

Chapter 1

Purpose, Need, and Scope

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1.1 INTRODUCTION

This Environmental Impact Statement (EIS) analyzes the addition of Soldiers at Fort Lewis and the potential stationing of additional units to support Army Growth and transformation. The Department of the Army (Army) is in a period of critical transition. It has embarked on a 30-year process to transform its forces. This transformation includes modernizing its doctrine, equipment, leadership, organizational structure, facilities, business processes, and virtually every component of its operations.

Since the Record of Decision (ROD) for the Final Programmatic Environmental Impact Statement (FPEIS) for Army Transformation was signed in 2002, the Army has been implementing the Transformation process. Organizationally, the Army is transitioning from large powerful, fixed organizations constituted at the Division level (10,000 to 12,000 personnel) to an Army designed around smaller, standardized, self-contained, rapidly deployable Brigade Combat Teams (BCTs) (3,500 to 4,000 personnel). There are three types of modular BCTs: Heavy BCTs (HBCTs), Infantry BCTs (IBCTs), and Stryker BCTs (SBCTs). Each type of BCT has different needs for equipment, training, maneuver, and support.

The Army has almost completed the transformation to a modular or standardized force structure designed around the three types of BCTs. Subsequent phases of Transformation are focusing on analyzing and realigning Combat Support (CS) and Combat Service Support (CSS) units. This realignment of CS and CSS units will ensure the Army is fielding the proper force to support its modular BCTs and its operational mission requirements.

Recently, the Army identified the need to increase its overall size while continuing to restructure its forces in accordance with modular Transformation decisions:

- to further Army Transformation,
- to meet the 21st Century's requirements for increased national security and defense,
- to maintain training and operational readiness levels of the force, and
- to preserve a high quality of life for Soldiers and their Families.

This increase in the numbers and configurations of units will enhance operational readiness by allowing Soldiers more time to train and maintain their equipment. It also will afford Soldiers and Families more time together at home station while providing the nation with greater capability to respond to the increased challenges to national defense and security.

In 2007, the Army analyzed the environmental effects of an addition of units (to support Army Modularity and Global Defense Posture Realignment [GDPR] and growth of new units by up to six Active component BCTs). These effects were documented in the FPEIS for Army Growth and Force Structure Realignment (Grow-the-Army or GTA). This growth is intended to mitigate shortages in units, Soldiers, and time to train that would otherwise inhibit the Army from meeting readiness goals and supporting strategic requirements.

In December 2007, the Deputy Chief of Staff of the Army, G-3/5/7 (Operations, Plans, and Training), signed the ROD for the 2007 GTA FPEIS. This ROD validated the Army's plan to grow by approximately 74,200 Active and Reserve component Soldiers and to station these additional Soldiers at various specified installations. Specifically, the ROD states that the Army will proceed with the preferred alternative (Alternative 3) identified in the GTA FPEIS to:

1. Implement realignments and associated activities between Fiscal Year (FY) 2008 and FY 2013 to support the Army's decisions on Modular Transformation and GDPR,
2. Add approximately 30,000 CS and CSS Soldiers to the Active and Reserve components of the Army to address critical shortfalls in high-demand military skills, and
3. Grow the Army by up to six Active BCTs.

Decisions in the ROD about where growth and realignments would occur include stationing about 560 additional Active Duty Soldiers at Fort Lewis and augmenting Fort Lewis's existing units by approximately 1,320 Soldiers, for a total of approximately 1,880 additional Soldiers. Finally, the decisions about stationing actions were made with the understanding that site-specific analysis under the National Environmental Policy Act (NEPA) would be undertaken at the affected installations before the actions were implemented (Thurman 2007).

This EIS documents the site-specific analysis of adding approximately 1,880 Active Duty Soldiers at Fort Lewis as directed by the ROD for the GTA FPEIS. In addition, it analyzes the potential stationing at Fort Lewis of additional CSS units (consisting of up to 1,000 Soldiers) and a medium Combat Aviation Brigade (CAB) (consisting of approximately 2,800 Soldiers) to support the SBCTs and other units stationed at Fort Lewis. The EIS also documents the analysis of effects from pertinent past, present, and reasonably foreseeable future actions (RFFAs) connected to the GTA actions. These RFFAs also include the training of three SBCTs simultaneously at Fort Lewis and Yakima Training Center (YTC) with the GTA-directed new units being stationed and the other units already training at Fort Lewis and YTC. The analysis also considers construction of the facilities necessary to support these units.

To accommodate GTA actions and other changes at Fort Lewis, the newly developed Area Development Plans (ADPs) are being prepared as part of the Fort Lewis and YTC Master Plans. NEPA analysis of such master plan changes are required by Army Regulation (AR) 210-20.

This EIS provides decision makers, regulatory agencies, and the public information on the potential environmental and socioeconomic effects of implementing the 2007 GTA stationing decision at Fort Lewis and YTC. Decision-makers will be able to compare the alternatives analyzed in detail and assess their environmental and socioeconomic effects to make informed decisions.

On February 1, 2010, Fort Lewis and McChord Air Force Base became Joint Base Lewis-McChord (JBLM). On this date, it reached initial operational capability and began a phased consolidation to Army management under the Joint Base Garrison, which will be complete on October 1, 2010. Although the names of Fort Lewis and YTC have officially changed to JBLM-Lewis and JBLM-YTC, the Army decided to continue using the previous naming conventions for Fort Lewis and YTC in this document. This decision was made to ensure consistency throughout the current NEPA process, including consistency with the 2009 DEIS and with the 2007 FPEIS for Army Growth and Force Structure Realignment.

1.2 PURPOSE OF AND NEED FOR THE PROPOSED ACTION

The purpose of the Proposed Action is to implement the decisions made in the ROD for the 2007 GTA FPEIS as well as other potential Army decisions to station additional CSS and CAB Soldiers at Fort Lewis. Fort Lewis must provide adequate permanent administrative facilities, ranges, and training areas to support all Soldiers assigned to Fort Lewis given the assignment of new units to Fort Lewis and the likelihood that all three SBCTs will be present at Fort Lewis simultaneously. Fort Lewis must ensure that sufficient firing ranges are available to support these units. It must also meet the Army's goals of sustaining global force readiness. Fort Lewis's Soldiers must be able to train as they fight. Fort Lewis must also preserve/enhance Soldier and Family quality of life. This includes analyzing the requirements for units like 1,000 CSS Soldiers and a medium CAB that have not yet been designated to come to Fort Lewis. This enables the Army to anticipate possible needs. The information also will be made available to Army decision makers and planners who might be considering the assignment of additional units to Fort Lewis.

Fort Lewis currently houses and trains about 34,000 Soldiers. The Proposed Action and all those recent past and (reasonably foreseeable) future actions (including now having the three SBCTs present and training simultaneously at Fort Lewis and YTC) will add up to 5,680 Soldiers (and about 8,640 Family members), which would stretch current facilities. Fort Lewis must provide adequate cantonment area and training area resources for all of the Soldiers that will be assigned to it.

The Army already supports the following primary units and organizations at Fort Lewis:

- I Corps Headquarters
- 4th Brigade, 2nd Infantry Division SBCT
- 555th Engineer Brigade
- 62nd Medical Brigade
- 17th Fires Brigade
- 4–6 Air Cavalry Squadron
- 2nd Battalion, 75th Ranger Regiment
- 6th Military Police Group (CID)
- Madigan Army Medical Center
- US Army Garrison
- 81st Infantry Brigade Combat Team, Heavy (Washington Army National Guard)
- 191st Infantry Brigade, U.S. Army Reserve
- 66th Combat Aviation Brigade (Washington Army National Guard)
- 3rd Brigade, 2nd Infantry Division SBCT
- 5th Brigade, 2nd Infantry Division SBCT (reflags to (2nd Brigade, 2nd Infantry Division SBCT in late 2010)
- 42nd Military Police Brigade
- 593rd Sustainment Brigade
- 1st Joint Mobilization Brigade
- 201st Battlefield Surveillance Brigade
- 20th Support Command
- 404th Army Field Support Brigade
- 1st Special Forces Group (Airborne)
- 4th Battalion, 160th Special Operations Aviation Regiment (Airborne)
- 8th Brigade, U.S. Army Cadet Command

Although three SBCTs have been stationed at Fort Lewis since April 2007, there has never been a period during which all three were training simultaneously at full intensity at Fort Lewis or YTC. This is because at least one of the SBCTs has been deployed in combat or to an Army Training Center outside of Fort Lewis and YTC or was in an Army Force Generation "Reset" mode following return from a combat deployment at any given time since the third SBCT arrived. These serial deployments will not last indefinitely. Part of the purpose of the proposed action is to support the presence of and full-intensity training requirements for all three SBCTs simultaneously. The associated need is to upgrade infrastructure in the cantonment area for the third SBCT so that it meets current standards and improves the training range capability to meet the collective firing range requirements for all three SBCTs at Fort Lewis and YTC.

In addition, since the SBCTs were stationed at Fort Lewis, their annual training requirements have increased from roughly 44,000 miles (71,000 kilometers [km]) per year to 530,000 miles (853,000 km) per year (totals include all vehicles in a single SBCT driving on Military Class 4 and 5 roads and off road). This is due to evolving doctrine for the SBCT as the Army has determined how it should be employed. Much of the requirements are based on lessons learned from SBCT deployments to Iraq and Afghanistan.

As described above, the ROD for the Army's 2007 GTA FPEIS assigned about 1,880 additional Soldiers to Fort Lewis, with stationing to occur between FY 2008 and FY 2013. The same ROD also chose to keep at Fort Lewis several units that were scheduled to leave Fort Lewis, totaling about 380 Soldiers. Because stationing was to begin in 2008, many of the 1,880 new Soldiers have already arrived.

Army Growth was extremely important to the war efforts in Iraq and Afghanistan and had to occur throughout the United States before full planning and analysis could take place at installations such as Fort Lewis. The new units that have arrived were placed in existing buildings and have trained on existing ranges within previously approved range capacities. Eventually, however, the units will require additional cantonment area construction. Upon the return of all three SBCTs to Fort Lewis, the 1,880 GTA Soldiers will also contribute to the need for new ranges and increased training area use. So another part of the purpose of the proposed action is to support the presence of and training requirements for the GTA Soldiers, whether their units have already arrived or not. The associated need is to upgrade infrastructure in the cantonment area for the units so that it meets current standards and improves the training range capability to meet the collective firing range requirements for all units scheduled to be assigned to Fort Lewis, including those GTA Soldiers who have already arrived.

In addition to the stationing actions at Fort Lewis directed by the ROD for the GTA FPEIS, the growth at the installation may include the stationing of CSS units and stationing of a medium CAB. The CSS units perform logistic (sustainment) functions and could consist of transportation, quartermaster, medical, headquarters, or other CSS units. The CSS units would include as many as 1,000 Soldiers, and they would support operations at Fort Lewis and YTC.

The medium CAB is the standard design for Army aviation brigades under the Army Modular Force (AMF) plan. Formerly called the multi-functional aviation brigade, the medium CAB is part of Army Transformation. Stationing a medium CAB to support the three SBCTs and other units already stationed at Fort Lewis would enhance integrated training at Fort Lewis and YTC. The Army is considering Fort Lewis and several other locations for stationing of a medium CAB in the 2010 to 2013 timeframe. Because of this, the Army has included an evaluation of the potential impacts of stationing a medium CAB at Fort Lewis in this EIS.

Stationing these 1,000 CSS Soldiers and the CAB would involve constructing new facilities to support additional Soldiers and their Families, upgrading existing training ranges, constructing new training ranges, and continuing the use of training ranges and maneuver areas. Facilities for training, garrison operations, and Soldiers' quality of life are critical for supporting the operations of the new units that would be stationed at Fort Lewis and those units already at Fort Lewis undergoing strength increases from GTA-directed augmentations. Current facilities at Fort Lewis or YTC are not adequate to accommodate the new units. Therefore, construction of facilities would be required.

1.2.1 Army Training Strategy and Doctrine

Current training needs have been shaped by AMF and Transformation, operational experience in Afghanistan and Iraq, and the capabilities of new equipment. Training requirements are outlined in Training Circular (TC) 25–1, *Training Land* (Army 2004e) and TC 25–8, *Training Ranges* (Army 2004f).

Training in the current operational environment requires large maneuver or training areas of varying characteristics with complex terrain. The Army also has an increased need to conduct urban training operations. Trends toward greater urbanization in operational theaters across the globe require the Army to provide security, stability, and counterinsurgency operations in populated urban environments. The military's experiences in Iraq and Afghanistan have demonstrated that Special Forces operations, intelligence gathering, and the use of joint multi-service and multinational (sister service and coalition) assets are also critical to mission success and defeat of a dispersed and poorly defined enemy force. It should be noted, however, that the Army has been emphasizing urban, Special Forces, intelligence gathering, and joint and multinational training at Fort Lewis and YTC to ensure current and future mission success. In addition to these increased training requirements, the Army must retain its ability to train on mechanized force-on-force training tasks.

Training needs must also consider contingencies that Soldiers may face in future conflicts, taking into account weapons and communications capabilities and the full range of potential enemies.

High-quality training that prepares Soldiers for the operational environment is essential to ensuring the success of the nation's strategic defense objectives, national security, and the safety of Soldiers. Home stations, such as Fort Lewis, must prepare Soldiers for operational deployments and missions. This preparation includes live-fire mission support and maneuver training, each of which is discussed as follows in the context of the needs of SBCTs and a medium CAB.

1.2.2 Installation Sustainability

On October 1, 2004, the Secretary of the Army and the Army Chief of Staff issued the *Army Strategy for the Environment*, which focuses on the interrelationships of mission, environment, and community. A sustainable installation simultaneously meets current and future mission requirements, safeguards human health, improves quality of life, and enhances the natural environment (Army 2004d). A sustained natural environment is necessary to allow the Army to train and maintain military readiness.

The Army's Strategy for the Environment is supported by AR 200–1, *Environmental Protection and Enhancement*. AR 200–1 reinforces the Army's commitment to applying sustainable policies and practices to safeguard the environment. Fort Lewis and YTC have built upon these environmental policies and regulations to protect environmental resources at Fort Lewis and YTC.

The Army recognizes that a unit executing training for its current mission, or to doctrinal standards to maintain its overall readiness, affects training lands. To manage training lands in a sustainable manner, the Army has instituted land and environmental management programs to support sound natural resource management practices and to provide stewardship of its training lands.

As an installation, Fort Lewis has developed eight 25-year Sustainability Goals. These goals are related to air quality, energy, sustainable community, products and materials, sustainable training lands, and water resources. Fort Lewis has committed to achieving a higher level of environmental performance through continued progress toward its Sustainability Goals. The progress toward

implementation of these voluntary measures depends on available funding. Additional information on Fort Lewis's achievements and goals can be found at <http://sustainablefortlewis.army.mil/>.

Recently, YTC revised its Sustainability Goals (Mulkey 2008). YTC's five goals are consistent with those of Fort Lewis and are measurable, but they are specific to YTC's different location and environment. The five goals are related to air quality, energy, products and materials, sustainable training lands, and water resources. As with Fort Lewis, progress toward implementation of these voluntary measures depends on available funding.

The impacts to land from military training are a particular focus of sustainability efforts at Fort Lewis and YTC. The Integrated Training Area Management (ITAM) program establishes a uniform land management program, elements of which include inventorying and monitoring land condition, integrating training requirements with land carrying capacity while training to standard, educating land users to minimize adverse impacts, and prioritizing and implementing rehabilitation and maintenance projects. ITAM is governed by AR 350–19, *The Army Sustainable Range Program*. Fort Lewis uses AR 350–19 and Fort Lewis Regulation 350–30, *Fort Lewis Range Regulations*, as guidance documents for its ITAM program. Other important resource management programs and procedures are provided in Fort Lewis's Integrated Natural Resource Management Plan (INRMP) and Integrated Cultural Resource Management Plan (ICRMP) and YTC's Cultural and Natural Resource Management Plan (CNRMP). These programs seek to optimize training while providing sustainable land management to ensure that training lands continue to be available to support the Army's mission.

1.3 SCOPE OF THE ANALYSIS

This EIS addresses environmental and socioeconomic impacts at Fort Lewis and YTC because of stationing Soldiers at the installation. This site-specific EIS has been developed in accordance with NEPA; the regulations issued by the Council on Environmental Quality (CEQ), 40 Code of Federal Regulations (CFR) Parts 1500–1508; and the Army's implementing procedures published in 32 CFR Part 651, *Environmental Analysis of Army Actions*. The potential stationing of additional CSS units and a medium CAB is also analyzed in this document for the reasons stated in **Section 1.2**. Additional analysis may be required to evaluate the site-specific components and effects of these actions that cannot be projected currently, such as the proportional distribution of the 1,000 CSS Soldiers among the various CSS units (e.g., transportation, medical, quartermaster, and headquarters).

The decisions on these stationing actions have been made at Headquarters, Department of the Army (HQDA), many in the ROD for the 2007 GTA FPEIS. Future decisions on the 1,000 CSS Soldiers and medium CAB will also be made at HQDA. Although the *decisions* themselves whether to send these units to Fort Lewis are outside the scope of the proposed action and the analysis in this EIS, we have analyzed the *impact* of stationing these units at Fort Lewis should the decision be made to do so.

This EIS incorporates the analysis of the 2007 GTA FPEIS by reference and provides the baseline conditions of the No Action Alternative.

1.4 PUBLIC INVOLVEMENT

As required by NEPA regulations, the Army invites public participation in the EIS process. Comments from all interested persons promote open communication and enable better decision making. All agencies, organizations, and members of the public with a potential interest in the

Proposed Action, including minority, low-income, disadvantaged, and Native American groups, will be provided the opportunity to participate in this process.

1.4.1 Overview of the Public Involvement Process

Opportunities for the public to participate in this NEPA process and decision making on the Proposed Action are guided by 32 CFR Part 651. The EIS process begins by involving the public, agencies, and other interested parties in the scoping process, which begins with the Army's publication in the *Federal Register* of a Notice of Intent (NOI) to prepare an EIS. The Army also publishes scoping notices in the local newspapers near Fort Lewis and YTC. The scoping process is the best time to identify issues and provide recommendations. The overall goal is to define the scope of issues to be addressed in depth in the analysis that will be included in the EIS. Following scoping, the Army prepares the Draft EIS (DEIS).

The next major step in the EIS process that provides an opportunity for public input is when the Army submits the DEIS for public review and comment. The U.S. Environmental Protection Agency (EPA) and Army each publish a Notice of Availability (NOA) in the *Federal Register* informing the public of the DEIS's availability for review. The Army also publishes NOAs in the local newspapers near Fort Lewis and YTC. A 45-day comment period begins on the date of publication of the EPA's NOA. During this period, but after at least 15 days following publication of the NOA, the Army will hold public meetings to provide an opportunity for the public, organizations, and regulatory agencies to provide comments on the DEIS.

Following the comment period, the Army will prepare a Final EIS (FEIS) that addresses all comments received on the DEIS. The Army files the FEIS with EPA and makes it available to the public for review. As with the DEIS, the Army and EPA each publish an NOA in the *Federal Register* informing the public of the FEIS's availability for review. The Army also publishes NOAs in the local newspapers near Fort Lewis and YTC.

A final decision on the Proposed Action is documented in a ROD. The Army issues the ROD no sooner than 30 days after the FEIS is released to the public. The Army publishes an NOA for the ROD in the *Federal Register*.

1.4.2 Scoping and Public Notice

On December 22, 2008, the Army published in the *Federal Register* an NOI to prepare an EIS for GTA actions at Fort Lewis, Washington (73 *Federal Register* 78336). In addition, letters were sent to parties on a mailing list of those interested in activities and actions at Fort Lewis and YTC. Notices of three public scoping meetings were published in local newspapers.

1.4.2.1 Agency Scoping

Agencies with permitting review responsibilities and other interested parties were invited to participate in scoping for the Fort Lewis GTA EIS. Several representatives of agencies and local governments attended the public scoping meetings. Federal and state governmental agencies and several local governmental representatives provided comments during the scoping period.

1.4.2.2 Public Scoping

Public scoping meetings were held at the Lacey Community Center in Lacey on January 20, 2009, the Hal Holmes Community Center in Ellensburg on January 21, 2009, and the Howard Johnson Plaza in Yakima on January 22, 2009. All three scoping meetings were conducted in an open house

format during the hours of 6:00 to 8:00 p.m. Approximately two weeks before the public scoping meetings, notices of the meetings were published in the following seven general circulation papers: Seattle Times, Seattle Post Intelligencer, The News Tribune, Olympian, Yakima Herald Republic, Ellensburg Daily Record, and Columbia Basin Herald. These public notices provided information on the background and purpose of the Proposed Action, requested public comments, and provided information on the public scoping meetings.

At each meeting, the Army was represented by Fort Lewis and YTC staff. Approximately 20, 3, and 7 members of the public, including local media representatives, attended the three meetings, respectively.

At each of the meetings, the members of the public were greeted upon arrival; requested to sign an attendance record form listing their name, address, and affiliation (if any); and given an information sheet. All attendees were given comment forms to provide written comments or concerns that they would like addressed in the EIS. They were asked to either complete and return the forms before leaving the meeting or return the forms to the Army no later than the close of the scoping period on February 5, 2009.

Individuals, organizations, and governmental representatives provided written comments on the scope of the EIS during the scoping period. Comments received were grouped based on comment threads or topics, and a primary issue statement was prepared for each group of comments. Twelve issues were incorporated into the NEPA analysis. They are:

- The effects of increased military usage of YTC on deer and elk hunting
- Traffic impacts resulting from increased military personnel and civilian employment at Fort Lewis
- The effects of Army Growth and Force Structure Realignment on surface water resources (waters of the United States and waters of the state) at Fort Lewis and YTC
- The effects of construction and demolition activities and long-term operations on surface and groundwater quality, including drinking water sources, and hydrology
- The effects on air quality, and resulting effects on human health and climate change, from proposed construction/demolition activities and long-term operations associated with GTA actions at Fort Lewis and YTC
- The effects on the environment from a potential release of hazardous/toxic chemicals during operations or because of an accident
- The effects of increased training activities at Fort Lewis and YTC on rare species and habitats on the installations
- The effects of GTA actions on the spread of noxious weeds/invasive species, and their resulting environmental effects
- Temporary and permanent land use effects from implementing the GTA initiative
- The effects of Army expansion at Fort Lewis on the availability of off-post housing and community facilities
- The potential for increased range fires resulting from increased live-fire training use of YTC
- The potential for disproportionate adverse impacts to minority and low-income populations from implementation of the project

Additional details regarding the scoping process and results are available in the Scoping Summary for the Fort Lewis Army Growth and Force Structure Realignment Environmental Impact Statement (ARCADIS 2009), which is available for review at http://www.lewis.army.mil/publicworks/sites/envir/EIA_2.htm.

1.4.3 Review of the Draft Environmental Impact Statement

The DEIS was available for public review and comment from September 11, 2009 through October 26, 2009. The Army encouraged reviewers to submit written comments on the document during this period. In addition, the Army held public meetings at the Lacey Community Center in Lacey on September 29, 2009, the Hal Holmes Community Center in Ellensburg on September 30, 2009, and the Howard Johnson Plaza in Yakima on October 1, 2009 to provide the public with the opportunity to ask questions and submit comments on the DEIS in person.

Twenty-seven reviewers of the DEIS submitted comments via letters or e-mails. Overall, comments primarily focused on the NEPA process, alternatives, biological resources, cultural resources, water resources, wildfire, air quality, socioeconomics, and cumulative effects. Appendix G contains a summary of the comments received on the DEIS and the Army's responses to those comments.

In response to the comments, the Army made a variety of changes throughout the document. The discussion of alternatives in Chapter 2 was revised to expand and clarify information on the alternatives. For example, the table that compares and contrasts the alternatives was moved from the front of Volume 2 in the DEIS into Chapter 2 in the FEIS. Discussions of the affected environment in Chapters 3 and 5 were expanded to provide some additional information requested in the comments. The discussions of environmental consequences in Chapters 4 and 6 also were revised and expanded to provide a clearer perception of the likely effects of the alternatives and incorporate additional mitigation measures.

1.5 LEGAL FRAMEWORK

The scope of this EIS is to evaluate the environmental and socioeconomic impacts of the Proposed Action (**Section 1.2**). The timing for implementing the Proposed Action is contingent on numerous factors, such as mission requirements, schedule, availability of funding, and environmental considerations. In addressing environmental considerations at Fort Lewis and YTC, AR 200-1, *Environmental Protection and Enhancement*, mandates compliance with:

- all applicable federal, state, and local environmental regulations;
- requirements of environmental permits;
- Executive Orders (EOs) that establish standards and provide guidance on environmental and natural resources management and planning; and
- Army and Fort Lewis regulations that define overall management of the land at Fort Lewis and YTC.

These guiding statutes and regulations are discussed throughout Chapters 3 and 5, where applicable, for the resources evaluated in this EIS.

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