overall socioeconomic impact for Fort Hood is significant and this recalculation would not change that. While the data do not change the overall conclusion in the SPEA for the Fort Hood ROI, the Army thanks the commenters for the additional information, which will be made a part of the administrative record and taken into consideration during the force structure decision process.

One commenter identified what they believe to be errors and incorrect data used for the socioeconomic analysis within the SPEA for Fort Hood, casting doubts on the EIFS modeling conclusions. The commenter believes that more accurate data would demonstrate that impacts to the region would be worse than those noted in the SPEA. Different, higher population figures were cited that the commenter feels should have been used in calculating the socioeconomic impacts. The commenter noted that the *References* section of the SPEA cited Fort Gordon for population numbers used at Fort Hood. The commenter believes a discrepancy exists between the military population numbers used by the Army and those used by the U.S. Census Bureau. Concern was expressed that population data excluded deployed Soldiers, which could result in incomplete impacts analyses. Fort Hood's actual factor of 1.97 children per married Soldier should have been used instead of the standard planning factor of 1.7.

**R:** The Army reviewed its data and confirmed that the population figures, cited by the commenter as incorrect, were in fact for Fort Hood; a clerical error mistakenly indicated that an employee of another installation was cited as an information source.

The numbers referenced by the commenter were provided from two different sources over different time periods. Additionally, the figures cited in the SPEA relate to the 2011 baseline year, not 2014. The U.S. Census data were an average of 5 years of historical data, while the Army's permanent party population figures were determined at a precise point in time. In addition, deployed forces are often counted in the overseas count through the Census and not at the last duty installation. The U.S. Census data were estimated from surveys, while the Army data were not estimated using this method. The decrease in total population resulting from the potential reduction of troops at Fort Hood was input into the EIFS analysis and was compared against the historical population of the study area's counties and not just Bell County. If there is an underestimate of the active duty personnel and/or Census population in the ROI counties, this would indicate that the Army force reductions would actually be a smaller percentage of the base population and/or ROI population, making the economic impact less.

Also, as explained in Section 4.0.4 of the 2013 PEA, which the SPEA supplements, the number of dependents associated with each Soldier and civilian job loss was calculated using Defense Manpower Data Center nationwide averages. Additionally, the use of an average across the Army for the percentage of children per Soldier is a valid approach as the actual number can change over time. This accounts for the possibility that the Soldiers

actually stationed at Fort Hood when cuts occur may be closer to the national average in terms of number of dependents.

The Army's analysis concluded that socioeconomic impacts would be significant for Fort Hood under Alternative 1 and "significant," as explained and defined in Sections 4.02 and 4.04 of the SPEA, is the highest possible qualitative rating for impacts of an action when analyzed under NEPA. The Army acknowledges the serious socioeconomic impacts for the counties and communities surrounding Fort Hood and the possibility that these impacts could be even more adverse than identified in the SPEA. Community Investment

A commenter stated a recent community investment in a \$56 million water treatment plant, to be completed in 3 to 5 years, supports Fort Hood by reducing competition for apportioned water rights in Belton Lake, which is a primary water supply for the installation. The commenter points out that this investment is largely being funded by the cities of Killen, Harker Heights, and Copperas Cove. A commenter also discussed improvements to nearby highways that are in progress, funded without DoD assistance, that will enhance access to Fort Hood.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Therefore, please see universal comment 7 regarding Community Investment and the Army's response.

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### Fort Huachuca, Arizona

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

#### Environmental Impact

Multiple commenters noted that Fort Huachuca is an excellent steward of water resources and prime ecological lands, as well as historical sites. The commenters stated that if the installation were to close, these protected resources would be vulnerable to destruction and exploitation. Commenters are concerned that if the federal lands were sold, then one of the most pristine and beautiful areas of the county would be available for development, thereby displacing wildlife, destroying rare plants, and creating greater potential for financial and human loss due to urban-

wild land interface. Commenters believe that development would also put extreme pressure on water resources, which are already under pressure. Commenters noted that force reductions would diminish an environmentally friendly installation, stating that Fort Huachuca is nearly net zero for water, has the Army's largest solar array, and was recently issued a non-jeopardy biological opinion by USFWS demonstrating the ability to continue ongoing missions and training without negative impacts to threatened and endangered species.

One commenter noted that some buildings would most likely be demolished or mothballed if the proposed reduction were to occur.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 9 regarding Environmental Impact and the Army's response. Additionally, as indicated in the Army's response to universal comment 5 regarding BRAC, this action will not result in the closure of any installations.

One commenter indicated that force reductions could affect operation of the air control tower, thus impacting air space and safety.

**R:** The Army is committed to ensuring that force reductions will not result in a compromise of safety. Operation of the air control tower would be continued at a level that will maintain the level of safety required.

One commenter noted that the reductions could affect cultural resource staff and their ability to maintain compliance. The commenter also stated that the Army should make the statement that environmental compliance would depend on future budget allocations.

**R:** The Army is committed to ensuring that force reductions will not result in compromised compliance issues for environmental or cultural resources. Installations would continue to manage cultural resources in accordance with applicable legal requirements. As stated in Section 1.3 of the SPEA, specific future reductions in the level of Army staff that could result in potential impacts to the environment would be the subject of appropriate site-specific, follow-on NEPA analysis, and before any action with the potential to affect an eligible or potentially eligible resource, the State Historic Preservation Officer would be consulted under Section 106 of the National Historic Preservation Act, as required, or under existing agreements.

One commenter indicated that reduced effluent flows to the installation's waste water treatment plant would not be beneficial since the current flows are already below the permitted minimum flows. The plant would need to be replaced in order to meet future compliance standards.

**R:** The Army acknowledges that reduced flows could lead to an adverse effect due to an increased need to use effluent recycled water and additional potential water quality violations. This information is discussed in Section 4.11.10.2 of the SPEA.

### **Socioeconomic Impacts**

Multiple commenters indicated that the proposed force reductions would have a negative effect on all aspects of the local economy and public services. Multiple commenters stated that force reductions at Fort Huachuca would reduce real estate values, reduce financial security, and affect the tax base and the level of public services available in Cochise County. One commenter believes that there would be a greater loss of higher paying jobs than of lower paying jobs. Commenters noted that the community is already suffering from sequestration or reductions in personnel that have occurred in the recent past, having trouble in the housing, lodging, and retail markets as well as an overall lack of employment in the area, and that further force reductions would only exacerbate these problems. Commenters requested that the Army weigh the relationship between Fort Huachuca and the city of Sierra Vista and Cochise County and stated that force reductions would result in unemployment. One commenter noted that, according to a TRADOC study, Fort Huachuca is the least resourced of all TRADOC Center of Excellence locations. The commenter recommended reviewing the study and consolidating training at Fort Huachuca. One commenter believes that the proposed cuts would be devastating to the community of Sierra Vista. Another commenter believes that this installation is vital not only to the community of Sierra Vista but to all of southern Arizona.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

One commenter was concerned about the effect the Proposed Action would have on the local education system. Another commenter was concerned that higher education was addressed in more detail regarding Fort Drum than for Fort Huachuca and provided information for consideration.

**R:** The Army appreciates the additional information and will include it in the administrative record for consideration. Please see universal comment 13(d) regarding Schools and the Army's response.

Multiple commenters were concerned that the ROI used in the economic model was too large and therefore not appropriate. The commenters also suggested that to offset errors due to the size of the ROI, the analysis should include the impacts of a reduction in defense contractor activities, a decline in TDY travel, a reduction in the installation's student load, changes in Army lodging policies, and previous reductions in Soldier and Army civilian populations

**R:** The ROI for all of the installations in the SPEA is defined as the counties in which the installation is located and where the majority of the installation population live and work, contributing to the demographic and economic composition of the ROI. The ROI is county-based and was determined based on discussions with installation personnel. While the Army agrees that this is a large county and the installation population only affects two-thirds of the population in the county, the EIFS model cannot disaggregate the county data. Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(c) regarding Region of Influence and the Army's response.

The EIFS model takes into consideration loss of jobs, including defense contracting jobs and impacts to housing in its analysis, and previous reductions at the installation are considered in the baseline for the analysis. As described in Section 1.3 of the SPEA, Army trainees and students are not included in the analysis as it changes to these populations are not known at this time.

Multiple commenters believe that the baseline population numbers used in the SPEA are incorrect.

**R:** The SPEA's use of 562,000 Soldiers as the baseline for its "no action alternative" is appropriate under NEPA. If this were a new proposed action/analysis unrelated to the 2013 PEA, then a different baseline would be appropriate. However, this analysis is a supplement to the original 2013 PEA. Therefore, the SPEA analysis must use the same baseline of 562,000 Soldiers in order to be consistent and determine the additional magnitude of environmental and socioeconomic effects of the SPEA's action alternative.

Multiple commenters requested that the Army use the IMPLAN economic model instead of the EIFS model.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Therefore, please see universal comment 13(b) regarding Alternative Economic Models and Analyses and the Army's response.

One commenter expressed concern about the potential impact to health care services in the region.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Therefore, please see universal comment 13(e) regarding Public Services and the Army's response.

## **Army/Community Relationship**

Several commenters stated that they believe that Sierra Vista is a place to which people return after they retire from the Army, noting that it has low crime rates and good schools and is close to great universities. The commenters stated that the local community high school serves children of service members, receives high rankings, and has a STEM program along with junior ROTC. Additionally, military Families rely on the commissary and the services that the installation provides.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Therefore, please see universal comment 4 regarding the Army/Community Relationship and the Army's response.

## **Community Investment**

Commenters noted that \$101 million is currently being invested in hospital facilities and staffing in Sierra Vista, and the facility is scheduled for completion in 2015. They believe the hospital is important because it will provide critical services to Soldiers, their Families, and the local population and offset the reduction of medical services at military facilities throughout the U.S. during the past decade.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

## **Strategic Benefit**

Several commenters believe that Fort Huachuca provides a strategic location, noting that the location within a valley surrounded by mountains prevents electromagnetic interference. Commenters stated that with the presence of intelligence, communications, and electronics support activities that Fort Huachuca is supporting are critical for the future for all of the services, and these missions cannot be easily shifted to other installations. Commenters stated that, in addition to restricted airspace, Fort Huachuca has the ability to control all of the airspace in the area. One commenter noted that Fort Huachuca is also used to watch for illegal air traffic and for people illegally entering into the country, while a second commenter believes that Fort Huachuca is also an integral link in regional border security and drug interdiction efforts. Other commenters noted that an advantage of the installation includes the remoteness of the location while still being near other DoD installations.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 14 regarding Strategic Benefit and the Army's response.

## **Mission/Readiness/Training**

Multiple commenters stated that they believe that Fort Huachuca provides a unique training environment, including areas that mimic Afghanistan. One commenter noted that the remote location between mountain ranges provides a good environment for electronic testing for the Electronic Proving Ground Program; the people in the local area have above average technical skills because of the NETCOM and Signal missions; the installation provides a location for the testing of UAVs; and the installation is the home of Military Intelligence, all of which adds to a diverse mix of people, skills, qualifications, and missions. Several commenters stated that the installation is the only UAVs restricted airspace in the Nation and that they believe the low population density also reduces the risk of accidental injury or damage to civilians and civilian areas in the event of a training accident. One commenter noted that, if Fort Huachuca was reduced, it was thought that intelligence training would be disrupted until another school was set up elsewhere and would not receive the same support that is available in Sierra Vista. One commenter stated that Fort Huachuca is home to the U.S. Army Intelligence Center of Excellence and HUMINT. The commenter stated that the intelligence gathering is the backbone of current and future military operations and the key to the success of commanders on the battlefield. Another commenter noted that Fort Huachuca's proximity to Mexico enables its tenants to work closely with Customs and Border Patrol personnel in training, enforcement, and testing cutting edge technology. One commenter recommended a location to which training for specific units and specialties could be relocated, but questioned whether force reductions would be the best option for the Army. Other commenters expressed similar concerns.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 11 regarding Mission/Readiness/Training and the Army's response. Additionally, while the capability to operate UAS at Fort Huachuca is important to Army training and readiness, it is not unique. The Army operates UAS at many installations. Though the operation of UAS may be constrained currently by airspace, facility, and range limitations at some installations, the Army is currently working to develop, build, and deploy the facilities, technologies, procedures, and authorizations that will remove those restrictions and enhance training and readiness.

## **Capacity for Growth**

Two commenters believe that Fort Huachuca has the capacity for growth, and one commenter suggested that DoD would realize large savings if it consolidated Command, Control, Communications, Computing, Combat Systems, Intelligence Surveillance, and Reconnaissance missions at this installation.



## **Veteran Impacts**

Multiple commenters stated that medical access and commissary facilities are heavily used by veterans in the area and that the reduction or elimination of these services would create medical and financial problems. One commenter noted that there is a veteran homeless population that receives support from the installation as well.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 15 regarding Veteran Impacts and the Army's response.

## **National Security**

Multiple commenters believe that reductions at Fort Huachuca would put the U.S. at risk because of the installation's location just north of Mexico and the important missions Fort Huachuca supports including communications and signals. Commenters noted that, due to its unique technology, information systems, and intelligence capabilities, reductions in the Fort Huachuca mission during this period of international turmoil would negatively affect the military installation and the surrounding community and also would place the Nation at risk. Specifically, commenters noted that Fort Huachuca is home to radar-equipped aerostat, one of a series of systems maintained for the DEA and supports the DEA drug interdiction mission by detecting low-flying aircraft attempting to penetrate the U.S.

**R:** Since similar concerns about missions were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 11 regarding Mission/Readiness/Training and the Army's response. The Army anticipates that partnerships with the DEA will continue.

## **BRAC**

Many commenters believe that Fort Huachuca would close as a result of a BRAC action and provided comments based on that assumption.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 5 regarding BRAC and the Army's response.

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## **Fort Irwin, California**

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No specific comments were received regarding Fort Irwin; however, as Fort Irwin was one of the 30 installations analyzed in the SPEA, readers may be interested in the No Specific Installation section near the end of this Annex. Additionally, readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain

summaries of issues and concerns applicable to many installations. Included with each are the Army's responses.

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## Fort Jackson, South Carolina

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### Socioeconomic Impacts

Multiple commenters believe force reductions would have a large economic impact and would result in a reduction in sales, reduction in impact aid to schools, and loss of military patronage at local businesses. Many commenters stated that they are concerned that the economic impact of force reductions at Fort Jackson would be devastating to the region. As a result, the commenters requested that no force reductions occur at Fort Jackson.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and universal comment 13(d) regarding Schools and the Army's response for each.

Several commenters note that the SPEA did not quantitatively include the impact of any reduction in the number of basic trainees at Fort Jackson resulting from an Army end-strength of 420,000. They noted that the basic training program graduates approximately 1,000 Soldiers per week and that graduation ceremonies bring more than 200,000 visitors to Columbia each year. Among other things, commenters stated that graduations account for more than 20 percent of the traffic at the local airport. It was also noted that Fort Jackson is the only U.S. Army Training Center and that the training impact could very likely be significantly disproportional to that of any other installation and, therefore, is not accurately reflected by the SPEA assessment.

**R:** The SPEA analyzes a number of installations with major Army training missions (see Table 1.3-1 in Section 1.3 of the SPEA), and as noted in Section 1.3, until final decisions are made as to the nature of reductions (e.g., reducing the number of ABCTs means that the Armor School would need to train fewer Soldiers within this MOS), the Army cannot make any decision about training loads or the frequency of training to be conducted at Fort

Jackson and the other installations with large training missions. Therefore, a quantitative analysis of potential impacts regarding students and trainees could not be included in the socioeconomic impact analysis. However, as indicated in Section 4.13.12.2, the Army recognizes that students and trainees may have a substantial impact on the local economy surrounding Fort Jackson even though trainees were not quantitatively included in the analysis; the Army still concluded in the SPEA that force reductions would have a significant socioeconomic impact within the ROI. “Significant” is the highest possible qualitative rating for impacts of an action when analyzed under NEPA. The Army appreciates and acknowledges the concerns regarding potential impacts force reductions may have on the number of temporary students and trainees stationed at Fort Jackson, and it thanks the commenters for the information provided regarding the number of graduating basic trainees and the benefits that visitors attending graduation ceremonies have on the local economy. This information is being made a part of the administrative record and will be considered by the Army leadership in subsequent phases of the force structure decision process.

One commenter indicated that the employment and income impacts in the Fort Jackson region would be more severe than portrayed by the Army’s EIFS model and asked the Army to consider a detailed economic analysis and report prepared by the University of South Carolina’s Moore School of Business. The commenter noted that this alternate model considered factors excluded from the Army’s EIFS model, such as visitor spending associated with graduation ceremonies and military retiree’s pension payments. Other differences in the models were also highlighted.

**R:** The SPEA concludes that force reductions under Alternative 1 would result in significant socioeconomic impacts to the Fort Jackson ROI (please see Table 4.13-1-2 of the SPEA); “significant” is the highest qualitative rating for impacts of an action when analyzed under NEPA. In analyzing socioeconomic impacts, the Army uses the EIFS model and its parameters, which has been reviewed many times and is considered a reasonable model. The Army does, however, recognize that there are other socioeconomic models that may define and use different parameters than the EIFS model and may come to different conclusions. The Army acknowledges the serious socioeconomic impacts for the counties and communities surrounding Fort Jackson and the possibility that these impacts could be even more adverse than identified in the SPEA. The Army will include the report in the administrative record for the project and consider all of the comments raised in the report in subsequent phases of the force structure decision process. Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(b) regarding Alternative Economic Models and Analyses and the Army's response.

A commenter expressed concern with the ROI identified in the SPEA, noting a different ROI was used when the University of South Carolina’s Moore School of Business economic model

analyzed potential impacts of the Army's Proposed Action. That model included both the state of South Carolina MSA and the Columbia, South Carolina, MSA. The MSA used in the university's model was composed of Calhoun, Fairfield, Kershaw, Lexington, Richland, and Saluda counties. The ROI for the SPEA socioeconomic analysis included the counties of Calhoun, Fairfield, Kershaw, Lee, Lexington, Richland, and Sumter in South Carolina.

**R:** Since similar ROI concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(c) regarding Region of Influence and the Army's response.

### **Army/Community Relationship**

Multiple commenters noted that residents of Columbia pride themselves on being a military friendly community and value the partnership with Fort Jackson.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army's response.

### **Community Investment**

Commenters noted that Fort Jackson is highly intertwined with many state and local policies as well as regional planning initiatives and investments. One commenter noted that some state and local policies and programs have recently been instituted that benefit the Soldiers and Families at Fort Jackson.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Military Investment**

Commenters believe that the military has invested millions of dollars into infrastructure and training facilities at Fort Jackson and that the current force levels should be maintained.

### **Strategic Benefit**

One commenter noted that Fort Jackson is strategic in its location and should continue to train Soldiers, but that force levels should not be maintained for the sole purpose of bolstering the economy of the city of Columbia.

### **National Security**

Many commenters noted that the mission of Fort Jackson is critical to the country's national defense, stating that Fort Jackson trains more than 50 percent of the U.S. Army's Initial Entry

Training Soldiers and provides many advanced training courses. Commenters believe that Fort Jackson has beneficial ties to all of the military installations and assists with training and services for the U.S. Air Force, ARNG, and Army Reserve.

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## Fort Knox, Kentucky

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### Environmental Impact

One commenter noted that, under *Air Quality*, the SPEA concludes: “There would be a beneficial impact to regional air quality from reduced stationary and mobile emission sources at all installations considered under this alternative.” The commenter believes this is the correct evaluation measure, but is an unsupported conclusion. The actual data in the SPEA does not support this. It would support a tentative conclusion that at each affected installation there would be a beneficial impact to air quality, but this is not the measure - regional air quality is. The commenter stated that the SPEA did not examine, e.g., how, whether, and to what degree one emission source location might be or would be merely duplicated or even exceeded by another emission source or location. That is to say, it is illogical and fanciful to say without data that simply because fewer civilian employees will commute to a particular Army installation the regional air quality will be benefitted. Those employees will likely commute elsewhere, and may end up giving up public transportation to do so, or even drive longer distances in the privately owned vehicles.

**R:** The Army acknowledges that it may be the case that regional air quality may not benefit because former Army personnel may continue to commute within the same regional airshed. Section 5.0 of draft FNSI contained the following statement regarding this subject: “...for installations in more urban areas, those vehicles would likely still be traveling within the same airshed.” While generally true, the Army acknowledges that the same logic applies more broadly to include installations located in, near, or within reasonable commuting distance to urban areas, such as Fort Knox with its proximity to Louisville. The Army has therefore clarified its conclusion in Section 5.0 of the FNSI, under the summary of Air Quality effects, and the new text reads: “...for installations in, near, or within reasonable commuting distance to more urban areas, those vehicles would likely still be

traveling within the same airshed.” The Army appreciates the assistance with clarifying this important point.

One commenter questioned the impacts on airspace if training and airfield activities should be reduced, stating that the SPEA did not cover this issue, merely concluding that there would be “negligible impacts.” This commenter stated that the activities may not be reduced on Fort Knox, but the quantity of activities will be and the commenter noted that UPS and Standiford International Airport utilize airspace over Fort Knox. Another commenter inquired about the lack of an overall significant benefit to airspace. If military airspace is made available for civilian use and occurs over many installations, the cumulative effect would be both significant and beneficial.

**R:** Although the SPEA concluded that the overall impact to airspace for Fort Knox is negligible, the SPEA also acknowledged that there may be a slight beneficial impact. Section 4.14.4.2 of the SPEA states: “The force reductions could potentially lower the utilization rate of existing SUA as some units where UAS may be inactivated and no longer require the use of the existing SUA. This reduction would result in a minor, beneficial impact to airspace at Fort Knox.” Restricted airspace might be used less, but its use would not change dramatically. The Army determined that this was not a significant beneficial impact.

The Army concluded that nine installations would realize a beneficial impact to airspace. In most cases, the SPEA analysis stated that force reductions would not substantially alter airspace use. This situation would not produce a significant beneficial impact. It has not yet been determined whether aviation units would be among the ones a given installation could lose. For instance, the analysis for another installation, Fort Huachuca, states: “If force reductions are applied to those units using Libby AAF, the use of SUA could potentially be reduced because of reduced airfield activity resulting in beneficial impacts to airspace.” At this stage in the force structure decision process, the status of aviation units or other units such as artillery (that need restricted airspace) is not known.

One commenter asked why there is not a significant benefit overall to resources such as noise, soils, and biological resources.

**R:** Table FNSI-3 shows that most of the impacts to these resources are either beneficial or negligible. These benefits are not significant due to the localized nature of the effects.

One commenter pointed out that the SPEA has unrealistic assumptions that assist the Army in concluding that there are no adverse environmental effects for several of the VECs. One assumption is that all laid off civilian employees simply move away from the area. They all move away and take their carbon-producing privately owned vehicles, water consumption patterns, and hazardous waste generating habits with them.

**R:** The Army acknowledges that the assumption that all civilian employees affected would leave the area could mean that both adverse economic impacts and beneficial impacts for other environmental resource areas were overestimated. There is no way to know where affected employees would go and how many would stay in the area. The assumption made in the SPEA was reasonable because it captured the most potentially impactful scenario from a socioeconomic perspective.

One commenter asked for the basis for the conclusion that “regional” energy demands would decrease and for the basis for the conclusion that installation, regional, or the cumulative total of energy demand would not result in a significant change and effect.

**R:** Installation energy demands would certainly decrease. Regional energy demand would be reduced by the amount of reduction on the installation, but it is possible that regional demand would have a net increase for other reasons. The FNSI now reflects the fact that a subsequent review has determined that there would be no significant beneficial impacts for energy demand and generation.

One commenter stated that the SPEA should provide the amount of hazardous and solid waste and the average number of spills generated by a BCT.

**R:** The SPEA is a programmatic document, so detailed analyses of the types and amounts of waste generated at each installation or by particular types of units were beyond its scope.

One commenter noted that there is no basis for the Army's statement that traffic would decrease off of the installation. Assuming this is true and could be supported by data, the commenter asked how the cumulative effect of decreased traffic at 30 installations could *not* be significant.

**R:** Traffic is a local phenomenon, and the installation effects described in the SPEA would not combine to result in a nationwide cumulative impact. It is reasonable to assume that traffic would decrease at intersections and roads on which commuters would go to and from installations, even though these locations are outside the installation. All but one installation indicates a beneficial impact on traffic and transportation.

One commenter stated page 4-374 of the SPEA notes that Fort Knox already has an excess of facilities and stated that this action would result in even more. This commenter asked whether the Army had conducted a study on what would happen to these facilities, or to all the excess facilities at all 30 installations when evaluated for cumulative effects. One commenter questioned why the SPEA did not analyze the environmental effects of underutilized installation facilities such as ranges or training areas becoming “surplus” and transferred to other owners because the specifics are not yet known. Similarly, they wondered why the SPEA did not analyze the effects of demolishing excess buildings and infrastructure.

**R:** As explained in Section 1.3 of the SPEA, analysis of the potential impacts of underutilization, abandonment, and/or demolition of facilities as a result of force reductions is speculative and beyond the scope of this programmatic analysis.

One commenter stated that the SPEA limited its analysis to environmental effects within the boundaries of the installation and that this was overly restrictive as Fort Knox is part of a region.

**R:** The analysis of resources at Fort Knox was not limited to the installation boundaries; analysis was based on appropriate ROIs which were, in turn, based on the VEC analyzed. For example, reductions in personnel typically affected traffic, both on and off of the installation and were addressed in Section 4.14.16 of the SPEA.

One commenter notes that the SPEA adds the word “adverse” as a qualifier to significant and then concludes that reductions at Fort Knox would have only negligible impacts to biological resources and wetlands if Alternative 1 is adopted.

**R:** The SPEA’s overall impact rating for these resources is “negligible,” although there are some beneficial aspects for biological resources.

As noted, the earlier 2013 PEA and No Action Alternative characterize the effect to energy demand and generation to be “negligible.” The SPEA characterizes the effects as having “minor, beneficial impacts.” There is no analysis, however, as to how these personnel and training losses would affect the region's energy demand and generation. Further, there is no discussion on how or whether reduction of use of the solid waste and/or natural gas electrification facility would affect the region.

**R:** As stated in Section 4.14.13.2 of the SPEA, “under Alternative 1, minor, beneficial impacts to energy are anticipated due to a further reduction in energy consumption associated with additional force reductions. The installation would also be better positioned to meet energy and sustainability goals.” Other changes to energy generation that are not reasonably foreseeable such as conversion to natural gas, are speculative at best, and were not included in this analysis.

One commenter noted that DoD schools are closing or will close on posts as the result of this action. It is not known on which posts this will occur, but it is certain that the DoD school inventory will shrink. An inventory of those or a representative sample of those schools will reveal how many, for example, contain asbestos which would require particular demolition techniques and safeguards, and disposal in something other than a regular construction debris landfill. The SPEA contains no analysis of these hazardous materials and wastes, or whether they are individually or cumulatively significant.



**R:** There are DoD schools at several of the installations considered in the SPEA: Forts Benning, Bragg, Campbell, Jackson, Knox, Rucker, and Stewart. The closure of four schools at Fort Knox is acknowledged in the SPEA on page 4-381. There is no information to indicate that any buildings in these school systems are to be demolished. Because demolition of the buildings is not reasonably foreseeable, it was not analyzed. Potential closure or demolition of facilities due to the Proposed Action in the SPEA is beyond the scope of this analysis.

### **Socioeconomic Impacts**

Multiple commenters stated that, in addition to lost spending power in the local economy, employment and the rental and housing market would be negatively affected by force reductions. The commenters noted that, while the communities closest to the Fort Knox would be hardest hit, the effect would be far reaching because of a workforce that commutes from a large surrounding area. A third commenter believes that Hardin County should not pay the economic price for Army reductions. An additional two commenters stated that Fort Knox has already faced previous BRAC reductions and further cuts would threaten a struggling economy.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

One commenter questioned the salary figures used by the EIFS model and recommended that the data should be more specific to Fort Knox. The commenter also questioned the exclusion of contractor salaries from the model. The commenter provided specific examples and details on how the Army could improve its analysis and be more rigorous. This commenter went on to question whether this Army model is a good, peer reviewed model giving accurate results or merely a convenient "one size fits all" model regardless of the circumstances.

**R:** Section 4.0.4 of the 2013 PEA and Section 4.0.2 of the 2014 SPEA describe EIFS, the socioeconomic model used to analyzed impacts of proposed force realignments. EIFS has been in use by the Army for many years and is considered a reasonable model.

At the nationwide programmatic scope used in the SPEA, local variations were not taken into account. For example, average or total salaries would vary from unit to unit within a given installation, and the Army has not made decisions on which units may be subject to force structure changes. Additionally, salaries would generally be higher at installations with higher grade structures. This could mean that income losses from force reduction and declines in sales could be greater than otherwise indicated. To have taken into account some of these variations would have been extremely difficult and, considering the

programmatic nature of the analysis, the Army decided the additional details would not have substantially changed the conclusions reached.

Additionally, Section 1.3 of the SPEA also indicates that changes to the number of Army contactors and contract support as a result of force reductions are unknown and therefore not able to be analyzed quantitatively. Section 4.14.12 of the SPEA has an extensive economic analysis and addresses contract service jobs and induced employment loss for the Fort Knox ROI.

One commenter noted that the draft FNSI indicated that socioeconomic impacts could include greater impacts to lower income populations, and the commenter asked why the Army used the word “could,” stating that if greater impacts to lower income populations would occur, the Army should perform additional analysis to comply with the Environmental Justice provision of 32 CFR 651.17. A commenter requested that two communities in particular be examined in greater detail and should be mentioned in the Environmental Justice section of the SPEA: Muldraugh, because it is a community of mostly lower income people that is completely surrounded by Fort Knox, and Radcliff, because it has a larger minority population than elsewhere in the ROI.

**R:** The section of the draft FNSI cited in the comment reads: “Socioeconomic impacts could include greater impacts to lower income populations that provide services to military employees and installations, or where job losses affect communities whose proportion of minority population is higher than the state average.” For Fort Knox, the SPEA states: “...the proportion of minority populations in Hardin County is greater than the proportion in Kentucky as a whole. Because of the higher percentage of minority populations in Hardin County, the implementation of Alternative 1 has the potential to result in adverse impacts to minority-owned and/or staffed businesses if Soldiers and Army civilians directly affected under Alternative 1 move to areas outside the ROI...Overall, environmental justice populations could be adversely impacted under Alternative 1, although the impacts are not likely to be disproportional.” The word “disproportional” is key, referring to the term “disproportionately high” in the Executive Order 12898. Force reduction would affect places such as Muldraugh and Radcliff with their relatively lower income populations, but this economic impact would affect these places as a part of its overall effect on the local community. Muldraugh and Radcliff would not be singled out for impact as opposed to other parts of the local community. Therefore, the impact is not “disproportionate” within the meaning of the executive order. The actual impact from force reductions on these populations is highly speculative, so the Army uses the word “could” rather than “would.”

In reference to the draft FNSI, one commenter stated that the Army is walking a fine line between “less training means more recreational activities on post” and “but there would not be such underutilization of training areas that they would be designated excess and transferred to others” on the other. The commenter believes the Army appears to be attempting to avoid doing

any serious environmental documentation as the adverse or beneficial effects would not be significant.

**R:** The Army stands by both of these possibilities as likely outcomes of the proposed force reductions and does not view their acknowledgment as an attempt to avoid further or deeper analysis. While the volume of training activities may decrease (potentially resulting in greater opportunity for recreational activities), the Army would still maintain the same training requirements for remaining forces.

One commenter suggested that the reductions were so severe that the Army should consider an EIS to consider the socioeconomic impact alone, even if it decides not to combine it with other significant, or cumulatively significant VECs.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(a) regarding Significance and the Army's response.

### **Loss of Trust**

One commenter stated that while both he and his family have served in the military, he could no longer recommend the military as a career choice, noting that he has not seen a more demoralized military and retiree community than he sees currently. The commenter requested no force reductions at Fort Knox.

**R:** As loss of trust concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 8 regarding Loss of Trust and the Army's response.

### **Community Investment**

Multiple commenters provided input on the amount of community investment that the region has provided to Fort Knox, noting that, in the midst of the recession, the Commonwealth of Kentucky committed \$251 million for new schools, roads, and other needed infrastructure investments to accommodate the anticipated growth. Commenters stated that colleges and universities established new curriculums to ensure local job seekers were prepared to fill any vacancies within the new commands. Commenters stated that community leaders traveled to relocating units to meet with the workforce and answer questions. They noted that local business and community organizations partnered to host hundreds of civilian employees and their families who were considering a move to Kentucky, a workforce they believe the Army needs to move in order to meet its mission. Commenters noted that 14 tours of more than 500 people were funded by local small business owners who wanted to demonstrate the welcoming nature of the communities.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army’s response.

### **Military Investment**

Commenters pointed out investments made at Fort Knox, some in anticipation of previously anticipated growth. One commenter supporting force reductions at Fort Knox stated that the on-installation population was already too small to support the operation of the installation and associated infrastructure and support services. The commenter indicated that Fort Knox already has a number of vacant and underused facilities and that select installation recreational facilities, such as the gym, are able to be used by the public on a pay basis. The commenter recommended that the Army should allow the public to take possession of select installation facilities and contribute to the expense of the operation of the support services currently paid for by the military.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 10 regarding Military Investment and the Army’s response.

A commenter noted that the concluding paragraph on Fort Knox, SPEA page 4-387, states that there will be a loss of approximately 7,600 Soldiers under Alternative 1. Actually, the loss is anticipated to be just under 6,000, with about 1,600 civilian employees. Contractor employees are not considered in the analysis.

**R:** Thank you for pointing out this error. The statement should have included “and Army civilians” after the word “Soldiers.”

### **Strategic Benefit**

Two commenters noted that the geographic location of Fort Knox, in the interior of the country and near major transportation networks and a logistics hub with global reach, meets the Army’s requirement for security, agility, and enhanced global presence.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 14 regarding Strategic Benefit and the Army’s response.

### **Mission/Readiness/Training**

One commenter noted that Fort Knox is home to multiple major commands under TRADOC, Human Resources Command, and several other active and reserve component commands.

## Capacity for Growth

Two commenters stated that Fort Knox is a cost-efficient installation and should be targeted for growth, not reduction. One commenter stated that Fort Knox had made more progress on energy efficiency than other similar installations and that this year the installation will demonstrate its ability to operate outside of the power grid. The commenter noted that these are real costs that many leaders have worked hard to decrease over the years and requested that the Army consider the cost savings in energy and other areas that Fort Knox has to offer.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 6 regarding Capacity for Growth and the Army's response.

## Other Comments

One commenter asserted that the Army is inappropriately tiering one study upon another, and one effect upon another, merely building on preexisting environmental documents (in this case an existing EA from 2013) instead of conducting new analysis examining the effects of this particular proposal.

**R:** The SPEA supplements the 2013 PEA rather than tiering from it. It is also important to note that the SPEA did not "merely build on" the 2013 PEA; the Army conducted a new analysis in the SPEA for the 21 installations that were analyzed under the 2013 PEA, looking at the effects of the revised action.

A commenter stated that the SPEA did not analyze all reasonable alternatives. The commenter stated that other alternatives reducing cuts by less than 142,000, such as by 70,000 or 100,000 should have been analyzed. The commenter believes the Army may have only examined two alternatives, the "No Action Alternative" and the "Preferred Alternative," in an attempt to get a study done quickly. Limiting the number of alternatives, the commenter states, is contrary to CEQ and the Army's own regulations, which provide for a reasonable number of alternatives to assist decision makers in making decisions based on realistic alternatives. Additionally, one commenter suggested that an analysis of every VEC would be considerably enhanced by the use of at least two or three realistic alternatives in addition to the "no action alternative," providing decision makers a helpful tool to make stationing and restructuring decisions.

**R:** The fact that the SPEA analyzed maximum proposed reduction numbers at each installation ensured that potential impacts were thoroughly analyzed and does not limit Army decision makers' ability to select and implement lesser reduction numbers at a given installation. It is important to note that the Army does not refer to Alternative 1 as the "preferred alternative." First, this is a NEPA term of art and is required for EISs, but not EAs. Second, the issue of alternatives is addressed in the Army's response to universal comment 2,

Additional Alternatives. The possibility of an “interim” alternative is discussed in Section 3.3 of the SPEA.

One commenter pointed out that the SPEA itself notes that the “No Action Alternative” is “no longer realistic” because changes have already occurred but, nonetheless, includes it. The SPEA states: “No BCT restructuring would have occurred...and no unit inactivations would have occurred.” In any case, personnel strength and logistics or infrastructure load at a certain time in the past may be a useful baseline, but it is not an alternative to be studied under NEPA. In effect, this means that the Army has evaluated only one alternative—its preferred alternative.

**R:** The SPEA does not have a preferred alternative. See the Army’s response for universal comment 2, Additional Alternatives. The description of the No Action alternative in Section 3.2.2 of the SPEA explains why the baseline from the 2013 PEA was used.

A commenter stated that the Army has failed to comply with 32 CFR 651.16, Cumulative Impacts. One commenter stated that by defining “significant” so narrowly, defining it as exclusively negative or adverse, and confining it to what happens at an installation or, in rare cases, in the surrounding region, the SPEA also defines away its obligation to examine cumulative effects. The commenter believes the SPEA quotes CEQ regulations and an EPA document to demonstrate that “cumulative impact” is a very broad term. The commenter states that the Army did not examine the cumulative effects of any VEC, other than socioeconomics and GHGs, at all 30 locations for analysis of possible regional or national cumulative effect. Another commenter stated that Fort Knox's VEC influences should be added to those of the other 29 installations to determine whether there has been any significant cumulative impact. A commenter also stated that the analysis fails to address actions that may currently be occurring by other federal and non-federal agencies and private parties within the ROI of the 30 installations covered in the SPEA. A commenter asked what the cumulative effect on noise would be when 30 installations decrease noise generation. A commenter wondered whether the Army considered the cumulative effect on training areas, soils, air emissions, ESA compliance, hazardous waste generation, and probable reduction in the number of spills.

**R:** The Army acknowledges its obligation to analyze cumulative effects, and it did so in the SPEA as thoroughly as possible and as appropriate for a programmatic analysis. At Fort Knox, cumulative effects were examined in Section 4.14.17 of the SPEA. As noted in Section 4.32.1 of the SPEA, GHGs and socioeconomics were further analyzed as the sole resource areas that could conceivably have a broad regional or nationwide cumulative effect. Impacts for many of the VECs are localized and their cumulative, nationwide impacts were anticipated to be negligible; therefore, they were not covered in Section 4.32.1 of the SPEA.

One commenter stated that the NOA published in the *Federal Register* for the SPEA and introductory or general matters in the SPEA itself contain factual inaccuracies or statements

otherwise not supported by the text or data in the SPEA. For example, the NOA states that nearly all Army installations will be affected in some way by additional reductions, but the SPEA does not identify any significant environmental impacts anticipated as a result of implementing the Proposed Action, with the exception of socioeconomic impacts at most installations. The commenter thought this conclusion was overly broad and not supported by the evidence. They believe the Army has conducted insufficient analysis to make such a conclusion in light of the Army's own statement in the FNSI that the potential reductions in Army strength are "substantial." The commenter found this statement unwarranted by the analysis done to date and the study itself under-inclusive, pointing out that there may well be installations with fewer than 1,000 personnel losses that have significant impacts in their own right. The commenter stated that the Army has not examined these installations either by themselves, or in terms of the cumulative effects these proposed changes would have on the total environment.

**R:** Section 1.3 of the SPEA explains why the 1,000-person threshold was selected for this programmatic NEPA document. All Army organizations and installations have the potential to be affected by force reductions. It may be that some installations not included in the SPEA will have to prepare site-specific NEPA documentation for changes that occur, to include the issues identified in the comment.

One commenter asked how much could the Army could shrink before the Army itself considers the changes environmentally significant. A commenter disagrees with the Army's exclusion of any analysis of the Army Reserve and ARNG changes because these forces represent a significant part of the Army's combat and administrative strength.

**R:** The reason for omitting the Army Reserve components from the scope is discussed in Section 1.3 of the SPEA.

One commenter did not agree with the reduction numbers analyzed by the Army. The commenter pointed out the SPEA assumptions indicate that the Army studied the effects of losing two BCTs at large installations, whether those installations have two or six, and smaller installations with only one or two BCTs would lose all of their BCTs. The commenter stated that there is nothing that indicates this is a realistic assumption, or why it is realistic; the commenter believes it is simply an arbitrary figure.

**R:** Section 3.2.1 of the SPEA explains that the Army looked at the maximum potential reduction numbers at each installation. This was a realistic assumption. The Army does not contemplate losses beyond this scope. The comment is correct that some installations could lose proportionately more than others. The response to universal comment 1 addresses the overall force structure decision process.

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## Fort Leavenworth, Kansas

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### **Socioeconomic Impacts**

Many commenters believe that force reductions at Fort Leavenworth would adversely affect the local economy, reduce tax dollars, and require local businesses to close and will result in an inability to maintain existing infrastructure. One commenter noted that Fort Leavenworth and Fort Riley are large parts of the Kansas identity, including the economy. Many commenters stated that Fort Leavenworth employees and students represent the largest block of travelers using the Kansas City International Airport. Another commenter stated that Fort Leavenworth attracts DoD contractors, generating jobs for Lansing residents. Several commenters noted potential impacts to public school budgets and subsequent impacts to staff and facilities as a result of force reductions.

**R:** Since similar concern were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

Several commenters believes that the potential socioeconomic impacts were significantly understated in the SPEA.

**R:** Since similar matters were raised by commenters concerned about socioeconomic impacts in the regions of a number of different installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(a) regarding Significance and the Army's response.

One commenter provided suggestions for programs or services that could be reduced or eliminated from Fort Leavenworth, in an effort to reduce the operating budget without force reductions. Specific ideas included not providing schools on the installation and elimination of the PX and commissary, given that these services can be provided by the local communities.



## **Army/Community Relationship**

Multiple commenters believe that the region has formed a strong partnership with Fort Leavenworth and has affordable housing and support facilities for the installation's current force levels. Commenters noted that shared resources, such as fire, emergency services, public works, and medical services benefit the entire region and that the surrounding communities provide ample and affordable housing, shopping, cultural, entertainment, and national sporting (football, baseball, and soccer) venues. One commenter emphasized the strong partnership between Fort Leavenworth and the public school system and the ability of both the staff and facilities to accommodate Fort Leavenworth's needs. Several commenters wrote that members of the community have sponsored foreign students coming to Fort Leavenworth for training. The commenters support keeping Fort Leavenworth's population at its current force levels.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army's response.

## **Community Investment**

Multiple commenters stated that citizens of Kansas and Missouri have developed critical infrastructure around Fort Leavenworth by expanding transportation access to and increasing capacities of local highways and bridges. Commenters noted that affordable housing has been developed, a downtown area has been revitalized, and three hotels are in the process of being constructed, all actions which support the military. Commenters wrote that the University of Kansas and other nearby colleges offer undergraduate and graduate degree programs to better meet the needs of military and civilian employees and their Family members.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

## **Military Investment**

One commenter stated that a new military prison has just recently been built and serves the needs of the Nation as the only maximum security facility serving the military justice system. A second commenter noted that considerable funding has been spent in recent years to make physical improvements to the installation.

## **Strategic Benefit**

Multiple commenters believe that Fort Leavenworth is a critical strategic location for national defense and international deployment because of its central location and proximity to an international airport.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 14 regarding Strategic Benefit and the Army's response.

### **Mission/Readiness/Training**

Multiple commenters noted that professional military education and training at Fort Leavenworth are important and expressed concern that reductions would erode the Army's ability to develop leaders and analyze and adapt to threats in a changing world. Commenters mentioned the value of the TRADOC Analysis Center, headquartered at the installation, which gives Army forces feedback on how best to adjust tactics to achieve more effective results with decreased threat to deployed troops. One commenter provided an in-depth history of training at Fort Leavenworth and stated that force reductions would result in not only a loss of individuals, but in a loss of talent needed to educate the next generation of commanders and general staff officers.

Commenters questioned whether Fort Leavenworth and the Command and General Staff College would be able to react sufficiently to the accelerated education of Soldiers in the future if the proposed force reductions take effect. Concern was also expressed regarding continued education of civilian employees in light of the Army Management Staff College having moved to Fort Leavenworth as a result of the last BRAC. Several commenters mentioned the installation's role in the judicial system, with commenters noting that the installation houses the only high-security detention facility for military personnel adjudicated under the Uniform Code of Military Justice. One commenter recommended relocating leadership training to Fort Leavenworth, noting that consolidation of the Army leadership training mission would be the best use of the Army's real property resources and would allow students to interact and observe diverse leadership styles across ranks.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 11 regarding Mission/Readiness/Training and the Army's response.

### **Veteran Impacts**

Commenters noted that the community includes many veteran-owned businesses and believes that force reductions would affect those business owners.

### **National Security**

One commenter noted that Fort Leavenworth serves as the intellectual center of the Army, stating that the schools and programs that take place on-post are significant to the future of the Army and its ability to adapt and continue to be the greatest fighting force in the world. A second commenter noted that Fort Leavenworth offers assets to the U.S. Army that are unique within the system and urged the Army to consider the costs to national security of eliminating or reducing programs offered only at Fort Leavenworth, including two prisons, the Command and General Staff College, and the Advanced Military Studies Program, which provide a centralized

intellectual hub. One commenter stated that force reductions at Fort Leavenworth would damage the joint training of U.S. and international officers, which the commenter believes would have global implications, including the loss of trust, damaged relationships, and a lack of shared strategic conversations around the world.

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## Fort Lee, Virginia

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Socioeconomic Impacts**

Two commenters stated that reductions at Fort Lee would continue to decrease jobs in an area where limited job openings are available and would have negative impacts for the local economy, human health, and the environment. As a result, commenters requested no reductions at Fort Lee.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

### **Community Investment**

Commenters noted that state and local resources were invested in improvements for the benefit of Soldiers, their Families, and the military and civilian workforce. These included road improvements, school construction, public transportation initiatives, utility upgrades, and public health services. One commenter noted that the proposed force reductions would result in the loss of property values and decrease of sales and property taxes, which, in turn, raises concerns with local communities meeting their future bond obligations associated with community investments. Two commenters noted that this year Virginia's FACT Fund, a grant program available to prevent or mitigate encroachment issues around military facilities, made \$4.3 million available for these efforts.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Mission/Readiness/Training**

Several commenters questioned how potential cuts to forces at Fort Lee and the impacts analyzed for those cuts could be done without taking into consideration the training loads and student population at Fort Lee, as well as the Army's mission. One commenter questioned how force reductions are distributed, in terms of grade, required expertise, experience, future requirements, lead time for reconstruction and overall force structure. The commenter disagrees with the decision to address the personnel cuts that may be distributed to Fort Lee without consideration of the requirements for which the installation will remain responsible (e.g., training) and believes that the analysis is based upon a mathematical allocation of the potential cuts to some, but not all, installations without regard for the surviving mission of each installation. Two commenters stated that addressing the proposed personnel cuts without considering the ultimate training and pipeline needs of the service limits the usefulness of the analysis. A number of commenters noted the training and logistics support Fort Lee provides to the Army. One commenter noted that as part of Fort Lee's mission of supporting the "generating force," it provides training for 36 percent of the Army's enlisted MOS and 40 percent of the Army's warrant officer specialties. The commenter notes that the heavy concentration of training responsibility at Fort Lee is a reflection of the logistics synergy present in the personnel resources present at Fort Lee and the efficiency of a single location to provide logistics training across Soldier specialties. With that, the commenter stated that the Army would not be able to reconstitute the loss of forces at Fort Lee in a timely manner, and that it is the magnitude and impact of that loss and the difficulty in timely replacement that distinguishes Fort Lee from the other installations evaluated for force reductions. Several commenters also noted that the installation is home to the Defense Commissary Agency and the Defense Contract Management Agency. With respect to all three installations in Virginia, a couple of commenters stated that it is important to consider these pipelines of Army doctrine, resources, and personnel when considering how to implement what will be one of the most difficult current military drawdowns of our time.

**R:** As noted in Section 1.3 of the SPEA, changes to the number of Army trainees, transients, holdees, and students as a result of force reductions are unknown; therefore, any analysis can only be discussed generally and qualitatively in the SPEA. Additionally, until final decisions are made as to where the nature of reductions (e.g., reducing the number of ABCTs means that the Armor School would need to train fewer Soldiers within this MOS), TRADOC cannot make any decisions about training loads or the frequency of training to be conducted at Fort Lee or other installations with major Army training missions. However, as part of the overall force reduction decision making process, the mission of installations will be taken into consideration. Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in

a manner that addresses many installations. Please see universal comment 1 regarding Force Structure Decision Process and the Army's response.

As noted in Section 1.3 of the SPEA, the document does not analyze any potential reductions in other military departments. Reductions in DoD-level organizations, such as the Defense Commissary Agency and Defense Contract Management Agency, are also not part of the Army's Proposed Action and are excluded from analysis.

### **National Security**

One commenter noted that ISIS is an emerging threat, as well as Russia and disagrees with the decision to reduce forces in the U.S., noting the Army should retain troops and enlist more. Another commenter noted that significant decrements to the mission of Fort Lee will render an Army at risk of being inadequately supported in the field. This commenter stated that while there can be no doubt about the combat effectiveness of our deployed troops, even the most effective fighting force depends on rations, ammunition, transportation, fuel, and mobility to survive and prevail in sustained operations.

**R:** The Army acknowledges that new problems have arisen since preparation of the SPEA, including conflict in Iraq and Syria and the Ebola virus situation in West Africa. Force structure decisions will be made with full awareness of these issues.

### **Other Comments**

One commenter stated that the proposal to impose massive personnel cuts at Fort Lee is without regard for impacts on the Army and its mission. Another commenter expressed concern that the Army's force reductions were being distributed across the installations, to include Fort Lee, in a manner that lacks the reasoned, mission-oriented evaluation that national defense requires. A commenter stated that 10 U.S.C. §993 includes the requirements to submit to Congress an evaluation of the local strategic and operational impact of the reductions in question and that all impacts should be examined in one document.

**R:** Analyzing impacts to the Army's mission is beyond the scope of the SPEA; however, impacts on the Army's mission will be taken into consideration during the force structure decision process, a process which is not completed. Also, the Army will also meet its 10 U.S.C. §993 requirements prior to implementing any reportable force structure decisions. Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 1 regarding Force Structure Decision Process and the Army's response.

One commenter stated that the analysis in the SPEA suffers from a significant legal error in that it did not consider all reasonable alternatives, including the closing of some installations and

consolidating assets at a remaining installation. The commenter noted that BRAC is not the only legal means by which installations are closed and that the Executive Branch is empowered to close installations that it deems unnecessary, subject to a reporting requirement to Congress. The commenter also noted that such an alternative would be a major federal action with significant adverse impacts and require an EIS instead of an EA. The commenter believes that the Army did not consider this alternative in order to avoid preparing an EIS.

**R:** In general, closures of military installations require action by Congress, are beyond the scope of the SPEA, and thus were not analyzed herein. Please see the Army’s response to universal comment 5 regarding BRAC. The response is provided to address many commenters concerns on whether the Proposed Action analyzed in the SPEA was related to a potential future BRAC process.

One commenter stated that the SPEA is flawed in that it arbitrarily excluded from consideration smaller installations; AMC populations; other military service civilian and military personnel; Army tenants at bases other than those controlled by the Army; environmental, safety, fire, and rescue personnel; and health care personnel. The commenter notes that this exclusion minimizes the impact at bases where such populations are large while disproportionately distributing reductions to bases where such excluded populations are not as concentrated.

**R:** Section 1.3 of the SPEA explains why the 1,000-person threshold was selected for this programmatic NEPA document and, on page 1-5, states: “all Army organizations [and installations] have the potential to be affected by the Army’s force reduction.” Force reductions may affect installations not analyzed in the SPEA. It may be that some installations not included in the SPEA will have to prepare site-specific NEPA documentation for changes that occur.

As noted in this same SPEA section, on page 1-8, three installations affected by the Proposed Action analyzed in the SPEA are joint bases managed by the Air Force—Joint Base Elmendorf-Richardson, Joint Base Langley-Eustis, and Joint Base San Antonio-Fort Sam Houston.

As the Army does not have the authority to reduce personnel from the other military services, the scope of the SPEA excluded those from the Army’s analysis.

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### Fort Leonard Wood, Missouri

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar

topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Socioeconomic Impacts**

Numerous commenters believe that there would be adverse impacts to the local economy, reductions of the tax base, lower home values, closures of local businesses, and adverse effects on the local school districts if force reductions were to occur at Fort Leonard Wood. They noted that the local region relies heavily on the installation, especially Pulaski County because 46 percent of its workforce is employed on Fort Leonard Wood. Commenters stated that Fort Leonard Wood is one of the largest employers in their state. A commenter noted that home abandonment and re-possession will likely skyrocket. Some commenters described the anticipated impact of proposed reduction in forces at the installation as devastating to the local region. A number of commenters believe the SPEA analysis fails to accurately relate the real impact of the proposed force reductions in the rural installation location. A number of commenters believe the analysis in the SPEA treats all installations alike with respect to economic impact and that a rural area, like the communities surrounding Fort Leonard Wood, would be more significantly affected than an area where the Army is not the largest employer. Another commenter believes that Fort Leonard Wood is an affordable location for business and cost-of-living, which would benefit the Army operations as well as Soldiers.

**R:** As with other installations, the SPEA concluded that the ROI for Fort Leonard Wood would experience significant socioeconomic impacts (see Table 4.17-1). "Significant" is the highest qualitative rating for impacts of an action when analyzed under NEPA. The Army recognizes potentially devastating impact substantial personnel reductions would have on the communities surrounding Fort Leonard Wood and the possibility that these impacts could be even more adverse than identified in the SPEA. The Army will consider all of the comments raised in its subsequent phases of the force structure decision process. Other similar concerns were raised by commenters regarding the region for which they were concerned; they are included in the front of this Annex in a manner that addresses many installations. Please also see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

Several commenters disagree with the use of a seven-county ROI for the analysis and instead recommended a smaller four-county ROI. Commenters also stated that the less than significant finding for Sales Volume is a result of the larger ROI.

**R:** Since similar ROI concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations.

Please see universal comment 13(c) regarding Region of Influence and the Army's response.

Multiple commenters were concerned about the potential impact of the Proposed Action to schools, both public and private. Many commenters specifically identified concerns of impacts to the Waynesville R-VI School District as approximately 60 percent of its students are military dependents and an additional 15 percent of its students are dependents of civilians working on the installation. Commenters noted that reduced enrollment constrains the District's budget and will result in reductions in certified teaching positions. Commenters also expressed concern that the proposed reductions at Fort Leonard would possibly prohibit the Waynesville R-VI School District from continuing Missouri's first National Math and Science Initiative college readiness program, a program made possible by a grant from the DoD Education Authority. A commenter stated that most of the classrooms in the entire area would be missing technology, labs, and equipment that could not be afforded without government impact aid.

**R:** Since similar concerns were raised by commenters from a number of installations regarding impacts to schools in their regions; they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(d) regarding Schools and the Army's response.

### **Army/Community Relationship**

Commenters noted that regional community members embrace the military and have worked very hard to develop a strong relationship between the communities and the installation. A commenter believes further reduction of military and civilian personnel at Fort Leonard Wood will constrain the vital partnerships represented at the University of Missouri Technology Park at Fort Leonard Wood, which serve as catalysts for innovations in military-centered research and training. That commenter stated that, if the 2014 SPEA were to be implemented, the impact would be a blow to the ongoing development and growth of the dynamic alliance between the Army and the University of Missouri System, with unfavorable repercussions to the social and economic fabric of the mid-Missouri region. As an aspect of community support to Fort Leonard Wood, one commenter suggested the Army should remove budget items for some services and allow the community to provide them.

**R:** Since similar concerns were raised by commenters from a number of installations regarding their communities, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army's response. Additionally, while the Army appreciates the budgetary support suggested, the Army must comply with appropriate laws and regulations that govern financing of services provided by communities in the vicinity of military installations.



## Community Investment

Commenters stated that citizens of Missouri have developed critical infrastructure around military installations, including Fort Leonard Wood, by expanding transportation access to and increasing capacities of local highways and bridges. Commenters noted that affordable housing had been developed in support of the military. Commenter noted that Pulaski County and the cities of Waynesville and St. Robert have made substantial investments to provide infrastructure, amenities, and services for the military and their Families. Multiple commenters stated that the Waynesville R-VI School District has invested more than \$100 million in new construction and facility improvement projects, which also support military students. A commenter noted that the Ozark Technical College has built a new branch campus in Waynesville. Examples of other community investments mentioned by multiple commenters as improving the quality of life for Soldiers and their Family members include a new industrial park, medical facility, and multiplex movie theater. One commenter noted that \$6 million was invested in military airport program projects as a joint civilian-military effort that benefited both Fort Leonard Wood and the community. A commenter expressed concern that the proposed reductions would impact the future viability of the University of Missouri Technology Park at Fort Leonard Wood, whose tenants include Fortune 500 companies as well as Leonard Wood Institute, a not-for-profit research institute that facilitates collaborative initiatives among government, academia, and industry in support of military missions.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

## Military Investment

Many commenters requested no force reductions at Fort Leonard Wood, noting that the military has made a multi-billion dollar investment in new infrastructure at the installation. One commenter noted that Fort Leonard Wood pioneers a number of DoD concepts, including implementing sustainability programs, housing multiple schools at one installation, and offering multi-service training and education.

## Strategic Benefit

Many commenters stated that that Fort Leonard Wood is a critical, strategic location for national defense and international deployment due to its central location and accessibility from air, rail, and road.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 14 regarding Strategic Benefit and the Army's response.

## **Mission/Readiness/Training**

Commenters expressed concern that the proposed reductions at Fort Leonard Wood would severely impact crucial training for Soldiers in a variety of specialties to include law enforcement, chemistry, and engineering as well as mission training related to the war on terror. One commenter believes that force reductions at Fort Leonard Wood would affect training activities unique to the installation, including prime power training, live agent training, heavy equipment operation, and detainee operations.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 11 regarding Mission/Readiness/Training and the Army's response.

## **Capacity for Growth**

Many commenters believe there is room for growth at Fort Leonard Wood because the base is surrounded by National Forest System lands and that communities surrounding the base are not encroaching upon it. The commenters stated that Fort Leonard Wood can support more training missions and combat units because of the size of the installation, noting there is a lot of area not currently used on the installation and remodeling the barracks would be cost effective.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 6 regarding Capacity for Growth and the Army's response. Additionally, the Proposed Action evaluated in this document is a reduction in force structure and therefore would not include expansion of the installation.

## **National Security**

Several commenters believe that force reductions at Fort Leonard Wood would reduce the U.S. defense capabilities and military readiness. Commenters expressed concern with the timing of these reductions in light of world events.

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## **Fort Meade, Maryland**

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Other than a reminder to ensure appropriate compliance requirements are met once force realignment decisions are made and the Army makes changes at Fort Meade in response to those decisions, no specific comments were received regarding Fort Meade. As Fort Meade was one of the 30 installations analyzed in the SPEA, readers may be interested in the No Specific Installation section near the end of this Annex. Additionally, readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Included with each are the Army's responses.

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## Fort Polk, Louisiana

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### Environmental Impacts

Many commenters believe that the SPEA does not consider the full range of indirect impacts.

**R:** The SPEA looks at indirect effects. In particular, the economic analysis looks at the broader community and not just the installation. Also, since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 9 regarding Environmental Impact and the Army's response.

Many commenters believe the SPEA failed to assess all land use and airspace effects.

**R:** The Army believes that the SPEA adequately addressed airspace and land use in the SPEA. Information regarding airspace and land use will be further considered and site-specific NEPA analysis conducted if required after specific force reduction decisions. Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 1 regarding Force Reduction Decision Process and the Army's response.

Many commenters believe the SPEA failed to properly address cumulative effects.

**R:** The Army believes that cumulative impacts were adequately addressed for the assessed force reductions at Fort Polk as well as at the other 29 locations in the SPEA. As a supplement to the 2013 PEA, the 2014 SPEA expanded on the cumulative impact section of the 2013 PEA.

### Environmental Justice

Commenters noted that the SPEA failed to properly consider environmental justice.

**R:** The Army believes that the SPEA adequately evaluated environmental justice at each installation, and it was determined that there would be no disproportionate adverse impacts to minorities, economically disadvantaged populations or children.

### **Socioeconomic Impacts**

Several commenters stated that force reductions at Fort Polk would affect the economy, tax base, schools, local businesses, and municipal services. Commenters stated that Fort Polk is Louisiana's largest employer and the reduction would also reduce civilian jobs. Commenters believe that housing prices would be reduced and fewer military children would be enrolled in local schools, resulting in cuts to teaching staff. Many commenters believe that the socio-economic data and analyses were incorrect and that the SPEA used an improper baseline for its impact analysis. Multiple commenters believe that the SPEA ignored significant Soldier populations, such as trainees. Many commenters believe the analysis should consider the effects on local hospitals.

Commenters requested no cuts at Fort Polk and asked that the Army recognize that Fort Polk is a cost-efficient installation.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and universal comment 13(e) regarding Public Services and the Army's response for each.

Additionally, the Army explained in Section 1.2 of the SPEA that reductions to Army trainees, transients, holdees, students, and the Army Medical Command troops cannot be evaluated at this time. This section also explains that overseas troops were already considered for reductions, many of which have already been implemented.

A commenter stated that the SPEA fails to adequately look at the entire Army enterprise when considering force structure reductions and that commands with less than 1,000 personnel such as acquisition, logistics, training, R&D, arsenals, and other activities should have been considered in the SPEA.

**R:** Since similar concerns were raised by commenters from a number of installations they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 3 regarding Installations Analyzed and the Army's response.

One commenter supported force reductions at Fort Polk, noting housing and other issues, such as unsafe drinking water and mold, birth defects, and poorly rated schools. The commenter also noted the increased costs of moving personnel, given that the nearest airport is 45 minutes away.

Many commenters believe that the SPEA failed to consider operational costs.

**R:** Information regarding operational costs will be considered during the force structure decision process but was not a factor in the NEPA process. Since similar concerns were raised by commenters from a number of installations they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 1 regarding Force Reduction Decision Process and the Army's response.

One commenter indicated that the analysis in the SPEA was incorrect in stating that reductions in federal employment by the Army at Fort Polk would be partially off-set by increased employment by the Louisiana DOT as part of the efforts to improve state highways.

**R:** The Army recognizes that force reductions would have significant socioeconomic impacts within the ROI. The Army did not intend to imply that projects underway in the near future by the Louisiana DOT could be the only project to off-set effects from force reductions by themselves, but would help off-set job losses in conjunction with many other infrastructure and development projects in the region as described in the 2013 PEA and in the SPEA.

### **Army/Community Relationship**

Several commenters noted that the communities around Fort Polk have experienced the "boom-and-bust cycles" of Army force structure changes at the installation. The commenters recommended that a stable and reasonably sized force, consistent with the contingent of Soldiers at Fort Polk today, would sustain and encourage a prosperous and high quality of life for veterans, Soldiers, and their Families and would honor and respect the partnership between the community and the Army. One commenter noted that educators and students who come into the school system, even if for a short time, encourage change and growth that benefit the entire Fort Polk and Vernon Parish community, noting that new ideas and experiences broaden the vision of those who have been in the area for their entire lives. Another commenter noted that the community surrounding the installation has already been asked to sacrifice as Fort Polk's training space increases, through the Army's land acquisition program and the communities of southwest Louisiana, including Lake Charles, signed a Community Covenant with Fort Polk solidifying the region's desire to support and work with Fort Polk and its military Families.

**R:** Since similar concerns were raised by commenters from a number of installations regarding their communities, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army's response.

### **Community Investment**

One commenter noted that Leesville High School is undergoing a \$1 million renovation; South Pole Elementary is about to be remodeled; and new hotels are being constructed to accommodate Soldiers. Several commenters wrote of the Highway 28 widening, a transportation infrastructure investment, and one also remarked on the recently completed four-lane improvement project for

Highway 171 from Fort Polk to Interstate 10. A commenter pointed out a number of recent community investments made at England Airpark/Alexandria International Airport, noting that the airport serves as the Aerial Port of Embarkation for Fort Polk.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Military Investment**

Commenters noted that the Army recently completed new facilities including a Brigade Complex, PX, commissary, fire station, and wastewater treatment plant. Improvements to Highway 28 to accommodate expansion were also noted. A commenter stated that Fort Polk recently acquired approximately 23,000 additional acres, and it is currently considering the acquisition of an additional 10,000 acres. This commenter wrote that the community has made significant sacrifices to allow this land acquisition program to move forward. Commenters believe that force reductions would make all of these improvements and investment for nothing.

**R:** The type and quality of Soldier training supported by investments at Fort Polk, including the continuing acquisition of training land, remain of vital importance to the mission of Fort Polk's JRTC to train Soldiers across the Army, regardless of the proposed force reductions. Please also see universal comment 10 regarding Military Investment and the Army's response.

### **Strategic Benefit**

Several commenters noted that the location of the installation near energy production and export facilities makes the location a high priority for the protection of the Gulf Coast area and Nation. Another commenter believes that the installation is uniquely positioned geographically to grow and to accommodate an array of new missions that will not only sustain a strong economy in the region but directly impact national security.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 14 regarding Strategic Benefit and the Army's response.

### **Mission/Readiness/Training**

Several commenters provided input regarding training at Fort Polk; they believe Fort Polk provides an unlimited training ground for personnel without disrupting the civilian population, and they noted that the JRTC is used by the Army to prepare troops for deployment to the Middle East. One commenter highlighted the JRTC as one of only two Combat Training Centers in the country and stated it is the Army's premier light infantry training facility. Commenters also remarked on the recent purchase of additional land area for Fort Polk; one commenter also

noted that this acquisition increased the installation's capacity to support indirect/non-line-of-sight weapons training. Commenters stated that of all of the bases in the U.S., they believe that Fort Polk offers the most cost-effective, rigorous, and relevant training together along with exceptional maneuver space, SUA, and rapid deployment facilities. A commenter also noted that Gray Eagle UAV operations just recently received a FAA waiver and are now approved for use at Fort Polk.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 11 regarding Mission/Readiness/Training and the Army's response.

### **Veteran Impacts**

Several commenters believe that cuts to the military at Fort Polk would result in reductions or the closure of on-post medical care and shopping that would have a direct negative effect to veterans. One commenter also noted that some veterans are at an age where relocation to another military community to receive services is not feasible.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 15 regarding Veteran Impacts and the Army's response.

### **National Security**

Multiple commenters are opposed to any cuts to the military, including at Fort Polk, noting that the U.S. needs a strong national defense.

### **Other Comments**

Multiple commenters believe the SPEA failed to fulfill NEPA's decision-making purposes. They also stated that the SPEA used an improper "no action" alternative and failed to analyze all reasonable alternatives. Several commenters stated that the SPEA should have analyzed a second action alternative of a reduction to 440,000 to 450,000 Soldiers. They noted that the SPEA analyzed a worst-case scenario of a 420,000 end-strength but failed to also analyze the end-strength identified in the 2014 QDR and cited by General Odierno in testimony to Congress as the "absolute floor for end-strength reductions."

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 2 regarding Additional Alternatives and the Army's response.

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## Fort Riley, Kansas

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Socioeconomic Impacts**

Multiple commenters stated the force reductions will result in tax revenue losses, property values decreases, and the closing or moving of businesses. The commenters believe talk of force reductions will cause new businesses to look elsewhere when consider investing in the community. A commenter noted that approximately 65 percent of the students in USD 475, the school district which services Fort Riley, are military related. Commenters believe that people will leave the local communities to seek out employment and better opportunities in other cities and states. One commenter noted that the loss of military spouses could leave vacant employment positions that would be difficult to fill, including positions at the local hospital.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

### **Army/Community Relationship**

Commenters stated that both the region and Fort Riley have benefited from forming strong partnerships in areas such as municipal and emergency services, education (kindergarten through grade 12 and higher), quality of life programs, and medical services. Multiple commenters noted that the community around Fort Riley has put an emphasis on education and accommodated students of military Families. They stated that college and technical training opportunities, including those at Kansas State University, are robust and affordable. They noted that members of the military and their Families can take on-campus or online courses with online courses enabling Soldiers to continue their education while being deployed. However, one commenter voiced concern over community interactions with Fort Riley particularly in regard to tuition at Kansas State University where the commenter believes military personnel were being taken advantage of as a result of higher tuition rates for on-line classes. Another commenter noted the importance of interactions of Fort Riley and its Soldiers and their Families to performing arts and cultural activities at Kansas State University. Commenters noted the willingness of the



community to work with Fort Riley to establish voluntary easements to secure the ability for military training operations. Multiple commenters believe that the strong Army/community relationship at Fort Riley is unique, as evidenced by all the events that happen throughout the year. Commenters indicated the local community has invested in restaurants, hotels, entertainment, and shopping opportunities that also support the Fort Riley community. Commenters were concerned that any change to the military population would hurt the community as a whole. They noted that the surrounding communities have consistently demonstrated their willingness for a symbiotic relationship and requested no force reductions at this location. One commenter noted the benefits of interactions between military and non-military children and the importance of these interactions to the community.

**R:** Since similar concerns were raised by commenters from a number of installations regarding their communities, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army's response.

### **Community Investment**

Multiple commenters remarked on investments made by state and local communities in support of Fort Riley and the many partnerships between the military and local communities. Investments and financial partnerships mentioned included the construction of adequate housing for the return of the 1st Division; constructions of new schools, some of which are currently being constructed; money saving partnerships such as those associated with the purchase of salt for the roads during winter months and shared emergency management support. Several commenters noted safety and volume improvements made to local highways. A commenter noted that Manhattan issued a \$97.5 million quality-of-life bond for numerous facility and aesthetic improvements, which were also expected to be enjoyed by Fort Riley personnel and military Families.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Military Investment**

Several commenters stated that Fort Riley has the lowest utility rates of any installation and estimated that the Army has awarded \$5 million each for ongoing repairs to and upgrades to water, gas, and electric distribution systems. Commenters noted the Army built a state-of-the-art sustainable wastewater treatment plant to meet environmental requirements. They believe Fort Riley receives water for free from the Republican River through a pump station that has more than twice the capacity needed to meet Fort Riley's needs. Commenters noted that Fort Riley's infrastructure makes it a cost-effective installation. Additionally, commenters noted that a new hospital has been built and will be ready for occupancy next year, and they believe that this new

hospital is a model for energy and resource savings and will be a sustainable, cost-effective facility, for treating the region's retired military community as well as the active duty component.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 10 regarding Military Investment and the Army's response.

### **Strategic Benefit**

Several commenters believe that because of its location in the central U.S., Fort Riley, in combination with Fort Leonard Wood and Fort Leavenworth, is a critical, strategic location for national defense and international deployment.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 14 regarding Strategic Benefit and the Army's response.

### **Mission/Readiness/Training**

Several commenters believe Fort Riley provides a unique training experience for those who use its training areas, weapons, and ranges. They noted that Fort Riley is fully capable of assisting any state or federal government agency with training needs. Commenters stated because Fort Riley experiences all four seasons and all training areas are within the fence line, they believe it has exceptional facilities for both live-fire and simulations training, along with excellent facilities to support the rapid deployment of units by rail and air. Two commenters noted Fort Riley is one of the few areas in the country with FAA clearance for UAV operations. One commenter stated that the installation has natural barriers to encroachment on three sides, which would lessen the need for actions to ensure future buffers to encroachment.

**R:** While the capability exists to operate UAS at Fort Riley and other areas, it would be incorrect to note that there are few areas cleared for UAS operations. The Army operates UAS at many installations. While operation of UAS at some installations currently may be constrained by airspace, facility, and range limitations, the Army is working to develop, build, and deploy facilities, technologies, procedures, and authorizations to remove those restrictions and enhance training and readiness. Please see universal comment 1 regarding Force Structure Decision Process and the Army's response.

## Capacity for Growth

One commenter noted that Fort Riley has land for growth to increase its size.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 6 regarding Capacity for Growth and the Army's response. Additionally, the Proposed Action evaluated in the SPEA is a reduction in force structure and does not include expansion of the installation.

## National Security

Several commenters stated that weakening support for Fort Riley will weaken the military strength in a time when terrorism is rampant. Another commenter believes that it is a bad time to reduce forces at Fort Riley because U.S. enemies would be aware of the force reduction. One commenter noted that the location of Fort Riley in the central U.S. is key to the national security.

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### Fort Rucker, Alabama

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No specific comments were received regarding Fort Rucker; however, as Fort Rucker was one of the 30 installations analyzed in the SPEA, readers may be interested in the No Specific Installation section near the end of this Annex. Additionally, readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Included with each are the Army's responses.

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### Fort Sill, Oklahoma

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

## Socioeconomic Impacts

Multiple commenters believe that force reductions would result in economic fallout, including the loss of real estate values, reduced rental occupancy, decreased new construction, potential for

school closings, and a lack of patronage to local businesses. Several commenters believe that as incomes decline, crime could rise, businesses could close, and blight and vacant houses could take over. One commenter noted that the cuts could affect the Senior Citizens Center and, if membership decreases, the Center will not be able to meet its financial obligations. The local utility supplier, CenterPoint Energy, stated it would lose 12 percent of its customer base, which would result in additional job reductions in the area. Additionally, two commenters noted that there would be a huge burden on the community services if cuts were made at Fort Sill, including an influx of patient load on off-installation hospitals from reduced on-installation services. Commenters stated that force reductions would decrease the quality of health care for non-military families from increased wait times. One commenter referred to higher job losses computed using an alternative model and emphasized potential adverse economic impacts to the Central Mall and its tenants, many of which could potentially be forced to close. A number of business owners and managers expressed concern regarding whether their businesses could survive the effects of a Fort Sill downsizing.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

A number of commenters were concerned about the potential impact of the Proposed Action to schools. Several commenters indicated a number of educational programs were developed by Cameron University and the Great Plains Technology Center in support of Soldiers and their Families. One commenter stated that many military Families who have special needs children request assignments to Fort Sill because of Lawton's educational special services.

**R:** Since similar concerns were raised by commenters from a number of installations regarding impacts to schools in their regions; they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(d) regarding Schools and the Army's response.

### **Army/Community Relationship**

Several commenters believe that Lawton embraces Soldiers and military Families, from church to school support, and that there is no separation between the community and Fort Sill, with many commenters noting that the area is often referred to as "Lawton-Fort Sill." Concern was expressed that reductions would result in lost opportunities for non-military students to learn about experiences of military students. Commenters stated that the influence that Fort Sill, Lawton, and the surrounding communities have had on each other has been positive and beneficial. A commenter requested that the Army consider Fort Sill as a location for future programs. Several commenters pointed out that the positive relationship between the community and Fort Sill influenced many prior military employees to select the region as their home when

they retired. A commenter applied the phrase “mutually beneficial symbiotic” to describe the relationship between the installation and Lawton.

**R:** Since similar concerns were raised by commenters from a number of installations regarding their communities, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army’s response.

### **Community Investment**

Commenters noted that a substantial amount of money has been spent on the installation and community. Multiple commenters stated that the community constructed new housing, schools, and shopping centers, and hotels to accommodate the needs of the installation and community. With the Army considering substantial force reductions at Fort Sill, another commenter believes that the Army is telling the community that their commitment to and investments in the Army do not matter.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army’s response.

### **Veteran Impacts**

One commenter stated that a reduction in force for Fort Sill would financially affect many veterans and working families and could increase the poverty level for veterans.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 15 regarding Veteran Impacts and the Army’s response.

### **Other Comments**

One commenter recommended the Army move Soldiers from overseas to take up the slack of losses affecting Fort Sill. This recommendation, in essence, recommends reducing forces at overseas installations instead of installations in the U.S.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 16 regarding Overseas Cuts and the Army’s response.

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## Fort Stewart, Georgia

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Socioeconomic Impacts**

Multiple commenters stated that they believe force reductions will result in losses in tax revenues, will decrease property values, and will force businesses and homeowners to close or move away from the local communities due to the drawdown. One commenter mentioned that adverse economic impacts would likely be felt throughout coastal Georgia. One commenter points out that Fort Stewart expects to suffer the largest percentage loss in income, the second largest percentage loss in employment, and the third largest loss in percentage of population of the installations evaluated in the SPEA. One commenter believes that job losses were underestimated in the SPEA. The commenter also believes that the Proposed Action would impose high costs to the city of Hinesville and its residents related to a shared wastewater treatment plant. Two commenters noted that recent staff reductions at Fort Stewart are already adversely affecting the local economy and that further force reductions will only intensify these impacts. One commenter noted potential adverse impacts to medical services as a result of potential medical staff losses, leading to longer wait times or increased travel for health services.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and universal comment 13(f) regarding Military Health System and the Army's response for each.

One commenter mentioned that savings or environmental impact from the energy plant within the cantonment should be included in the analysis.

**R:** The energy plant cost savings analysis and environmental impact were not considered since it is not relevant for the evaluation of impacts to energy demand and socioeconomic impacts associated with force reductions.

## **Army/Community Relationship**

Commenters provided examples of the close relationship between the Army and community, including a new elementary school on the installation that is located so that attendance is afforded to both military and civilian students. Another example included STARBASE Savannah, the 5th grade STEM training initiative, which is a partnership among DoD, the Army, the local school district and several area corporate supporters. Another commenter discussed the strong ties between Fort Stewart and the city of Pembroke, which have established communication systems between the two entities.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army's response.

## **Community Investment**

Multiple commenters noted that the Fort Stewart community has invested in meeting and supporting Fort Stewart's needs, including an investment in a robust fiber network to improve local and national communications and through the construction of new schools and infrastructure. The current real estate infrastructure to support more military and their Families is still in place.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

## **Loss of trust**

One commenter noted that several years ago, developers and builders of the community worked to develop land to make room for a 5th Brigade that never came. The current real estate infrastructure to support additional military and their Families are still in place. Commenters believe Army leadership broke its promise of adding an additional brigade and 3,500 more people to the community.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 8 regarding Loss of Trust and the Army's response.

## **Military Investment**

Several commenters noted that the military has, in recent years, invested substantial funds in rehabilitating and replacing a number of facilities at Fort Stewart. Commenters noted the Army

has invested millions of taxpayer dollars in constructing training facilities and housing at these military bases, and stated reducing the manpower at this time would be a waste of those dollars.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 10 regarding Military Investment and the Army's response.

### **Strategic Benefit**

Two commenters noted that Fort Stewart is easily accessible by numerous ports, including the Port of Savannah, as well as multiple airports and rail lines.

One commenter noted that Fort Stewart has a top environmental program meeting Presidential Energy goals with future renewable energy projects planned and as such are ahead of other installations in this aspect.

### **Capacity for Growth**

One commenter asked that force reduction occur at other installations and that troops be transferred to Fort Stewart. Multiple commenters noted that Fort Stewart is the largest installation east of the Mississippi River at almost 285,000 acres. It is capable of housing Army and joint forces, training and maneuver, and employing all manner of Army weapon and munition without restrictions.

### **Mission/Readiness/Training**

Numerous commenters believe that Fort Stewart provides a unique training experience for those who use its training areas, weapons, and ranges, noting that Fort Stewart is fully capable of assisting state and federal agencies with training needs.

### **Veteran Impacts**

Two commenters noted that Fort Stewart supports a number of retirees and veterans not only in the commuting area but throughout the states of Florida and South Carolina.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 15 regarding Veteran Impact and the Army's response.

### **National Security**

Two commenters opposed the reduction in force because they believe that military forces are necessary to the country's ability to both defend its homeland and keep commitments to allies around the world. Commenters stated that force reductions and the weakening support for critical



military bases, including Fort Stewart, are not responsible actions and will make the U.S. vulnerable.

### **Other Comments**

One commenter mentioned that the SPEA did not specifically identify U.S. Coast Guard units stationed at Fort Stewart, which would affect population and demographic numbers, and it did not address the average percentage of annual training conducted by ARNG and Army Reserve units in the region.

**R:** The total working population for Fort Stewart cited in Section 4.23.12.1 includes, as indicated, other military services, e.g., U.S. Coast Guard units. The SPEA only addresses active Army reductions, so ARNG or Army Reserve reductions are outside the scope of this analysis. The Army acknowledges that installations may be subject to additional reductions due to reductions of other service branches, including the U.S. Coast Guard. However, as indicated in Section 1.3 of the SPEA, specific information regarding force structure reductions by other service branches were not available for inclusion in this analysis.

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## **Fort Wainwright, Alaska**

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Socioeconomic Impacts**

Commenters noted that military Families comprise a significant portion of the Fairbanks economy, accounting for 20 percent of the population and 39 percent of jobs in the FNSB and stated that force reductions would result in significant reduction in employment, loss of housing demand, and declines in real estate values and school enrollment. Another commenter noted that serious economic impacts would occur to the area if the installation was not kept at status quo.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

Several commenters supported force reductions at Fort Wainwright. Commenters believe that reduced spending is responsible and prudent and that the community would continue to thrive with reduced operations at Fort Wainwright. One commenter believes that an increased Army presence at Fort Wainwright would allow for improper land use of the area and lead to adverse impacts to socioeconomics.

A couple of commenters stated that the SPEA severely underestimated the socioeconomic impact on Fairbanks and FNSB and requested that the Army revisit the economic impact estimates in the SPEA so that it reflects more accurately local factors and, as one commenter stated, total remuneration Soldiers receive. One commenter indicated that the FEDC developed the Fairbanks Economic Model in 2009 and updated it in 2012 and noted that while the SPEA concludes Fairbanks would lose 10 percent of its employment income, the Fairbanks Economic Model indicated it would be closer to 20 percent.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(b) regarding Alternative Economic Models and Analyses and the Army's response.

Commenters are concerned about the impact of force reductions on the school district, explaining that reductions would result in reduced operating funding and a possible need to close schools. One commenter anticipated a loss of \$14.4 million in state funding, more than \$9 million lost in federal impact aid funding, and a \$1.5 million decrease in pupil transportation funding. The commenter anticipates \$4.5 million state foundation revenue offset for a total loss of \$20.5 million.

### **Army/Community Relationship**

Commenters stated that Fairbanks offers employment opportunities within the community that are integral to spouses and dependents. Commenters noted that Fort Wainwright residents are also city of Fairbanks residents that are actively involved with municipal happenings. Commenters believe that there is a strong patriotic bond between the local community and the military, and one commenter stated that Interior Alaska flourishes with Army, U.S. Air Force, active, guard, reserves, veterans, retirees, and many proud Americans. One commenter explained that the community tries hard to consider the needs of military Families, from recreational opportunities to how deployments affect school children, and seeks ways the school district can help students through the difficult times of deployments and moving to new schools.

**R:** Since similar concerns were raised by commenters from a number of installations regarding their communities, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army's response.

One commenter noted that the legislature has taken action to reduce the cost of energy and passed a bill that offers tax incentives for businesses that establish themselves in military facility zones around Fort Wainwright. Another commenter explained that by using liquefied natural gas for heating, energy costs could be cut in half, in addition to benefitting the environment by reducing particulate pollution. Another commenter points out that the military's active Native Liaison program ensures the continuation of positive relationships with over 60 tribal communities.

### **Community Investment**

One commenter noted that the state co-funded a bridge to military training grounds. Another noted that the state of Alaska has invested millions of dollars in the installation. A few commenters stated that both local and state government has invested millions of dollars to develop the military industry of Interior Alaska.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Military Investment**

One commenter noted that Fort Wainwright is well established with a robust existing infrastructure that would be expensive to replicate elsewhere. Specific examples presented included the connection to the existing road system, connection to the rail-belt, a location adjacent to the pipeline, and a self-sufficiency due to the installation's power plant that provides electricity and heat. Several commenters provided examples of recent military investments including Bassett Army Community Hospital, PX/Commissary, child care, chapel/religious services, on-installation housing, MWR services, fire station, Brigade Complex, Simulations Center, Aviation Task Force Complex, Urban Assault Course, Physical Fitness Facility and upgraded rail lines, and educational institutions. Another commented about the buildup of the Army's presence in Alaska during the "Grow the Army" era, which they state continues to this day with the anticipated stationing of the Gray Eagle UAV in Interior Alaska and the Army's near-term plans to replace aging Kiowa Warrior helicopters at Fort Wainwright with a modern Apache attack helicopter fleet.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 10 regarding Military Investment and the Army's response.

### **Strategic Benefit**

Commenters believe Fort Wainwright's strategic location provides strong, tough, well-trained, well-equipped, maneuver units in sub-Arctic Alaska and serves to deter hostile aggression from the north and west. Commenters noted that ground forces stationed in Alaska are capable of

rapid reaction on short notice to the majority of "hot spots" around the globe and can quickly deploy to Europe, Middle East, and Asian locations. One commenter also noted that Alaska provides joint forces with a high-capacity, high-quality, full-spectrum training environment. One commenter noted that Fort Wainwright is the closest military installation to the Arctic Ocean and is critical to maintaining America's place in the Arctic's future.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 14 regarding Strategic Benefit and the Army's response.

### **Mission/Readiness/Training**

One commenter noted that because Fairbanks is isolated, there is opportunity for training and joint exercises away from populated areas. The commenter also believes that cold weather training results in a tougher Soldier, both mentally and physically. Another commenter noted that Alaska offers a training environment that tests both Soldiers and equipment to the fullest extent and stated: "If it works in Alaska, it will work anywhere." Another commented on the diversity of training opportunities, citing training in wooded, swampy, mountainous, cold, and snowy remote areas and long supply chains as critical to Army readiness. Commenters noted that Fort Wainwright supports full-spectrum Army aviation training, including UAVs, and other supporting services with approximately 67,000 square miles of airspace in the JPARC and another 40,000 square miles of airspace elsewhere in Alaska. Multiple commenters cited an available 1.3 million acres for training and maneuvers, and the ability to train with Air Force in joint live operations as valuable assets to the Army. One commenter stated it was impossible to duplicate JPARC anywhere else in the U.S. or other foreign areas designated for military training.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 11 regarding Mission/Readiness/Training and the Army's response.

### **National Security**

One commenter cautions that much has changed in the world since the completion of the 2014 QDR on which current force structure projections rely, enactment of the 2011 Budget Control Act, and formulation of the SPEA. The commenter believes that neither Russian incursions into the Ukraine nor the rise of ISIS/ISIL were contemplated in recent discussions about Army force structure. The commenter also warns that new challenges like the strategic rebalance to Asia and the Pacific and emerging military challenges of a changing Arctic persist and will require increased attention from the Army in 2020 and succeeding years.

**R:** The Army acknowledges that new problems have arisen since preparation of the SPEA, including conflict in Iraq and Syria and the Ebola virus situation in West Africa. Force structure decisions will be made with full awareness of these issues.

### **Capacity for Growth**

Multiple commenters noted the capacity for growth in Interior Alaska and recommended that the Army take advantage of opportunities to position additional forces at Fort Wainwright as force reductions occur elsewhere. The commenters believe that repositioning systems and forces to Interior Alaska will achieve a more attractive economy of scale.

### **Veteran Impacts**

One commenter noted that the health and well-being of retirees could be harmed as a result of any reductions in force at Fort Wainwright.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 15 regarding Veteran Impacts and the Army's response.

### **Other Comments**

Several commenters request that if the Army considers actions at either Joint Base Elmendorf-Richardson or Fort Wainwright that would result in the loss of Soldiers and Family members, it conduct a site-specific EIS to thoroughly assess the significant negative impacts that would be created in the area surrounding these installations, and the entire state of Alaska.

**R:** The 2013 PEA and the 2014 SPEA serve as the NEPA documentation for the identified potential reduction in forces at both Joint Base Elmendorf-Richardson and Fort Wainwright and concluded there are no significant environmental impacts other than socioeconomic with implementation of the Proposed Action. These significant socioeconomic impacts are of particular concern to the Army, however, as explained in Section 1.5 of the SPEA, 40 CFR 1508.14 states that significant socioeconomic impacts alone do not require the preparation of an EIS. The Army will consider further site-specific NEPA analysis after making force structure decisions.

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## **Joint Base Elmendorf-Richardson, Alaska**

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many

comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Socioeconomic Impacts**

Several commenters stated that the socioeconomic impacts at Joint Base Elmendorf-Richardson would be more severe than portrayed in the SPEA and would be devastating to the communities affected. One of these commenters noted that the Labor Market Information Institute's indirect/induced job multiplier, used widely by the U.S. military and specifically in the FY 2012 Economic Impact Analysis of Joint Base Elmendorf-Richardson, indicates that the number of indirect jobs lost under Alternative 1 would be nearly double the SPEA estimate.

**R:** The SPEA concludes that force reductions under Alternative 1 would result in significant socioeconomic impacts to the Joint Base Elmendorf-Richardson ROI (please see Table 4.25-1), and "significant" is the highest qualitative rating for impacts of an action when analyzed under NEPA. As noted in Table 4.30-4 of the SPEA, the significant impact finding for socioeconomics includes significant impacts to employment and population. In analyzing socioeconomic impacts, the Army uses the EIFS model and its parameters, which has been reviewed many times. The Army does, however, recognize that there are other socioeconomic models that may define and use different parameters than the EIFS model and may come to different conclusions. In addition, please see universal comment 13(b) regarding Alternate Economic Models and Analyses and the Army's response. The Army also acknowledges the serious socioeconomic impacts for the counties and communities surrounding Joint Base Elmendorf-Richardson and the possibility that these impacts could be even more adverse than identified in the SPEA. Although the Army will not be revising the SPEA as socioeconomic impacts for the Joint Base Elmendorf-Richardson ROI are already deemed significant, the Army will consider all of the comments raised in its subsequent phases of the force structure decision process.

Several commenters requested that, if the Army considers actions at either Joint Base Elmendorf-Richardson or Fort Wainwright that would result in the loss of Soldiers and Family members, it conduct a site-specific EIS to thoroughly assess the significant negative impacts that would be created in the area surrounding these installations, and the entire state of Alaska.

**R:** The 2013 PEA and the 2014 SPEA serve as the NEPA documentation for the identified potential reduction in forces at both Joint Base Elmendorf-Richardson and Fort Wainwright and conclude there are no significant environmental impacts other than socioeconomic with implementation of the Proposed Action. These significant socioeconomic impacts are of particular concern to the Army; however, as explained in Section 1.5 of the SPEA, 40 CFR 1508.14 states that significant socioeconomic impacts alone do not require the preparation

of an EIS. The Army will consider further site-specific NEPA analysis after making force structure decisions.

### **Army/Community Relationship**

Multiple commenters noted that Alaskans strongly support Joint Base Elmendorf-Richardson and its mission, as well as Soldiers and Families stationed at the installation.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding the Army/Community Relationship and the Army's response.

### **Community Investment**

One commenter noted that the community made a number of investments in support of the Army, for example, the Tanana River Bridge near Salcha. The commenter explained that the Army did not have year-round access to training areas on the east side of the Tanana River and relied on an ice bridge for winter access. Because the military received only partial funds from Congress to provide dependable access, the commenter stated that the state of Alaska contributed more than \$80 million of the required \$180 million to fund the project, noting that the bridge is scheduled to open in 2014.

**R:** Since similar community investment concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Military Investment**

Several commenters noted that the DoD has invested in Alaska's Army installations and greatly improved infrastructure over the last decade. This includes a new fire station, Brigade Complex, Simulations Center, Aviation Task Force Complex, urban assault course, physical fitness facility, and upgraded rail lines.

### **Strategic Benefit**

One commenter pointed out that 4-25th BCT (Airborne) at Joint Base Elmendorf-Richardson is a high-value asset that is ideally positioned to meet contingencies on the Pacific Rim. Several commenters stated that Alaska provides strategic value, noting that, because of the Arctic location, forces deployed from Alaska can arrive at any location in the Northern Hemisphere in less than 8 hours. Some commenters believe that Alaska offers the Army a strategic advantage by its ability to provide quick reaction forces for any situation in Europe, Asia, or the Middle East, noting that Alaska is closer to many Asian countries than Hawai'i and is also closer to Central Europe than any other location in the U.S.

**R:** Since similar comments were raised from a number of areas, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 14 regarding Strategic Benefit and the Army's response.

### **Mission/Readiness/Training**

Two commenters believe that Alaska offers matchless training value to the Army, noting more than 2,490 square miles of training area and 1.5 million acres of maneuverable land. The commenters stated that other range facilities around the country are limited by environmental and civilian concerns, but Alaska's training ranges do not share those challenges. The commenters believe that the U.S. Air Force at Joint Base Elmendorf-Richardson and Eielson Air Force Base offer joint training opportunities with the Army, which the commenters believe is crucial to replicate real-world combat scenarios to ensure that the Army and Air Force are prepared to conduct joint operations. The commenters also indicated that training is about to be enhanced at Joint Base Elmendorf-Richardson because the new Tanana River Bridge will open summer 2014, providing the Army year-round access to those training areas on the east side of the river for which access previously depended on ice bridges.

### **Capacity for Growth**

One commenter recommended the addition of a MOUT range at Joint Base Elmendorf-Richardson to provide live, virtual and constructive training for environments the 4th BCT would likely face when deployed.

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## **Joint Base Langley-Eustis, Virginia**

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Army/Community Relationship**

One commenter noted that Soldiers are valued members of the community who actively participate in many activities and organizations on the Virginia Peninsula. The commenter stated that the city of Newport News is proud of the relationship with the military and civilian personnel at Joint Base Langley-Eustis and provides outstanding quality of life with tremendous education, business, and technology opportunities.



**R:** The Army appreciates the input provided regarding the positive relationship between the military and the Peninsula communities. Since similar concerns were raised by commenters from a number of installations regarding their communities, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army's response.

### **Community Investment**

Two commenters noted that state and local resources were invested in improvements for the benefit of Soldiers, their Families, and the military and civilian workforce. These included road improvements, school construction, public transportation initiatives, and utility upgrades. The commenters noted that this year Virginia's FACT Fund, a grant program available to prevent or mitigate encroachment issues around military facilities, made \$4.3 million available for these efforts.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Mission/Readiness/Training**

Two commenters questioned how the impacts analyzed for potential cuts to forces at Virginia installations, including Joint Base Langley-Eustis, could be done without taking into consideration the training loads and student populations at the installations, as well as the Army's mission. They stated that addressing the proposed personnel cuts without considering the ultimate training and pipeline needs of the service limits the usefulness of the analysis. They noted that a major Army command is headquartered on Joint Base Langley-Eustis. With respect to all three installations in Virginia, the commenters stated that it is important to consider these pipelines of Army doctrine, resources, and personnel when considering how to implement what will be one of the most difficult current military drawdowns of our time.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 11 regarding Mission/Readiness/Training and the Army's response.

### **Other Comments**

A commenter expressed concern that the Army's force reductions were being distributed across the installations, to include Joint Base Langley-Eustis, in a manner that lacks the reasoned, mission-oriented evaluation that national defense requires.

**R:** The Army has not completed the decision process for force reductions. The information in the SPEA will be used to support a series of decisions in the coming years regarding how

the force is to be realigned. Please see universal comment 1 regarding the Force Structure Decision Process and the Army's response.

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## Joint Base Lewis-McChord, Washington

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### Environmental Impacts

One commenter believes that the Proposed Action would make it difficult to comply with mandatory environmental regulations. Another commenter stated that environmental program staffing levels on the joint base have been faced with major budget challenges for more than four years, leaving key positions unfilled for extended times and reducing or eliminating the military's participation in regional community planning and environmental resource management groups.

**R:** As stated in Section 1.3 of the SPEA and reiterated in the analysis for Joint Base Lewis-McChord, the Army is committed to ensuring that personnel cuts will not result in non-compliance with mandatory environmental regulations.

Another commenter expressed concern that if the proposed reductions were to be implemented, important Army-community efforts that led to recent environmental management accomplishments for Joint Base Lewis-McChord would not be able to be sustained. The commenter was also concerned that, if the Army decided to have local communities manage roads maintenance and other services, Army staffing reductions may hinder the communications necessary to make such partnerships successful.

**R:** Implementation of the Proposed Action would reduce traffic congestion on the installation and nearby off-post roadways, as is described in Section 4.27.16.2 of the SPEA. The Army recognizes; however, that ongoing and planned actions, unassociated with the Proposed Action contained within the SPEA, would result in roadway and LOS improvements.

Two commenters supported force reductions at Joint Base Lewis-McChord, stating that the installation causes adverse environmental impacts, including air pollution, noise pollution, water pollution, increased vehicle traffic, and sprawl.

### **Environmental Justice**

One commenter disagrees with the Army's conclusion that there would be no disproportionate impacts to populations living below the poverty level. The commenter believes that the largest impacts would be to people who currently work in service industries off-base because with fewer military employees in the region, businesses will decline, employees of local businesses will be laid off, and the resulting unemployed will be overrepresented by lower-skilled workers who typically earn lower wages; therefore, the economic impacts would disproportionately affect low-income populations and people in poverty.

**R:** The Army agrees that some low-paying service sector jobs would be affected by the Army force reductions; however, other supporting jobs would also be affected, such as real estate, health care, financial and insurance sectors, which are not typically low paying jobs. As these impacts would be experienced across all service sectors, the Army anticipates that the impacts would not be disproportionate to low income or minority populations.

### **Socioeconomic Impacts**

A number of commenters believe that the force reductions at Joint Base Lewis-McChord would adversely affect employment, local businesses and employees, the real estate market and housing values, social service programs, schools/universities, and the local transit system in terms of a loss of ridership. Some commenters believe that the potential socioeconomic impacts were understated in the SPEA. One commenter noted that, when 17,000 Joint Base Lewis-McChord Soldiers were deployed, businesses struggled to keep their doors open. One was concerned about the potential impact of the state unemployment compensation program on local businesses. Another stated that there was no evidence that displaced workers would find work and remain in the area.

**R:** Although Joint Base Lewis-McChord is located in a large and diversified metropolitan region, where the ROI has a population of greater than 1 million, the Army acknowledges the significant socioeconomic impact the proposed force reduction could have on the community. Since similar concerns about the economic impacts of the proposed force reductions on their communities were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

Multiple commenters expressed concerns with the EIFS model and the data used by the Army. One commenter believes that some of the model's conclusions were not supported by an

appropriate information source or sufficient quantitative data. Another commenter stated that the current analysis fails to acknowledge significant impacts on sales and income within the city of Olympia, noting the city is a key location within the ROI. Additionally, a commenter noted that, while the analysis estimates that some Soldiers affected by the force reductions would remain in the ROI, the analysis does not estimate the impact to the labor force on unemployment rates or average wages, including impacts to Madigan Army Medical Center. Various commenters provided detailed recommendations which they believe would improve the model and generate more accurate results. One commenter noted that Washington State's Office of Financial Management, which provides revenue forecasts for the state's legislature, found that the impact to the local community was up to three times greater than the Army's findings. That office's conclusions were based on the REMI model, which contains variables calibrated to reflect the Washington State economy. Another commenter, in addition to noting that the Army's model underestimated the economic impacts, when compared to the analysis done by the Washington State Office of Financial Management, also stated that the Pierce County Economic Development's analysis came to a similar conclusion as the state.

**R:** The EIFS model used by the Army to analyze socioeconomic impacts has been reviewed many times. As noted in Section 4.0.2 of the SPEA, this model has been used by the Army for more than 20 years with system algorithms firmly based on economic theory. While the Army has concluded that, taken as a whole, these comments, suggested corrections, and proposed recalculations of the socioeconomic analysis contained in the SPEA would not change the SPEA's overall conclusion of "significant," the Army acknowledges the serious socioeconomic impacts for the counties and communities surrounding Joint Base Lewis-McChord and the possibility that these impacts could be even more adverse than identified in the SPEA. The Army will consider all of the comments raised in subsequent phases of the force structure decision process. Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(b) regarding Alternative Economic Models and Analyses and the Army's response.

One commenter disagrees with the ROI used in the analysis for Joint Base Lewis-McChord and requested that Grays Harbor, Kitsap, and Mason counties be included in a revised ROI analysis. Another commenter suggested that the ROI should be smaller.

**R:** These counties are on the opposite side of Puget Sound from Joint Base Lewis-McChord. Selection of too large an ROI can artificially dilute socioeconomic impacts, whereas selection of too small an ROI can cause the analysis to miss serious impacts to a neighboring county outside of the ROI. The Army selected an ROI for each installation most likely to be impacted, based on available population data, input from installation staff, and experience gained from the 2013 PEA socioeconomic analysis. Please also see universal comment 13(c) regarding Region of Influence and the Army's response.

Commenters were concerned about the potential impact of the Proposed Action to schools. Several commenters noted that force reductions would substantially reduce federal funding for the local school districts. Two commenters stated that any further reductions in school funding, especially in the short term, will exacerbate an already challenging financial situation.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(d) regarding Schools and the Army's response.

Multiple commenters believe that public services would be impacted to a greater extent than is described in the SPEA.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(e) regarding Public Services and the Army's response.

One commenter disagrees that the reduced demand for training would increase recreational opportunities.

**R:** Although the FNSI stated: "Depending on the installation, this could...allow for more use of installation land for recreational activities in lieu of training activities," this was not a conclusion identified in the Joint Base Lewis-McChord section of the SPEA.

One commenter supported force reductions at Joint Base Lewis-McChord, stating that current impacts from the installation include increased anti-social behavior, crime, lowered property values, and damage to private and public property. The commenter also believes that the installation inhibits urban development and revitalization of Pierce County and stated that there are fewer tax dollars for local jurisdictions, while the installation population increases the demand for public services.

### **Cumulative Reductions from Other Services**

Multiple commenters believe that the cumulative impacts analysis for Joint Base Lewis-McChord was insufficient and should have included information from other service branches, particularly the Air Force. Commenters noted that the absence of a similar analysis from nearby Navy and Coast Guard facilities likewise represents an information gap in the cumulative impacts analysis. One commenter stated that cumulative impacts in the SPEA should have mentioned the Western Regional Medical Command.

**R:** The Army acknowledges that Joint Base Lewis-McChord may be subject to additional reductions due to structure reductions implemented by other military departments affecting units stationed to the joint base. The Army also acknowledges that cumulative impacts from reductions at other military service installations in proximity to Joint Base Lewis-

McChord. As indicated in Section 1.3 of the SPEA, specific information regarding force structure reductions by the other service branches was not available for inclusion in the analysis.

Western Regional Medical Command is an Army command on Joint Base Lewis-McChord; therefore, mention of potential staff reductions within that command in the cumulative effects section would be inappropriate. Specific Army organizations to face reductions have not been determined; those decisions will be part of the force structure decision process.

### **Army/Community Relationship**

Many commenters wrote about the longstanding and positive relationship between Joint Base Lewis-McChord and surrounding communities. Multiple commenters stated that local communities have demonstrated they fully support local military members and Families and should not have to suffer the projected force reductions. One commenter noted how the community and its leaders search for ways to ensure the Joint Base Lewis-McChord can get its important business done, stating that community leaders meet regularly with local military leaders, support both public and private organizations working to mitigate traffic issues, keep clear zones open, and support Family and unit morale programs. One commenter noted that the Army/community relationship was the driving force for the Joint Base Lewis-McChord being the most requested duty station in the continental U.S.

**R:** Since similar concerns were raised by commenters from a number of installations regarding their communities, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army's response.

### **Loss of Trust**

One commenter believes that if Army-community efforts that led to recent environmental management accomplishments are not sustained, it would result in a loss of trust with the regional partners who co-developed those broader, regional goals with the Army, and who have made and continue to make their own plans predicated on that regional commitment.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comments 4 and 8 regarding Army/Community Relationship and Loss of Trust, respectively, and the Army's response for each.

### **Community Investment**

Commenters believe that the community has invested millions of dollars to support Soldiers relocated as a result of BRAC and an extensive amount of time in support of Joint Base Lewis-

McChord. Recent and in-process community investment examples included new and renovated schools, new housing, new shopping areas, highway improvements, and expansion of services.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 7 regarding Community Investment and the Army's response.

### **Military Investment**

Commenters noted the military has recently invested substantial funds in rehabilitating and replacing a number of facilities and housing at Joint Base Lewis-McChord, with one example being the Reserve Readiness Center. A commenter stated that reducing the manpower at this time would be a tremendous waste of those dollars.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 10 regarding Military Investment and the Army's response.

### **Strategic Benefit**

One commenter highlighted Joint Base Lewis-McChord's position as the only multi-server Power Projection Platform west of the Mississippi River and its access to two deepwater ports. Another commenter expressed concern that reductions at Joint Base Lewis-McChord would hinder the ability of the Army to provide forces to the Commander of the U.S. Pacific Command, if called upon to do so.

**R:** Strategic benefits were raised by commenters from a number of installations; they are included in the front of this Annex in a manner that addresses many installations. Please see universal comments 1 and 14 regarding the Force Structure Decision Process and Strategic Benefit, respectively, and the Army's response for each.

### **Mission/Readiness/Training**

Multiple commenters were concerned about the impact that further troop reductions would have on the ability to accomplish the Army's mission. With the instability in the Middle East, Ukraine, and the Pacific region, commenters questioned whether the U.S. should further reduce military forces. A commenter was concerned that, if other conflicts were to occur, U.S. troops will not have the support needed to ensure their readiness, safety, and success, which will lead to increased casualties. Multiple commenters believe that force reductions at Joint Base Lewis-McChord would reduce the capability of the military to respond to a crisis.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 11 regarding Mission/Readiness/Training and the Army's response.

## **Veteran Impacts**

Two commenters noted a large number of military retirees live within a 50 mile radius of Joint Base Lewis-McChord, including former Army and Air Force Families who are eligible to use the installation's support activities. One commenter believes that force reductions would result in a ripple effect of reduced benefits and services to military retirees, ranging from availability of health care to administrative services. A commenter expressed concern that force reductions would increase wait time at service facilities and impact service levels.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 15 regarding Veteran Impacts and the Army's response.

## **Other Comments**

One commenter was concerned that the Yakima Training Center was omitted from the analysis.

**R:** The Yakima Training Center was not included in the analysis for Joint Base Lewis-McChord. The ability of Joint Base Lewis-McChord units to train at Yakima Training Center will be considered in the force structure decision process. Until specific Army units are designated for reductions, the impact on training loads and manning at Yakima Training Center is unknown. Also, it is located a great distance from the main installation and therefore has a separate ROI. Finally, the manning level at Yakima Training Center is delineated separately in the ASIP database and is less than 0.8 percent of the working population of Joint Base Lewis-McChord.

One commenter supported reductions and noted the DoD budget has been inflated over the past 15 years and that monetary and force reductions are needed.

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## **Joint Base San Antonio-Fort Sam Houston, Texas**

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.



## **Socioeconomic Impacts**

One commenter believes that force reductions may have a negative economic impact on local communities and the state economy.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

One commenter stated that the SPEA did not provide a complete quantitative look at the economic impact of potential reductions and does not fully account for local economic conditions, stating that a lack of meaningful analysis will make it difficult for a decision on reductions in forces to be made and for local communities to plan accordingly. The commenter stated that the approach and model used in the SPEA failed to thoroughly examine all parts of the economy that might be affected, such as the potential impact to housing and other real estate value and school funding amounts. One commenter pointed out that, while the SPEA indicated that an estimated 16 percent of sales would be subject to local and state sales tax, historical sales tax collection data shows a much higher rate of gross sales subject to sales tax in the San Antonio MSA—19.3 percent of gross sales in 2013.

**R:** Since similar concerns were raised by commenters from a number of installations they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and universal comment 13(d) regarding Schools and the Army's responses for each.

Additionally, the Army acknowledges that the commenter may have more specific data on local and state sales tax information than the Army had at the time of the analysis, and that the impact may be higher for sales tax than what was estimated. Due to the large size of the economy within the ROI, the additional change in state revenue losses would not change the overall conclusion of less than significant socioeconomic impacts in the SPEA for the Joint Base San Antonio-Fort Sam Houston ROI. The Army thanks the commenter for the additional information, and while the data does not change the overall conclusion in the SPEA, this information will be made a part of the administrative record and taken into consideration during the force structure decision process.

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### **USAG Hawaii, Hawai'i**

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Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader

convenience, these responses are not reiterated below; however, other components of similar topics may be contained in installation-specific comments. In addition, the Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA and are included in the No Specific Installation section near the end of this Annex. The following are specific to this installation.

### **Environmental Impacts**

One commenter noted that as the Army seeks to realign forces and leverage training resources across several locations, it is vital for the Army to maintain and increase biosecurity measures to prevent the transport of invasive species within the state and across the Pacific.

One commenter noted that, while a significant reduction in USAG Hawaii forces is anticipated to have beneficial impacts to environmental components from reduced use of training ranges, the beneficial impacts would not be realized unless effective Army planning allows for appropriate hazardous waste management and environmental remediation. As an example the commenter points out that, under Alternative 1, beneficial impacts to soils and biological resources are anticipated to occur on Schofield Barracks Military Reservation; however, the environmental remediation necessary to achieve the beneficial impact is not mentioned or identified.

**R:** Due to the programmatic nature of the SPEA, it is not possible at this time to identify the specific mitigation or remediation measures necessary to achieve the beneficial impacts. As noted in the SPEA in Section 4.29.8.2, the Army would ensure that adequate staffing remains so that the installation could comply with all mandatory environmental regulations. Additionally, as force reduction decisions are made, specific actions implementing those decisions may require follow-on, site-specific NEPA analysis at which time any necessary mitigation or remediation efforts would be identified.

One commenter mentioned the island has exceeded the carrying capacity for natural water, and was in support of the force reduction in order to bring the region back to its natural water carrying capacity.

### **Environmental Justice**

One commenter disagrees with the conclusion in the SPEA that Alternative 1 would not have a disproportionate adverse impact on minorities, economically disadvantaged populations, or children in the ROI. The commenter indicated that the population of Wahiawa has a significantly lower median income, home ownership, college education, and health care than other communities in the City and County of Honolulu. The commenter also indicated Wahiawa has one of the highest unemployment rates on Oahu and in the state of Hawai'i, and that about 33 percent of the population is Caucasian, 28 percent are Asian, with more than half of the Asian residents being of Filipino ancestry. They also indicated that Wahiawa is home to the largest concentration of African Americans in Hawai'i.

**R:** The Wahiawa census county division does reflect relatively high proportions of minorities and low income residents, although these percentages are not substantially different from the proportions for residents across the state of Hawai‘i. The Army acknowledges that force reductions will significantly impact local communities. As the commenter stated, force reductions would considerably impact revenues and sales for businesses in proximate communities, affecting jobs and income for these businesses. It is anticipated that the force reductions would adversely impact environmental justice populations through sales losses for minority-owned and/or staffed businesses and reductions in employment and income to these populations. However, non-environmental justice populations in the communities would also be impacted; therefore, the force reductions would not have disproportionate adverse impacts on environmental justice populations.

### **Socioeconomic Impacts**

Multiple commenters stated that the studied reductions would put Hawai‘i into an economic slump without the influx of military money and would affect people working to support the facilities. Several commenters stated there would be significant negative socioeconomic impacts from the potential reduction with some commenters highlighting specific communities for which they were particularly concerned. Various commenters noted that in Hawai‘i, the military has the single most significant economic impact on the economy after tourism. Commenters remarked on the hardships communities, neighborhoods, schools, and businesses experience whenever Soldiers are deployed and expressed concern over the more permanent impacts force reductions would entail.

**R:** Since similar concerns were raised by commenters regarding the region for which they were concerned, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army’s response.

One commenter believes that the reduction of troops and the military should occur in Hawai‘i and cited various issues that the installations affect, including the high cost of limited water, overpopulation on the small island, and traffic problems.

Several commenters stated that a reduction in forces would result in reductions in civilian personnel and their jobs, collaborative military community projects, business, and assistance in the preservation of native plants and water wells.

One commenter disagrees with the ROI selected for Schofield Barracks, stating that including the entire city and county of Honolulu and the entire island of Oahu is an erroneous measurement tool. The commenter indicated that a more reliable assessment and analysis would be to use the census county divisions at a minimum, or use census tracts and zip-code descriptions to better appreciate the severe socioeconomic effects upon the local population. The commenter also

disagrees with the assessment that that there “could” be significant impacts to population, employment, tax receipts, housings values, and schools in the ROI. The commenter stated that a reduction of such scale will have an irreversible and severe and substantial impact upon Hawai‘i—particularly the communities of Wahiawa, Whitmore Village, and Launani Valley.

**R:** Since similar ROI concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13(c) regarding Region of Influence and the Army’s response. Please also see universal comment 13(a) regarding Significance and the Army’s response.

One commenter provided census data for the community of Wahiawa as it pertains to demographics, per capita income, and housing values. The commenter also stated that the findings of the SPEA contradict the conclusions of the FNSI, noting that the SPEA concludes that socioeconomic impacts could include greater impacts to lower income populations that provide services to military employees and installations or where job losses affect communities whose proportion of minority population is higher than the state average, while the FNSI concludes that no significant environmental impacts other than socioeconomic impacts are likely to result from the Proposed Action. The commenter also disagrees with the fact that sales and income for the community of Wahiawa is analyzed as less than significant.

**R:** The SPEA concludes that force reductions under Alternative 1 would result in “significant” socioeconomic impacts to the USAG Hawaii ROI, which includes Schofield Barracks and Wahiawa (see Table 4.29-1) and “significant” is the highest qualitative rating for impacts of an action when analyzed under NEPA. In analyzing socioeconomic impacts, the Army uses the EIFS model and its parameters, which has been reviewed many times. EIFS uses county-level data for its calculations, and therefore detailed information and analysis for individual towns, such as Wahiawa, within a county is not possible. The less than significant impact for sales and income pertains to the entire ROI, not just Wahiawa. While the Army has concluded that, taken as a whole, the commenter’s information pertaining to Wahiawa would not change the SPEA’s overall conclusion of significant, the Army acknowledges the serious socioeconomic impacts for the communities surrounding Schofield Barracks, as well as Fort Shafter, and the possibility that these impacts could be even more adverse than identified in the SPEA. The Army thanks the commenter for the information specific to Wahiawa. This information will be made a part of the administrative record and taken under consideration in subsequent phases of the force structure decision.

### **Army Community Relationship**

Several commenters believe that USAG Hawaii and the surrounding communities are highly entrenched and mutually dependent on one another. Two commenters noted that the Hawai‘i

Chamber of Commerce actively partners with USAG Hawaii, U.S. Pacific Command, and other services in Hawai‘i to ensure that Hawai‘i continues to provide an effective home for the military. Another commenter noted that a harmonious partnership between the Army and the community exists today and is one to which the community is strongly committed. Several commenters mentioned that the military is a valued member of the Hawaiian community, and they recognize and value the military’s significant economic impact as well as the rich diversity, volunteerism, and service the military adds to communities and schools.

**R:** Since similar comments were raised from a number of regions, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 4 regarding Army/Community Relationship and the Army’s response.

### **Military Investment**

One commenter expressed concern about the military walking away from recent investments, such as the renovations to the Tripler Army Hospital.

### **Strategic Benefit**

Several commenters believe that there is a rising threat in the Pacific Theater and that Schofield Barracks is a strong location for Soldiers to live and train. Commenters believe that the lack of a strong military presence will destabilize the region and will reduce the ability to respond quickly, affecting allies in the Asian-Pacific Region. Several commenters noted that a draw-down of the Army’s presence in Hawai‘i will almost certainly send the wrong message to both allies and potential adversaries in the region.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 14 regarding Strategic Benefit and the Army’s response.

### **National Security**

One commenter supports force reductions, noting that although Hawai‘i presents a strong strategic location for an Army base, 420,000 Soldiers in the U.S. will be sufficient to maintain national security.

### **Other Comments**

One commenter believes that the calculations determining the recommended number of personnel cuts on Oahu are somewhat arbitrary and therefore understate the quantity of cuts that should be taken. The commenter believes a more thorough analysis of the actual units stationed on the installations to provide support and command and control functions for the two BCTs on Oahu would result in more cuts than the arbitrary 70/60/30 percent calculations. The commenter points out that virtually all the Soldiers and civilians stationed on Schofield Barracks are in direct or indirect support of the two BCTs. The 25th Infantry Division Headquarters, its division base

units, and combat support and combat service support units at division and echelons above division level would no longer be needed on Oahu if the two BCTs are eliminated. Base support functions and administrative functions of USAG Hawaii would be virtually eliminated, and a much smaller version of this activity could relocate to Fort Shafter to provide support to the few remaining Soldiers and civilians on Oahu. The commenter concurs with calculations that about 30 percent of the current Soldiers on Fort Shafter should probably be maintained, assuming that Fort Shafter remain a 4-star headquarters. However, the commenter does not believe Fort Shafter is necessarily the best location for USARPAC Headquarters and that relocating this headquarters or combining its functions with another command within the Pacific should be considered. The commenter also believes the Army civilian downsizing of 30 percent is too low in proportion to the total recommended cuts of forces on Schofield and Fort Shafter.

**R:** As noted in Section 1.3 of the SPEA, the Army has not yet determined how to implement the reduction in end-strength of the additional 70,000 Soldiers and Army civilians considered in the SPEA. Options to achieve the additional force restructure are too numerous to analyze at this time; therefore, analysis of reductions related to specific units or organizations is not within the scope of the SPEA.

One commenter pointed out that, while the SPEA cites the superior quality of life programs for Army Families on Schofield Barracks and Fort Shafter, the SPEA should also include the fact that the Army has a championship 18-hole golf course and club, the multi-purpose Nehelani Community Center, a recently renovated temporary lodging facility on Schofield Barracks, and the multi-purpose Hale Ikena Community Center on Fort Shafter. The commenter notes that Army Families also have access to an Army managed ocean-side outdoor recreation area in Waianae, the Hale Koa Hotel Armed Forces Recreation Center in Waikiki, and the Kilauea Armed Forces Recreation Center at Kilauea Military Camp on the island of Hawai‘i.

**R:** Although the additional information does not alter the conclusions of the SPEA, the Army thanks the commenter for the additional information which will be made a part of the administrative record and considered prior to final force structure decisions.

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### No Specific Installation

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The Army received many comments that either were not specific to a particular installation or that could be applied to all installations analyzed in the SPEA. Those comments are included in this section for clarity. Readers are reminded that universal comments and responses appear at the beginning of this Annex. These universal comments contain summaries of issues and concerns applicable to many installations. Army responses are provided for each of these universal comments. For reader convenience, these responses are not reiterated below; however,

other components of similar topics may be contained in installation-specific comments. The following responses are regarding comments received not specific to any one installation.

### **Socioeconomic Impacts**

A commenter raised concerns with the future success of DoD's MHPI, a program authorized in 1996 to address the poor condition of DoD-owned housing and a shortage of quality, affordable private housing. The commenter noted that this competitively awarded, public-private partnership operates under 50-year leases, and DoD's private partners own, redevelop, maintain, and operate family housing communities. The commenter stated that a reduction of the magnitude proposed in the SPEA jeopardizes the ability of this housing program and its partners to build and sustain quality housing for Soldiers and their Families. They believe that reduced occupancy, and the corresponding revenue reduction, will force MHPI owners to make operating adjustments such as reducing property services and amenities. In turn, insufficient revenue will drain reserve accounts needed to fund future maintenance and community improvement projects. Additionally, funding shortfalls will also threaten owners' ability to meet debt service obligations and will impair recapitalization efforts.

**R:** The Army acknowledges the potential for serious impacts to the MHPI program and on privatized housing on military installations. These concerns and related public-private partnership agreements will be considered by the Army as part of the force structure decision process.

### **National Security**

Multiple commenters stated that to weaken the support for military bases is to weaken the military strength in a time when terrorism is rampant.

### **Other Comments**

One commenter provided a general comment stating that, before any force reductions or base budget cuts are implemented, foreign aid should be reduced or eliminated. The commenter believes that a reduction in forces would upset local economies.

**R:** Distribution of foreign aid by the U.S. is not within the purview of the Army and is outside of the scope of the SPEA. Also, since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 13 regarding Socioeconomic Impacts and the Army's response.

One commenter stated that a certain level of environmental data and analysis must be conducted before an end product (an EA or EIS) is satisfactorily completed. Data must precede analysis. Analysis must precede a decision. Only by generating or gathering data can the Army then conduct the environmental analysis necessary to intelligently assess the environmental

consequences of its possible decisions. In this case, the commenter believes neither sufficient data has been collected nor sufficient analysis conducted, so any conclusion is premature

**R:** In general, the Army believes that the 2013 PEA and 2014 SPEA have sufficient data and analysis for a programmatic NEPA document.

One commenter stated that the CEQ promulgated regulations implementing NEPA, which are found at 40 CFR 1500–1508, are more fundamental, and more general, than the more specific Army NEPA regulation. The Army-specific regulation “supplements the regulations of the CEQ...for Army actions, and must be read in conjunction with them” (32 CFR 651.2(c)). The commenter stated that their study of the CEQ NEPA regulations indicates that the SPEA is not consistent with them anymore than it is consistent with the Army NEPA regulation.

**R:** The Army believes its analysis is consistent with both regulations.

One commenter stated that only an EIS will provide the level of detail needed in this case to the decision makers. The commenter also noted that the CEQ regulations speak in terms of multiple "alternatives," not just a single alternative, as the Army has done in the SPEA. Finally, the commenter noted that reasonable alternatives should include beneficial effects—those that would "enhance" quality.

**R:** The SPEA provides an adequate level of detail for this programmatic analysis. The issue of alternatives is addressed in universal comment 2 regarding Additional Alternatives.

Multiple commenters stated that an environmental document with only one alternative is not compliant with NEPA. In this case, the Army could analyze various options, including reductions and realignments of active duty strength to 490,000 Soldiers, to 450,000 Soldiers, to 420,000 Soldiers, and to 400,000 Soldiers, with the corresponding loss of civilian employees, contractor employees, and infrastructure. 40 CFR 1508.9 presumes multiple alternatives in an EA context.

**R:** The 2013 PEA addressed both the “no action” alternative and two action alternatives. The SPEA supplements the 2013 PEA and therefore includes its alternatives. The SPEA action alternative has a reduction down to 420,000 Soldiers. It encompasses an analysis of impacts at higher end strengths (i.e., 440,000 to 450,000 Soldiers). The socioeconomic model used by the Army in both the 2013 PEA and 2014 SPEA is generally linear and scalable for the range of population reductions assessed. Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 2 regarding Additional Alternatives and the Army’s response.



Commenters stated that the SPEA was improperly segmented, cumulative impacts analysis was not assessed or was assessed inadequately, the perceived segmentation was why the significance threshold was not breached for VECs other than socioeconomic, and the analysis did not address the effects by media or VEC. One commenter believes that the Army did not complete VEC analysis and that the Army segmented its analysis into 30 different discrete parts rather than analyzing the effects as a cumulative whole. Commenters stated the Army improperly segmented the single Army action into 30 smaller pieces and then determined each piece as less than significant. Another commenter voiced the opinion that the Army was likely attempting to split up effects into the smallest piece possible so that all effects can be covered with an EA or even a categorical exclusion. A commenter believes that actions occurring at 30 installations are “connected actions” because they are “interdependent parts of a larger action and depend on the larger action for their justification.” They are cumulative and have “cumulatively significant impacts and should therefore be discussed in the same impact statement.” One commenter stated that the SPEA is intended to study the environmental effects of shrinking the Army’s Soldier strength from 562,000 to 420,000, or even “well below 400,000,” per page FNSI-3 in the draft FNSI. Thus, the Army stated it is studying a potential reduction of more than 28 percent of its strength, yet concludes there are no significant environmental effects singly or cumulatively. Further, the commenter believes the Army wants it both ways, stating on the one hand that this is merely a programmatic study but on the other that it is providing decision makers with a full assessment of effects at each installation. Nonetheless, this is inappropriate, and the Army in this study should at least study the cumulative environmental effects of the overall action.

**R:** The Army does not believe that the SPEA engaged in improper segmentation. The Army did analyze cumulative environmental and socioeconomic effects of the overall action and believes that cumulative impacts were addressed appropriately. The impacts for all 30 installations were analyzed and potential effects by VEC were done for each installation. Cumulative installation impacts are discussed in the section for each installation. Those resources for which the Army 2020 action as a whole could have a nationwide cumulative effect were analyzed in Section 4.32 of the SPEA. One nationwide impact was generally positive, and one was negative.

Additionally, the Army notes that it is not planning for a 28 percent reduction of its strength. The referenced text from the draft FNSI stated: “The studied reductions for all 30 locations, if added together, would reduce the Army’s active force to well below 400,000. Such deep reductions are not envisioned, but analyzing the potential reductions at each of the 30 locations will provide Army leaders flexibility in making future decisions about how and where to make cuts to reach the necessary end-strength as dictated by current fiscal, policy, and strategic conditions.”

One commenter stated that the Army has not adequately analyzed the indirect effects of this Proposed Action. The language is clear that a study of “effects” is not to be limited to the

boundaries of the installation. Doing so is much too narrow a focus, and is not in compliance with the regulations.

**R:** The SPEA looks at indirect effects. For example, the economic analysis looks at the broader community and not just the installation; it includes “induced” employment factors, an indirect effect. It also addresses other factors such as air quality, noise, and traffic and transportation beyond the installation boundary. The analysis of resources throughout the SPEA was not limited to each installation’s boundaries; analysis was based on appropriate ROIs which were, in turn, based on the VEC analyzed. Three other examples of VECs, for which there are more examples, where analysis extended beyond installation boundaries are air quality, noise, and traffic and transportation.

A commenter stated that the Army has not identified reasonable alternatives. Because the Army indicates the “No Action Alternative” is unrealistic, already out of date, and impossible to maintain or implement, the commenter stated that presenting only one alternative is a violation of Army regulation.

**R:** Since similar concerns were raised by commenters from a number of installations, they are included in the front of this Annex in a manner that addresses many installations. Please see universal comment 2 regarding Additional Alternatives and the Army’s response.

One commenter pointed out that 32 CFR 651.32(b) provides: “An EA can be 1 to 25 pages in length and be adequate to meet the requirements of this part, depending upon site-specific circumstances and conditions. Any analysis that exceeds 25 pages in length should be evaluated to consider whether the action and its effects are significant and thus warrant an EIS.” The current document is nearly 40 times the maximum length of an EA, per this regulatory standard. It may be labeled an EA, but already contains some of the analysis of an EIS. It still needs some additional analysis. Similarly, the CFR states a FNSI is normally no more than two pages in length. This FNSI is considerably longer, indicating that a FNSI is not really appropriate, and that a Notice of Intent to do an EIS is the more appropriate document.

**R:** EAs exceeding 25 pages and FNSIs exceeding 2 pages do not automatically mean that an EIS is required. The length of the SPEA was necessary to allow the Army to take a hard look at the affected environment and potential impacts at the 30 installations covered.

One commenter stated that 32 CFR 651.42(e) specifically provides that the realignment or stationing of a brigade unit during peacetime normally requires an EIS. If the only significant impact is socioeconomic, with no significant biophysical environmental impact (and the commenter pointed out that the word “adverse” does not appear), then an EIS may be dispensed with. In this case, the Army is proposing the realignment or restationing of up to 20 BCTs, 10 initially, and up to 10 in the future; therefore, the commenter believes an EIS is required.

**R:** Section 651.42 of 32 CFR also has this language: “except where the only significant impacts are socioeconomic, with no significant biophysical environmental impact.” Additionally, this is not a “normal situation.” The SPEA does not address a “gain” scenario as the 2013 PEA did. An action in which a new brigade would arrive on an installation and require new building construction and ranges would be a more likely situation in which the regulation would point toward an EIS.

One commenter indicated that the standards the Army uses for determining significance are severely limited, and more limited than regulation provides. The commenter believes the Army inserts “adverse” into its criteria so that any effect that may not be adverse, but beneficial, or neutral, is excluded. This is contrary to the regulation, which certainly wants an analysis of adverse effects on certain VECs (see, e.g., its language about the adverse regional effects of energy availability in 32 CFR 651.33[k]), but in other instances simply requires an analysis of effects, whether beneficial or negative.

**R:** The commenter is correct that the Army NEPA regulation refers to significant impacts and often does not include the word “adverse.” Neither does the CEQ NEPA regulation (see, for instance, 40 CFR 1502.1). The debate over whether an EIS would be required if the only significant impacts were beneficial is not new. Table FNSI-3 indicates that every installation has some beneficial impacts for the action alternative. Table 4 of the FNSI for the 2013 PEA, which the SPEA supplements, made a similar finding for Alternative 1. Neither analysis made a determination of whether any of these beneficial impacts were significant. The Army reviewed the beneficial impacts identified in the SPEA and determined that none of the beneficial impacts were significant and that their cumulative beneficial impact was also not significant. Given this, an EIS is not required on this basis. The Army appreciates the opportunity to address this issue that the comment brought to light.

A commenter stated that the SPEA is not consistent with either CEQ or Army regulations. The SPEA cites the Army Environmental Command’s NEPA Analysis Guidance Manual from 2007. But the real sources for analysis, and the standards by which this and other documents are to be examined and evaluated, is not an internal Army guide, but generally applicable federal regulations which govern both the Army’s and other federal agencies’ actions. Except for some casual preliminary mention, the SPEA is singularly silent with respect to these standards.

**R:** The SPEA specifically refers to the CEQ’s NEPA regulation in Sections 1.3, 1.5, and 4.0. The SPEA was prepared in accordance with that regulation and the Army’s implementing regulation and guidance.

One commenter stated that the VECs are useful helps for analysis, but the VEC ratings sometimes change the meaning of terms from the CEQ regulations. The commenter stated that in so far as they do so, they depart from the governing standards. For example, a “significant

impact” is defined on page 4-4 of the SPEA as: “an adverse environmental impact, which, given the context and intensity, violates or exceeds regulatory or policy standards or otherwise exceeds the identified threshold.” Per the commenter, this is a very severe and limited definition that goes well beyond CEQ and Army regulations. The use of the concepts and language in generally applicable regulations published in the *Federal Register* would preclude the incomplete analysis and unsupported conclusions made in the SPEA. It seems likely, from the commenter’s perspective, that it is for that reason the Army relies on its own internal guidance documents instead.

**R:** The Army believes that the significance thresholds it set out were appropriate. It should be noted that installations could find significant impacts based on different thresholds as a matter of context and intensity. It is correct that some of the significance thresholds are based on regulatory standards. Others represent a combination. For instance, the threshold for biological resources is based on loss or impairment of habitat as well as the "take" prohibition of the ESA. For air quality, the threshold is exceedance of a permit standard. If a proposed action were to involve such exceedance, it would not mean that the Army would commit an illegal act; rather, the installation would seek to modify its permit. The threshold for water resource unpermitted discharges should be read the same way. For land use, the threshold makes clear that the 5,000-acre measure would vary according to the context and intensity of the situation. The Proposed Action, the Army notes, does not include major changes in land use. For traffic and transportation, the term LOS is a term of art that measures the flow of traffic at major intersections. Again, the Proposed Action does not result in any significant increases in traffic.

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### Acronyms and Abbreviations

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Acronym	Definition
AAF	Army Airfield
ABCT	Armored Brigade Combat Team
ACUB	Army Compatible Use Buffer
AMC	U.S. Army Materiel Command
Army or U.S. Army	U.S. Department of the Army
ARNG	Army National Guard
ARSTRAT	Army Forces Strategic Command
ASIP	Army Stationing and Installation Plan
ATEF	Automotive Technology Evaluation Facility

Acronym	Definition
BCT	Brigade Combat Team
BRAC	Base Realignment and Closure
C4ISR	Command, Control, Communications, Computers, Intelligence, Surveillance and Reconnaissance
CBRNE	Chemical, Biological, Radiological, Nuclear and Explosive
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CSRA	Central Savannah River Area
DEA	Drug Enforcement Agency
DHR	Department of Historic Resources
DoD	Department of Defense
DOT	Department of Transportation
EA	Environmental Assessment
EIFS	Economic Impact Forecast System
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FAA	Federal Aviation Administration
FACT	Family and Children's Trust
FEDC	Fairbanks Economic Development Corporation
FNSB	Fairbanks North Star Borough
FNSI	Finding of No Significant Impact
FORSCOM	U.S. Army Forces Command
FY	Fiscal Year
GHG	Greenhouse Gas
HUMINT	Human Intelligence
IMPLAN	Impact Analysis for Planning
ISIL	Islamic State of Iraq and the Levant
ISIS	Islamic State in Iraq and Syria
JPARC	Joint Pacific-Alaska Range Complex

Acronym	Definition
JRTC	Joint Readiness Training Center
LOS	Level of Service
MHPI	Military Housing Privatization Initiative
MOS	Military Occupational Specialties
MOUT	Military Operations in Urban Terrain
MSA	Metropolitan Statistical Area
MVA	Military Value Analysis
MWR	Morale, Welfare and Recreation
NEPA	National Environmental Policy Act
NETCOM	Network Enterprise Technology Command
NOA	Notice of Availability
NORAD	North American Aerospace Defense Command
2013 PEA	2013 Programmatic Environmental Assessment [for Army 2020 Force Structure Realignment]
PX	Post Exchange
PM <sub>10</sub>	Particulate Matter whose diameter is less than or equal to 10 micrometers
QDR	Quadrennial Defense Review
R&D	Research and Development
R&R	Rest and Recuperation
RDTE	Research, Development, Test & Evaluation
REDI	Rapid Expeditionary Deployment Initiative
ROI	Region of Influence
ROTC	Reserve Officers' Training Corps
SMDC	U.S. Army Space and Missile Defense Command
SPEA	Supplemental Programmatic Environmental Assessment
STEM	Science, Technology, Engineering, and Mathematics
SUA	Special Use Airspace
TDY	Temporary Duty
TRADOC	U.S. Army Training and Doctrine Command

<b>Acronym</b>	<b>Definition</b>
UAS	Unmanned Aircraft System(s)
UAV	Unmanned Aerial Vehicle
UPS	United Parcel Service
U.S.	United States
U.S.C.	United States Code
USAG	U.S. Army Garrison
USARPAC	U.S. Army Reserve Pacific
USFWS	U.S. Fish and Wildlife Service
USNORTHCOM	U.S. Northern Command
VA	Veterans Affairs
VEC	Valued Environmental Component

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