

Department of the Army
Fort Lewis, Washington

Public Scoping Summary Report

Army Transformation and Resource Sustainability at Fort Lewis and Yakima Training Center, Washington

April 2003

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**Army Transformation and Resource
Sustainability at Fort Lewis and
Yakima Training Center, Washington**

Prepared for
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1.0 SUMMARY OF PUBLIC AND AGENCY SCOPING ACTIVITIES

1.1 Introduction

The United States Army (Army) at Fort Lewis, Washington, is preparing an Environmental Impact Statement (EIS) to implement a program of transformation of the Army from the current Legacy Force to a more technologically-advanced Objective Force at Fort Lewis and Yakima Training Center (YTC), a subinstallation of Fort Lewis. The proposed transformation will take place in several phases over a period of a decade and will include changes to training facilities, support facilities, and infrastructure on Fort Lewis and YTC. The Initial Phase of the transformation project, which has already taken place at Fort Lewis, consisted of the creation of two Brigade Combat Teams (BCTs), equipped with light armored vehicles (LAVs) known as Strykers.

The purpose of the proposed action is to provide the Army at Fort Lewis with greater flexibility in developing training missions and strategies for the current BCTs, 2nd Battalion/75th Infantry, 1st Special Forces Group, and other tenant and visiting units that use Fort Lewis and YTC. Fort Lewis will reconfigure maneuver areas, establish combat training facilities that are more appropriate to the types of threats the Army expects to encounter, and strengthen infrastructure to ensure that the leaders and soldiers that train at Fort Lewis and YTC are well prepared for a wide range of future military situations.

It is projected that as a result of these changes, impacts to natural resources from military training would increase, and that these impacts could significantly affect the health and welfare of resources and persons on Fort Lewis, and in nearby communities, if not mitigated. Thus, concurrent with transformation activities, the Army will develop and implement an overall planning process that supports the Army's ability to achieve optimal levels of military readiness into the indefinite future, without compromising environmental quality or community (military and civilian) quality of life. This planning process would endorse the concept of sustainable resource management (sustainability) and would be based on performance- and prescriptive-based management strategies. This process would include developing and implementing an integrated long-range (25-years) strategy for achieving the Army's objectives, and developing short-term (5 years) action plans for implementing sustainability. This process would also ensure that impacts from military training would not adversely impact natural and cultural resources. The first step in the planning process would be the development, by Fort Lewis and YTC concurrently, of strategic goals and objectives, detailed in a sustainable land use strategy. Fort Lewis and YTC would then revise their current environmental management plans to incorporate these goals and objectives

The Army's proposed action is to transform the Army to a more technologically advanced force while concurrently implementing a performance-based resource sustainability program. This program would involve monitoring the condition of environmental resources and adjusting military activities to ensure that these resources are maintained on Fort Lewis and YTC. Monitoring of resource conditions would determine when pre-established resource thresholds, designed to ensure that the health of the resource is protected, are exceeded, thereby necessitating training modification or reduction. Situations where resource conditions are improving may allow the installations to increase or modify training activities. Increased flexibility in overall resource management would also be facilitated by permitting the Army to re-evaluate existing land use agreements. Resources affected by previous agreements would



still be managed and protected, in accordance with whatever needs were determined by the environmental management program. However, the Army would not be bound by previous land use agreements and would be able to alter its resource management programs in response to current resource conditions.

The Army first announced this EIS in a Federal Register *Notice of Intent to Prepare an EIS* (67 FR 61077) on September 27, 2002. The Army held three public scoping meetings in Washington between October 15 to 17, 2002, and accepted written comments until October 31, 2002, to solicit public input on the range of actions, alternatives, and impacts to be considered within the EIS. This document provides a summary of all comments received and the key issues identified during the scoping process.

1.2 Why is the Army Preparing an EIS?

In 1994, an EIS was completed to evaluate and mitigate impacts from stationing up to two heavy brigades at Fort Lewis and YTC. However, only one heavy brigade was stationed, resulting in a total of one heavy and one light brigade at Fort Lewis. Most mitigation measures committed to in the Record of Decision (ROD) for that EIS were one-time construction projects, and most have since been completed. Other mitigation measures included in the ROD were directed at monitoring impacts produced by the two anticipated heavy brigades to identify whether additional mitigation measures were necessary.

In February of 2002, the Department of the Army issued a *Final Programmatic Environmental Impact Statement for Army Transformation* (PEIS), which evaluated the potential environmental and socioeconomic effects associated with transformation of the entire Army. The PEIS evaluated two alternatives: the proposed action to transform the Army to an Objective Force, and the no action alternative. The notice of availability for this document was published on March 8, 2002, and on April 11, 2002, the Deputy Chief of Staff of the Army signed the Record of Decision (ROD), indicating the Army's intent to proceed with implementing a program of transformation.

In February of 2000, in anticipation of Army transformation, a Record of Environmental Consideration (REC) was completed to address the first two phases (Initial and Interim) of brigade transformation at Fort Lewis and YTC. Due to many unanswered questions regarding troop strength, facility modernization, new construction, equipment acquisition, and other concerns, transformation activities and impacts were confined to those evaluated in the 1994 EIS.

As a result of the REC completed in February 2000, it was clear that a more in-depth analysis would be necessary to address a range of changes coming to Fort Lewis and YTC as a result of the transformation. Consequently, an Environmental Assessment (EA), titled *Interim Brigade Combat Team Transformation at Fort Lewis, Washington, Environmental Assessment* was completed in November 2001 that described and evaluated activities specific to transformation of the two Fort Lewis brigades to interim phase BCTs. This document expanded and further defined activities and actions likely to occur in the next several years, particularly construction and training type activities.

The *Interim BCT EA* resulted in a Finding of no Significant Impact (FONSI) for the phases of transformation covered by the document. However, the EA did not cover transformation activities beyond the initial few years of the project. Thus, additional NEPA documentation is still required for the majority of the future transformation activities



scheduled to take place on Fort Lewis and YTC under the PEIS. The intent of the EA was to serve as a bridge document that would allow Fort Lewis to complete the initial phase of transformation and begin using BCTs on Fort Lewis and YTC. Although significant impacts were not anticipated under the training program analyzed in the EA, the annual limits on the number of maneuver training events, vehicle training miles, and other training components that were included in the document are less flexible than those desired under the full transformation. The Army anticipates that in addition to increases in training, the full transformation would also entail changes in infrastructure, and would potentially result in significant impacts in certain resource areas.

Implicit in the transformation process is the need to conduct new types of training, using new types of equipment, and, as the need arises, to train at higher levels than those currently supported at Fort Lewis, YTC, and other military installations. Present installation land use planning, however, does not provide mechanisms to ensure that the military can meet its mission without compromising the natural training environment and community quality of life values. The Army recognizes that if it is to provide for long-term sustainability, operational procedures and plans, it must have the ability to more effectively address changes in mission objectives, environmental conditions, regulatory constraints, and emerging land use issues (e.g., encroachment).

In March 2000, the Army's Senior Environmental Leadership Conference mandated that installations establish an integrated strategy, with a defined end state, tying objectives to resources, and engaging stakeholders at all levels, in order to indefinitely sustain the Army mission. An Installation Sustainability Program was developed by Forces Command (FORSCOM) to meet this mandate, and to satisfy the requirements of Executive Order 13148, *Greening the Government Through Leadership in Environmental Management*, effective April 26, 2000.

Fort Lewis hosted a sustainability workshop in February 2002 to bring together the stakeholders from the Army, environmental regulatory agencies, the community, and the installation to obtain a consensus on Fort Lewis' 25-year environmental goals. Based on information gathered at this workshop, Fort Lewis prepared a *Sustainability Implementation Plan for FY03-07*. This plan identifies the 12 goals that were identified at the workshop as the basis for Fort Lewis' sustainability plan, and the procedures that will be followed to meet these goals (Fort Lewis 2002).

Goals, which were grouped into five major resource areas, included:

Air Quality

- Reduce traffic congestion and air emissions by 85 percent by 2025.
- Reduce air pollutants from training without a reduction in training activity.
- Reduce stationary source air emissions by 85 percent by 2025.

Infrastructure/Energy

- Sustain all activities on post using renewable energy sources and generate all electricity on post by 2025.
- Ensure that all facilities adhere to the SPiRiT Platinum standard for sustainable facilities by 2025.

Products and Materials

- Cycle all material to achieve zero net waste by 2025.



Water Resources

- Develop an effective regional aquifer and watershed management program by 2012.
- Cascade water use to achieve zero discharge of wastewater by 2025.
- Reduce Fort Lewis' potable water consumption by 75 percent by 2025.
- Ensure that Fort Lewis contributes no pollutants to groundwater and has remediated all contaminated groundwater by 2025.

Sustainable Training Areas

- Obtain healthy, resilient Fort Lewis and regional lands that support training, ecosystem, cultural, and economic values by 2025.
- Recover all listed and candidate species in the South Puget Sound Region.

The *Army Transformation and Resource Sustainability EIS*, which will be tiered off of the PEIS, will analyze the potential impacts to the natural and human environment at Fort Lewis and YTC from the proposed action and several alternative actions. The EIS will compare alternatives in terms of their ability to protect, conserve, and preserve cultural, natural and socioeconomic resources and values at both installations. The decision of which alternative best provides for military training, readiness, and facilities requirements, while ensuring the sustained use of resources, will be based on the results of this EIS, and on strategic, operational, environmental, and other considerations. The EIS will assist Fort Lewis trainers and planners in understanding and incorporating into transformation planning and decision-making potential risks and associated impacts of implementing each alternative.

1.3 What Is an Environmental Impact Statement?

An EIS is a broad analysis document required by NEPA that evaluates the effects of government actions or activities on the human and natural environment before any major federal action is made. The Act was signed into law in 1970 as the national charter for protecting the environment. In addition to requiring federal agencies to evaluate the potential environmental impacts of a planned major federal action, NEPA also provides an opportunity for public awareness and input early in the planning stages of federal projects. The intent of NEPA is to develop and encourage dialogue between the government, stakeholders, and other interested parties.

1.4 The NEPA-EIS Process

The NEPA-EIS process has a structured feedback system that allows public input along various steps throughout production of the EIS. After the initial scoping period, which ended on October 31, 2002, the Army began preparing a draft EIS. During preparation of the EIS, the Army will analyze potential impacts of the proposed actions, as well as alternative actions, and make its findings available for public and agency review. The diagram on page 1-6 illustrates the steps in the NEPA-EIS process and identifies which steps include opportunities for public comment. The entire NEPA-EIS process should take about 2½ years to complete, with a final draft EIS expected in the fall of 2004.

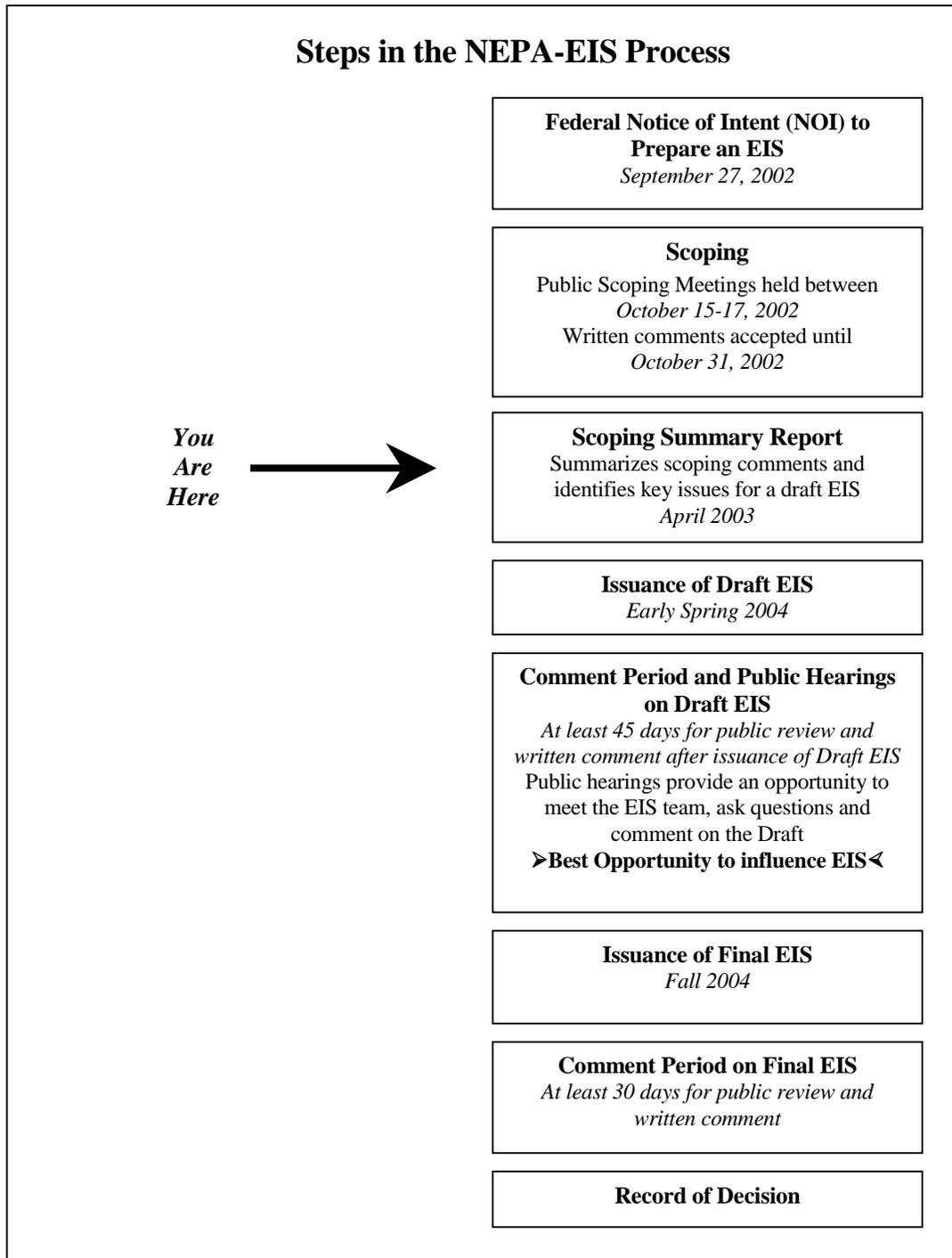


1.5 The Scoping Process

The National Environmental Policy Act mandates that there “shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.” This process, known as scoping, allows the public to comment on what the EIS should cover in order to help determine possible alternatives, issues, and impacts to be analyzed. The purposes of the scoping process are to identify the affected public, record public and agency concerns, define issues to be examined, and assign EIS preparation tasks.

For the Army Transformation EIS, the scoping process included a written comment period that lasted from September 28 to October 31, 2002. Comments on the proposal could be submitted in writing to the Army Project Manager. Three public scoping meetings were held in the vicinity of Fort Lewis and YTC to describe the proposed project and solicit public input on the range of actions, alternatives, and impacts to be considered within the EIS. These meetings were held on October 15, 2002, in Yakima, Washington, on October 16, 2002, in Ellensburg, Washington, and on October 17, 2002, in Lakewood, Washington. The Army published formal notices of the dates and locations of scoping meetings and the scoping period in the following local newspapers: *The Seattle Times*, *The News Tribune* (Tacoma), *The Olympian* (Olympia), the *Yakima Herald-Republic*, the *Daily Record* (Ellensburg), and the *Nickel Saver* (Moses Lake).

The scoping meetings were conducted in an open-house style. Informational displays were provided at the meetings, and handouts describing the project, the NEPA process, and issues/alternatives were distributed to the public. In addition, a formal presentation was given in Yakima to provide the public with additional information on program goals and objectives. Written and/or oral comments were accepted at these meetings, and a court reporter prepared a transcript of comments given at the meeting in Yakima; no formal presentation or public comments were given at meetings in Ellensburg or Lakewood due to the small audience.





2.0 SUMMARY OF COMMENTS

2.1 Overview

This section summarizes the comments received by the Army at the three public scoping meetings, as well as comments received in writing during the formal scoping period. Comments have been grouped by topic to identify key issues for the EIS as a whole. Alternatives for the draft EIS will incorporate the key issues identified during scoping. A mailing list of those individuals and organizations that requested the draft and final EIS and updates on the progress of the EIS has also been prepared.

2.2 Proposed Action and Purpose and Need

2.2.1 Alternatives

One respondent noted that the process of Army transformation has already begun under an earlier programmatic EIS, making it impossible to identify any meaningful environmental alternatives for this EIS.

2.2.2 Consultation and Coordination

One respondent recommended that lessons learned from land management efforts at other installations, such as Fort Bragg, which piloted an Installation Sustainability Program in 2001, should be incorporated into this EIS process. It was also suggested that jurisdictions, agencies, and other interested groups be contacted directly for comments about the proposed activities. One respondent felt that the scoping advertisements did not adequately describe the environmental dimensions of the project, and that potential environmental impacts were downplayed by the use of positive terminology, such as 'sustainable' and 'stewardship.' It was also suggested that the scoping period should be extended in order to solicit better feedback. It was requested that the Army consult with the Washington Natural Heritage Program throughout the planning process to ensure inclusion of their data on rare species and high-quality or rare native ecosystems, particularly in the case of potential conflicts with natural heritage resources.

2.2.3 Transformation

One respondent questioned how the numbers of new equipment (300 Stryker vehicles for each of six brigades) compared to the total number of vehicles being phased out. Another comment noted that the EIS should focus less on explaining the process of transformation and more on how differences in combat training will affect range use. One respondent also wondered when, and at what stage, a full changeover would occur. One respondent wondered how resource monitoring would accompany the escalation of Stryker usage under a phased transformation schedule. It was also suggested that the project be accompanied by an updated environmental training component to augment field-training activities.



2.3 Environmental Consequences

2.3.1 Noise

Noise from heavy artillery and tank guns was raised as an issue of concern. Another respondent wondered whether increased training levels would create more noise, especially from overflights or night firings.

2.3.2 Soil

One respondent expressed concern for the effects of training activities on rates of soil erosion. Another respondent noted that the new training vehicles may cause greater soil disruption, and that greater numbers of them would amplify the training impacts. It was also noted that estimates of baseline soil erosion conditions would be confounded by abnormally low precipitation this year.

2.3.3 Water

Concern was expressed about the effect of increased erosion on water bodies, both on- and off-site. One respondent was concerned about the increased infiltration of spilled fuels, chemicals, and metals from unexploded ordnance caused by increased training levels. The effects of sedimentation and infiltration on the biological quality of water bodies and fish was also an issue of concern. One respondent noted a need to evaluate the potential for water quality degradation of McAllister Springs, which is the primary drinking water source for Olympia.

2.3.4 Fire

Two respondents were concerned about the protection of private property from fires, and specifically from fires spreading south of YTC. One respondent also stressed that fire damage compensation to private landowners as a result of 1996 fires still needs to be settled at YTC.

2.3.5 Livestock

One respondent was concerned about the impacts of training activities on livestock crossings at YTC.

2.3.6 Weeds

One respondent felt that knapweed spreading from the installation was a concern, while another noted that the spread of all noxious weed species was a concern.

2.3.7 Neighboring Communities

Several comments were received concerning the effects of the proposed activities on neighboring communities. Two respondents identified the protection of private property and the consideration of neighbors' interests as important issues. One respondent noted that these issues could be addressed through collaborative land use planning along



common boundaries. Another respondent was concerned about dust from training activities and maneuvers. One comment suggested that local use of the Yakima Training Center by the public should be maximized.

2.3.8 Recreation

One respondent wondered how training activities at Fort Lewis would affect the functional quality of American Lake as a recreational facility. One respondent felt that multiple use by the public, such as horseback riding, sightseeing, and recreation, should be maximized at Army installations.

2.3.9 Built Environment/Infrastructure

One respondent suggested considering the impacts of additional troops on the built environment, including infrastructure, water, sewer, and solid waste management. The impacts of increased training on heavy truck and convoy traffic on Interstate-5 and other state facilities should also be addressed. In addition, the effects of increased troop levels on local services, such as water, sewer, schools, and emergency services, should be considered. One respondent noted that interstate access along Interstate-90 was an issue, and that access near YTC in the vicinity of Stevens Road was preferred to Ryegrass or Prater roads.

2.3.10 Off-Site Impacts

One respondent suggested that impacts to off-site resources should be identified and addressed. It was noted that off-site accommodation of increased Army personnel will affect local commuter traffic and demands on transportation facilities. The spill-over effects of activities at McChord Air Force Base, such as more frequent overflights, and the associated safety concerns, was raised as an issue to be addressed. One respondent also felt that off-site concerns couldn't be directly monitored by the Army, making it difficult to identify when demonstrable degradation would trigger mitigation activities. One respondent wondered whether growth from training combined with range degradation might necessitate the immediate or eventual acquisition of additional training lands.

2.4 Issues Not Considered in this EIS

The Army EIS core team met to review public comments and determine which comments would be addressed in the EIS. The following are comments that the team decided would not be addressed in the EIS.

One respondent expressed agreement with the Army's efforts to manage their training lands in a sustainable manner. Since this comment was of a general nature and does not lend itself to analysis, it was acknowledged but will not be addressed in the EIS.

One respondent requested the Army's involvement in supporting a Snoqualmie Pass tunnel project. Another respondent was opposed to windmills at Army installations. These comments deal with issues or concerns that are unrelated to the project purpose and need, which is to implement a phased program of transformation of the Army, and will therefore not be evaluated in the EIS.