

# Record of Decision

## Fort Lewis Army Growth and Force Structure Realignment



February 2011



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# RECORD OF DECISION FOR THE FORT LEWIS ARMY GROWTH AND FORCE STRUCTURE REALIGNMENT

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## 1 EXECUTIVE SUMMARY

As the Army's Installation Management Command (IMCOM) Executive Director, I have reviewed the Final Environmental Impact Statement (FEIS) for the Fort Lewis Army Growth and Force Structure Realignment. The FEIS adequately assesses the potential environmental and socioeconomic consequences associated with implementing, at Fort Lewis and the Yakima Training Center (YTC)<sup>1</sup>, the December 2007 (updated in June 2010) Record of Decision (ROD) for the Final Programmatic Environmental Impact Statement (FPEIS) for Army Growth and Force Structure Realignment (also known as "Grow The Army" or GTA). The FEIS, dated July 2010 and released for public review in August 2010, is incorporated by reference in this ROD.

This ROD explains that the Army will proceed with its Preferred Alternative identified in the FEIS. The Preferred Alternative consists of several components including stationing, construction, and training.

The FEIS analyzed the environmental and socioeconomic impacts of stationing approximately 5,700 additional Soldiers, and their Families at Fort Lewis. This includes approximately:

- 1,900 Soldiers (December 2007 GTA ROD);
- 1,000 Combat Service Support (CSS) Soldiers, and;
- 2,800 Soldiers for a medium Combat Aviation Brigade (CAB).

The Army will proceed with the stationing of the 1,900 additional GTA Soldiers and their Families, and will proceed with the stationing of the CSS Soldiers and/or elements of the CAB if the Army decides to station these units at Fort Lewis. No final decisions have been made at Headquarters Department of the Army on the 1,000 additional CSS Soldiers or elements of a CAB at this time. A decision on CAB stationing is anticipated shortly.

New facilities, additional ranges, and training facilities will be constructed to support the stationing of the GTA Soldiers. The Soldiers will conduct training at Fort Lewis and YTC to maintain mission proficiency, and will train along with all other major units stationed at Fort Lewis.

The FEIS analyzed the environmental and socioeconomic impacts at Fort Lewis and YTC related to the potential stationing of CSS units and a CAB at Fort Lewis. The stationing of a CAB as well as stationing of additional CSS units are actions that are being considered by the Army. The Army is completing a programmatic environmental analysis of potential stationing locations that may result in the stationing of a CAB or CAB units at Fort Lewis and/or Fort Carson. Implementation of actions

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<sup>1</sup> On 1 February 2010, Fort Lewis, the Yakima Training Center, and McChord Air Force Base were designated a joint base and renamed "Joint Base Lewis-McChord" (JBLM). Because the EIS process began prior to the consolidation and earlier documents used the former installation names, the terms "Fort Lewis," "Yakima Training Center," and "YTC" are retained in this document for consistency with previous EIS documents.

related to the CSS and CAB stationing would not occur until the Army makes a final decision on stationing of these units. This ROD documents a decision about where the facilities for these units would be located on the installation, how training would be accomplished, and what impacts or effects are anticipated. Construction and training support for the CSS Soldiers and CAB stationing would proceed if the Army decides to station all or some of the Soldiers at Fort Lewis.

Implementation of this decision continues the process of Army growth and transformation, identifies requirements for supporting potential future stationing of CSS and aviation assets, and enhances the Army's mission capability.

## **2 BACKGROUND**

Since publication of the ROD for the FPEIS for Army Transformation in 2002, the Army has been implementing 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. The December 2007 GTA FPEIS 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 including Fort Lewis.

The FEIS tiers from the December 2007 GTA FPEIS by assessing the alternatives for implementing the Fort Lewis stationing decisions. The FEIS and this ROD comply with the requirements of the Council on Environmental Quality (CEQ) regulations that implement the National Environmental Policy Act (NEPA) (40 Code of Federal Regulations [CFR] Parts 1500–1508) and the Army NEPA implementing procedures, 32 CFR Part 651.

## **3 PROPOSED ACTION**

The Proposed Action is consistent with the FEIS purpose and need to implement the decisions in the December 2007 GTA FPEIS ROD pertaining to Fort Lewis and YTC. The Proposed Action includes three primary components: the stationing of additional Soldiers, facility demolition and construction to support the increased troop levels, and additional aviation, maneuver, and live fire training.

The Proposed Action includes the GTA FPEIS ROD action of stationing approximately 1,900 new Soldiers and their Families at Fort Lewis. This stationing is ongoing, and about half of the Soldiers have already arrived. In addition, the Proposed Action includes potentially stationing CSS units with up to approximately 1,000 Soldiers, and potentially stationing a CAB with up to approximately 2,800 Soldiers. As of January 2010, the military population at Fort Lewis was approximately 34,000 Soldiers. Full implementation of all stationing in the Preferred Alternative would add up to 5,700 Soldiers. No final decisions have been made at Headquarters Department of the Army on the 1,000 additional CSS Soldiers or elements of a CAB at this time. A decision on CAB stationing is anticipated in the near future. This decision is being evaluated by Army Headquarters as part of a separate EIS process.

Facility construction and renovation projects are included as part of the Proposed Action to provide housing, administrative, infrastructure upgrades, and training facilities to support the stationing of the GTA Soldiers who have already arrived or are yet to arrive. The Soldiers who have arrived were placed in existing buildings, many of which are below current Army housing standards. Construction is also included to support a Stryker Brigade Combat Team (SBCT) assigned to Fort Lewis in April 2007 (the third of three SBCTs) which was also housed in temporary buildings. The Area Development Plans (ADPs) that are part of the installation Master Plan for Fort Lewis and YTC are being updated to accommodate the range of infrastructure changes that either have occurred due to previous actions or would occur pursuant to this ROD. The ADP's will respond to the need for

changes in traffic infrastructure, Family housing requirements, Soldier and Family “quality of life” facilities, commercial and retail development, and mission capability enhancements.

Training of the additional Soldiers is also part of the Proposed Action. The maneuver and live-fire training that would occur under this action would be consistent with current Fort Lewis and YTC training activities and would be in addition to the training conducted by all other units currently stationed here. New firing ranges would be constructed to meet the training requirements of the additional Soldiers.

## **4 ALTERNATIVES**

Alternatives for implementing the Proposed Action are discussed in Chapter 2 of the FEIS and are summarized here. **Table 1** provides a summary of the key attributes of the alternatives.

### **4.1 Alternative 1 — No Action Alternative**

The No Action alternative assumes that the Army GTA and separate CAB growth and realignment decisions would not be implemented. Analysis of the No Action alternative serves as a baseline for comparison of the other alternatives. Under this alternative, planned construction that is not part of the GTA decisions would be conducted. The construction includes troop barracks, recreational facilities, traffic flow improvements, and other infrastructure upgrades at Fort Lewis.

Analysis of the No Action alternative is required by CEQ and Army NEPA-implementing regulations. The No Action alternative does not meet the Purpose of and Need for the Proposed Action. The Army’s decision to increase the size of the force was made, after NEPA review, and is reflected in the 2007 GTA FPEIS ROD. That decision included the study of the possible locations within the Army for stationing of the new units. Fort Lewis was chosen as one of the stationing locations as part of that process. The No Action alternative provides a benchmark to compare the magnitude of the environmental effects of the Preferred Alternative and the other Alternatives.

### **4.2 Alternative 2 (GTA Alternative) — Implement Army GTA Actions and Those Actions Interconnected to GTA**

The GTA alternative implements the Army GTA decisions affecting Fort Lewis and YTC. Maneuver and live-fire training of an additional 1,900 Soldiers will occur at Fort Lewis and YTC. This alternative also includes the training of three Stryker Brigade Combat Teams (SBCTs) simultaneously at Fort Lewis and YTC. Planned new construction includes brigade barracks complexes, the upgrade of sub-standard SBCT facilities to meet Army standards, and additional firing ranges at Fort Lewis and YTC.

The new Soldiers would conduct maneuver and live-fire training at both Fort Lewis and YTC with all other units currently stationed at Fort Lewis, including three SBCTs. Platoon, company, and some battalion level maneuver events would normally be conducted at Fort Lewis, while company level and the majority of battalion and brigade level training would occur at YTC. The maneuver events would involve both on and off-road driving. Approximately 60 percent of the total miles would be driven at Fort Lewis (**Table 1**). The three SBCTs would account for the majority of the miles driven.

### **4.3 Alternative 3 (CSS Alternative) — All Actions under Alternative 2 and the Potential Stationing of up to 1,000 Combat Service Support (CSS) Soldiers**

The CSS alternative represents the potential stationing at Fort Lewis of up to 1,000 CSS Soldiers in addition to Alternative 2. The stationing of additional CSS Soldiers is a stationing action that the

Army is considering. Maneuver and live-fire training of up to approximately 2,900 new Soldiers would occur at Fort Lewis and YTC. While no new range construction is anticipated, facility, and other specific construction projects cannot be identified until the types and numbers of CSS units are known, but new construction would include barracks, motor pools, classrooms, and administrative facilities.

The CSS Soldiers would train at Fort Lewis and YTC along with all other units stationed at Fort Lewis, including three SBCTs. The maneuver and live-fire training would be similar to Alternative 2, with the CSS Soldiers accounting for a minor increase over Alternative 2 in the maneuver and live-fire events conducted. Approximately 60 percent of the miles would be driven at Fort Lewis (**Table 1**). The SBCTs would continue to account for the majority of maneuver miles driven.

#### **4.4 Alternative 4 (CAB Alternative) — All Actions under Alternative 3 and the Potential Stationing of a Combat Aviation Brigade**

The CAB alternative represents the potential stationing at Fort Lewis of a CAB in addition to Alternative 3. Maneuver and live-fire training of up to approximately 5,700 new Soldiers would occur at Fort Lewis and YTC. This maneuver would include both the air and ground assets of the CAB. Currently, the Army is completing a programmatic environmental analysis of potential stationing locations that may result in the stationing of a CAB or additional CAB units at Fort Lewis. No final decisions have been made at the Headquarters, Department of the Army level on a CAB at this time. While no new range construction is anticipated, facility and other specific construction projects to support the CAB cannot be identified until the types and numbers of CAB units are known, but new construction facilities would be similar to those required for Alternative 3.

The CAB Soldiers would train along with all other units stationed at Fort Lewis, including the three SBCTs. The CAB would provide aviation support to the three SBCTs and other major units in combined arms training events, including combined arms live-fire exercises. The CAB would also conduct aviation gunnery training at both Fort Lewis and YTC except for aerial rocket firing, which would be accomplished only at YTC. The training would involve low-level, terrain or nap-of-the-earth flights depending on the mission. There would be an increase in the number of flight hours and the number of takeoffs and landings at Fort Lewis and YTC. The majority of the flight hours and takeoffs/landings would occur at Fort Lewis (**Table 1**). CAB training would result in an increase in the maneuver and live-fire events conducted and number of miles driven. Approximately 60 percent of the miles would be driven at Fort Lewis (**Table 1**). The SBCTs would continue to account for the majority of maneuver miles driven.

## **5 PUBLIC INVOLVEMENT**

In accordance with CEQ regulations and 32 CFR Part 651, the Army provided federal, state and local agency stakeholders, the public and other interested parties the following notifications and opportunities for involvement during the preparation of the FEIS:

- A Notice of Intent to prepare an EIS was published in the *Federal Register* December 22, 2008. In addition, letters were sent to parties on a mailing list of those interested in activities and actions at Fort Lewis and YTC, providing notice of the Army's intent and inviting the parties to scheduled public scoping meetings. Notices of the scoping meetings were also published in local newspapers approximately two weeks before the meetings.

**Table 1 Summary of the Key Attributes of the Alternatives**

<b>Attribute</b>	<b>Alternative 1—No Action</b>	<b>Alternative 2—GTA Actions</b>	<b>Alternative 3—GTA Actions + CSS Soldiers</b>	<b>Alternative 4—GTA Actions + CSS Soldiers + CAB</b>
Approx. Number of New Soldiers <sup>1</sup>	None	1,900 Soldiers	2,900 Soldiers (1,900 + 1,000)	5,700 Soldiers (1,900 + 1,000 + 2,800)
Approx. Number of New Soldiers and Family Members	None	4,790 Soldiers and Family	7,310 Soldiers and Family (4,790 + 2,520)	14,370 Soldiers and Family (4,790 + 2,520 + 7,060)
New Cantonment Area Construction:				
<i>Fort Lewis</i>	Several new SBCT and other previously approved facilities throughout cantonment area	Several additional new SBCT and GTA facilities throughout cantonment area	Several CSS facilities to be located in the North Fort area	Several CAB facilities to be located near Gray Army Airfield and East Division areas
<i>YTC</i>	No construction	No construction	No construction proposed	No construction proposed
New Range Construction				
<i>Fort Lewis</i>	No construction	5 range construction projects	No additional ranges proposed	No additional ranges proposed
<i>YTC</i>	No construction	2 range construction projects	No additional ranges proposed	No additional ranges proposed
CAB Training	None	None	None	29,000 hours total annual flight time (1,450 hours at YTC) and 58,000 total takeoffs and landings (2,900 at YTC)
Units Training Simultaneously at Full Intensity	2 SBCTs + all other Fort Lewis units	3 SBCTs + GTA Units + all other Fort Lewis units	3 SBCTs + GTA Units + CSS Units + all other Fort Lewis units	3 SBCTs + GTA Units + CSS Units + CAB unit + all other Fort Lewis units
Number of Annual Maneuver Miles (by Units)				
<i>SBCT:</i>	4,520,000 miles Fort Lewis: 2,710,000 miles; YTC: 1,810,000 miles	6,770,000 miles Fort Lewis: 4,060,000 miles; YTC: 2,710,000 miles	6,770,000 miles Fort Lewis: 4,060,000 miles; YTC: 2,710,000 miles	6,770,000 miles Fort Lewis: 4,060,000 miles; YTC: 2,710,000 miles
<i>GTA Units:</i>	0 miles	144,000 miles Fort Lewis: 91,000 miles; YTC: 53,000 miles	144,000 miles Fort Lewis: 91,000 miles; YTC: 53,000 miles	144,000 miles Fort Lewis: 91,000 miles; YTC: 53,000 miles
<i>CSS Units:</i>	0 miles	0 miles	421,000 miles Fort Lewis: 330,000 miles; YTC: 91,000 miles	421,000 miles Fort Lewis: 330,000 miles; YTC: 91,000 miles
<i>CAB Vehicles:</i>	0 miles	0 miles	0 miles	354,000 miles Fort Lewis: 270,000 miles; YTC: 84,000 miles
<i>Total<sup>2</sup>:</i>	4,520,000 miles Fort Lewis: 2,710,000 miles; YTC: 1,810,000 miles	6,910,000 miles Fort Lewis: 4,150,000 miles; YTC: 2,760,000 miles	7,340,000 miles Fort Lewis: 4,480,000 miles; YTC: 2,860,000	7,700,000 miles Fort Lewis: 4,750,000 miles; YTC: 2,950,000 miles

Note:

- 1 All stationing would occur at Fort Lewis. Training of new Soldiers would occur at both Fort Lewis and YTC.
- 2 Totals may not match precisely with the value obtained by adding unit numbers because of rounding conventions.

- Public scoping meetings were held in Lacey, Ellensburg, and Yakima, Washington on January 20, 21, and 22, 2009 respectively. Comments received during the scoping meetings were included in a Scoping Report and considered during the environmental analyses.
- The Notice of Availability for the Draft Environmental Impact Statement (DEIS) was published in the *Federal Register* on September 11, 2009. Interested stakeholders were notified of the DEIS availability by mail and e-mail, and notified of scheduled public meetings on the DEIS. A public notice announcing the DEIS public meetings was published in local newspapers. Public meetings on the DEIS were held in Lacey, Ellensburg, and Yakima, Washington on September 29 through October 1, 2009.
- The DEIS was available for public review and comment from September 11, 2009 through October 26, 2009. The DEIS was available at public libraries near Fort Lewis and YTC. Hard or digital copies of the DEIS were provided to selected parties and those who requested them. The DEIS was also available online on a Fort Lewis public website for download and review. A summary of the comments received on the DEIS and the Army's responses to those comments are included in the FEIS.
- The FEIS was available to the public when the Army Notice of Availability (NOA) for the FEIS was published in the *Federal Register* on September 10, 2010. In addition, a public notice announcing the availability was published in local newspapers. Interested stakeholders were notified of the FEIS availability by mail and e-mail. Hard or digital copies of the FEIS were provided to selected parties and those who requested them. The FEIS was also available at public libraries near Fort Lewis and YTC and available online on a Fort Lewis public website for download and review. After the FEIS NOA was published, 35 comments were received. These comments, which were focused primarily on traffic congestion and delays that would be caused by the Proposed Action, were fully considered in my evaluation and are discussed below.
- The Notice of Availability of this ROD will be published in the *Federal Register*. Following its publication, the ROD will be made available (with the FEIS) online and at local libraries.

## **6 DECISION FOR THE FORT LEWIS ARMY GROWTH AND FORCE STRUCTURE REALIGNMENT**

In the FEIS, the Army identified Alternative 4 as the Preferred Alternative. This alternative implements the GTA decision to station up to 1,900 Soldiers and their Families at Fort Lewis, and allows implementation of any actions analyzed in the FEIS, including the potential stationing of additional CSS Soldiers and a CAB. Although the Army has not made the final decision on CAB stationing locations, the FEIS included an analysis of the potential consequences of locating these Soldiers and their Families at Fort Lewis and the impacts associated with their training at Fort Lewis and YTC. This ROD identifies the facility location and training requirements associated with the potential stationing of additional CSS Soldiers and a CAB, and their potential environmental and socioeconomic impacts, should the Army decide to station these units at Fort Lewis.

I have considered the results of the analyses in the FEIS, supporting studies, comments provided during public comment and review periods, and Army mission requirements. Based on this review, I have determined that the CAB alternative best meets the Purpose of and Need for the Proposed Action. The CAB alternative provides the proper balance of supporting Army growth and force structure realignment, improving training opportunities for assigned Fort Lewis units, improving current and future operational mission capability, and protecting the environment.

My decision to implement the Proposed Action through selection of the CAB Alternative is based on the following considerations:

The largest component of the environmental disturbance footprint for the Proposed Action would come from implementing Alternative 2. The training of three SBCTs along with all other assigned units that are part of Alternative 2 (especially the maneuver and live-fire aspects associated with that training) would be primarily responsible for the significant impacts of the Proposed Action. The growth that would occur at Fort Lewis from implementing the Proposed Action, as well as growth from past Army decisions such as Global Defense Posture Realignment, may require the stationing of additional logistical support units. The transportation, medical, supply, headquarters or other CSS units would be stationed as needed to provide specific logistics support for the increased training and operational activities at Fort Lewis and YTC. The potential stationing of up to 1,000 CSS Soldiers would not result in any new significant impacts and would contribute a relatively small cumulative addition to the overall disturbance footprint.

Fort Lewis is a potential Army stationing location for a CAB. It is one of the installations that meets the Army's needs for stationing and training CAB units as part of a proposed action in a programmatic analysis currently being completed at the Headquarters, Department of the Army level. Fort Lewis is one of the Army's Power Projection Platforms and is home to a Corps headquarters and three SBCTs. Other units stationed at Fort Lewis include a Fires Brigade, a Military Police Brigade, an Engineer Brigade, a Medical Brigade, a Battlefield Surveillance Brigade, a Sustainment Brigade, a Special Forces Group, as well as separate battalions and other units. The CAB would allow the Army to maximize integrated air-ground mission training and operations for units assigned to Fort Lewis. The additional aviation assets would meet the need to conduct training that is consistent with Army doctrine, as well as support future operational mission requirements in accordance with the needs of the Army.

It should be noted that the Army is considering a reduction in the number of Soldiers to be stationed at Fort Lewis as part of CAB stationing. The Army is considering the reduction of a full CAB equivalent of Soldiers and equipment to approximately half that total (1,400 new Soldiers and their equipment). This more limited CAB stationing would provide a CAB training capability at Fort Lewis that would complement Active Army aviation units already stationed there. A final decision on the CAB stationing will be made as part of a separate decision by the Army. This decision is currently undergoing separate NEPA review.

Other alternatives eliminated from further consideration are discussed in Chapter 2 of the FEIS. The No Action alternative is the "environmentally preferred alternative," but as previously stated, it does not meet the Purpose of and Need for the Proposed Action. Consequently, I did not select this alternative.

## **7 ENVIRONMENTAL CONSEQUENCES**

The primary study area includes all land within the boundaries of Fort Lewis and YTC. Baseline conditions and effects to areas surrounding Fort Lewis and YTC are described and considered, as appropriate based on the Region of Influence (ROI) for environmental resource areas. For instance, effects to cultural resources would primarily occur within the boundaries of Fort Lewis and YTC, but effects to other resource areas, such as socioeconomics, utilities, and transportation, could be regional in nature. Cumulative effects involve a broader analysis of resource areas, combining a historic perspective with present and anticipated future effects for each resource area. Cumulative effects analyses included consideration of Fort Lewis, YTC, and surrounding areas.

The FEIS analyzed the effects of each Proposed Action Alternative on a number of Valued Environmental Components (VECs) that included biological resources (including special status species), water resources, traffic and transportation, historic and cultural resources, land use, air quality, noise, wetlands, wildfire management, solid and hazardous materials/waste, energy, environmental justice, and socioeconomics. The FEIS evaluated the potential direct, indirect, and cumulative impacts to these resource areas and related them to training mission and long-term sustainability goals at Fort Lewis. The FEIS also identified mitigation measures to address potential adverse impacts from implementation of the alternatives for the Proposed Action.

Implementation of this decision would result in direct, indirect, and cumulative effects to Fort Lewis, YTC, and nearby areas. The VECs that would have potentially significant impacts from the Proposed Action are biological resources, noise, and socioeconomics (schools and traffic) at Fort Lewis, and biological resources and wildfire management at YTC. At Fort Lewis, the frequency and duration of noise (annual cumulative noise) from demolitions and live-fire training would increase, and would extend further into the local communities and the Nisqually Indian Reservation. With the projected additional troop strength, Fort Lewis would experience an increase of up to 2,770 school-aged children (over the current population of approximately 15,550) that would need to be accommodated by the local school districts supporting Fort Lewis. Traffic volumes could increase by up to 19 percent at key Fort Lewis intersections during peak traffic hours, causing congestion and wait times per vehicle in excess of 80 seconds. Vegetation and habitat degradation are expected with the additional maneuver training. Wildlife may experience some population reductions with the increased training tempo from both ground and aviation activities. At YTC, more wildland fires are expected with the increase in maneuver and live-fire training. The additional maneuver training would cause additional vegetation and habitat degradation.

Unavoidable adverse impacts could occur as a result of implementing this decision. Some of these impacts would be short-term, while others could be long-term. These impacts could include the generation of fugitive dust and other pollutants during construction and training; loss of or harm to vegetation and a reduction in the acreage of native plant communities as a result of construction and training; loss of or harm to wildlife and wildlife habitat as a result of construction and training; loss of fish habitat as a result of soil erosion and sedimentation from construction and training at YTC; loss of or harm to special status species as a result of training; increased noise levels and disturbance from construction and training; increased on-road and off-road traffic as a result of higher levels of training activity; and increased production of hazardous wastes as a result of construction and training.

Although the Solo Point WWTP is currently operating within its design capacity as far as volume is concerned, it is expected that discharges will violate permit treatment requirements more frequently in the future as demand increases under the selected action. Over the 2004-to-2009 period of the previous permit, the Army exceeded the permit treatment limitations six times. Given the past performance of the facility, however, it is expected that increased demand combined with more stringent requirements for discharges under future NPDES permits would render the Solo Point WWTP insufficiently protective of Puget Sound water quality. Consequently, without substantial modification or replacement of the WWTP, effects are expected to be significant.

In addition, the EIS determined effects of the selected action on endangered species based on the following logic (from the biological assessment): "The new WWTP would be built to accommodate the increase in wastewater inputs associated with population growth, and would allow Fort Lewis to meet more stringent effluent limits required by both the 2010 and 2015 permits. Therefore, the proposed action may effect, but is not likely to adversely affect bocaccio, yelloweye rockfish, or canary rockfish, provided the new WWTP is built." The National Marine Fisheries Service (NMFS)







- Install aerial rope bridges at key road crossing points, and reduce vehicle speed limits within high squirrel population areas to protect western gray squirrels (federal species of concern and state threatened species).
- Determine and mitigate training impacts on the western gray squirrel.
- Repair and maintain maneuver trails on Fort Lewis to reduce anticipated increase in impacts to soils and vegetation due to increased travel related to maneuver training.
- Assess the condition of at least 30 archaeological sites per year to determine accumulated training damage and prioritize National Register of Historic Places (NRHP)-eligible sites for increased protection (i.e., Seibert staking) or data recovery excavations.
- Build and refine a GIS-based predictive model that will indicate the probability that a particular land parcel contains prehistoric archaeological resources, and will be used to avoid training and construction impacts to significant prehistoric sites and prioritize and focus future archaeological survey areas.
- Conduct archaeological surveys of proposed construction footprints and downrange areas that are being impacted by increased off-road training and/or usage (approximately 100 acres per year).
- Evaluate a sample of downrange archaeological sites for National Register of Historic Places eligibility before ongoing military training impacts results in the destruction of currently unevaluated sites (approximately twelve archaeological sites per year). Protection measures will be put in place for sites determined to be eligible for the National Register; ineligible sites will be opened to unrestricted military training or construction.
- Identify those National Register eligible sites that are being impacted by GTA and prioritize sites for data recovery excavations to salvage important scientific and historical information that would otherwise be lost to ongoing military training impacts (approximately one archaeological site per year).
- Include one or more public education/outreach components (i.e. brochures, non-technical reports, web sites, public tours, public archaeology, multi-media cd-rom, etc.) in inventory, evaluation, and data recovery projects.
- Develop documentation and educational material to preserve and share the history of the Garrison Historic District to mitigate adverse impacts associated with the implementation of the Historic Downtown Area Development Plan (ADP) component of the Fort Lewis Master Plan.
- Contract with a qualified historic architect to develop and evaluate adaptive reuse alternatives that will support the goals of the Installation's Master Plan and Installation Sustainability Program and will focus on the Pendleton Avenue corridor through the Fort Lewis Garrison Historic District.
- Install a traffic signal, construct a traffic island and remark lanes at the intersection of DuPont-Steilacoom Road and East Drive.
- Construct a northbound right-turn lane on A Street at the intersection of North Gate Road and East Drive.
- Continue ongoing coordination with local, state and federal agencies to assist in addressing short- and long-term solutions to traffic congestion on Interstate Highway 5 (I-5) in the vicinity of Fort Lewis.
- Conduct enhanced outreach and coordination with surrounding school districts regarding near- and long-term potential stationing actions, which would help these districts plan for changes in enrollment.

At YTC, the Army will:

- Continue implementation of ITAM program components (Land Rehabilitation and Maintenance, Range and Training Land Assessment, Sustainable Range Awareness, and Training Requirements Integration) to maintain and sustain lands.
- Evaluate high use helicopter landing zones (e.g. ranges) that support GTA actions to determine if site hardening is required to prevent excessive soil erosion at these sites and where it is determined hardening is appropriate, install hover pads.
- Implement erosion control measures to address the anticipated increase in sediment delivery to the Yakima and Columbia Rivers following wildfire events caused by GTA-related increases and changes in training activities.
- Realign sage-grouse habitat and core use area protection boundaries to mitigate for reductions in available habitat and to protect areas consisting of core areas of sage-grouse use on YTC, including realigning sage-grouse habitat and core use area protection boundaries in Training Areas 7, 8, 10, 11, and 16 to incorporate sage-grouse use information not considered in the current management plan and to manage primary containment areas to early seral conditions within the current sage-grouse protection area (SGPA).
- Provide a process to insure that newly discovered leks (areas where male sage-grouse gather for mating display behavior) receive designated area protection and that leks which may have become inactive are managed to land allocation standards in which they are contained.
- Provide designated area protection to two recently discovered leks in TA 16 and TA 8, and manage two inactive leks in TA 12 and TA 5 and one active lek in the CIA to the land allocation standards of the area they are in.
- Revise the sage-grouse management plan to incorporate new information and mitigation measures as part of the YTC INRMP revision.
- Revise flight restrictions related to sage-grouse protection areas and leks by extending existing flight restrictions to all newly proposed SGPA and secondary sage-grouse habitat areas that contain a primary flight route and/or are within 1 km of a protected lek.
- Increase West Nile Virus (WNV) surveillance and control to reduce the susceptibility of sage-grouse to WNV. Continue the current cooperative surveillance program and increase control efforts at all man-made sources of mosquito breeding habitat to include newly proposed aerial fire suppression water sources.
- Install forb (herbaceous flowering plant that is not a grass) restoration/greenhouse facilities to augment sage-grouse habitat restoration efforts. Install/use previously acquired greenhouses and procure additional greenhouse/restoration supplies for annual forb growing for species not commercially available.
- Implement a genetic augmentation project to compensate for anticipated population declines caused by negative impacts from increases in military training activities.
- Participate in and provide support to the South Central Washington Shrub-Steppe Collaborative (SCWSSC) to promote/implement the conservation strategy of the SCWSSC to include developing conservation action proposals (acquisition, easements, a Candidate Conservation Agreement with Assurances for private landholdings within the SCWSSC focal area, a regional fire prevention/suppression strategy for the focal area, pre-incident plans for all non-fire district jurisdictional areas within the focal area, a regional habitat restoration strategy and conference, and establishment of a cooperative agreement for the development of locally adapted plant materials for use in restoration.
- Establish a candidate conservation agreement with the USFWS to ensure that YTC sage-grouse management efforts to preclude the species from further listing are acknowledged.

Work cooperatively with the USFWS in revising and including the YTC sage-grouse management plan in a Candidate Conservation Agreement with the Service.

- Explore Candidate Conservation Agreement with Assurances for off-installation mitigation to provide added assurances and as an incentive to land owners for sage-grouse and shrub-steppe conservation efforts, coordinate with the SCWSSC regarding their exploration of a Candidate Conservation Agreement with Assurances for private landowners within the Yakima Focal Area of the SCWSSC.
- Develop a regional habitat restoration/protection strategy for GTA training-related impacts to sage-grouse that extends beyond the installation boundaries to ensure that stewardship responsibilities of sage-grouse and shrub-steppe habitat extend beyond YTC boundaries at spatial scales appropriate for this species and its habitat, and develop a Regional Habitat Restoration/Protection Strategy for all federal and state agencies within the Yakima Focal Area of the SCWSSC.
- Develop a sage-grouse predator assessment and management plan to address the negative impacts to habitat quantity and quality from GTA-related military training and the resulting effect this has on local sage-grouse predator-prey relationships.
- Remove fences no longer required and mark required fences to increase their visibility to sage grouse to address this source of mortality.
- Continue to implement the training land recovery program at a level that appropriately addresses impacts from GTA actions to meet a variety of resource (e.g., site repair and habitat recovery) and land use objectives (e.g., sustainable military training) for sites that have been impacted by military training (e.g., fire and mechanical disturbance).
- Develop and maintain pre-incident plans for designated locations or activities (e.g., containment areas, fire exclusion areas, and high-risk activities outside of containment areas) to improve efficiencies in fire prevention and suppression.
- Conduct periodic review and refinement of the wildland fire risk matrix to assist in reducing the potential fire ignition caused by training related events.
- Establish wildland fire containment areas where fires will be suppressed at minimal size within the containment area boundary to more effectively contain and suppress fires within areas where recurring fires are expected (e.g., established ranges and impact/dud areas).
- Establish fire exclusion areas on the installation that have increased fire prevention and suppression priority (e.g., land use constraints, enhanced prevention and suppression assets/capabilities) to protect high value resources (e.g., mature late seral shrub-steppe, sage grouse habitat, restoration sites, and riparian areas) and to allow restoration and rehabilitation to occur where applicable.
- Implement temporal constraints and other necessary training restrictions during the high fire danger period (15 May through 30 September) to reduce the risk of ignition during periods of highest potential for ignition and to minimize the occurrence of catastrophic fires, fires in exclusion areas, or fires leaving the installation.
- Increase support to the YTC wildland fire management program in response to increased occurrence of wildland fires resulting from GTA actions, particularly the simultaneous operation of all YTC ranges, and the need to reduce impacts to the military training mission and natural resources through effective containment of fires.
- Provide wildland fire suppression equipment to address the inadequacy of existing equipment to meet current requirements and projected pre-suppression and suppression requirements associated with increased GTA training activities.

- Continue aerial fire suppression capability (as described in the 2007 Modification of Aerial Fire Suppression Requirements EA) on an annual basis and pre-positioned prior to the fire season to ensure adequate fire suppression capability, particularly in areas of YTC where ground fire suppression is impractical (54 percent of YTC lands) or ineffective.
- Develop 12 additional water resources in areas where they currently do not exist or where enhancement of existing water resources is required to enable a maximum 12-minute turn-around time across the installation for fire suppression to address the lack of sufficient aerial fire suppression water resources (water storage or dip tanks at some existing sites, wells and storage tanks at new sites) to support current and increased training activities associated with GTA actions.
- Conduct firebreak update and maintenance to reduce fire-related impacts from increased training associated with GTA actions that result in degraded mission capabilities and natural resource conditions, and to ensure the maximum effectiveness of firebreaks.
- Conduct site restoration for wildland fire impacts to compensate for incremental annual loss or large-scale fire impacts to habitat and to meet increased site restoration requirements associated with fire damage from GTA related training.
- Conduct archaeological re-evaluations of cultural sites that may be eligible for inclusion on National Register of Historic Places as specified by Section 106 of the National Historic Preservation Act (approximately 100 sites per year for 5 years).

Some proposed mitigation measures in the FEIS are measures already being implemented through the Fort Lewis environmental management programs and will continue to be implemented. These measures are listed below. If additional funds are required to implement programs, they will be requested through appropriate program funding channels.

- Implement Integrated Training Area Management (ITAM) program maintenance of sustainable training lands, including rehabilitating vegetation impacted by vehicle maneuvers, bivouac, digging, and other training activities and increased frequency of soil condition monitoring and reporting.
- Conduct noxious weed monitoring and control.
- Clean vehicles of noxious weed components from off-post training sites (YTC, National Training Center, etc.) or from deployment prior to returning to Fort Lewis.
- Create and maintain suitable habitat for candidate species on Fort Lewis (Mardon skipper, Taylor's checkerspot, Streaked horned lark, and Mazama pocket gopher).
- Develop and maintain habitat and protective buffers for all identified streaked horned lark nesting colonies, and restrict low level hovering by aircraft near nesting colonies and in buffer areas during the nesting period (exceptions to this mitigation are any nesting colonies identified at GAAF. Suitable habitat for these colonies will be developed downrange).
- Enhance adjacent habitat and conduct translocations of pocket gophers from disturbed habitat on an as-needed basis to mitigate for loss of habitat due to range construction projects.
- Continue to implement the requirements of Fort Lewis Regulation 420-5, *Procedures for the Protection of State and Federally Listed, Threatened, Endangered, Candidate Species, Species of Concern, and Designated Critical Habitat*.
- Conduct monitoring and recording of the frequency, intensity, and location of wildfires on Fort Lewis, and as necessary, implement additional fire prevention and control measures including firebreak maintenance, prescribed burning, and fire suppression activities.

- Restrict aircraft to a minimum of 2,000 feet AGL when flying over the Nisqually National Wildlife Refuge.
- Continue coordination with local, state, and federal agencies to discuss on-going concerns/issues with military growth affecting local education activities, both on and off the installation, and assist with planning for infrastructure requirements/improvements.
- Provide waste storage facilities, and conduct waste pick-up and on-site waste storage for hazardous waste generated at the installation.
- Conduct site surveys, develop process maps, and audit compliance with environmental operating permits.

All practicable means to avoid or minimize environmental harm have been adopted, except as described below. The mitigation measures that were identified as proposed mitigation measures in Chapters 4 and 6 of the FEIS and are not being carried forward at this time are as follows:

- Increase Fort Lewis's environmental staff to address additional program requirements from more intensive use of training lands and increased impacts to natural resources, including surveying and monitoring of listed and candidate species and monitoring of military activities for their effect on species; management actions to address training impacts, including the increase in infestations of non-native species; and project review and input.

IMCOM has determined that the Fort Lewis environmental staff is sufficient for its mission. No additional positions, nor funding for additional positions are authorized. Because the current staff has been determined to be sufficient there will be no adverse impacts associated with not implementing this mitigation.

- Establish monitoring stations on Fort Lewis to collect localized air quality sampling data to assess impacts of hazardous air pollutants.

No requirement for monitoring stations has been identified at this time other than as specified in the EIS. Because of this, the Army will not have additional data generated by these air quality monitoring stations on hazardous air pollutants.

- Construct sound mitigating berms on selected firing ranges at Fort Lewis (Ranges 1–4, 43–45, 47, 52, and 53).

No funding is available at this time for sound mitigating berms. As a result, the noise energy attenuation that might have been achieved from these berms will not occur, and noise from the ranges will spread further.

- Upgrade YTC's range control to a Tier 2 installation capability, which would provide monitoring and enforcement of land use policies and assist in controlling avoidable training impacts to natural resources by identifying policy violations (e.g., encroachment within Seibert staked areas, digging without a permit or digging in unauthorized areas, bivouacking in unauthorized areas, refueling within the protective buffer for water bodies, and violating installation wildland fire management policies).

Fort Lewis and YTC are currently categorized together as a Tier 2 installation. Therefore, this mitigation measure was not necessary and failure to implement it will have no impact.

- Construct a new Wastewater Treatment Plant (WWTP) to mitigate the significant impacts to aquatic resources from implementation of the Proposed Action. The Army will procure needed funding through the programming and budgeting process to include the WWTP construction project in the FY13 Military Construction program.

The delay in construction of the WWTP to FY13 will have minor adverse effects but should not change the overall effect of the proposal on endangered species or long-term water quality. NOAA concurred with the Army's effect determinations on Essential Fish Habitat in the Biological Assessment, even when the delay for the new WWTP is taken into account. The EPA is currently conducting consultation with the NMFS on the renewal of the NPDES permit for the Solo Point WWTP, and the EPA and Army are awaiting the effect determinations from this consultation on listed fish species.

During the FEIS wait period, 35 public comments were received. Of these, 22 expressed concern over the increased traffic congestion and delays on I-5 caused by both regional growth and the population increase at Fort Lewis. Four of the 22 objected to construction of the cross base highway. Two agencies expressed a need for additional transportation analysis to provide greater detail on the impacts to the I-5 mainline and the interchanges at Fort Lewis. A number of recommendations were submitted in the comments including consideration of flexible work times to reduce congestion at the installation access gates during peak traffic hours.

All comments received during the wait period have been considered. We believe that the existing analysis for the DEIS, and results from other analyses that were added to the FEIS sufficiently document the conclusion that implementing the Proposed Action would result in significant transportation impacts. The FEIS cited the I-5 Transportation Alternatives Analysis and Operations Model Study (Lakewood/Fort Lewis/I-5 Study). That study concluded that future demands on I-5 due to regional growth would exceed current capacity by an additional lane. The cited study also examines future improvements needed at the Fort Lewis I-5 interchanges. In addition, the FEIS indicates that to mitigate the potentially significant impacts on one of the interchanges (DuPont), a reconstruction of the interchange is necessary. We believe that additional analysis would only reinforce the FEIS conclusion of significant transportation impacts. The Army has been aware of the traffic issues and is continuing to consider all short- and long-term alternatives to address the issues. Since the FEIS was published, an additional Fort Lewis egress gate to access the City of DuPont and southbound I-5 has been opened. This reduces the wait time to leave the installation and allows for an additional access ramp for vehicles to merge onto I-5. Other measures are being considered including flexible work times and additional emphasis on van/car pooling. Flexible work hours are authorized for civilians and some Soldiers; however, there are core requirements and training schedules that restrict flexible hours for Soldier units. Other feasible transportation mitigation measures identified in the FEIS (e.g. reconstruction of the I-5 interchanges, adding of additional lanes to I-5) are not within the Army's jurisdiction or funding authority. The Army will continue coordination with local, state, and federal agencies to discuss on-going concerns/issues with military growth affecting local education activities, both on and off the installation, and assist with planning for infrastructure requirements/improvements.

The Army will also employ a monitoring and enforcement program for the mitigation adopted in this decision.

## **9 AGENCY CONSULTATION**

As part of the Fort Lewis Army Growth and Force Structure Realignment NEPA process, the Army has consulted with the U.S. Fish and Wildlife Service (USFWS) on threatened or endangered

species, with the National Oceanic and Atmospheric Administration (NOAA) on threatened and endangered species and Essential Fish Habitat, and with the Washington State Historic Preservation Officer (SHPO) on cultural resources. Recently, the Army and USFWS concluded informal consultation and conferencing pursuant to the implementing regulations of the Endangered Species Act, 50 CFR 402.13 and 402.10, respectively. USFWS concurred with the Army's effect determinations for listed and candidate species, which are presented in the FEIS and Biological Assessment (Appendix F of the FEIS).

In addition, the Washington State Historic Preservation Office and the tribes have signed the Programmatic Agreement developed to address the effects of Alternative 4 on cultural resources at Fort Lewis and YTC. A copy of the Programmatic Agreement signature page is included in the FEIS (Appendix D).

## **10 POINT OF CONTACT**

If you have any questions or wish to obtain additional copies of this document, please contact:

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I have considered the results of the analysis described in the FEIS, supporting studies, comments provided during formal comment and review periods, and Army mission requirements. Based on this documentation, which incorporated the best information available, I have determined that the Proposed Action and mitigations discussed above reflect the proper balance of initiatives for the Army's mission needs, Soldier and Family quality of life, protection of the environment, and funding considerations.

  
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Mr. John B. Nergler  
Executive Director  
U.S. Army Installation Management Command

*1 February 2011*  
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Date