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## **CHAPTER 6 OTHER REQUIRED ANALYSES**

### **6.0 INTRODUCTION**

In addition to the analyses discussed in Chapters 4 and 5, NEPA requires an additional evaluation of the Proposed Actions potential impacts with regard to significant unavoidable adverse impacts, the relationship between short-term uses and long-term productivity, and any irreversible or irretrievable commitment of resources.

### **6.1 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS**

Section 1500.2(e) of NEPA requires a review of any significant unavoidable impacts for which either no mitigation or only partial mitigation is feasible. Significant and unavoidable impacts from the Proposed Action would occur in the following areas:

- Impacts on listed terrestrial species and habitat resulting from the proposed IPBA construction and operation (Biological Resources, Section 4.9);
- Impacts from fire on listed terrestrial species and critical habitats (Biological Resources, Section 4.9);
- Increased wildfire ignition (Wildfires, Section 4.15);
- Impacts on archaeological resources (Cultural Resources, Section 4.10);
- Access to archaeological sites (Cultural Resources, Section 4.10);
- Environmental justice impacts on access to archaeological sites (Socioeconomics and Environmental Justice, Section 4.13); and
- Cumulative impacts on biological resources, cultural resources, and wildfires (Cumulative Projects and Impacts, Chapter 5).

### **6.2 RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF THE ENVIRONMENT AND LONG-TERM PRODUCTIVITY**

Section 101 2(c)(iv) of NEPA requires a review on the relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity. Short-term uses of the environment may include direct and indirect changes to the physical environment and energy use during the construction of the proposed IPBA alternatives except for the No Action Alternative. Construction of the proposed IPBA would involve short-term increases in fugitive emissions, construction-generated noise, and the increased use of fossil fuels to power construction equipment. Construction activities, especially for the IPBA, would be short-term and temporary. Long-term uses may include alteration of the physical environment, loss of habitat to listed species, potential increase of wildfires, and loss of cultural resources. Construction impacts would be mitigated, where practicable, under the constraints of public safety and the military mission.

The long-term productivity of the proposed IPBA is based on the Army's mission. Any measurement of long-term productivity in this context must recognize the paramount importance of national defense and the Army's obligation to adapt to changing national security needs. While the Army would take whatever actions are reasonable and practicable to preserve and protect the natural environment and cultural resources under its stewardship, the necessity of national defense requires the Army to provide the nation with capabilities that meet current and evolving national defense requirements. The proposed IPBA is designed to help meet these goals and further the security and welfare of the U.S., its residents, and its natural environment.

The Army would comply with regulatory mandates, plans, procedures, protocols, regulations, and laws established to protect the environment and human health to reduce both short-term and long-term impacts as practicable.

### **6.3 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES**

Section 101 2(c)(iv) of NEPA requires a review of any irreversible and irretrievable commitments of resources that would be involved in the Proposed Action should it be implemented. Irreversible and irretrievable resource commitments involve the use of non-renewable resources and the effects that the use of those resources have on future generations. Irreversible commitments of resources are those that cannot be reversed, except over a long period of time. Irreversible effects may result from destruction of a specific resource (e.g., energy) that cannot be replaced or restored within a reasonable timeframe. Irretrievable commitments of resources are related to the loss in value of a resource that cannot be restored as a result of the Proposed Action, such as the extinction of a Federally-listed endangered or threatened species.

The Proposed Action would represent an irreversible or irretrievable commitment of non-renewable resources for the materials, energy, time, and money expended during implementation activities. Specific irreversible and/or irretrievable impacts that would result include

- Consumption of fossil fuels and energy during construction and operation activities;
- Fossil fuels (gasoline and diesel oil) to power construction equipment and vehicles; and
- Electrical power for lighting and operations.

The energy consumed for the proposed IPBA construction and operation would constitute a permanent and non-renewable commitment of these resources. Materials for construction of the proposed IPBA, including the MOUT and Shootouse, would be irretrievably committed for the life of the project, representing a depletion of natural resources. Construction and maintenance activities are considered a long-term non-renewable investment of these resources.

Land that would be physically altered by construction of the proposed IPBA would be committed to this new use for the foreseeable future representing a permanent commitment of the land. The capital and labor required for construction would be an irreversible and irretrievable commitment of

- Soil displaced by construction and training activities;

- Loss of some terrestrial habitat for listed plant species; and
- Removal or disturbance of some archaeological sites and traditional cultural resources.

In addition, other non-renewable resources would include fossil fuels (gasoline and diesel oil) used during training activities at the IPBA to transport vehicles and Soldiers to the range, and other resources necessary to maintain and operate facilities and military vehicle trails and roads at PTA.