UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 30 2007

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Public Affairs Office
U.S. Army Environmental Command
Building E4460
5179 Hoadley Road
Attention IMAE-PA
Aberdeen Proving Ground, MD 21010-5401

Dear Sir/Madam:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the Environmental Protection Agency (EPA) has reviewed the U.S. Army's Draft Environmental Impact Statement (EIS) for the Permanent Stationing of the 2/25th Stryker Brigade Combat Team (CEQ# 20070307).

In May 2004, the Army issued a final EIS for Transformation of the 2nd Brigade, 25th Infantry Division (Light) to a Stryker Brigade Combat Team (SBCT). The SBCT is a maneuver brigade that includes approximately 4,000 soldiers and 1,000 vehicles. In July 2004, the Army released a Record of Decision (ROD) documenting its decision to transform the 2/25th in place to an SBCT and permanently home station it in Hawaii. A federal appellate court found in October of 2006 that the Army had not considered all alternative locations outside Hawaii in establishing the Stryker Combat Brigade. This resulted in requiring the Army to cease all activities associated with the Stryker. The Army prepared this EIS in accordance with the Court's guidance to examine a fuller range of reasonable alternatives for permanently stationing the 2/25th SBCT.

The draft EIS examines several alternative Army installations capable of supporting this action. In addition to the no action, the alternatives include:

- Alternative A - Permanently stationing the 2/25th SBCT at Schofield Barracks Military Reservation while conducting required training at military training sites in Hawaii;

- Alternative B - Permanently stationing the 2/25th SBCT at Fort Richardson while conducting required training at military training sites in Alaska and replacing the SBCT in Hawaii with an Infantry Brigade Combat Team (IBCT) from Alaska; and

- Alternative C - Permanently stationing the 2/25th SBCT at Fort Carson while conducting required training at military training sites in Colorado and replacing the SBCT in Hawaii with an IBCT from Colorado.

The document analyzes potential environmental impacts associated with of all activities (equipment fielding, training, facilities construction, and soldier and family support) required for stationing the 2/25th. Specifically, it analyzes potential impacts associated with water and cultural resources, threatened and endangered species, soil erosion, wildfire management, noise, traffic and transportation. The draft EIS acknowledges that the proposed action may have a significant impact in the areas of cultural resources, wildfire management, soil erosion, threatened and endangered species and noise for some alternatives. However, it does not consider the cumulative impacts of Alternative B with the recent decision to resume year-round training operations in the Eagle River Flats (ERF) area at Fort Richardson, Alaska. If the ERF is opened for year-round training, there is high likelihood that the additional troops from the SBCT would also utilize the ERF for live fire training, thus increasing impacts. We recommend that the final EIS include an analysis of the cumulative impacts of this action particularly on water resources and to the Cook Inlet Beluga whale population in this area.

Because the Army did not identify a preferred alternative, EPA rated the potential environmental impacts of the three action alternatives individually. Based on our review of the document and the above information, we have rated Alternatives A and C Lack of Objections (LO). Alternative B has been rated Environmental Concerns/Insufficient Information (EC- 2), (see enclosure "Summary of EPA Rating System").

We appreciate the opportunity to review this draft EIS. We look forward to reviewing the final EIS related to this project. The staff contact for the review is Marthea Rountree and she can be reached at (202) 564-7141.

Sincerely,

Anne N. Miller

Anne Norton Miller
Director
Office of Federal Activities

Enclosure

SUMMARY OF EPA RATING SYSTEM

Rating the Environmental Impact of the Action

- **LO (Lack of Objections)** The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.
- **EC (Environmental Concerns)** The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.
- **EO (Environmental Objections)** The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental objections can include situations:
    1. *Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;*
    2. *Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;*
    3. *Where there is a violation of an EPA policy declaration;*
    4. *Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or*
    5. *Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.*
- **EU (Environmentally Unsatisfactory)** The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:
    1. *The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;*
    2. *There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or*
    3. *The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.*

Adequacy of the Impact Statement

- **Category 1 (Adequate)** The draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.
- **Category 2 (Insufficient Information)** The draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the final EIS.
- **Category 3 (Inadequate)** The draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS.