
APPENDIX A

RECORD OF DECISION
for NATIONWIDE ARMY TRANSFORMATION PEIS

RECORD OF DECISION

As the Army G-3, I have reviewed the *Final Programmatic Environmental Impact Statement (PEIS) for Army Transformation*. The PEIS adequately assesses the program level impacts of Army Transformation and related alternatives on the biological, physical, and cultural environment. As indicated herein, the Army will proceed with its preferred alternative, implementation of a multi-year, phased, and synchronized program of transformation.

1.0 Background

In October 1999, the Secretary of the Army and the Chief of Staff of the Army articulated a vision about people, readiness, and transformation of the Army to meet the demands of the 21st century. The requirement for change within the Army is based on the emerging security challenges of the 21st century. Chief among these challenges is the need to be able to respond more rapidly to different types of operations requiring military action. The strategic significance of land forces continues to lie not only in their ability to fight and win the Nation's wars, but also in their providing options to shape the global environment to the future benefit of the United States and its allies. The Army must change to become more strategically responsive and dominant at every point on the spectrum of operations.

The PEIS which evaluates the Army Transformation Program and this Record of Decision complies with the statutory requirements contained in the Council on Environmental Quality regulations which implements the National Environmental Policy Act (NEPA) (40 CFR Parts 1500 – 1508) and Army Regulation 200-2 (*Environmental Effects of Army Actions*).

2.0 Proposed Action

The proposal evaluated in the PEIS is for implementation of a deliberate, phased, and synchronized 30-year program to transform the Army.

The three major objectives of the transformation process are the Objective Force, Interim Force, and the Initial Force.

- *Objective Force*. The Objective Force will achieve the ultimate transformation objective: to fulfill the Army Vision which provides for an Army that has the characteristics of being more responsive, deployable, agile, versatile, lethal, survivable, and sustainable; being strategically responsive; and being able to deploy rapidly and being dominant across the full spectrum of operations.

Capitalizing on advances in science and technology, the Objective Force will be equipped with leap-ahead technologies that enable overmatching combat power.

- *Interim Force.* The Interim Force will fill the strategic near-term capability gap. It will leverage state-of-the-art technology and a modernized Legacy Force (the current force) as a bridge to the future. The Interim Force, although organized as a rapidly deployable force for providing the warfighting commanders-in-chief with increased options for responding to small-scale contingencies, will be available for employment, with augmentation, in major-theater wars. Interim Force units will be highly mobile at the strategic, operational, and tactical levels.
- *Initial Force.* The Initial Force consists of two brigades at Fort Lewis, Washington. These brigades, furnished with off-the-shelf equipment, are being used to evaluate and refine the Operations and Organization Concept for a brigade combat team (BCT) and to validate tactics, techniques, and procedures.

Transformation activities, to occur during an Initial Phase, an Interim Capability Phase, and Objective Force Phase, will affect virtually all aspects of the entire Army, to include doctrine, training, leader development, organizations, installations, materiel, and soldiers. The three phases identified for transformation are as follows:

- *Initial Phase.* In this phase, the Army is creating two Initial BCTs at Fort Lewis to validate an organizational and operational model for Interim BCTs.
- *Interim Capability Phase.* The major objective of this phase is to complete the fielding of five to eight Interim BCTs (IBCT). The Interim Capability Phase will begin with fielding of interim armored vehicles (IAVs) and will end when the last IBCT is fully manned, equipped, and trained to possess the capabilities described in the IBCT Operations and Organization Concept.
- *Objective Capability Phase.* This phase will begin when the first Objective Force operational unit is fully manned, equipped with a future combat system, and trained to achieve the capabilities described for the Objective Force. The phase would end when the Army has been fully converted to the Objective Force capability.

3.0 Alternatives

The PEIS evaluated two alternatives in detail: a preferred alternative and the no action alternative. The preferred alternative is implementation of the above-described proposed action.

Under the no action alternative, the Army would not undertake a formal, synchronized program of transformation. Needed changes affecting Army organization, weapons

systems, operations, and other matters would, over time, be addressed in an incremental, evolutionary manner.

Two other alternatives were identified but not carried forward. "Partial implementation" of transformation could necessitate that the Army retain for an indefinite period its present heavy forces built around the Abrams tank and Bradley fighting vehicle. Alternatively, the Army could attempt to achieve transformation without establishing an Interim Force. In this case, based on science and technology decisions and production and fielding of new systems, the Army would proceed directly to an Objective Force capability. Both of these alternatives were eliminated from detailed consideration because they would not meet the purpose of and need for the proposed action.

4.0 PEIS Methodology

The PEIS evaluated "activity groups" occurring in conjunction with transformation and having potential to cause environmental impacts. The activity groups are:

- *Systems Acquisition:* Development, testing, production, fielding, and disposal of the weapon systems and equipment necessary to achieve the seven force characteristics of the Objective Force.
- *Construction:* All types of construction activities, including the erection or creation of buildings, training facilities, and infrastructure, as well as renovation or demolition of buildings and facilities.
- *Land Transactions:* Three distinct types of real property activities: acquisition, asset management, and disposal.
- *Deployment:* Operational deployment of forces, as well as training that is specifically tied to deployment of forces.
- *Stationing:* Distribution of forces across Army installations in a manner that best supports achievement of the Army's mission.
- *Training:* Achieving and maintaining readiness to perform assigned missions on both an individual and collective (unit) basis.
- *Institutional Matters:* The entire range of diverse day-to-day activities not otherwise specifically accounted for in the other six activity groups.

The PEIS analyzed implementation of transformation by evaluating the effects of activity groups on environmental resources and conditions. Aspects of the human and natural environments analyzed in the PEIS are land use, real property and infrastructure, airspace, air quality, noise, water resources, geology and soils, biological resources,

cultural resources, hazardous materials and wastes, human health and safety, and the socioeconomic environment.

5.0 Environmental Consequences

Implementation of a program for transformation of the Army is expected to result in a variety of adverse and beneficial impacts to the environment. The majority of impacts will be direct impacts to affected resources. Many of the impacts will be long-term. The following provides summaries of the expected impacts determined in the PEIS for each resource for both the proposed action and no action alternatives.

5.1 Impacts to Land Use

Proposed Action Alternative. Long-term direct adverse and beneficial effects are expected. Land use is expected to change based on the requirements of the Interim Force and, ultimately, the requirements of the Objective Force. The intensity and nature of installation land use and, in some cases, adjacent land use will also be expected to change for activities such as systems acquisition, deployment, stationing, and training.

No Action Alternative. No additional or increased effects to land use are expected. Changes in weapons systems, doctrine, and training will inevitably occur. Those changes will be of such infrequency or magnitude, however, as to have no substantial impacts to land use or compatibilities with adjoining property.

5.2 Impacts to Real Property and Infrastructure

Proposed Action Alternative. Short-term and long-term direct adverse and beneficial effects are expected. Adverse effects will occur with respect to systems acquisition, land transactions, deployment, stationing, training, and institutional matters. Beneficial effects will also occur with respect to systems acquisition and land transactions.

No Action Alternative. No additional or increased effects are expected. The Army will continue to expend funds for acquisition of real property assets, for repair and maintenance of facilities, and for management of its real property and infrastructure. Additional base realignment and closure actions might reduce the inventory of real property and infrastructure. Disposal of excess properties will represent cost avoidance of the maintenance; if wholly or partially allocated to the Army, the savings could be applied to remaining assets or to other purposes, as appropriate.

5.3 Impacts to Airspace

Proposed Action Alternative. Army Transformation will result in short- and long-term direct adverse effects to airspace use. Construction or modifications of airfields and training and maneuver areas could result in changes to existing airspace use. Airspace use will be most affected by the brief, intense activities of deployment exercises and by

routine training exercises of varying intensities. Effects to airspace use will depend also upon the degree of use of modified or new systems and their associated support requirements (e.g., unmanned aerial vehicles).

No Action Alternative. No additional effects are expected. There will be little change in airspace use with respect to the Army's rotary-wing assets. Division and corps commanders presently exercise operational control over unmanned aerial vehicles. The extent of training with these limited assets would not be expected to change materially.

5.4 Impacts to Air quality

Proposed Action Alternative. Implementation of transformation in the Army will, over the long term, result in a moderate overall improvement in ambient air quality at Army installations. Net improvement in air quality over present conditions would be attributable to continuing changes in vehicles, equipment, and processes; reductions in use of mobile sources in field training due to increased reliance on simulation training; and improved adherence to compliance standards through use of better management techniques. In the short-term, the Army's retention of and predominant reliance on the Legacy Force will have little effect on air quality. Training in the use of existing systems (vehicles, weapons, and other equipment) is not expected to involve any material changes in generation of air emissions. Similarly, maintenance of existing systems will not materially change. Numbers of mobile and stationary sources across the Army's inventory of installations will remain essentially static. That is, there will be little, if any, variance in the numbers of tactical vehicles and privately-owned vehicles (commuters) or in the numbers of "process" emissions from maintenance shops and other sources (e.g., on-post dry cleaning establishments). In the short term, emissions from stationary sources could be reduced as the Army moves toward removal of WW II-era facilities and construction of new, consolidated facilities having more efficient heating and cooling systems.

No Action Alternative. No additional effects are expected. Levels of air emissions presently produced by Army activities will generally continue, subject to slight incremental increase or decrease due to changes that will occur even in the absence of a program for transformation. The Army will continue to recapitalize and modernize its equipment and vehicles inventories, regulatory requirements will continue to evolve (generally becoming more stringent), and the mobile and stationary sources associated with training and day-to-day facilities operations will continue to generate emissions of varying types and quantities. Air emissions resulting from Army operations will occur within the context of, and as authorized by, relevant air quality permits issued by appropriate authorities.

5.5 Impacts to Noise

Proposed Action Alternative. Army Transformation will result in both direct adverse and beneficial effects. Short-term minor adverse effects could occur due to activities

associated with construction, accelerated training, and deployment. Short-term adverse noise effects will likely occur during training exercises. However, in the long term, overall beneficial effects will occur with the use of new systems based on technological advances (e.g., reductions in engine noise).

No Action Alternative. No effects are expected. Noise levels of Army activities will generally continue, subject to slight incremental increase or decrease due to changes in training doctrine or employment of equipment.

5.6 Impacts to Water Resources

Proposed Action Alternative. The activities associated with transformation will cause both direct and indirect adverse effects to water resources with considerable variability among locations. Effects due to systems acquisition, construction, land transactions, training, and institutional matters will be of both short-term and long-term duration.

No Action Alternative. Long-term direct beneficial effects are expected. Army environmental stewardship efforts seek the enhanced conservation and protection of natural resources at Army installations. Consistent with this goal, the Army has begun to implement, or is now at the threshold of implementing, important programs and initiatives such as Integrated Natural Resources Management Plans, an Environmental Management System, and sustainability principles. Programs and initiatives such as these, which would commence even in the absence of the proposed action, are expected to produce positive benefits to the targeted resources.

5.7 Impacts to Geology and Soils

Proposed Action Alternative. Activities associated with transformation will cause direct adverse effects to soil resources. Differences from current practices will be related to use of wheeled vehicles instead of tracked vehicles and potential use of new, currently vegetated areas for construction, training, or deployment. Optimal use of soil resources will require that soil use be considered along with use of other resources so that it can be used sustainably for dedicated purposes and/or not damaged to the point where it could not be returned to other uses (such as natural areas or agricultural lands) when required.

No Action Alternative. No additional or increased effects are expected. Changes in landform and soil losses through sedimentation in connection with construction activities would be expected to continue at generally their present levels. Training exercises will generally be expected to continue at their present locations, frequencies, and durations. Incidental adverse effects to soils associated with training would be subject to protective and rehabilitative measures through the Land Rehabilitation and Maintenance component of the Integrated Training Area Management Program.

5.8 Impacts to Biological Resources

Proposed Action Alternative. The activities associated with transformation will cause adverse and beneficial effects to biological resources. These effects will be both short-term and long-term. Training and construction activities will create the majority of adverse effects. Army land stewardship initiatives aimed at range and maneuver area sustainability are expected to generate beneficial effects.

No Action Alternative. Long-term direct beneficial effects are expected. Army environmental stewardship efforts seek the enhanced conservation and protection of natural resources at Army installations. Consistent with this goal, the Army has begun to implement, or is now at the threshold of implementing, important programs and initiatives such as Integrated Natural Resources Management Plans, an Environmental Management System, and sustainability principles. Programs and initiatives such as these, which would commence even in the absence of the proposed action, are expected to produce positive benefits to the targeted resources.

5.9 Impacts to Cultural Resources

Proposed Action Alternative. Long-term direct adverse and beneficial effects are expected. Throughout the period of transformation, the Army will continue to exercise diligence with respect to archaeological sites, traditional cultural and historic properties, and paleontological resources presently within its control. Notwithstanding the Army's responsible management pursuant to federal law and regulations, however, actions within the construction and training activity groups pose various risks of harm to cultural resources. Installation commanders' adherence to Integrated Cultural Resources Management Plans will minimize these potential risks. Land transactions involving private land could result in beneficial effects through the provision of federal protections to cultural resources.

No Action Alternative. Long-term direct adverse and beneficial effects are expected. The potential for adverse effects on cultural resources exists without regard to implementation of the proposed action. The preceding discussion concerning the proposed action is equally applicable to the no action alternative.

5.10 Impacts to Hazardous Materials and Wastes

Proposed Action Alternative. Direct beneficial and adverse effects are expected. The beneficial effects will occur within the context of systems acquisition and land activities. Adverse effects will occur with respect to construction.

No Action Alternative. No increase in effects is expected. Existing programs for the management of hazardous materials and wastes will continue. Abatement actions to deal with threats arising from past hazardous wastes practices will also continue.

5.11 Impacts to Human Health and Safety

Proposed Action Alternative. Long-term direct adverse and beneficial effects are expected. Beneficial effects are expected with respect to systems acquisition, training, and institutional matters. Adverse effects are expected with respect to construction and deployment.

No Action Alternative. No increase in effects is expected.

5.12 Impacts to the Socioeconomic Environment

Proposed Action Alternative. At the national level of assessment addressed in the PEIS, no effects to socioeconomic resources are expected. Although workforce levels at individual installations or within communities linked strongly to some defense industries could be affected by transformation, overall troop levels and associated civilian employment will likely remain essentially unchanged. The Nation's military force levels are determined by national security policy decisions and would not be affected by the proposed action. Employment changes could, however, occur at the installation or community level and in such cases the resulting economic effects would be assessed in a site-level environmental assessment or environmental impact statement. Implementation of the proposed action is consistent with the goals for achievement of environmental justice as articulated in Executive Order 12898. Implementation also comports with the objectives of Executive Order 13045; the Army's actions will not pose any risks of safety to children, whether resident on an installation or present as a visitor.

No Action Alternative. No change in effects is expected, as change would occur on a more evolutionary scale.

5.13 Cumulative Effects

The effects of the transformation program will extend over the next 30 years and will be nationwide. The PEIS recognizes these large scales and, based on trends analysis, identifies a limited number of potential cumulative effects associated with population growth, energy consumption, management of lands for multiple use, and airspace.

- *Population Growth.* The combined effects of activities by the Army and adjacent, larger populations may be most noticeable with respect to air quality, noise, traffic congestion, water quality, fragmentation of ecosystems, and displacement of wildlife.
- *Energy.* To the extent that the Army's transformation would act as a catalyst for development of hybrid diesel-electric vehicles or for use of fuel cells, there would be positive cumulative effects on energy resources.
- *Management of Lands for Multiple Uses.* The expected higher tempo of training and robust characteristics of forces needed for the Interim and Objective Forces

could strain the capacities of present Army land holdings and require use of additional lands for some types of training. These circumstances could potentially reduce the availability of those other lands for as many uses as they now bear. This might be most noticeable in the amount of acreage available in some locations for recreation, agriculture, and grazing.

- *Airspace.* Where there is presently insufficient special use airspace over or near Army installations, the Army would seek additional designations from the Federal Aviation Administration. The allocation of the resource to Army use could reduce the airspace available to nonmilitary aircraft and could compound the difficulties in maintaining some air corridors.

6.0 Mitigation Commitments

The PEIS occurs at the inception of a long process that requires extensive planning and step-wise execution. As the potential environmental effects of creating, training, and employing the Objective Force are presently only generally estimable, identification of specific mitigation measures is not practicable. In order to attain its underlying goal to treat its resources in a manner that best assures their long-term availability, the Army will continue to act responsibly to avoid, reduce, or compensate for effects arising throughout the transformation process. At the present juncture, the Army will take four types of actions to minimize the effects transformation can be expected to generate.

- *Mitigation in conjunction with site-specific NEPA analyses.* Prior to implementation of transformation-related projects or proposed actions at specific sites, the Army will analyze each action to evaluate potential environmental effects. Identification of site- or project-specific mitigation will occur through this process.
- *Fostering of a "sustainable environment" ethic.* The Army will continue on its present course to implement sustainability principles in both its built environment and with respect to actions taken that affect natural resources.
- *Implementation of an Environmental Management System.* An Environmental Management System will provide an overarching architecture for informed decision making with respect to environmental issues. Implementation of a comprehensive Environmental Management System is expected before 2006.
- *Use of best management practices.* Best management practices are various site- and project-specific stratagems that planners, engineers, natural resources managers, and other professionals use to avoid or minimize adverse effects while carrying out projects. Consistent use of best management practices reduces risk of creating situations that might lead to consequences that would be adverse to the environment.

7.0 Decision

On behalf of the Department of the Army, I have decided to proceed with a multi-year, phased, and synchronized process to transform the Army. I have considered the results of the analysis described in the PEIS, supporting studies, and comments provided during formal comment and review periods. Based on this review, I have determined that the preferred alternative reflects the proper balance between initiatives for protection of the environment, appropriate mitigation, and actions to achieve the Army Vision. The Army has identified and shall adopt and implement a variety of measures to avoid or minimize harm to the environment that may be caused by implementation of the proposed action.

My decision to proceed with Army Transformation, based on the consideration of the results of the PEIS, as well as other, strategic considerations, extends to ratification, approval, and confirmation of certain related matters, as follows:

- The program to transform the Army must continually accommodate changes in national security requirements.
- Project- and site-specific proposals for transformation actions and activities will be appropriately evaluated for their potential environmental effects. Future planning for and initiating actions to accomplish transformation shall be subject to appropriate evaluation pursuant to the National Environmental Policy Act and other requirements.
- The Army has undertaken the conversion of two brigades at Fort Lewis, Washington, to develop and validate organizational and operational concepts for brigade combat teams. As their conversion is completed and circumstances warrant, these two Initial BCTs shall proceed to Interim BCT status. As addressed in the PEIS, activities of and activities directly supporting the conversions at Fort Lewis shall continue to be subject to evaluation of their potential environmental effects.
- As indicated in the PEIS, transformation will affect virtually all aspects of the Army's doctrine, training, leader development, organizations, installations, materiel, and soldiers. Absent a significant change in circumstances, Interim Force units shall be constituted from existing units at their home stations.
- On July 12, 2001, the Army identified four additional brigades for conversion to Interim BCTs. These are the 172nd Infantry Brigade (Separate), Forts Wainwright and Richardson, Alaska; the 2nd Armored Cavalry Regiment (Light), Fort Polk, Louisiana; the 2nd Brigade, 25th Infantry Division (Light), Schofield Barracks, Hawaii; and the 56th Brigade of the 28th Infantry Division (Mechanized), Pennsylvania National Guard. Final designation of these brigades for conversion was conditional on the completion of the PEIS. Based on national

security requirements and strategic factors, as well as the environmental factors identified in the PEIS, I confirm the series of planned conversions previously announced. Actions at these installations to implement Army Transformation, including conversion of each of these four units to IBCT/ICR status, shall be subject to appropriate evaluation of potential environmental effects in accordance with the National Environmental Policy Act.



11 Apr 02
Date

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