

Final

**Army National Guard Nationwide Environmental Assessment
for Fielding the Mine Clearance Vehicle (MC-V), Unmanned
Mine Vehicle (MV-4), and Vehicle Mounted Mine Detection
(VMMD) System at Multiple Locations**



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August 2016

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NATIONWIDE ENVIRONMENTAL ASSESSMENT ORGANIZATION

This Nationwide Environmental Assessment (EA) evaluates potential physical, environmental, and cultural effects of the proposed fielding of, and training with, the Mine Clearance Vehicle (MC-V or “Flail”), Mine Vehicle (MV-4), and Vehicle Mounted Mine Detection (VMMD or “Husky”) System by the Army National Guard (ARNG) at a national level. Twenty-six State ARNGs, including 48 ARNG units, would be involved in implementing the Proposed Action, with three States (Texas, Missouri, and South Carolina) receiving all three vehicles. This Nationwide EA addresses the potential effects of fielding and training with this equipment within each of the 26 States involved, and identifies Technical Resource Areas that could be affected by the Proposed Action, as well as those that would not be expected to experience meaningful effects. Where appropriate, Best Management Practices (BMPs) are presented that would maintain identified potential effects at acceptable, less-than-significant levels.

For site-specific fielding and training, each involved State ARNG would develop a tiered National Environmental Policy Act (NEPA) document in accordance with 40 Code of Federal Regulations (CFR) § 1502.20: "Agencies are encouraged to tier their environmental impact statements [or EAs] to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review (§1508.28). Whenever a broad environmental impact statement [or EA] has been prepared (such as a program or policy statement) and a subsequent statement or environmental assessment is then prepared on an action included within the entire program or policy (such as a site specific action), the subsequent statement or environmental assessment need only summarize the issues discussed in the broader statement and incorporate discussions from the broader statement by reference and shall concentrate on the issues specific to the subsequent action." In most cases, this tiered NEPA document would be a standard ARNG Record of Environmental Consideration/Environmental Checklist.

As required by the NEPA of 1969 (42 United States Code [USC] 4321 *et seq.*), Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 CFR Parts 1500-1508), and 32 CFR Part 651 (Environmental Analysis of Army Actions, Final Rule), the potential effects of the Proposed Action and alternatives are analyzed in this Nationwide EA. This Nationwide EA will facilitate the decision-making process regarding the Proposed Action and is organized as follows:

- **EXECUTIVE SUMMARY:** Describes the Proposed Action; summarizes anticipated physical, environmental, and cultural consequences; and compares potential effects associated with the two considered alternatives.
- **SECTION 1 PURPOSE AND NEED FOR THE PROPOSED ACTION:** Summarizes the purpose of and need for the Proposed Action, provides relevant background information, and describes the scope of the Nationwide EA.
- **SECTION 2 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES:** Describes substantive elements of the Proposed Action and project alternatives, including a comparison of key differentiators between evaluated scenarios.
- **SECTION 3 AFFECTED ENVIRONMENT:** Describes the existing physical, environmental, and cultural setting typical of existing ARNG units and training areas.

- **SECTION 4 ENVIRONMENTAL CONSEQUENCES:** Identifies individual and cumulative potential environmental effects of implementing the Proposed Action and alternatives, and identifies appropriate BMPs.
- **SECTION 5 COMPARISON OF ALTERNATIVES AND CONCLUSIONS:** Compares the environmental effects of the considered alternatives and summarizes the significance of individual and expected cumulative effects of these alternatives.
- **SECTION 6 REFERENCES:** Provides bibliographical information for cited sources.
- **SECTION 7 GLOSSARY:** Defines terms used in this Nationwide EA.
- **SECTION 8 LIST OF PREPARERS:** Identifies document preparers and their areas of expertise.
- **SECTION 9 AGENCIES AND INDIVIDUALS CONSULTED:** Lists agencies, Federally recognized Native American Tribes, and individuals consulted during preparation of this Nationwide EA.
- **APPENDICES:**
 - APPENDIX A.** Agency Consultation and Correspondence
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- ✓ **Funding Source:** *National Guard Bureau*
 - ✓ **Proponent:** *Army National Guard*

NATIONWIDE ENVIRONMENTAL ASSESSMENT TITLE PAGE

LEAD AGENCY: Army National Guard Installations and Environment Directorate
(ARNG-IEZ)

COOPERATING AGENCIES: None

TITLE OF PROPOSED ACTION: Army National Guard Nationwide Environmental Assessment for Fielding the Mine Clearance Vehicle (MC-V), Mine Vehicle (MV-4), and Vehicle Mounted Mine Detection (VMMD) System at Multiple Locations

AFFECTED JURISDICTION: 26 ARNG States

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DOCUMENT DESIGNATION: Final Nationwide Environmental Assessment (EA)

ABSTRACT: This Nationwide EA has been prepared to identify, document, and address the potential physical, environmental, and cultural effects of the Army National Guard (ARNG) proposal for new equipment fielding of, and training with, three distinct vehicles: Mine Clearance Vehicle (MC-V), Mine Vehicle (MV-4), and Vehicle Mounted Mine Detection (VMMD) System at 26 State ARNGs, including 48 ARNG units. The ARNG proposes fielding six MC-Vs to three State ARNGs, 18 MV-4s to 13 State ARNGs, and 152 VMMDs to 26 State ARNGs; three State ARNGs (Texas, Missouri, and South Carolina) would receive all three vehicle types. The Proposed Action is needed to ensure the involved ARNG units, consisting of Engineer Battalions, Mine Clearance Companies, Brigade Combat Teams (BCTs), and Area Clearance Platoons, are able to accomplish the requisite mine detection and clearance training in order to maintain required parallel capabilities to United States Department of the Army (US Army) Soldiers. This ensures the involved ARNG units' mission readiness and preparedness, as well as ability to support force integration and overall Army modularity in support of Outside the Continental US (OCONUS) operations. This Nationwide EA evaluates the direct, indirect, and cumulative effects of the Proposed Action (e.g., training, maintenance, and storage of the MC-V, MV-4, and VMMD) and the No Action Alternative, with respect to the following Technical Resource Areas: air quality; noise; water resources, biological resources, cultural resources, and hazardous and toxic materials/wastes. The analysis documented in this Nationwide EA concludes there would be no significant adverse impacts, either individually or cumulatively, to the environment or quality of life associated with implementing the Proposed Action.

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EXECUTIVE SUMMARY

Nationwide Environmental Assessment for Fielding the Mine Clearance Vehicle (MC-V), Mine Vehicle (MV-4), and Vehicle Mounted Mine Detection (VMMD) System at Multiple Locations

This Nationwide Environmental Assessment (EA) evaluates potential physical, environmental, and cultural effects of the proposed nationwide fielding of, and mine detection and clearance training with, the Mine Clearance Vehicle (MC-V), Mine Vehicle (MV-4), and Vehicle Mounted Mine Detection (VMMD) System by the Army National Guard (ARNG) at a national level. All three types of equipment are currently used by the United States Department of the Army (US Army), but are new to the ARNG inventory. Twenty-six State ARNGs, including 48 State ARNG units, would be involved in implementing the Proposed Action, with three States (Texas, Missouri, and South Carolina) receiving all three vehicle types. This Nationwide EA addresses the potential direct, indirect, and cumulative effects of fielding and training with this equipment as required under the National Environmental Policy Act (NEPA) of 1969, as amended (43 United States Code [USC] 4321 *et seq.*); the President's Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500 – 1508); and *Environmental Analysis of Army Actions*; Final Rule (32 CFR Part 651). Where appropriate, Best Management Practices (BMPs) are presented that would maintain identified potential effects at acceptable, less-than-significant levels.

For site-specific fielding and training, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR § 1502.20: "Agencies are encouraged to tier their environmental impact statements [or EAs] to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review (§1508.28). Whenever a broad environmental impact statement [or EA] has been prepared (such as a program or policy statement) and a subsequent statement or environmental assessment is then prepared on an action included within the entire program or policy (such as a site specific action), the subsequent statement or environmental assessment need only summarize the issues discussed in the broader statement and incorporate discussions from the broader statement by reference and shall concentrate on the issues specific to the subsequent action."

In most cases, this tiered NEPA document would be a standard ARNG Record of Environmental Consideration (REC) and Environmental Checklist. The development of a tiered EA, rather than the completion of a REC/Environmental Checklist, would depend on the degree of specific potential resource impacts at each involved installation. Actions that would not qualify for a REC per the Army's NEPA implementing regulation (32 CFR Part 651) will be evaluated within a tiered EA. Each site-specific ARNG Proposed Action will be evaluated within either a REC/Environmental Checklist or an EA.

Overview of Purpose and Need

The purpose of the Proposed Action is for the ARNG to field the MC-V, MV-4, and VMMD. This fielding would provide the requisite mine detection and clearance training and proficiency for appropriate ARNG units on each piece of equipment. This also would ensure that the ARNG maintains required parallel capabilities to United States (US) Army Soldiers, who are already training with this equipment, in conducting operations to detect, bypass, breach, mark, report, and eliminate mines or minefields in accordance with Field Manual (FM) 3-34.210, *Explosive Hazards Operations* (US Army 2007b).

The need for the Proposed Action is to ensure the involved ARNG units are able to accomplish the requisite mine detection and clearance training in order to maintain necessary parallel capabilities to US Army Soldiers. This ensures the involved ARNG units' mission readiness and preparedness, as well as ability to support force integration and overall Army modularity in support of Outside the Continental US (OCONUS) operations. All of the involved ARNG units, consisting of Engineer Battalions, Mine Clearance Companies, Brigade Combat Teams (BCTs), and Area Clearance Platoons, have training, staffing, and equipment requirements, called Mission Table of Organization and Equipment (MTOE) requirements, that include fielding and training with the MC-V, MV-4, and/or VMMD, as appropriate.

The Army trains in accordance with the Army Force Generation model, which is the structured progression of increased unit readiness over time, and produces in recurring periods, trained, ready, and cohesive units. These requirements support the prioritization and synchronization of resourcing, equipping, training, sustaining, mobilizing, and deploying cohesive units more effectively and efficiently (US Army 2007a). Mission training objectives are defined in National Guard Regulation 350-1, *Army National Guard Training* (National Guard Bureau [NGB] 2009), which guides the creation of forces trained in the latest technological equipment to continue the Army's ongoing transformation process designed to provide the Nation with combat forces that are more responsive, deployable, agile, versatile, lethal, survivable, and sustainable (NGB 2005).

Overview of Proposed Action

The ARNG proposes fielding three types of equipment, the MC-V, MV-4, and VMMD. Each type of equipment is shown and described in **Section 1.1**. The ARNG proposes fielding six MC-Vs to three State ARNGs, 18 MV-4s to 13 State ARNGs, and 152 VMMDs to 26 State ARNGs; three State ARNGs (Texas, Missouri, and South Carolina) would receive all three types of equipment. **Tables 2-1, 2-2, and 2-3** in the EA identify the units, training sites, and State ARNGs that would be receiving this equipment.

No new construction at any ARNG installation is proposed as part of the Proposed Action. The equipment would be stored at existing, secure storage facilities and would be used for training on existing, approved ARNG and Army training sites. The equipment would only be used on drill weekends (i.e., Inactive Duty Training, or Inactive Duty Training and during two-week Annual Training events). Training during most drill weekends would only involve preventive maintenance checks and services (PMCS). Generally, the vehicles would only be used in a training capacity two or three times per year. If the vehicles need to be transported from the storage location(s) to the training site(s), they would be transported via a low-boy semi-trailer on public roads. The vehicles would only be cleaned at existing wash racks upon returning

from training and during inspections. The Proposed Action would not require the addition or reduction of personnel.

Fielding of the equipment would only occur at pre-approved, established training sites. The equipment would be stored at existing Readiness Centers (i.e., Armories) or existing training sites in existing, secure military equipment parking areas. Maintenance locations of the equipment would be at the nearest Field Maintenance Shop, Unit Training Equipment Site, or Combined Support Maintenance Shop.

The locations proposed for equipment fielding are based on specific ARNG units' training, staffing, and equipment requirements, which are called MTOE requirements. In order to field the equipment, each location and receiving unit is required to provide adequate training scenarios and facilities. Adequate facilities include the provision of administrative, maintenance, and logistical support.

Alternatives Development – Screening Criteria

ARNG planners developed and applied the following screening criteria to evaluate potential alternatives that would meet the purpose of and need for the proposed fielding of, and training with, the MC-V, MV-4, and VMMD.

To be carried forward for further consideration and analysis, a "reasonable" alternative must meet all of the following specific screening criteria:

1. Ensure all ARNG units with the appropriate training, staffing, and equipment requirements (i.e., MTOE requirements) field and train with this equipment. This includes some States with a local Regional Training Institute to enable New Equipment Training (NET) with this equipment. All States with a heavy engineering unit must field and train with the MC-V.
2. Be fielded to a location(s) within an existing, proximate, and available Active Duty-, Army Reserve-, or ARNG-owned or -controlled facility to avoid land acquisition costs and to permit required training to be conducted completely and effectively.
3. Avoid excessive travel times and costs for ARNG units to be trained.
4. Utilize appropriate, existing storage facilities and training areas (e.g., Engineer Training Sites and driving areas) to minimize land commitment and allow for other required training to occur now and in the future.
5. Minimize potential environmental issues.

After an examination of Active Duty, National Guard, and Army Reserve installations in the US, the ARNG identified 26 State ARNGs, including 48 ARNG units, that met all of the screening criteria needed to provide the required training and training support facilities for the MC-V, MV-4, and VMMD, as appropriate.

Overview of Considered Project Alternatives

NEPA, CEQ Regulations, and 32 CFR Part 651 require that all reasonable alternatives be explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified, along with a brief discussion of the reasons for eliminating them.

For purposes of this EA's analysis, an alternative was considered "reasonable" only if it would enable the ARNG to accomplish the primary mission of sustaining quality military training, including maintaining and improving involved units' readiness nationwide. This would meet the purpose of and need for the Proposed Action, as well as satisfy the Proposed Action's screening criteria. "Unreasonable" alternatives would not enable the ARNG to meet the purpose of and need for the Proposed Action. The ARNG initially considered the following alternatives: (1) Use Other Existing ARNG Facilities; (2) Establish New Training Sites; and (3) Reduce Scale. These three alternatives were eliminated from further consideration because they did not meet one or more of the screening criteria.

This EA examines the Preferred Action Alternative and the No Action Alternative in-depth. Each alternative is defined as follows.

- **Preferred Action Alternative** – Under the Preferred Action Alternative, the MC-V, MV-4, and/or VMMD would be fielded to the identified 26 ARNG States that met all of the screening criteria. The fielding locations identified contain existing training facilities, training areas, storage areas, maintenance facilities, and staffing to support the fielding without alteration. This alternative effectively provides the best combination of fielding locations to establish and sustain quality military training and maintain and improve units' readiness postures nationwide, in accordance with the purpose of and need for the Proposed Action.
- **No Action Alternative** – Under the No Action Alternative, the MC-V, the MV-4, and the VMMD would not be fielded by the ARNG. This alternative would limit the capability of the ARNG to carry out its assigned mission; the purpose of and need for the Proposed Action would not be met. This would result in the continuation of existing conditions that place the affected ARNG units at risk for not meeting training requirements for mine detection and clearance, potentially resulting in an inability to meet proficiency standards and support the Army. However, the No Action Alternative is carried forward in this EA to serve as a comparative baseline, or *status quo*, in accordance with 40 CFR § 1502.14(d).

This EA evaluates the direct, indirect, and cumulative effects associated with implementation of the Preferred Action Alternative and the No Action Alternative. In accordance with CEQ Regulations, the ARNG used internal and external scoping, including coordination with pertinent regulatory agencies, to "identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (40 CFR § 1506.3), narrowing the discussion of these issues in the statement [EA] to a brief presentation of why they will not have a significant effect on the human environment or providing a reference to their coverage elsewhere" (40 CFR § 1501.7(a)(3)). This approach is fully consistent with the NEPA and CEQ Regulations. Through this process, the ARNG determined that the only Technical Resource Areas that required in-depth evaluation within this EA are:

Air Quality; Noise; Water Resources; Biological Resources; Cultural Resources; and Hazardous and Toxic Materials and Wastes (HTMW).

Environmental Resource Issues, Areas, and Effects

Based on the analysis presented in this EA, the Proposed Action would not be anticipated to result in significant direct, indirect, or cumulative impacts within the region where the vehicles are fielded, stored, maintained, or trained. Impacts by resource area are described below and summarized in **Table ES-1**.

Table ES-1. Summary of Potential Environmental Impacts on Evaluated Technical Resource Areas		
Technical Resource Area	Preferred Action Alternative	No Action Alternative
Air Quality	Short-term, less-than-significant impacts due to the potential for dust generation from training activities within existing training areas. Long-term, less-than-significant impact from increased site emissions. Would be controlled through compliance with applicable, site-specific BMPs.	No impact. Ongoing emissions would continue, which are less than significant and properly controlled through compliance with each installation's specific BMPs (e.g., no idling policy).
Noise	Short-term, less-than-significant adverse impact by increasing the frequency of noise associated with vehicle use during training. Would be controlled through compliance with applicable, site-specific BMPs as set forth in the Installation Operational Noise Management Plan (IONMP).	No impact. Ongoing noise would continue, which is less than significant.
Water Resources	Long-term, less-than-significant adverse impacts to surface waters due to potential soil erosion and sedimentation during training near or across surface waters. Would be controlled through compliance with applicable, site-specific BMPs and National Pollutant Discharge Elimination System (NPDES) permits, including the applicable Erosion and Sedimentation Control Plans (ESCPs) (or equivalent).	No impact. NPDES storm water regulations (implemented through State-issued permits) address construction sites, including perpetual military dig/training sites, over 1 acre in area. Ongoing water resource effects would continue, which are less than significant and properly controlled through each installation's NPDES permit and associated ESCP (or equivalent).
Biological Resources	Long-term, less-than-significant adverse impacts due to noise, dust, and presence of vehicles associated with training operations within existing training areas, which would be minor and consistent with ongoing training events, conducted in accordance with each installation's Integrated Natural Resources Management Plan (INRMP). Would be controlled through compliance with applicable, site-specific BMPs as set forth in each training location's INRMP.	No impact. Ongoing biological resources effects would continue, which are less than significant and properly controlled through compliance with each installation's INRMP.

Table ES-1. Summary of Potential Environmental Impacts on Evaluated Technical Resource Areas		
Technical Resource Area	Preferred Action Alternative	No Action Alternative
Cultural Resources	No direct or indirect adverse effect on cultural resources. National Register of Historic Places (NRHP) eligible resources would be avoided within existing training areas; no training would occur within sensitive cultural areas consistent with each training location's Integrated Cultural Resources Management Plan (ICRMP). Would be controlled through compliance with applicable, site-specific BMPs as set forth in each training location's ICRMP.	No impact attributable to new ARNG action. Ongoing cultural resources effects would continue, which are less than significant and properly controlled through compliance with each installation's ICRMP.
HTMW	Long-term, less-than-significant direct impacts due to HTMW use/generation from increased operational activities. Impacts would be controlled through ongoing regulatory compliance and BMPs.	No impact attributable to new ARNG action. Ongoing HTMW issues would continue which are less than significant and properly controlled each installation's Hazardous Waste Management Plan and/or other applicable environmental Standard Operating Procedures.

Air Quality and Noise. The Preferred Action Alternative would result in short-term, less-than-significant air quality and noise impacts, and long-term, less-than-significant air quality impacts (due to increased air emissions at each installation from vehicle exhaust). The Proposed Action would not contribute significantly to cumulative increases in air quality and noise in the vicinity of the involved installations. As the equipment would be fielded to existing military training areas, the Preferred Action Alternative would not substantially change the intensity or type of use at these locations. Air quality emissions, primarily in the form of vehicle exhaust and fugitive dust from earth disturbance, would be similar to existing training activities. In addition, the State ARNG would continue to work with local government agencies and communities in identifying potential noise and land use incompatibility, and to address possible noise impacts to nearby residences or other sensitive receptors along the installation boundaries as part of the IONMP.

Under Section 176(c)(1) of the Federal Clean Air Act (CAA), Federal agencies that “engage in, support in any way or provide financial assistance for, license or permit, or approve any activity” must demonstrate that such actions do not interfere with State and local plans to bring an area into attainment with the National Ambient Air Quality Standards (42 USC § 7506(c)). Emissions under this Proposed Action would be *de minimis*. In order to comply with the General Conformity Rule (40 CFR Part 51, Subpart W) and NEPA (42 USC 4231 *et seq.*), a Record of Non-Applicability (RONA) must be prepared for Federal Actions where proposed emissions are clearly *de minimis* in accordance with the US Army's *General Conformity Under the Clean Air Act – Policy and Guidance* (dated 27 June 1995) and *Technical Guidance for Compliance with the General Conformity Rule* (Webber and Polyak 2013). Please see **Section 4.1** for more information. Each State ARNG would prepare a RONA for the Proposed Action prior to its implementation, and as part of the subsequent, tiered, site-specific NEPA documentation (see **Section 1.3**).

Noise from existing engineer equipment training activity is already a part of the local noise environment. Fielding of the MC-V, MV-4, and/or VMMD would not be anticipated to change the location or timing of noise-generating events within each installation (i.e., in areas where night-time training does not already occur, the Proposed Action would not introduce new night-time training). As such, neither individual nor cumulative effects would be anticipated to be significant.

Water Resources. No significant impacts would be anticipated as no new construction would be required that would affect water resources. Avoidance of waters of the US, adherence to existing permit conditions, and ongoing implementation of standard BMPs and NPDES permitting requirements, including compliance with existing ESCPs or equivalent, for soil erosion, sedimentation, and water resources management would protect water resources at existing training locations. No new or additional individual or cumulative effects would be anticipated.

Biological Resources. The Preferred Action Alternative would not require construction of new facilities, roads, or training areas and would, therefore, not result in conversion of habitat. Training operations would occur within established training areas, which operate in a manner consistent with each installation's INRMP, as applicable, to minimize effects to local biological resources. The noise and vibration associated with NET would be generally consistent with that generated by currently fielded vehicles at the proposed sites. Therefore, the Proposed Action would not contribute to cumulative conversion of habitat within an installation or region. Measures to protect Federally listed threatened and endangered species would continue to be implemented, where applicable. Therefore, no significant individual or cumulative effects to biological resources would be anticipated.

Cultural Resources. The Preferred Action Alternative would not require construction of new facilities, roads, or training areas and would, therefore, not result in excavation or conversion of structures that could individually or cumulatively affect cultural resources, either directly or indirectly (e.g., through noise or view shed changes). Training operations would occur within established training areas, which operate in a manner consistent with each installation's ICRMP, where applicable, to minimize effects to local cultural resources. No individual or cumulative effects to cultural resources at the involved installations would be anticipated.

HTMW. The ARNG would adhere to regulatory requirements and implement standard BMPs to minimize direct, indirect, individual, and cumulative effects to the environment from accidental releases of HTMW or from disturbing existing HTMW sites of concern. The Proposed Action would not contribute to a significant cumulative increase in HTMW in the areas affected. As such, no individual or cumulative HTMW effects would be anticipated.

Conclusions

The analyses presented in this Nationwide EA conclude that there would be no significant adverse direct or indirect impacts, either individually or cumulatively, to the environment or quality of life associated with the implementation of the Preferred Action Alternative. The ARNG would maintain their stewardship posture by implementing the BMPs and appropriate Management Plans as discussed in **Section 4.0** for each Technical Resource Area.

Therefore, an Environmental Impact Statement is unnecessary for implementation of the Preferred Action Alternative or No Action Alternative, and a Finding of No Significant Impact is appropriate. No project-specific NEPA mitigation measures would be necessary to reduce adverse impacts to less-than-significant levels.

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- B State Historic Preservation Office (SHPO) Consultation and Native American Consultation (NAC)
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LIST OF ACRONYMS AND ABBREVIATIONS

ABCT	Armor Brigade Combat Team	HAP	Hazardous air pollutants
AHPA	Archaeological and Historic Preservation Act	HTMW	Hazardous Toxic Materials and Waste
AIRFA	American Indian Religious Freedom Act	HWMP	Hazardous Waste Management Plans
AP	Anti-Personnel	IBCT	Infantry Brigade Combat Team
APE	Area of Potential Effect	ICRMP	Integrated Cultural Resources Management Plan
AR	Army Regulation	IED	improvised explosive device
ARNG	Army National Guard	IICEP	Interagency and Intergovernmental Coordination for Environmental Planning
ARNG-IEZ	Army National Guard Installations and Environment Directorate	INGR	Iowa National Guard Regulation
ARPA	Archaeological Resources Protection Act	INRMP	Integrated Natural Resources Management Plan
AT	Anti-tank	IONMP	Installation Operational Noise Management Plan
BCT	Brigade Combat Team	IPM	Integrated Pest Management
BEB	Brigade Engineer Battalion	ITAM	Installation Training Area Management
BGEPA	Bald and Golden Eagle Protection Act	MBTA	Migratory Bird Treaty Act
BMP	Best Management Practice(s)	MC-V	Mine Clearance Vehicle
BOIP	Basis of Issue Plans	MET	Mission Essential Task
CAA	Clean Air Act	METL	Mission Essential Task List
CAAA-90	Clean Air Act Amendments of 1990	MMPV	Medium Mine Protected Vehicle
CEQ	Council on Environmental Quality	MPCV	Mine Protected Clearance Vehicle
CFR	Code of Federal Regulations	MTOE	Mission Table of Organization and Equipment
CO	Carbon Monoxide	MV-4	Mine Vehicle
dB	decibel(s)	NAAQS	National Ambient Air Quality Standards
dba	a-weighted decibel(s)	NAC	Native American Consultation
DNL	day-night average sound level	NAGPRA	Native American Graves Protection and Repatriation Act
DNR	Department of Natural Resources	NEPA	National Environmental Policy Act
DoD	Department of Defense	NET	New Equipment Training
DoDI	Department of Defense Instruction	NGB	National Guard Bureau
EA	Environmental Assessment	NHPA	National Historic Preservation Act
EIS	Environmental Impact Statement	NMFS	National Marine Fisheries Service
EO	Executive Order	NMHC	Non-methane Hydrocarbons
EPA	US Environmental Protection Agency	NO₂	Nitrogen Dioxide
ESA	Endangered Species Act	NO_x	Nitrogen Oxides
ESCP	Erosion and Sedimentation Control Plan		
FM	Field Manual		
FNSI	Finding of No Significant Impact		

LIST OF ACRONYMS AND ABBREVIATIONS

NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O₃	Ozone
OCONUS	Outside Continental US
OSHA	Occupational Safety and Health Administration
Pb	Lead
PL	Public Law
PM	Particulate Matter
PMCS	Preventive Maintenance Checks and Services
POL	Petroleum, Oil, and Lubricants
RCRA	Resource Conservation and Recovery Act
REC	Record of Environmental Consideration
ROI	Region of Influence
RONA	Record of Non-Applicability
SBCT	Stryker Brigade Combat Team
SDZ	Surface Danger Zone
SHPO	State Historic Preservation Office(r)
SIP	State Implementation Plan
SO₂	sulfur dioxide
SOP	Standard Operating Procedure
SPCCP	Spill Prevention Control and Countermeasures Plan
SRP	Sustainable Range Program
SWPPP	Storm Water Pollution Prevention Plan
T&E	Threatened and Endangered
US	United States
USACE	US Army Corps of Engineers
USC	US Code
USDA	US Department of Agriculture
USFWS	US Fish and Wildlife Service
VMMD	Vehicle Mounted Mine Detection
VOC	Volatile Organic Compound

SECTION 1: Purpose of and Need for the Proposed Action

1.1 Introduction

This Nationwide Environmental Assessment (EA) evaluates potential physical, environmental, and cultural effects of the proposed fielding of, and training with, the Mine Clearance Vehicle (MC-V), Mine Vehicle (MV-4), and Vehicle Mounted Mine Detection (VMMD) System by the Army National Guard (ARNG) at a national level. All three types of equipment are currently used by the US Army, but are new to the ARNG inventory. Twenty-six State ARNGs, including 48 ARNG units, would be involved in implementing the Proposed Action, with three States (Texas, Missouri, and South Carolina) receiving all three vehicle types.

For site-specific fielding and training, each involved State ARNG would develop a tiered National Environmental Policy Act (NEPA) document in accordance with 40 Code of Federal Regulations (CFR) § 1502.20: "Agencies are encouraged to tier their environmental impact statements [or EAs] to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review (§1508.28). Whenever a broad environmental impact statement [or EA] has been prepared (such as a program or policy statement) and a subsequent statement or environmental assessment is then prepared on an action included within the entire program or policy (such as a site specific action), the subsequent statement or environmental assessment need only summarize the issues discussed in the broader statement and incorporate discussions from the broader statement by reference and shall concentrate on the issues specific to the subsequent action." In most cases, this tiered NEPA document would be a standard ARNG Record of Environmental Consideration (REC)/ Environmental Checklist (see **Appendix C**).



Operation of the MC-V or "Flail" detonates mines with its rotating chains and hammers.

This Nationwide EA provides the necessary information to properly and fully assess the potential effects of proposed fielding of, and training with, this equipment, at a national level, as required under the NEPA of 1969, as amended (42 United States Code [USC] 4321 *et seq.*); the President's Council on Environmental Quality (CEQ) Regulations (40 CFR Parts 1500-1508); and 32 CFR Part 651, *Environmental Analysis of Army Actions*, Final Rule (29 March 2002).

The **MC-V**, or "Flail" (shown left/above), entered the Army inventory in Fiscal Year 2015. The MC-V is a mobile, manned, medium flail vehicle designed to clear paths through minefields and to provide area clearance using a motorized flail system to detonate mines in a safe manner. The MC-V is "street legal." However, due to its size and low top-end speed, it is transported along public highways on a flat-bed semi-tractor trailer. This vehicle neutralizes anti-

personnel (AP) and anti-tank (AT) mines in large areas by destroying or detonating them with its rotating flail head equipped with 72 chains with hammers (shown below).



The MC-V's rotating flail head equipped with 72 chains with hammers.

The MC-V provides protection for the operator to survive the effects of mine blasts. This equipment is needed in order to properly train and maintain proficiency on assigned Engineer Mission Essential Tasks (METs). This vehicle would be fielded into the ARNG's Area Clearance Platoons in accordance with these units' applicable training, staffing, and equipment requirements, also known as their Mission Tables of Organization and Equipment (MTOEs). This equipment is not found within the Active Duty United States (US) Army formations and will only be fielded to Reserve Components, including the ARNG. Therefore, this equipment is needed within the ARNG in order to provide the Army with needed area clearance capabilities.

The ARNG's proposed MC-V fielding locations are presented in **Table 2-1** and shown in **Figures 1-1, 1-2, 1-3, and 1-4.**

The **MV-4 Light Flail** (shown right) system is a highly mobile, unmanned mine detonation system. The US Army has conducted testing and training activities with these vehicles for approximately 10 years. The machine is built on a tracked, self-supporting frame that is a remote-controlled skid steer equipped with a quick hitch system. This system allows the rapid fitting of a flail system or roller attachment. The MV-4 has a six cylinder diesel engine and uses standard military batteries for the Operator Control Unit for remote operations. The system is fitted with both single- and dual-point lifts for helicopter operations.



The MV-4 Light Flail System is operated remotely.

The MV-4 Light Flail system is designed to clear various types of terrain containing AP mines and unexploded ordnance. Because of its dimensions and maneuverability, the MV-4 is suitable for demining house yards, woods, forest paths, river banks, and other types of terrain that are inaccessible to larger machines, such as the MC-V. It has a traveling speed of 5 kilometers per hour and a working speed of 0.5 to 2 kilometers per hour. The flail will clear a single path width of 67.9 inches; the force of the flail hammers can cut through dense vegetation and dig into soil to a depth of 9.4 to 12.6 inches, depending on the type of soil. The operator can be between 200 and 450 meters away from the actual operations, but the operator must have direct Line of Sight with the system.



The MV-4 Light Flail System's roller attachment.

The **VMMD** system (shown right and below) has been in the Army inventory since 1998. The VMMD system is used during route and area clearance operations to detect and mark the location of suspected metallic explosive hazards, such as AP, AT pressure-fused mines, and Improvised Explosive Devices (IEDs). The VMMD is used in conjunction with blast-protected vehicles such as the Buffalo Mine Protected Clearance Vehicle (MPCV) and the Medium Mine Protected Vehicle Type II (MMPV). The MPCV and the MMPV are already in ARNG inventory and used in route clearance training. These vehicles remove suspected AP, AT, or IED from locations detected and marked by the VMMD.



The VMMD before extension of its mine detection device.

The flail hammers (shown left) either destroy or explode the ordnance in the path created by the MV-4 such that follow-on Soldiers or equipment are not injured or damaged by the explosives. This vehicle would be fielded into the ARNG's Engineer Battalions in accordance with these units' applicable training, staffing, and equipment requirements, also known as their MTOEs. This equipment is needed within the ARNG in order to provide the ARNG, in support of the US Army, with needed area clearance capabilities. The ARNG's proposed MV-4 fielding locations are presented in **Table 2-2** and shown in **Figures 1-1, 1-2, 1-3, and 1-4**.



The VMMD's mine detection device in full extension.

In accordance with applicable training, staffing, and equipment requirements (i.e., MTOEs), the VMMD would be fielded into the ARNG's Brigade Engineer Battalions (BEB) (Area Reconnaissance and Brigade Combat Teams [BCTs]), as well as Mine Clearance Companies, to better align with their Army counterparts. This equipment is needed within the ARNG in order to provide the ARNG, in support of the US Army, with needed area clearance capabilities. Like the MC-V, the VMMD is "street legal." However, due to its size and low top-end speed, it is transported along public highways on a flat-bed semi-tractor trailer. The ARNG's proposed VMMD fielding locations are presented in **Table 2-3** and shown in **Figures 1-1, 1-2, 1-3, and 1-4**.

This Federal Proposed Action requires analyses of potential impacts as set forth in the NEPA, as amended; CEQ Regulations; 32 CFR Part 651; the 2011 ARNG NEPA Handbook (ARNG 2011); Section 106 of the National Historic Preservation Act (NHPA); *Environmental Protection and Enhancement* (13 December 2007); and various other Federal, State, and Department of Defense (DoD) regulations and Executive Orders (EOs). This Nationwide EA will facilitate the decision-making process regarding the Proposed Action and its alternatives considered by the ARNG.

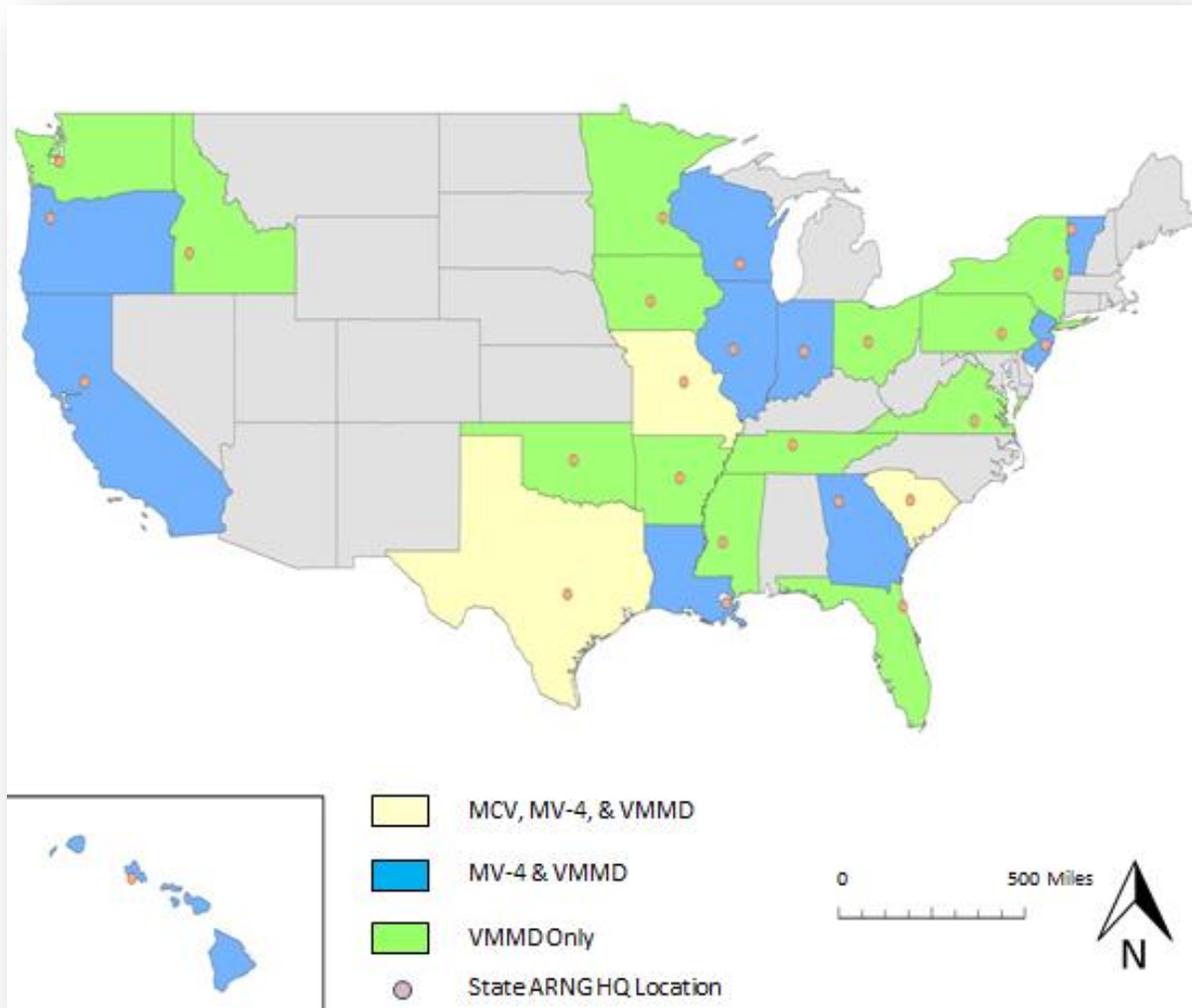


Figure 1-1: State ARNGs Proposed for Equipment Fielding

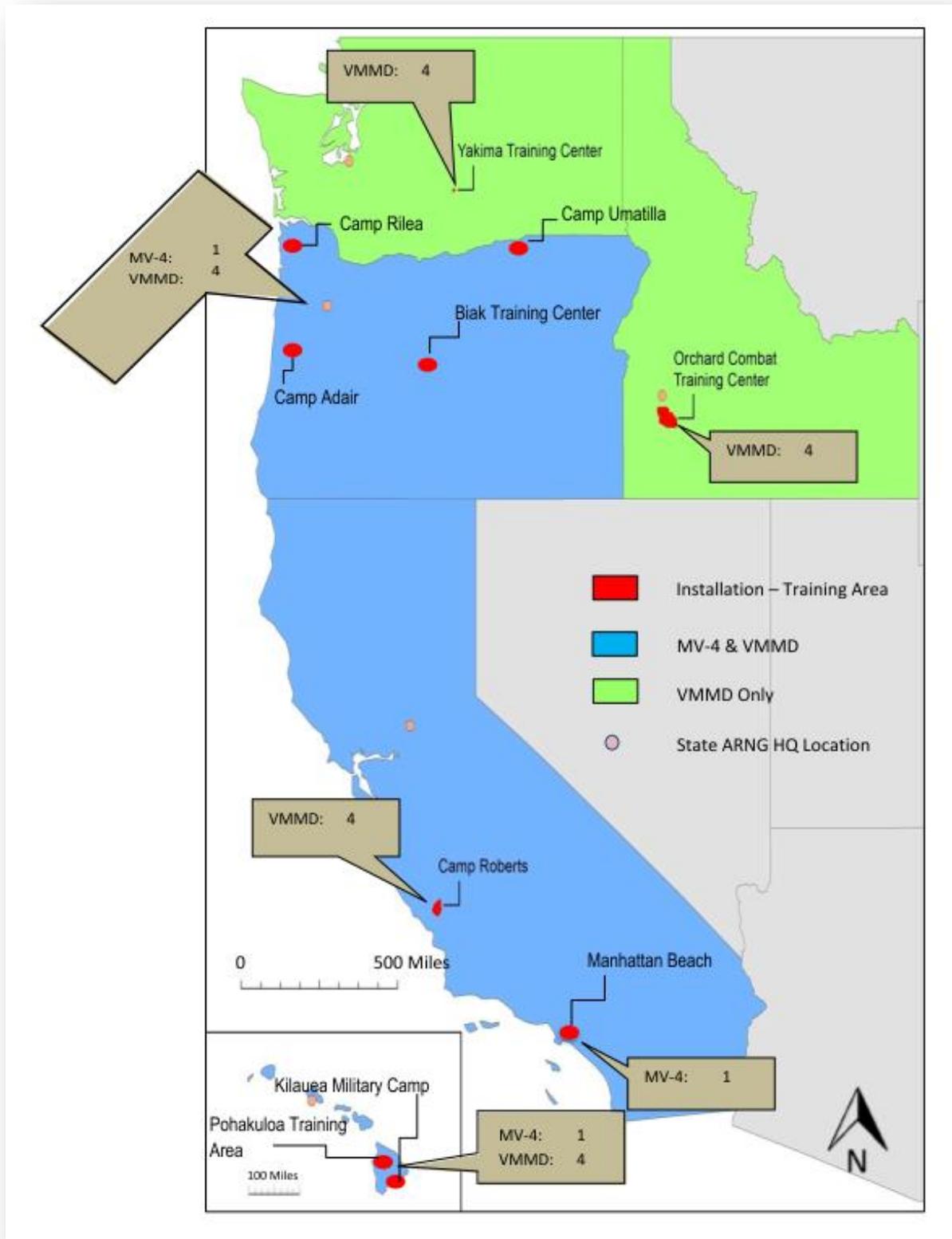


Figure 1-4: Northwest and Pacific State ARNGs Proposed for Equipment Fielding

1.2 Purpose and Need

The ***purpose*** of the Proposed Action is for the ARNG to field the MC-V, MV-4, and VMMD. This fielding would provide the requisite mine detection and clearance training and proficiency for appropriate ARNG units on each piece of equipment. This also would ensure that the ARNG maintains required parallel capabilities to US Army Soldiers, who already train with this equipment, in conducting operations to detect, bypass, breach, mark, report, and eliminate mines or minefields in accordance with Field Manual (FM) 3-34.210¹, *Explosive Hazards Operations* (US Army 2007b).

In accordance with each ARNG unit's MTOEs, METs, and Mission Essential Task Lists (METLs), all ARNG Area Clearance Platoons need to field the MC-V, all ARNG Engineer Battalions need to field the MV-4, and all ARNG Mine Clearance Companies and BEBs (Area Reconnaissance and BCTs) need to field the VMMD. In accordance with Army modularity, this fielding would enable the ARNG to effectively integrate these capabilities within the overall US Army mission.

The ***need*** for the Proposed Action is to ensure the involved ARNG units are able to accomplish the requisite mine detection and clearance training in order to maintain necessary parallel capabilities to US Army Soldiers. This ensures the involved ARNG units' mission readiness and preparedness, as well as ability to support force integration and overall Army modularity in support of Outside the Continental US operations. All of the involved ARNG units have training, staffing, and equipment requirements, called MTOE requirements, which include fielding and training with the MC-V, MV-4, and/or VMMD, as appropriate.

The proposed fielding also ensures that the ARNG provides the equipment necessary to maintain proficiency for its units, attain and maintain full readiness consistent with the Active Duty US Army, and meet mission training objectives. The US Army trains in accordance with the Army Force Generation model, which is the structured progression of increased unit readiness over time, and produces in recurring periods of availability, trained, ready, and cohesive units. These requirements support the prioritization and synchronization of resourcing, equipping, training, sustaining, mobilizing, and deploying cohesive units more effectively and efficiently (US Army 2007a). Mission training objectives are defined in National Guard Regulation 350-1, *Army National Guard Training* (National Guard Bureau [NGB] 2009), which guides the creation of forces trained in the latest technological equipment to continue the Army's ongoing transformation process designed to provide the Nation with combat forces that are more responsive, deployable, agile, versatile, lethal, survivable, and sustainable (NGB 2005).

1.3 Scope of the Nationwide EA

This Nationwide EA evaluates the potential direct, indirect, and cumulative environmental effects of the currently proposed fielding of, and training with, the MC-V, MV-4, and VMMD at 26 ARNG States nationwide (see **Figure 1-1**). Fielding of the MC-V, MV-4 and VMMD would modernize ARNG equipment

¹ FM 3-34.210 provides the US armed forces with the tactical, technical, and procedural guidance and doctrine required to bridge the gap between current force capabilities and the requirement for future forces in implementing appropriate explosive hazard mitigation.

to allow ARNG units to maintain required parallel capabilities to US Army Soldiers in conducting operations to detect, bypass, breach, mark, report, and eliminate mines or minefields in accordance with FM 3-34.210 (US Army 2007b). A detailed description of the Proposed Action is provided in **Section 2.2**. The ARNG developed screening criteria (described in **Section 2.3.1**) to determine appropriate ARNG units, fielding sites, and training sites that would meet the purpose of and need for this fielding and training Proposed Action. A summary of these alternative fielding scenarios and the evaluation process that resulted in the identification of reasonable alternatives is provided in **Section 2.3**.

This Nationwide EA provides a comparative analysis of two alternatives: the Preferred Action Alternative and No Action Alternative. In accordance with CEQ Regulations, the ARNG used internal and external scoping, including coordination with pertinent regulatory agencies, to “identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (40 CFR § 1506.3), narrowing the discussion of these issues in the statement [EA] to a brief presentation of why they will not have a significant effect on the human environment or providing a reference to their coverage elsewhere” (40 CFR § 1501.7(a)(3)). This approach is fully consistent with NEPA and CEQ Regulations.

Through this process, the ARNG determined that the only Technical Resource Areas that required in-depth evaluation within this EA are: *Air Quality; Noise; Water Resources; Biological Resources; Cultural Resources; and Hazardous and Toxic Materials and Wastes (HTMW)*. These Technical Resource Areas are described in **Section 3.0** and evaluated in **Section 4.0**. Technical Resource Areas not expected to experience meaningful effects and, therefore, not evaluated in this Nationwide EA include: *Land Use; Geology, Topography, and Soils; Socioeconomics; Environmental Justice; and Infrastructure*. A brief discussion of these resources is provided in **Section 3.2**.

This Nationwide EA identifies, documents, and evaluates, on a nationwide level, the potential physical, environmental, and cultural effects of fielding the MC-V, MV-4, and VMMD. The Nationwide EA evaluates the Proposed Action’s expected common effects on environmental resources and lays the foundation for subsequent site-specific analyses and decision making by the 26 involved State ARNGs proposed to receive the MC-V, MV-4, and/or VMMD.

For site-specific fielding and training, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR § 1502.20: "Agencies are encouraged to tier their environmental impact statements [or EAs] to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review (§1508.28). Whenever a broad environmental impact statement [or EA] has been prepared (such as a program or policy statement) and a subsequent statement or environmental assessment is then prepared on an action included within the entire program or policy (such as a site specific action), the subsequent statement or environmental assessment need only summarize the issues discussed in the broader statement and incorporate discussions from the broader statement by reference and shall concentrate on the issues specific to the subsequent action."

Although in some instances preparation of a site-specific EA may be necessary, the ARNG anticipates that State ARNGs would find preparation of a REC, including an associated Environmental Checklist, to

be the most appropriate course of action pursuant to 32 CFR Part 651. To ensure proper utilization of this Nationwide EA, and to facilitate compliance with NEPA, CEQ Regulations, and 32 CFR Part 651, an example REC and accompanying Environmental Checklist form are provided at **Appendix C**. If conditions outlined in the Environmental Checklist are met, and if procedures and mitigations are adopted at the installation level, a REC that references this Nationwide EA may be prepared and the Proposed Action may proceed.

As specified under NEPA and CEQ Regulations (40 CFR Parts 1500-1508), a monetary cost-benefit analysis is not required as part of this EA. The Proposed Action and its alternatives have been developed based on military training needs and mission requirements. As such, no quantitative financial assessment has been performed as part of this EA.

1.4 Decision Making

The primary legislation affecting the decision-making process associated with this Proposed Action is NEPA. NEPA requires that Federal agencies consider potential environmental consequences of their proposed actions. The law's intent is to protect, restore, or enhance the environment through well-informed Federal decisions with public input. The CEQ was established under NEPA for the purpose of implementing and overseeing Federal policies as they relate to this process. In 1978, the CEQ issued *Regulations for Implementing the Procedural Provisions of the NEPA* (40 CFR Parts 1500-1508). These regulations specify that an EA be prepared to:

- Briefly provide sufficient analysis and evidence for determining whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FNSI), the latter of which is the “decision document” that closes the NEPA process when no unavoidable significant impacts are identified;
- Aid in an agency's compliance with NEPA when no EIS is necessary; and
- Facilitate preparation of an EIS when one is necessary.

Per amendments to 10 USC 10501, described in DoD Directive 5105.77 (21 May 2008), NGB is a joint activity of the DoD. NGB serves as a channel of communication and funding between the US Army and State National Guard organizations in the 54 ARNG States and Territories. The ARNG is a Directorate within NGB. The ARNG's Installations and Environment Directorate (ARNG-IEZ) is the division within ARNG that is responsible for ARNG environmental matters, including the ARNG's compliance with NEPA. As the ARNG is the Federal decision-maker concerning this Proposed Action and controls the Federal funds that would be used for its implementation, this is a Federal Proposed Action.

1.5 Public and Agency Involvement

The ARNG invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision-making on the Proposed Action is guided by 32 CFR Part 651, the Army's policy for implementing NEPA. Consideration of the views of and information provided by

all interested persons promotes open communication and ultimately facilitates better decision-making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action, including minority, low-income, disadvantaged, and Native American groups, are encouraged to participate. **Section 9** of the EA presents a list of the potentially interested agencies and Federally recognized Tribes invited to consult during preparation of this EA. A record of public involvement, agency coordination, and Native American consultation associated with this EA is included in **Appendices A** and **B**.

1.5.1 Public Review

Public review of the Nationwide EA is another important component of the EA process, and includes regulatory agencies, interested members of the public, and other non-governmental organizations. The ARNG, as the proponent of the Proposed Action, has published and distributed this Final Nationwide EA and the draft FNSI for a 30-day public review and comment period, as announced by a Notice of Availability via a display advertisement published in the *Seattle Times*, *Chicago Tribune*, *New York Daily News*, *Washington Post*, *Atlanta Journal-Constitution*, *Houston Chronicle*, *Minnesota Star Tribune*, and *Honolulu Star Advertiser*. If deemed necessary, the NGB Public Affairs Office will be the primary contact for local news media inquiries. Substantive comments and concerns submitted during the review process will be incorporated and responded to as part of the Final FNSI. However, if the ARNG determines that implementation of the Proposed Action would result in significant impacts, the ARNG will either not implement this action as proposed, will modify the Proposed Action to avoid significant effects, or will publish in the *Federal Register* a Notice of Intent to prepare an EIS.

1.5.2 Agency Coordination

Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) is a Federally mandated process for informing and coordinating with other governmental agencies regarding proposed actions. As detailed in 40 CFR § 1501.4(b), CEQ Regulations require intergovernmental notifications prior to making any detailed statement of environmental impacts. Through the IICEP process, the ARNG notifies relevant Federal, State, and local environmental agencies and allows them sufficient time to make known their environmental concerns specific to a Proposed Action. Comments and concerns submitted by these agencies during the IICEP process are subsequently incorporated into the analysis of potential environmental impacts conducted as part of the NEPA document. This coordination fulfills requirements under EO 12372 (superseded by EO 12416, and subsequently supplemented by EO 13132), which requires Federal agencies to cooperate with and consider State and local views in implementing a Federal proposal.

Agencies consulted during preparation of this Nationwide EA are listed in **Section 9**. Scoping letters, dated 15 March 2016, were distributed by the ARNG to potentially interested agencies. A total of 58 agency responses were received and are included in **Appendix A**. At least one response was received from each of the 26 ARNG States, except for Florida. **Table 1-1** provides an overview of the responses received from each State, organized by Technical Resource Area.

Table 1-1. Comments Received from Federal and State Agencies by Technical Resource Area																											
Technical Resource Area	States																										
	AR	CA	FL	GA	HI	ID	IL	IN	IA	LA	MN	MS	MO	NJ	NY	OH	OK	OR	PA	SC	TN	TX	VT	VA	WA	WI	
Threatened & Endangered Species/ Biological Resources		✓		✓	✓		✓		✓				✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Cultural Resources		✓		✓				✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓		✓	✓	
Air Quality										✓												✓					
Water Resources	✓				✓	✓			✓	✓		✓				✓					✓		✓				
Soils/Sediment/ Erosion				✓		✓		✓	✓	✓										✓		✓					
Hazardous & Toxic Materials/Waste										✓			✓										✓				

Of the 58 responses, 41 of the agencies/entities responded that they had no objection to the Proposed Action and/or concurred that there would be no adverse effect. The US Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS), Washington Department of Fish and Wildlife, and Wisconsin Directorate of Public Works requested a copy of the Nationwide EA; the Final Nationwide EA was mailed to these agencies.

The remaining 14 agencies provided additional information for consideration that should be addressed by each applicable State ARNG within their tiered, site-specific NEPA document (see **Section 1.3**). The majority of these 14 agencies provided comments that pertained to protected species, the spread of invasive species and pests, and historic properties. None of these agencies identified the potential for significant effects; rather, they provided comments for further consideration at the site-specific level.

Agency information and comments provided through this scoping effort have been included or addressed within **Sections 3.7, 3.8, 4.4 and 4.5** of this EA. **Table 1-2** provides a summary of the Federal and State agency responses for each the 26 ARNG States, organized as follows: (1) no objection to the Proposed Action; (2) comments to be addressed in a site-specific, tiered NEPA document; and (3) no response received.

Table 1-2. Nature of Comments Received from Federal and State Agencies			
State	No Objection to the Proposed Action	Comments to be Addressed in Site-Specific Tiered NEPA document	No Response
AR	US Army Corps of Engineers (USACE)		Department of Environmental Quality; US Environmental Protection Agency (EPA); USDA; US Fish and Wildlife Service (USFWS); State Historic Preservation Office (SHPO)
CA		SHPO; USDA APHIS	USDA Natural Resources Conservation Service (NRCS); California EPA; Natural Resources Agency; USACE; EPA
FL			SHPO; Department of Environmental Protection; EPA; Fish and Wildlife Conservation Commission; USACE; USDA NRCS; USFWS
GA	USDA NRCS; SHPO	USFWS	Department of Natural Resources (DNR) (Environmental Protection Division); EPA; USACE; DNR (Non-Game Wildlife & Natural Heritage Section)
HI	Department of Land and Natural Resources		USFWS; EPA; USDA NRCS; USACE; Division of Forestry & Wildlife; SHPO
IA	USDA; DNR; SHPO		USFWS; EPA; USACE
ID	USDA NRCS	USACE	USFWS; SHPO; Idaho Department of Environmental Quality; EPA; Department of Fish and Game
IL	DNR		EPA; USDA; USFWS; SHPO; Illinois EPA; USACE

Table 1-2. Nature of Comments Received from Federal and State Agencies			
State	No Objection to the Proposed Action	Comments to be Addressed in Site-Specific Tiered NEPA document	No Response
IN	SHPO	USDA NRCS	DNR; USFWS; EPA; USACE
LA	USDA NRCS; SHPO	Department of Environmental Quality	USFWS; Department of Wildlife & Fisheries; USACE; EPA
MN	SHPO		Board of Water and Soil Resources; USFWS; USDA; DNR; EPA; USACE
MS	USACE; SHPO		USFWS; Department of Environmental Quality; Department of Wildlife Fisheries and Parks; USDA NRCS; EPA
MO		Department of Conservation; DNR	USFWS; USDA NRCS; SHPO; EPA; USACE
NJ	Department of Environmental Protection (Permit Coordination and Review); SHPO		USFWS; Department of Environmental Protection (Division of Fish & Wildlife); USDA; EPA; USACE
NY	USFWS; SHPO		EPA; USACE; USDA; Department of Environmental Conservation
OH	USFWS; SHPO	DNR	Ohio EPA; USACE; USDA NRCS; EPA
OK	Department of Wildlife Conservation; SHPO		USDA NRCS; USACE; EPA
OR	SHPO; USFWS	E.E. Wilson Wildlife Area	Department of Fish and Wildlife; Department of Environmental Quality; Department of Land Conservation and Development; EPA; USACE
PA	USFWS; SHPO		USACE; EPA; USDA; Department of Environmental Protection; Department of Conservation and Natural Resources; Game Commission
SC	USDA NRCS; USFWS		EPA; SHPO; USACE; Department of Health & Environmental Control;
TN	Department of Environment and Conservation Division of Water Resources; SHPO; USFWS		Department of Environment and Conservation Division of Air Pollution Control; USDA NRCS; USACE; Wildlife Resources Agency; EPA
TX	Park and Wildlife Department; USFWS; SHPO	USDA NRCS; Commission on Environmental Quality	USACE; EPA
VT	USACE; SHPO	Agency of Natural Resources	USDA; Department of Environmental Conservation; EPA; USFWS
VA		USFWS; Department of Game and Inland Fisheries	Department of Forestry; USDA NRCS; USACE; SHPO; EPA
WA	DNR (Natural Heritage Program); SHPO	Department of Fish and Wildlife	State Conservation Commission; USACE; USDA; USFWS; EPA
WI	Fort McCoy; SHPO		DNR; Ashland Fish and Wildlife Conservation Office; USFWS; USACE; EPA; USDA Wildlife Services

1.5.3 Native American Consultation/Coordination

The ARNG is conducting consultation with Federally recognized Native American Tribes as required under Department of Defense Instruction (DoDI) 4710.02, *DoD Interactions with Federally Recognized Tribes* (DoD 2006), which implements the *Annotated DoD American Indian and Alaska Native Policy* (DoD 1999); Army Regulation (AR) 200-1, *Environmental Protection and Enhancement* (US Army 2007a); NEPA; the NHPA; and the Native American Graves Protection and Repatriation Act (NAGPRA). Tribes were invited to participate in the Nationwide EA and NHPA Section 106 processes as Sovereign Nations per EO 13175 (*Consultation and Coordination with Indian Tribal Governments*). A sample of the letter sent to the Tribes and their responses are provided in **Appendix B**. All correspondence was conducted by US Postal Service Priority Mail with tracking service.

Of the 141 Tribes consulted with for the Nationwide EA and identified in **Section 9**, six Tribes provided a response: the Choctaw Nation of Oklahoma, Comanche Nation, Miami Tribe of Oklahoma, Mille Lacs Band of Ojibwe, Santa Ynez Band of Mission Indians, and Winnebago Tribe of Nebraska. The Comanche Nation and Miami Tribe of Oklahoma responded that there would be no historic properties affected and no further consultation was needed regarding the Proposed Action. The Mille Lacs Band of Ojibwe concurred that no historic properties would be affected. However, if human remains or suspected human remains are encountered, the work would cease and the Mille Lacs Band of the Ojibwe would be contacted. The Choctaw Nation of Oklahoma and Santa Ynez Band of Mission Indians requested to be a consulting party and to receive a copy of the EA. The Winnebago Tribe of Nebraska also requested a copy of the EA for their records. However, the Winnebago Tribe of Nebraska concurred that no historic properties would be affected. However, if human remains or cultural artifacts are encountered, the work would cease and the Winnebago Tribe of Nebraska would be contacted. As the Tribes requested, a copy of the Final Nationwide EA was provided to the Choctaw Nation of Oklahoma, Santa Ynez Band of Mission Indians, and Winnebago Tribe of Nebraska.

The ARNG sent a second letter to the six responding Tribes and other 135 Federally recognized Tribes on 7 August 2016, which included a link to the Final EA and Draft FNSI for this Proposed Action. The ARNG requested comments from the Tribes by 6 September 2016. A copy of the ARNG correspondence to the Tribes is included in **Appendix B**. No further comments have been received from any Tribe.

1.6 Related NEPA, Environmental, and Other Documents and Processes

Several documents completed over the past several years provided resource material used in preparing this Nationwide EA. Previously prepared US Army NEPA-compliant documents are listed below; these Army documents are complete and have been publicly circulated.

- US Army, 2016. Final EA and FNSI for the Nationwide Fielding of the Nuclear Biological Chemical Reconnaissance Vehicle (NBCRV) and Mine Protected Clearance Vehicle (MPCV) Buffalo; March 2016.
- US Army, 2013d. Programmatic Environmental, Safety and Occupational Health Evaluation for the M1271 Mine Clearing Vehicle To Support Full Material Release, October 2013.

- US Army, 2014d. Finding of No Significant Impact (FNSI) for the M1271 MC-V, March 2014.
- US Army, 2013b. EA for the M1271 Mine Clearing Vehicle, August 2013.
- US Army, 2011. Programmatic EA for the Vehicle Mounted Mine Detection (VMMD) System V 2.0, April 2011.

Note that the above-referenced documents (included in **Section 6**) are Army publications and not ARNG documents; these NEPA documents address Army Proposed Actions. These documents provide useful information regarding vehicle development, fielding, and training; however, these documents were determined to not sufficiently address potential impacts associated with the ARNG's proposed nationwide fielding of, and training with, the MC-V, MV-4, and VMMD. As such, these documents are not sufficiently applicable from which to tier the analyses of potential impacts associated with this Proposed Action, but are referenced in this Nationwide EA, as applicable.

1.7 Regulatory Framework

This Nationwide EA has been prepared under the provisions of, and in accordance with NEPA (42 USC 4321 *et seq.*), CEQ Regulations, 32 CFR Part 651, and the *Army National Guard NEPA Handbook, Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with the National Environmental Policy Act of 1969* (ARNG 2011). In addition, the US Army operates under numerous regulations and requirements, including AR 350-19 (US Army 2005), as further discussed below.

The effects of range and training use by military vehicles are managed through the US Army's Sustainable Range Program (SRP), which is mandated by AR 350-19, *The Army Sustainable Range Program* (US Army 2005). This regulation establishes the objectives, responsibilities, and policies for the US Army's SRP to achieve optimal and sustainable use of US Army training lands. This comprehensive program requires Army installations to implement a uniform land management regimen, including the integration of training requirements with land carrying capacity, education of land users to minimize adverse impacts, and the provision of required training land rehabilitation and maintenance.



Example of flail deployment on training location.

The SRP's *training constraints* overlay is a tool used to manage training lands and control training area land use. This overlay, provided to each military unit using military training lands, identifies areas off-limits to training and off-limits to vehicle use (US Army 2005). The off-limits areas prohibit Soldier training or vehicle operations, such as operation of the MC-V, MV-4 and VMMD, based on the presence of cultural resources, threatened or endangered species, critical habitat, or training lands in various stages of restoration or re-growth.

Federal, State, and local regulations and requirements, as well as EOs and Army- and ARNG-specific regulations, relevant to Technical Resource Areas of concern for this Proposed Action are presented in **Sections 3.0** and **4.0**, as appropriate. Please refer to those sections for further information.

SECTION 2: Description of the Proposed Action and Alternatives

2.1 Introduction

Implementation of the Proposed Action would consist of fielding of, and training with, new equipment, including the MC-V, MV-4, and VMMD, in 26 ARNG States. The following sections provide a detailed description of the Proposed Action and alternatives considered to meet the purpose of and need for the Proposed Action. Please refer to **Section 1.1** for a brief description of each piece of equipment.

Overall, the ARNG proposes fielding six MC-Vs to three State ARNGs, 18 MV-4s to 13 State ARNGs, and 152 VMMDs to 26 State ARNGs; three State ARNGs (Texas, Missouri, and South Carolina) would receive all three types of equipment. No new construction is proposed. The equipment would be stored at existing, secure storage facilities and would be used for training on existing, approved ARNG and US Army training sites. The equipment would only be used on drill weekends (i.e., Inactive Duty Training, or Inactive Duty Training and during two-week Annual Training events. Training during most drill weekends would only involve preventive maintenance checks and services (PMCS).



Example of heavy duty trailer used to transport vehicles to and from training locations (Rolla Armory, MO).

Generally, the vehicles would only be used in a training capacity two or three times per year. If the vehicles need to be transported from the storage location(s) to the training site(s), they would be transported via a low-boy semi-trailer (shown left) on public roads. The vehicles would only be cleaned at existing wash racks upon returning from training and during inspections.

The Proposed Action would not require construction of new training sites, storage areas, or addition or reduction of personnel. Fielding of the equipment would only occur at pre-approved training sites.

The equipment would be stored at existing Readiness Centers (Armories) or existing training sites in secure, approved, existing parking areas. Maintenance locations of the equipment would be at the nearest Field Maintenance Shop, Unit Training Equipment Site, or Combined Support Maintenance Shop. The locations proposed for equipment fielding are based on specific ARNG units' applicable training, staffing, and equipment requirements, also known as their MTOE requirements.

2.2 Proposed Action

The ARNG proposes to field, equip, and train Soldiers with three types of equipment, the MC-V, MV-4, and VMMD. According to the Army's 2010 Modernization Strategy, route clearance and area clearance vehicles are one of the key materiel programs (US Army 2010). Deployment of the MC-V, MV-4, and VMMD falls under this program. The Basis of Issue², consistent with AR 71-32, *Force Development and Documentation* (US Army 2013a), is the method by which the US Army issues equipment, vehicles, and weapons systems to individuals and units to facilitate accomplishment of mission requirements.

Prior to issuance of the MC-V, MV-4 and VMMD, the Program Manager's Fielding Coordinator for every involved ARNG State unit/installation would conduct site surveys approximately 180 days in advance of equipment arrival to ascertain availability of required storage, maintenance, and training space. Based on site screening criteria, the ARNG anticipates that all involved locations would be able to receive and support these vehicles, as a primary criterion for candidacy was that each location has a mission similar to, and compatible with, these vehicles. However, if additional facilities are needed, each State unit would be responsible for providing "bridge" structures (e.g., temporary maintenance "tents") until more permanent structures can be assessed in a tiered EA or REC and subsequently built. Proposed fielding locations are depicted in **Figures 1-1, 1-2, 1-3, and 1-4** and are described in greater detail below.

The MC-V, MV-4 and VMMD fielding would allow units to properly train and maintain proficiency on assigned METs within established training areas. The equipment would be fielded and operated in accordance with Training Circular 25-8, *Training Ranges* (US Army 2004); National Guard Regulation 350-1, *Army National Guard Training* (NGB 2009); FM 3-34.210 (US Army 2007b); and AR 350-19, *Army Sustainable Range Program* (US Army 2005), and would address training needs not currently met with existing equipment fielded by the ARNG at ARNG facilities.

2.2.1 Proposed Vehicle Fielding

The proposed Basis of Issue for the fielding of the MC-V, MV-4, and VMMD is based on regional training locations at major installations upon release (i.e., provision) of assets by the US Army. This allows flexibility for selective use of vehicle variants for mobilization, new equipment training (NET), and unit sustainment training at the regional ARNG pre-deployment training centers prior to collective training at the larger Combat Training Centers. The Regional Pre-Deployment Training Site training strategy is supported by NET teams and on-site field service representatives.

The equipment would be transported to each receiving location by land via truck transport over public roadways. The Basis of Issue Plan (BOIP) for the MC-V, MV-4, and VMMD is provided in **Tables 2-1, 2-2, and 2-3**, respectively. Locations are shown in **Figures 1-1, 1-2, 1-3, and 1-4**.

² BOIPs are US Army requirements documents. BOIPs support equipment acquisition and materiel development by identifying and documenting both personnel and equipment requirements. They are developed for new or improved items of equipment, describing in detail the item, its capabilities, component items of equipment, where the item is to be used, and the associated support items of equipment and personnel.

Table 2-1. Proposed MC-V Fielding Locations		
Unit Name and Fielding Location	Receiving State ARNG	Quantity
1220 th Area Clearance Platoon McCrary Training Center, Fort Jackson, SC	SC	2
111 th Area Clearance Platoon Camp Bowie, TX	TX	2
335 th Area Clearance Platoon Camp Crowder, MO	MO	2

Table 2-2. Proposed Unmanned MV-4 Fielding Locations		
Unit Name and Fielding Location	Receiving State ARNG	Quantity
156 th Engineer Battalion Camp Bowie, TX	TX*	1
172 nd Engineer Battalion Camp Bowie, TX	TX*	1
111 th Engineer Battalion Camp Bowie, TX	TX*	2
741 st Engineer Battalion Camp Rilea, OR; Camp Umatilla, OR; Biak Training Center, OR; Camp Adair, OR	OR*	1
769 th Engineer Battalion Baton Rouge, LA	LA*	1
173 rd Engineer Battalion Fort McCoy, WI	WI	1
177 th Engineer Battalion Fort Stewart, GA	GA	1
335 th Engineer Battalion Fort Leonard Wood, MO; Camp Crowder, MO	MO	2
766 th Engineer Battalion Marseilles Training Area, IL	IL	1
104 th Engineer Battalion Fort Dix, NJ (including Lakehurst Consolidated Logistics Training Facility)	NJ	1
1220 th Engineer Battalion McCrary Training Center, SC	SC	2
572 nd Engineer Battalion Camp Johnson, Colchester, VT	VT	1
578 th Engineer Battalion Manhattan Beach, CA	CA	1
776 th Engineer Battalion Camp Atterbury, IN	IN	1
227 th Engineer Battalion Kilauea Military Camp, HI; Pohakuloa Training Area, HI	HI	1
* State anticipates fielding equipment in late 2016. Balance of States would field equipment in 2017.		

Table 2-3. Proposed VMMD Fielding Locations		
Unit Name and Fielding Location	Receiving State ARNG	Quantity
1135 th Clearance Company Camp Crowder, MO	MO	12
1221 st Clearance Company McCrary Training Center, SC	SC	12
950 th Clearance Company Fort McCoy, WI	WI	12
454 th Clearance Company Camp Bowie, TX	TX	12
BEB, 1/34 th Area Reconnaissance Camp Ripley, MN	MN	4
BEB, 55/28 th AR Fort Indiantown Gap, PA	PA	4
BEB, 29 th Infantry Brigade Combat Team (IBCT) Kilauea Military Camp, HI; Pohakuloa Training Area, HI	HI	4
BEB, 76 th IBCT Camp Atterbury, IN	IN	4
BEB, 79 th IBCT Camp Roberts, CA	CA	4
BEB, 55/36 th IBCT Camp Bowie, TX	TX	4
BEB, 116 th Armor Brigade Combat Team (ABCT) Orchard Combat Training Center, ID	ID	4
BEB, 81 st ABCT Yakima, WA	WA	4
BEB, 155 th ABCT Camp Shelby, MS	MS	4
BEB, 278 th ABCT Fort Campbell, KY ¹	TN	4
BEB, 48 th IBCT Fort Stewart, GA	GA	4
BEB, 50 th IBCT Fort Dix, NJ	NJ	4
BEB, 33 rd IBCT Marseilles Training Area, IL	IL	4
BEB, 86 th IBCT Colchester, VT	VT	4
BEB, 27 th IBCT Fort Drum, NY	NY	4
BEB, 2/28 th IBCT Fort Indiantown Gap, PA	PA	4
BEB, 45 th IBCT Camp Gruber, OK	OK	4
BEB, 2/34 th IBCT	IA	4

Table 2-3. Proposed VMMD Fielding Locations		
Unit Name and Fielding Location	Receiving State ARNG	Quantity
Camp Dodge, IA		
BEB, 41 st IBCT Camp Rilea, OR	OR	4
BEB, 39 th IBCT Camp Robinson, AR; Fort Chaffee Joint Maneuver Training Center, AR	AR	4
BEB, 53 rd IBCT Camp Blanding, FL	FL	4
BEB, 116 th IBCT Fort Pickett, VA	VA	4
BEB, 37 th IBCT Camp Ravenna, OH	OH	4
BEB, 72/36 th IBCT Camp Bowie, TX	TX	4
BEB, 256 th IBCT Fort Polk, LA	LA	4
BEB, 56/28 th Stryker Brigade Combat Team (SBCT) Fort Indiantown Gap, PA	PA	4
¹ Tennessee's 278th ABCT unit's VMMD vehicles will be fielded to Fort Campbell, KY.		

2.2.2 Proposed Unit and Soldier Training Operations

2.2.2.1 Unit Training

Upon receipt of the new equipment, each unit would have a Material Fielding Team perform joint Technical Inspections on the vehicles and a joint inventory of associated items (i.e., maintenance tools). This “de-processing” would ensure that vehicles are in good working order and all necessary materials for maintenance and training have been provided. The NET for the fielding of the equipment would include Operator New Equipment Training, Field Level Maintenance New Equipment Training, and De-Processing, which would provide training to operators, maintainers, and unit leaders at the unit or designated regional location. The NET would be provided to the receiving units and appropriate Training and Doctrine Command schools and would be taught using the “train the trainer” method of instruction. The NET would include all associated tools, equipment, and Electronic Technical Manuals, used by the operator and maintenance personnel receiving the new equipment. The NET would include tactics, techniques, and procedures instruction by the material developer and proponent school training developer.



Example of existing disturbed terrain at designated training area.

These existing training areas and facilities include appropriate Best Management Practices (BMPs), such as sedimentation ponds, vegetative buffers, and other controls, as well as undergo regular maintenance and repair activities, to ensure environmental effects are minimized and the sites are regularly restored. In addition, for training with the MC-V and MV-4, these sites include sufficient land to accommodate the required 150-yard safe setback distance to protect property and personnel from materials discharged from the flail during training (shown right).

2.2.2.2 Soldier Training

Route Clearance Vehicles consist of a family of mine-protected vehicles employed by combat engineers (military occupational specialty 12 “Bravo”) (US Army 2010). The US Army Engineer School provides specialized unit and individual training, including the Route Reconnaissance and Clearance Course, Explosive Ordnance Clearance Agent Course, and Mine Detection Dog Course (US Army 2014b). Combat Engineer training includes 14 weeks of One Station Unit Training, which includes Basic Combat Training and Advanced Individual Training. Part of this time is spent in the classroom and part in the field with on-the-job instruction. Training includes:

- Mine detection and clearing
- Basic demolitions

Upon completion of NET, the equipment training of involved ARNG units would be accomplished through performance of typical missions at designated training areas (shown left and below). Unit training would occur within existing, established training areas that are capable of supporting and equipped to support these operations.

At involved training installations, existing Dig Sites, Engineer Training Sites, Mechanized Dig Sites, IED Lanes, and improved (tank) trails would be used to train with this equipment.



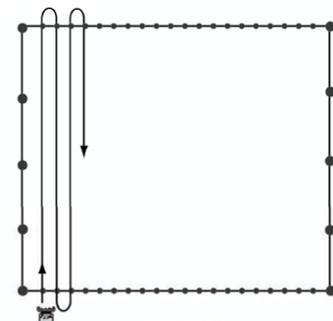
Example of existing disturbed terrain at designated Dig Site.

- Basic explosive hazards
- Operating heavy equipment

In-route mine clearance operations include deployment of mine-protected vehicles such as the Buffalo and Husky. These systems are deployed in route clearance squads with an MMPV serving as a command and control vehicle and providing local security to the squad. The VMMD is employed to detect and mark the mine or IED hazard so that the MPCV can investigate/interrogate the suspicious item with its articulating arm. All three vehicles provide the crew with protection from explosive blasts and small arms fire, and each is designed for rapid repair after an explosive incident (US Army 2010).

The two main vehicles are the MC-V (Medium Flail) and the MV-4 (Mini-Flail). The MC-V neutralizes AP and AT mines by destroying or detonating those with its rotating flail head. The MC-V neutralizes AT and AP mines in large areas and is designed to survive multiple AP and AT mine blasts. The MV-4, a mobile, unmanned, tele-operated flail system, neutralizes AP mines by destroying or detonating them with its rotating flail head. The MV-4 can be tele-operated from within a blast-protected MMPV or from a safe dismounted location. The MV-4 neutralizes AP mines in small areas and along footpaths (US Army 2010).

The number of mine detector operators required varies with the width of the route to be cleared and the sweep width of the detector used to clear it; this number is calculated by dividing the width of the road to be cleared by the sweep width to determine the mine detector operators needed. The sweep team must ensure that redundancy of effort is done by the mine detector operators so no gaps exist in routes with multiple lanes. The clearance phase is the direct application of an asset to remove a specific threat. Mines are cleared by mechanical mine-clearing systems, demolitions, incendiary devices, or manual means. The figure on the right shows an example of a clearance technique (US Army 2007b).



Example of minefield clearance technique.

2.2.3 Proposed Maintenance and Storage

2.2.3.1 Maintenance

The MC-V, MV-4, and VMMD would require before, during, and after operation PMCS, which would consist of weekly operations and scheduled PMCS. This regular maintenance is required in order to maintain the equipment’s readiness and increase the probability of the equipment being fully mission-capable in the least amount of time. All maintenance activities would occur at existing ARNG maintenance facilities using existing personnel. An example ARNG maintenance facility is shown right.



ARNG Maintenance Facility, Camp Crowder, MO.

2.2.3.2 Storage

The ARNG selected fielding locations in part due to the presence of facilities or available space needed to store, maintain, and train with the MC-V, MV-4, and VMMD.

Each vehicle requires approximately 900 square feet for storage. The locations proposed presently contain sufficient, secure vehicle storage areas (shown right); no new storage areas would be required. Some vehicles would also be stored at Readiness Centers (i.e., Armories).



ARNG Storage Compound, Camp Crowder, MO.

2.3 Alternatives Considered

NEPA, CEQ Regulations, and 32 CFR Part 651 requires all reasonable alternatives to be rigorously explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered “reasonable” only if it would enable the ARNG to meet the purpose of and need for the Proposed Action and meet the screening criteria identified below. “Unreasonable” alternatives are those would not enable the ARNG to meet the purpose of and need for the Proposed Action, and not meet the ARNG’s screening criteria.

2.3.1 Alternatives Development – Screening Criteria

The ARNG initially identified several potential alternatives to support equipment fielding and training. ARNG planners developed and applied the following screening criteria to evaluate potential alternatives that would meet the purpose of and need for the proposed fielding of, and training with, the MC-V, MV-4, and VMMD.

To be carried forward for further consideration and analysis, a "reasonable" alternative must meet all of the following specific screening criteria:

1. Ensure all ARNG units with the appropriate training, staffing, and equipment requirements (i.e., MTOE requirements) field and train with this equipment. This includes some States with a local Regional Training Institute to enable NET with this equipment. All States with a heavy engineering unit must field and train with the MC-V.
2. Be fielded to a location(s) within an existing, proximate, and available Active Duty-, Army Reserve-, or ARNG-owned or -controlled facility to avoid land acquisition costs and to permit required training to be conducted completely and effectively.
3. Avoid excessive travel times and costs for ARNG units to be trained.

4. Utilize appropriate, existing storage facilities and training areas (e.g., Engineer Training Sites and driving areas) to minimize land commitment and allow for other required training to occur now and in the future.
5. Minimize potential environmental issues.

After an examination of Active Duty, National Guard, and Army Reserve installations in the US, the ARNG identified 26 ARNG States and training sites, including 48 ARNG units, that met all of the screening criteria needed to provide the required training and training support facilities for the MC-V, MV-4, and/or VMMD, as appropriate.

2.3.2 Alternatives Evaluated

2.3.2.1 Preferred Action Alternative

The Preferred Action Alternative best meets all screening criteria as listed in **Section 2.3.1**. After an examination of all ARNG units MTOEs and Active Duty, National Guard, and Army Reserve installations in the US, the ARNG identified 26 ARNG States (and installations), including 48 ARNG units, that met all of the screening criteria. Critical in this analysis was inclusion of all ARNG units with the appropriate training, staffing, and equipment requirements (i.e., MTOE requirements) that must field and train with this equipment. These ARNG units include Engineer Battalions, Mine Clearance Companies, BCTs, and Area Clearance Platoons. Each unit has access to suitable existing training areas and facilities, maintains sufficient secure storage areas, possesses sufficient extant personnel, and meets other logistical requirements necessary to support the required fielding and training, including vehicle maintenance. The locations identified in **Tables 2-1, 2-2, and 2-3** identify the units, States, installations, and number of pieces of equipment per unit that are proposed under the Preferred Action Alternative. This alternative effectively provides the best combination of ARNG units and fielding locations to establish and sustain quality military training and maintain and improve units' readiness postures nationwide.

2.3.2.2 No Action Alternative

Pursuant to NEPA and CEQ Regulations at 40 CFR § 1502.14(d), the No Action Alternative must be considered to provide a comparative baseline analysis. With selection of the No Action Alternative, the MC-V, MV-4, and VMMD would not be fielded by the ARNG, and operations would continue as currently conducted. Without the MC-V, MV-4, and VMMD, the ARNG would not be able to perform mine detection and clearance operations to current standards and levels of proficiency. The ARNG, unlike the US Army, does not currently possess equipment that performs the functions of the MC-V, MV-4, and VMMD.

The No Action Alternative would limit the capability of the ARNG to safely carry out its assigned mission; the purpose of and need for the Proposed Action would not be met. This would result in the continuation of existing conditions that place the affected ARNG units at risk for not meeting training requirements (per their MTOEs, METs, and METLs) for mine detection and clearance, potentially resulting in an inability to meet proficiency standards and to support the US Army.

2.3.3 Alternatives Eliminated from Further Consideration

Alternatives that are eliminated from detailed analysis must be identified along with a brief discussion of the reasons for eliminating them. For purposes of this analysis, an alternative was considered “unreasonable” if it would not enable the ARNG to meet the purpose of and need for the Proposed Action. The ARNG initially considered the following alternatives: (1) Use Other Existing ARNG Facilities; (2) Establish New Training Sites; and (3) Reduce Scale. These alternatives were eliminated from further consideration because they did not meet one or more of the screening criteria included in **Section 2.3.1**, as summarized in **Table 2-4**, and therefore did not meet the purpose of and need for the Proposed Action. For additional information on eliminated alternatives, please refer to the following sections.

2.3.3.1 Use Other Existing Active Duty, ARNG, or Reserve Facilities

In accordance with US Army planning policy and regulations, the ARNG evaluated other existing Active Duty, National Guard, and Army Reserve installations nationwide to determine their potential suitability for supporting the needs associated with the Proposed Action. The use of other potentially available sites would limit the capability of the ARNG to carry out its assigned mission to provide adequate training, storage, and support facilities and the purpose of and need for the Proposed Action described in **Section 1.0**. Due to scheduling conflicts, distance, and limited available space and facilities, the use of other sites would potentially cause ARNG units to risk not meeting training requirements and to lose valuable training time. Alternatively, this alternative could result in the need to construct and operate new or additional training and support facilities, resulting in additional costs and environmental effects. Therefore, this alternative was eliminated from further consideration because it does not meet screening criteria #2, #3, #4, or #5, as outlined in **Section 2.3.1**.

Table 2-4. Summary of Alternatives Eliminated from Further Consideration						
Alternative Eliminated	Section	Screening Criterion (see Section 2.3.1) that would <u>not</u> be met				
		1	2	3	4	5
Use Other Existing ARNG Facilities	2.3.3.1		✓	✓	✓	✓
Establish New Training Sites	2.3.3.2		✓		✓	✓
Reduced Scale	2.3.3.3	✓		✓		
Screening criteria (per Section 2.3.1):						
<ol style="list-style-type: none"> 1. All ARNG units with the appropriate MTOE requirements must field and train with this equipment. 2. Be fielded to a location(s) within an existing, proximate, and available Active Duty-, Army Reserve-, or ARNG-owned or -controlled facility. 3. Avoid excessive travel times and costs for ARNG units to be trained. 4. Utilize appropriate, existing storage facilities and training areas. 5. Minimize potential environmental issues. 						

2.3.3.2 Establish New Training Sites

The ARNG considered but eliminated this alternative due to the fact that, as a primary component of Base Realignment and Closure, the DoD is eliminating and/or consolidating many installations throughout the US. As sufficient training areas and facilities are available at identified locations to accommodate the Proposed Action, the ARNG determined that, in accordance with DoD directives and vision, establishment of new training sites was neither feasible nor necessary. Further, this alternative does not meet screening criteria #2, #4, or #5, as outlined in **Section 2.3.1**.

2.3.3.3 Reduce Scale

In accordance with Army planning policy and regulations, the ARNG considered and evaluated the potential for a reduced-scale alternative that involved fewer ARNG States, ARNG units, and/or installations. Failure to field the equipment and provide the appropriate training to all ARNG units with the appropriate MTOEs would not meet screening criterion #1 and would not satisfy the purpose of or need for the Proposed Action.

Modern combat is complex and lethal; it demands that Soldiers be capable of performing their missions in any type of battlefield environment. Current doctrine provides Soldiers with guidelines to accomplish their tasks through training, and quality equipment provides the means. Scale reduction is contrary to this doctrine. Quality training and world-class equipment are the most effective means of preparing ARNG units for deployment in a war zone, short of actual combat. Units must include explosive hazard threat scenarios in their training exercises. Basic missions include minefield detection, reduction, marking, proofing, and recording. Live-mine training is conducted by preparing, laying, arming, neutralizing, and disarming live mines (with live fuses and components) in a training environment.

The use of fewer training locations would limit the capability of the ARNG to carry out its assigned mission to provide adequate training facilities and the purpose of and need for the Proposed Action would be compromised. Use of fewer sites would potentially cause ARNG units to risk not meeting training requirements, as well as result in loss of excessive training time during travel to and from appropriate training areas. The reduced-scale alternative does not meet screening criteria #1 or #3 in **Section 2.3.1** and, therefore, was eliminated from further consideration.

2.3.4 Alternatives' Impacts Comparison Matrix

In compliance with 40 CFR § 1502.14, the ARNG has developed an impacts comparison matrix for the Federal decision-maker and public to review the summary of potential effects by Alternative for each Technical Resource Area of concern. **Table 2-5** summarizes the differences in potential environmental effects between the Preferred Action Alternative and No Action Alternative. Please refer to **Section 4.0** of this EA for more in-depth information.

Table 2-5. Summary of Potential Environmental Impacts on Evaluated Technical Resource Areas		
Technical Resource Area	Preferred Action Alternative	No Action Alternative
Air Quality	Short-term, less-than-significant impacts due to the potential for dust generation from training activities within existing training areas. Long-term, less-than-significant impact from increased site emissions. Would be controlled through compliance with applicable, site-specific BMPs.	No impact. Ongoing emissions would continue, which are less than significant and properly controlled through compliance with each installation's specific BMPs (e.g., no idling policy).
Noise	Short-term, less-than-significant adverse impact by increasing the frequency of noise associated with vehicle use during training. Would be controlled through compliance with applicable, site-specific BMPs as set forth in the Installation Operational Noise Management Plan (IONMP).	No impact. Ongoing noise would continue, which is less than significant.
Water Resources	Long-term, less-than-significant adverse impacts to surface waters due to potential soil erosion and sedimentation during training near or across surface waters. Would be controlled through compliance with applicable, site-specific BMPs and National Pollutant Discharge Elimination System (NPDES) permits, including the applicable Erosion and Sedimentation Control Plans (ESCPs) (or equivalent).	No impact. NPDES storm water regulations (implemented through State-issued permits) address construction sites, including perpetual military dig/training sites, over 1 acre in area. Ongoing water resource effects would continue, which are less than significant and properly controlled through each installation's NPDES permit and associated ESCP (or equivalent).
Biological Resources	Long-term, less-than-significant adverse impacts due to noise, dust, and presence of vehicles associated with training operations within existing training areas, which would be minor and consistent with ongoing training events, conducted in accordance with each installation's Integrated Natural Resources Management Plan (INRMP). Would be controlled through compliance with applicable, site-specific BMPs as set forth in each training location's INRMP.	No impact. Ongoing biological resources effects would continue, which are less than significant and properly controlled through compliance with each installation's INRMP.
Cultural Resources	No direct or indirect adverse effect on cultural resources. National Register of Historic Places (NRHP) eligible resources would be avoided within existing training areas; no training would occur within sensitive cultural areas consistent with each training location's Integrated Cultural Resources Management Plan (ICRMP). Would be controlled through compliance with applicable, site-specific BMPs as set forth in each training location's ICRMP.	No impact attributable to new ARNG action. Ongoing cultural resources effects would continue, which are less than significant and properly controlled through compliance with each installation's ICRMP.
HTMW	Long-term, less-than-significant direct impacts due to HTMW use/generation from increased operational activities. Impacts would be controlled through ongoing regulatory compliance and BMPs.	No impact attributable to new ARNG action. Ongoing HTMW issues would continue which are less than significant and properly controlled each installation's Hazardous Waste Management Plan (HWMP) and/or other applicable environmental Standard Operating Procedures (SOPs).

SECTION 3: Affected Environment

3.1 Introduction

Section 3 describes existing physical, environmental, cultural, and socioeconomic conditions at and surrounding the Preferred Action Alternative sites, with emphasis on those Technical Resource Areas potentially affected by the Proposed Action. This section provides information that serves as a baseline from which to identify and evaluate any direct, indirect, or cumulative physical, environmental, cultural, and socioeconomic changes likely to result from the implementation of the Preferred Action Alternative and the No Action Alternative within this Region of Influence (ROI).

For the purposes of this analysis, the Proposed Action's ROI is defined to include areas where the MC-V, MV-4, and VMMD would be stored, maintained, and trained in each of the 26 involved states.

In compliance with the NEPA, CEQ Regulations, and 32 CFR Part 651, the description of the affected environment focuses on those resources and conditions potentially subject to effects. Those resources that are dismissed from detailed analysis are briefly discussed in **Section 3.2**, providing additional detail as to why the resource was not subjected to further analysis. The ARNG, as encouraged by the CEQ Regulations, endeavors to keep NEPA analyses as concise and focused as possible. This is in accordance with CEQ Regulations at 40 CFR § 1500.1(b) and § 1500.4(b): "...NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail....prepare analytic rather than encyclopedic analyses."

3.2 Resources Eliminated From Further Analysis

Table 3-1 presents the Technical Resource Areas that are retained for further analysis in this EA, and those that are eliminated from further analysis. The rationale for dismissing certain Technical Resource Areas is summarized in this subsection. Based on data provided from each State ARNG, the Technical Resource Areas that are relevant to all, or nearly all, locations at which the MC-V, MV-4, and/or VMMD would be fielded include:

- Air Quality
- Noise
- Water Quality/Resources
- Biological Resources
- Cultural Resources
- HTMW.

The Technical Resource Areas that are not carried forward for detailed analysis, including the rationale for their dismissal, are summarized briefly below.

Information was solicited from the 26 State ARNGs where the MC-V, MV-4, and/or VMMD would be fielded. **Table 3-1** summarizes State ARNG input concerning Technical Resource Areas that could experience environmental effects. The Technical Resource Areas addressed in these responses included land use, threatened and endangered (T&E) species, biological resources, cultural resources, noise, air quality, groundwater, surface water, wetlands, sediment/erosion, HTMW, and geology, topography, and soils.

	Table 3-1. Anticipated Environmental Effects to Technical Resource Areas Identified by State ARNGs																			
	FL	GA	IA	ID	IL	IN	MN	MS	MO	NJ	NY	OK	OR	PA	SC	TN	TX	VT	VA	WI
T&E Species / Biological Resources			✓			✓														
Cultural Resources			✓																	
Noise			✓																	
Air Quality				✓	✓	✓			✓		✓	✓		✓		✓				✓
Groundwater																				
Surface Water				✓	✓	✓			✓		✓	✓				✓				✓
Wetland			✓		✓	✓			✓		✓					✓				✓
Sediment / Erosion				✓	✓	✓			✓		✓	✓				✓				✓
HTMW																				
Land Use, Geology, Topography, Soils, Socioeconomics, Infrastructure																				

 = Technical Resource Areas retained for further analysis.

Land Use. Fielding of the MC-V, MV-4, and/or VMMD would not change existing land use within established training locations. Sites initially proposed to receive these vehicles maintain adequate lands and facilities to operate, maintain, and store these vehicles; any proposed changes to facilities or land use would be assessed in a tiered EA or REC/Checklist. Vehicles would not operate outside of existing installations or training areas and would be operated, maintained, and stored in a manner consistent with all applicable land use plans and policies.

Geology, Topography, and Soils. Fielding of the MC-V, MV-4, and/or VMMD would involve surface soil disturbance within established, previously disturbed training areas; however, disturbance would be consistent with ongoing use and training in these locations, as conducted by other military vehicles. No deep excavation or construction is proposed; as such, no impacts to topography or geology would occur. The maximum depth that the flail hammers will penetrate the soil is approximately 13 inches. Potential impacts to soils and consequent soil erosion and sedimentation are discussed in **Section 4.3, Water Resources**.

Socioeconomics/Environmental Justice. Fielding of the MC-V, MV-4, and/or VMMD would have no short-term or long-term economic impacts because there would be no new construction or change in personnel. Similarly, because all elements of the Proposed Action would be implemented at established and active training facilities, there would be no potential for minority or low-income populations to be disproportionately affected by implementation of the Proposed Action.

Infrastructure. Fielding locations of the MC-V, MV-4, and/or VMMD identified in **Tables 2-1, 2-2 and 2-3** contain existing training areas, maintenance facilities, storage facilities, and staffing. These locations would not require changes to existing infrastructure to support the proposed fielding.

Groundwater. Fielding of the MC-V, MV-4, and/or VMMD would have no effects to groundwater, as no new wells, deep excavation, or other potential activities that could affect groundwater are proposed.

3.3 Location Description

The proposed fielding locations identified in **Tables 2-1, 2-2, and 2-3** are established military installations that contain existing facilities and training areas needed to operate, store, and maintain the MC-V, MV-4, and/or VMMD. These installations include Army installations, regional ARNG pre-deployment training centers, and Combat Training Centers which vary in size based upon the operational and training requirements of each location. Many of these installations contain large maneuver areas and provide opportunities to train on multiple mission-essential tasks and wartime missions.

Training areas typically include a system of improved and unimproved roadways (shown on the following page). As previously stated, the MC-V, MV-4, and VMMD vehicles would not be driven over public roads; any transportation between the training site and any offsite location (e.g., maintenance facility) would be conducted using heavy duty trailers.



Example of improved road (tank trail) within an existing training area (Camp Crowder, MO).



Example of unimproved road within an existing training area, adjacent to an Engineer Training Site (Camp Crowder, MO).

3.4 Air Quality

Air quality refers to the amount of air pollution within an area. The Clean Air Act (CAA) regulates air pollution sources, with the objective of protecting and enhancing the quality of the nation's air resources. The CAA, the primary Federal statute regulating air emissions, applies to the ARNG and its activities. The CAA regulates air pollution sources through four primary programs: (1) ambient air quality regulation of new and existing sources through emission limits contained in State implementation plans (SIPs); (2) more stringent control technology and permitting requirements for new sources; (3) regulations addressing specific pollution issues, including hazardous air pollution and visibility impairment; and (4) a comprehensive operating permit program established in the Clean Air Act Amendments of 1990 (CAAA-90), which helps to establish in one place all CAA requirements that apply to a given stationary source of air emissions.

The CAA categorizes regions of the US as non-attainment areas if air quality within those areas does not meet the established ambient air quality levels set by the National Ambient Air Quality Standards (NAAQS). The NAAQS consists of primary and secondary standards for "criteria air pollutants," namely, sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), ozone (O₃), lead (Pb), and particulate matter (PM). Implementation of the CAA's requirements, for the purpose of achieving NAAQS, is achieved primarily through SIPs and various Federal programs. States have the authority to establish emission source requirements to achieve attainment of the NAAQS. The CAA requires states to develop SIPs that establish requirements for the attainment of NAAQS within their geographic areas. SIPs must identify major sources of air pollution, determine the reductions from each source necessary to attain NAAQS, establish source-specific and pollution-specific requirements as necessary for the area, and demonstrate attainment of NAAQS by the applicable deadlines established in the CAA. To be approved as Federally enforceable measures in a SIP, the requirements must be consistent with the CAA. Source emission requirements in SIPs may be established for stationary and mobile sources. If a State fails to

submit a SIP that attains the NAAQS, then the US Environmental Protection Agency (EPA) imposes a Federal implementation plan for that region.

In addition to ambient air standards, the CAA establishes standards and requirements to control other air pollution issues. The other major programs regulating emissions of air pollutants include standards for hazardous air pollutants (HAPs), an acid rain reduction program, and a program to phase out the manufacture and use of ozone-depleting chemicals. The prevention of accidental release and minimization standards including, but not limited to, the substances published under the Emergency Planning and Community Right-to-Know Act of 1986 are also required under the CAA.

The DoD strategy for air quality compliance includes prevention, control, and abatement of air pollution from stationary and mobile sources. The CAAA-90 provides the framework for the majority of air quality regulations and guidelines with which ARNG installations must comply. The CAAA-90 is implemented by detailed Federal, State, and local regulations. The CAAA-90 requirements are incorporated within AR 200-1 (US Army 2007a). The Air Pollution Abatement Program in AR 200-1 includes activities to control emissions and requires cooperation with appropriate regulatory agencies.

The Air Pollution Abatement Program objectives include the following:

- Identify and monitor air pollution sources, determine types and amounts of pollutant emissions, and control pollutant levels to those specified in the applicable regulations to protect health;
- Procure commercial equipment and vehicles with engines that meet applicable standards and regulations and that do not present a health hazard (exceptions are those vehicles or engines specifically excluded or exempted by EPA regulations or agreements);
- Ensure that each piece of military equipment is designed, operated, and maintained so that it meets applicable regulations;
- Monitor ambient air quality in the vicinity of ARNG activities per applicable regulations; and,
- Cooperate with the EPA and State authorities to achieve the requirements of the CAA and applicable regulations issued according to this act, applicable State and local air pollution regulations, and air pollution control provisions in other Federal and State environmental laws and regulations, including Resource Conservation and Recovery Act (RCRA) of 1976, as amended, the Toxic Substances Control Act of 1976, Comprehensive Environmental Response, Compensation, and Liability Act of 1980, Superfund Amendments and Reauthorization Acts of 1986, and applicable State and local environmental regulations.

The facilities and military installations involved with the proposed MC-V, MV-4, and VMMD fielding are required to comply with AR 200-1 (US Army 2007a) to ensure compliance with the CAA standards and State regulatory requirements.

The ARNG has broad compliance responsibilities under the CAA. The ARNG must comply with all Federal, State, interstate, and local requirements; administrative authorities; and processes and sanctions

in the same manner and to the same extent as any non-governmental entity. This compliance requirement includes reporting, recordkeeping, permitting requirements, and payment of service charges and fees set forth in regulations or statutes. It also includes cooperating with EPA or State inspectors. Federal facilities must comply with the applicable provisions of a valid automobile inspection and maintenance program, although military tactical and combat vehicles, such as the MC-V, MV-4, and VMMD, are exempt.

Installations must consider the effects that planned projects and activities would have on air quality both onsite and offsite. There are two independent legal requirements that address air quality management:

1. NEPA
2. The general conformity provision of the CAA section 176(c), including EPA's implementation of the General Conformity Rule (40 CFR Parts 6, 51, and 93).

Applicability of the two requirements must be considered separately. Exemption from one requirement does not automatically exempt the action from the other requirement, nor does fulfillment of one requirement constitute fulfillment of the other. Although installations should integrate compliance efforts to save time and resources, the two requirements are very different, necessitating separate analyses and documentation.

The NEPA requirement that addresses air quality management is fulfilled through this Nationwide EA. The General Conformity Analysis is addressed below.

3.4.1 General Conformity Analysis

Depending on the action and the air quality conformity attainment status of the installation (or other affected property), an installation might have to complete a separate conformity analysis to ensure that State air quality standards would not be exceeded and that the action would comply fully with the SIP. The proponent compares the emission levels of a Proposed Action to current baseline emissions. Where increases in emission levels exceed thresholds established in the General Conformity Rule, a conformity determination must be prepared. In support of the conformity determination, additional air quality modeling may be required to illustrate the Proposed Action's impacts on air quality in the region (40 CFR Parts 6, 51, and 93).

Federal actions that are exempt from the General Conformity Regulations include actions with emissions clearly at or below *de minimis* levels. Under the existing regulations, *de minimis* emission levels are listed for each criteria pollutant. When the total direct and indirect emissions from the Proposed Action are below the *de minimis* levels, the Proposed Action would not be subject to a conformity determination. *De minimis* levels for emissions resulting from fielding the MC-V, MV-4, and VMMD are listed below:

- CO (from vehicle emissions), SO₂ and NO₂ (all nonattainment & maintenance): 100 tons/year
- PM₁₀ (from dust)
 - Serious nonattainment: 70 tons/year

- Moderate nonattainment and maintenance: 100 tons/year
- PM_{2.5} (Direct emissions, SO₂, nitrogen oxides [NO_x; unless determined not to be a significant precursor], Volatile Organic Compound [VOC], or ammonia [if determined to be significant precursors] all nonattainment & maintenance): 100 tons/year
- Lead (from explosions): 25 tons/year

In order to comply with the General Conformity Rule (40 CFR Part 51, Subpart W) and NEPA (42 USC 4231 *et seq.*), a Record of Non-Applicability (RONA) must be prepared for Federal Actions where proposed emissions are clearly *de minimis* in accordance with the US Army's *General Conformity Under the Clean Air Act – Policy and Guidance* (dated 27 June 1995) and *Technical Guidance for Compliance with the General Conformity Rule* (Webber and Polyak 2013). The RONA documents the ARNG's decision not to prepare a written conformity determination for a Proposed Action and is signed by the proponent and the Environmental Program Manager.

Under NEPA, the impact of air emissions on sensitive members of the population is a special concern. Sensitive receptor groups include children, the elderly, and the acutely and chronically ill. NEPA requires consideration and mitigation of effects of adverse air quality to sensitive receptors, particularly where these groups are concentrated, including residences, schools, playgrounds, daycare centers, convalescent homes, and hospitals.

Under Section 176(c) of the CAA, the ARNG is prohibited from engaging in, supporting, providing assistance for, or approving activities (e.g., issuing a license or permit) that are inconsistent with SIP requirements. Activities must conform to an implementation plan's purpose of "eliminating or reducing the severity and number of violations" of NAAQS and achieving "expeditious attainment" of such standards. Such activities must not cause or contribute to a new violation; increase the frequency or severity of an existing violation; or delay timely attainment of any standard, required interim emission reduction, or other milestone.

3.5 Noise

Noise is unwanted or unwelcome sound usually caused by human activity and added to a natural acoustic setting. It is further defined as sound that disrupts normal activities or that diminishes the quality of the environment. Community response to noise is generally not based on a single event, but on a series of events over time. Factors that have been found to affect the subjective assessment of the daily noise environment include the noise levels of individual events, the number of events per day, and the times of the day at which noise-generating events occur.

Sound is usually measured using the decibel (dB). The descriptor of a 24-hour noise environment is the day-night average sound level (DNL). DNL is an average measure of sound, taking into account the loudness of a sound-producing event, the number of times the event occurs, and the time of day. Night noise is weighed more heavily because it is assumed to be more annoying. The DNL descriptor is accepted by Federal agencies as a standard for estimated impact and establishing guidelines for compatible land use. The use of average noise levels over an extended time period usually does not adequately assess the probability of community noise complaints.

Military noise consists of noise from vehicle, equipment, and tool operations; high-amplitude noise from artillery and armor firing; and noise from small arms firing. Installations have noise reduction and hearing protection programs to reduce the noise impacts on the environment and human health.

AR 200-1 (US Army 2007a) Section 14-4 defines land use compatibility concerning environmental noise for ARNG activities, including use of the land use planning zone contour to predict noise impact levels for operations at large caliber weapon ranges and airfields. Noise-sensitive land uses, such as housing, schools, and medical facilities, are compatible with noise zone I (noise environment of less than 65 DNL), normally not recommended in noise zone II (noise environment of 65-75 DNL), and not recommended in noise zone III (noise environment of greater than 75 DNL). A summary of noise level thresholds for these three noise zones is presented in **Table 3-2**.

Table 3-2. Noise Limits for Land Use Compatibility			
Noise Zone	Population Highly Annoyed	Noise Sensitive Land Use	Small Arms and Transportation Average Daily Sound Level
Zone I	<15%	Acceptable	<65 a-weighted decibel(s) (dBA)
Zone II	15%-39%	Normally Not Recommended	65-75 dBA
Zone III	>39%	Not Recommended	>75 dBA

Reference: AR 200-1, Table 14-1, page 44 (US Army 2007a).

The IONMP, sometimes referred to as a Statewide ONMP, is the primary tool the ARNG uses to analyze noise impacts and land use compatibility. The IONMP includes noise contour footprints associated with operations, taking into account both location and intensity. Management practices are then implemented to isolate and minimize noise based on findings within the IONMP. To the extent feasible, training ranges and other military noise sources tend to be located away from installation boundaries and noise sensitive land uses.

3.6 Water Resources

Water resources considered in ARNG NEPA analysis include surface water and drainage, flood hazards, groundwater, wetlands, and water quality. Surface water resources comprise lakes, rivers, streams, and wetlands and are important for a variety of economic, ecological, recreational, and human health reasons. Groundwater comprises the subsurface hydrologic resources of the physical environment and is an essential resource in many areas; groundwater is commonly used for potable water consumption, agricultural irrigation, and industrial applications. Groundwater properties are often described in terms of depth to aquifer, aquifer or well capacity, and surrounding geologic composition.

The Federal Emergency Management Agency maintains maps of flood inundation zones for development restrictions and insurance requirements. EO 11988, *Floodplain Management*, requires the ARNG to consider alternatives to avoid adverse effects and incompatible developments for any proposed action in

a floodplain or, if avoidance is infeasible, to design or modify the proposed action to minimize potential harm to the floodplain.

Wetlands are defined by the USACE and the EPA as “those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. As defined in 1984, wetlands generally include swamps, marshes, bogs, and similar areas” (33 CFR § 328.3 [b]). Wetlands provide a variety of functions including groundwater recharge and discharge; flood-flow alteration; sediment stabilization; sediment and toxicant retention; nutrient removal and transformation; and support of aquatic and terrestrial diversity and abundance. EO 11990, *Protection of Wetlands*, requires analyses of potential impacts to wetlands related to proposed Federal actions. Wetlands are protected as a subset of the Waters of the US under Section 404 of the Clean Water Act; the USACE requires a permit for any activities affecting wetlands or other Waters of the US, including any filling, dredging, or operational disturbance. DoD Instruction 4715.3, *Natural Resources Conservation Program*, provides guidance concerning how to mitigate or minimize any net loss of both jurisdictional and non-jurisdictional wetlands. Water resources protection measures are often also included as a component of an installation’s INRMP.

Federal NPDES storm water regulations (implemented through State-issued permits) address construction and other ground-disturbing activities that disturb one or more acres of land. Engineer Dig Sites, Equipment Training Areas, and other military training areas that experience regular ground disturbance are regulated as construction sites, and therefore are required to have an NPDES permit. Such permits required development and implementation of a site-specific ESCP, or equivalent, to ensure that ongoing activities do not result in off-site, downstream erosion and sedimentation effects to water resources.

3.7 Biological Resources

Biological resources include native or naturalized plants, fish, wildlife, and the habitats in which they occur. Sensitive biological resources are defined as those plant, fish, and wildlife species and their habitat that are Federally and State-listed as threatened, endangered, of special concern, or candidate. The USFWS identifies and lists Federally protected species and habitats; States also identify and list protected species and habitat. Under Section 7 of the Federal Endangered Species Act (ESA), the ARNG consults with the USFWS or the National Oceanic and Atmospheric Administration – National Marine Fisheries Service (NMFS) on Proposed Actions that may affect Federally listed species.

The ESA of 1973 protects listed species against killing, harming, harassment, or any action that may damage their habitat. Federal candidate species and species of concern are not afforded any protection under the ESA; however, species proposed for listing are afforded some protection under the ESA. In accordance with Section 7(a)(4) of the ESA, Federal agencies must consult with the USFWS or NMFS on a Proposed Action that “is likely to jeopardize the continued existence of any species proposed to be listed under Section 4 or result in the destruction or adverse modification of critical habitat proposed to be designated for such species.” Additionally, some of the installations proposed for this fielding action are

State-owned sites (e.g., Marseilles Training Center, IL); therefore, State ESA and other State environmental laws providing protection to biological resources would apply.

Migratory birds, as listed in 50 CFR § 10.13, are protected by the Migratory Bird Treaty Act (MBTA), as amended, which protects migratory birds from capture, pursuit, hunting, or removal from natural habitat. Over 800 bird species are currently protected under the MBTA. In 2001, EO 13186, *Responsibilities of Federal Agencies to Protect Migratory Birds*, was issued to ensure that Federal agencies consider environmental effects on migratory bird species and, where feasible, implement policies and programs supporting the conservation and protection of migratory birds. Additionally, bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (BGEPA) (16 USC §668a-d), which prohibits taking or harming bald or golden eagles, their eggs, nests, or young without having the applicable permit in place.

Sensitive habitats include those areas designated by the USFWS and NMFS as critical habitat, which is protected by the ESA, and areas designated by State or Federal rulings to be sensitive ecological areas. Sensitive habitats also include wetlands, sensitive upland communities, plant communities that are unusual or of limited distribution, and important seasonal use areas for wildlife (e.g., migration routes, breeding areas, feeding/forage areas, crucial summer/winter habitats).

Each installation and facility contains distinct biological resources. The ARNG is required by the ESA to conserve Federally listed T&E species that occur on its lands, and ensure that any action authorized, funded, or carried out by the ARNG does not jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. As of 2015, the ARNG has recorded 63 Federally listed T&E species on 128 installations. Three ARNG installations contain critical habitat for, and are recorded to support, Federally listed species. These installations are: Camp Navajo in Arizona, Kekaha Weekend Training Site in Hawaii and the Santa Cruz Armory in California (Jay Rubinoff, *Personal Correspondence*, 2016). None of the installations containing federally designated habitat are included in the Proposed Action.

Table 3-3 provides a summary of the Federally listed species that are known to occur at the proposed ARNG fielding locations identified in **Tables 2-1, 2-2, and 2-3**. A total of 29 Federally listed species have been documented at 20 of the 26 proposed ARNG fielding locations; these species include one amphibian, four birds, one crustacean, two fish, two insects, four mammals, three mussels, three reptiles, and 10 plants. In addition, to the Federally listed species protected under the ESA, several of these installations are also known to support bald or golden eagles, protected under the BGEPA, either on or near the installation (Jay Rubinoff, *Personal Correspondence*, 2016).

The ARNG conducted early agency coordination with the USFWS and State fish and wildlife agencies as part of the IICEP process in support of this Nationwide EA. This early coordination was intended to identify potential biological resource concerns associated with the Proposed Action. For more information on agency consultation and responses received, please refer to **Sections 1.5.2 and 4.4** and **Appendix A**.

Invasive and nuisance species may include plants, insects, or animals. Construction sites in particular provide colonizing opportunities for nuisance and invasive species, and long-term maintenance or

ground-disturbing activities, such as that envisioned under the Proposed Action, can perpetuate a disturbance regime that facilitates a continued dispersal mechanism for the spread of these species. To manage these issues, the ARNG develops and implements Integrated Pest Management (IPM) Plans for its installations. The goal of IPM program is to utilize non-chemical procedures to control pests, including both invasive and exotic plant and animal species.

Table 3-3. Federally Listed T&E Species Documented at the Proposed ARNG Fielding Locations

Common Name	Scientific Name	Federal Status	State ARNG Installation
Amphibians			
Striped newt	<i>Notophthalmus perstriatus</i>	C	Camp Blanding (FL)
Birds			
Black-capped vireo	<i>Vireo atricapilla</i>	E	Camp Bowie (TX)
Florida scrub jay	<i>Aphelocoma coerulescens</i>	T	Camp Blanding (FL)
Red-cockaded woodpecker	<i>Picoides borealis</i>	E	Camp Blanding (FL); McCrady Training Center (SC)
Wood stork	<i>Mycteria americana</i>	T	Camp Blanding (FL)
Crustaceans			
Vernal pool fairy shrimp	<i>Branchinecta lynchi</i>	T	Camp Roberts (CA)
Fish			
Roanoke logperch	<i>Percina rex</i>	E	Fort Pickett (VA)
Steelhead	<i>Oncorhynchus mykiss</i>	E	Camp Roberts (CA)
Insects			
American burying beetle	<i>Nicrophorus americanus</i>	E	Fort Chaffee (AR); Camp Gruber (OK)
Oregon silverspot butterfly	<i>Speyeria zerene hippolyta</i>	T	Camp Rilea (OR)
Mammals			
Gray bat	<i>Myotis grisescens</i>	E	Camp Crowder (MO)
Indiana bat	<i>Myotis sodalis</i>	E	Marseilles Training Area (IL); Camp Atterbury (IN)
Northern long-eared bat	<i>Myotis septentrionalis</i>	T	Fort Chaffee (AR); Camp Dodge (IA); Marseilles Training Area (IL); Camp Atterbury (IN); Camp Ripley (MN); Camp Crowder (MO); Camp Ravenna (OH); Camp Gruber (OK); Fort Indiantown Gap (PA); Fort Pickett (VA); and Camp Johnson (VT)
San Joaquin kit fox	<i>Vulpes macrotis mutica</i>	E	Camp Roberts (CA)
Mussels			
Dwarf wedgemussel	<i>Alasmidonta heterodon</i>	E	Fort Pickett (VA)
Rayed bean	<i>Villosa fabalis</i>	E	Camp Atterbury (IN)

Table 3-3. Federally Listed T&E Species Documented at the Proposed ARNG Fielding Locations

Common Name	Scientific Name	Federal Status	State ARNG Installation
Snuffbox mussel	<i>Epioblasma triquetra</i>	E	Camp Atterbury (IN)
Reptiles			
Black pine snake	<i>Pituophis melanoleucus lodingi</i>	T	Camp Shelby (MS)
Gopher tortoise	<i>Gopherus polyphemus</i>	C	Camp Blanding (FL)
		T	Camp Shelby (MS)
Eastern indigo snake	<i>Drymarchon corais couperi</i>	T	Camp Blanding (FL)
Plants			
Chapman's rhododendron	<i>Rhododendron chapmanii</i>	E	Camp Blanding (FL)
<i>Geocarpon</i>	<i>Geocarpon minimum</i>	T	Camp Robinson (AR)
Kincaid's lupine	<i>Lupinus sulphureus</i> ssp. <i>kincaidii</i>	T	Camp Adair (OR)
Louisiana quillwort	<i>Isoetes louisianensis</i>	E	Camp Shelby (MS)
Michaux's sumac	<i>Rhus michauxii</i>	E	Fort Pickett (VA)
Nelson's checker-mallow	<i>Sidalcea nelsoniana</i>	T	Camp Adair (OR)
Purple amole	<i>Chlorogalum purpureum</i>	T	Camp Roberts (CA)
Rough-leaved loosestrife	<i>Lysimachia asperulaefolia</i>	E	McCrary Training Center (SC)
Slickspot peppergrass	<i>Lepidium papilliferum</i>	PE	Orchard Training Site (ID)
Smooth coneflower	<i>Echinacea laevigata</i>	E	McCrary Training Center (SC)
FEDERAL STATUS E = Endangered = In danger of extinction throughout range. T = Threatened = Likely to become endangered in foreseeable future throughout range. PE = Proposed Endangered = Any species of fish, wildlife, or plant that is proposed in the <i>Federal Register</i> to be listed as endangered under the ESA. C = Candidate = In process for listing or recommended for listing, but currently not formally proposed.			
Reference: Jay Rubinoff, <i>Personal Correspondence</i> , 2016			

Each installation's IPM Plan includes pest identification and management requirements, outlines the resources necessary for surveillance and control of such species, and describes the administrative, safety, and environmental requirements of the program. This plan serves as a tool to reduce pesticide use, enhance environmental protection, and maximize the use of IPM techniques safely. It is the policy of the ARNG to minimize the use of all pesticides, including herbicides, at their facilities and on their training lands.

Due to their importance and sensitivity, as well as to comply with applicable regulations, habitat of protected species is avoided and/or impacts are minimized to the extent practical. Management and conservation of these species and their habitat is accomplished through an installation's Biological Opinion and/or implementation of an installation's Endangered Species Management Component of the INRMP, which is required for installations with significant natural resources (US Army 2007a). The INRMP supports the SRP and Installation Training Area Management (ITAM) program, which are mandated to sustain ARNG training and maneuver areas (US Army 2005). These programs implement the

conservation measures directly tied to training to avoid or minimize impacts on protected species, their habitat, and other sensitive biological resources to ensure compliance with the ESA and other applicable regulations, as well as to promote mission sustainability.

3.8 Cultural Resources

NEPA requires consideration of “important historic, cultural, and natural aspects of our national heritage,” yet no specific definition for these terms has been provided. Therefore, for the purposes of this EA and based on statutory requirements, the term “cultural resource” includes historic properties, as defined in the NHPA; cultural items, as defined in the NAGPRA; archaeological resources, as defined in the Archaeological Resources Protection Act (ARPA); historic and paleontological resources, as defined by the Antiquities Act; sites that are scientifically significant, as defined by the Archaeological and Historic Preservation Act (AHPA); sacred sites, as defined in EO 13007, *Indian Sacred Sites*, 24 May 1996, to which access and use is provided under the American Indian Religious Freedom Act (AIRFA); and collections, as defined in 36 CFR Part 79 (*Curation of Federally Owned and Administered Collections*).

The NHPA of 1966, as amended (Public Law [PL] 89-665; 16 USC 470), establishes the policy of the Federal government to provide leadership in the preservation of historic properties and administer Federally owned or controlled historic properties. Section 106 of the NHPA requires Federal agencies to consider the effect an undertaking may have on historic properties; its implementing regulations, 36 CFR Part 800, describe the procedures for identifying and evaluating historic properties; assessing the effects of Federal actions on historic properties; and consulting with the SHPO to avoid, reduce, or minimize adverse effects. The Section 106 process requires each undertaking to define an Area of Potential Effect (APE). An APE is “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any properties exist...[and the APE] is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking” (36 CFR § 800.16[d]). The Proposed Action is an undertaking as defined by 36 CFR § 800.3, and as such, must be evaluated under Section 106 of the NHPA.

The APE for the Proposed Action generally includes the entire boundary of the potential fielding sites. While activities within these areas may be seen from adjacent areas (i.e., the viewshed APE), these ongoing activities comply with the installation’s ICRMP and have been determined to have no effect on historic properties. As such, the APE is limited to those proposed fielding sites, in practice and analysis.

Consideration of cultural resources under NEPA at each installation includes the necessity to independently comply with the applicable procedures and requirements of other Federal and State laws, regulations, EOs, presidential memoranda, and ARNG guidance. Installations with historic or cultural resources operate under an ICRMP, a five-year plan for compliance with requirements of AR 200-1 (US Army 2007a). AR 200-1 addresses ARNG compliance with the NHPA, NAGPRA, AIRFA, ARPA, AHPA and other Federal and State regulations. The ICRMP is an internal ARNG compliance and management plan that integrates the entire installation’s cultural resources management program with ongoing mission activities. AR 200-1 requires that “installations make informed decisions regarding the cultural resources under their control in compliance with public laws, in support of the military mission, and consistent with sound principles of cultural resources management.”

ICRMPs are typically prepared in consultation with the SHPO and all Federally recognized Tribes within the vicinity of the installation. These documents provide detailed guidelines and procedures to enable the ARNG to meet their legal responsibilities for the identification, evaluation, and treatment of cultural resources under their jurisdiction in accordance with applicable Federal and State regulations. ICRMPs contain summaries of previous cultural resource studies for each installation, a detailed cultural resource management strategy, an inadvertent discovery response plan, and SOPs in relation to cultural resources.

The ARNG conducted early agency consultation with the SHPO in each of the involved 26 ARNG States as part of the IICEP process in support of this Nationwide EA. This early coordination was intended to identify potential cultural resources-related concerns, or lack thereof, associated with the Proposed Action. In addition, Native American Tribes were invited to participate in the Nationwide EA and NHPA Section 106 processes as Sovereign Nations per EO 13175. For more information on agency and Tribal consultation and responses received, please refer to **Sections 1.5.2, 1.5.3, and 4.5** and **Appendix A**.

3.9 Hazardous and Toxic Materials/Waste

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (through either physical or chemical reactions) to human health or the environment. Regulated hazardous substances are identified by the Occupational Safety and Health Administration (OSHA) through a number of Federal laws and regulations. The most comprehensive list is contained in 40 CFR Part 302, and identifies quantities of these substances that, when released to the environment, require notification to a Federal government agency. Hazardous wastes, defined in 40 CFR § 261.3, are generally discarded materials (solids or liquids) not otherwise excluded by 40 CFR § 261.4 that exhibit a hazardous characteristic (i.e., ignitable, corrosive, reactive, or toxic), or are specifically identified within 40 CFR Part 261. Petroleum products are specifically exempted from 40 CFR Part 302, but some are also generally considered hazardous substances due to their physical characteristics (especially fuel products), and their ability to impair natural resources.

The RCRA and State regulatory agencies identify which waste is considered hazardous, and regulates the generation, storage, treatment, and disposal of such waste. ARNG activities must comply with Federal, State, and local hazardous material and waste regulations and laws. For military vehicles, this primarily relates to the storage and management of hazardous material, such as Petroleum, Oil, and Lubricants (POL) products and waste oil. These materials, when not properly transported or stored, could cause adverse effects on human health and the environment. The ARNG must comply with Federal regulations (40 CFR Part 279) for the management of used oil and used oil filters.

Hazardous wastes shall not be disposed of in drains, dumpsters, training areas, wash racks, oil-water separators, or landfills. Hazardous wastes must be disposed in coordination with the Installation's Environmental Division and, in most cases, the Defense Logistics Agency Disposition Services. Hazardous wastes are typically brought from designated satellite accumulation points to a designated central accumulation point, for appropriate disposal.

SECTION 4: Environmental Consequences

This section describes the potential direct, indirect, and cumulative effects of implementing the Proposed Action (Preferred Action Alternative) and the No Action Alternative, as well as BMPs that would avoid or minimize adverse impacts. BMPs are considered integral to project implementation and are part of the Proposed Action. Implementation of the Proposed Action includes use of the MC-V, MV-4, and VMMD in unit and Soldier training, as well as routine maintenance and storage.

As described in **Section 1.3, Scope of the Nationwide EA**, this Nationwide EA evaluates the fielding of the MC-V, MV-4, and VMMD and assesses the potential impacts common to all 34 ARNG unit locations among the 26 States where proposed activities would occur.

Enviro Tracking #:	ARNG ENVIRONMENTAL CHECKLIST	State ARNG
Enter information in the yellow shaded areas.		
PART A - PROJECT INFORMATION		
1. PROJECT NAME:		
2. PROJECT NUMBER (MILCON if applicable)	3. DATE PREPARED:	
4. DESCRIPTION AND LOCATION OF THE PROJECT/PROPOSED ACTION:		
a. Location (include a detailed map, if applicable):		
b. Description:		
c. The proposed action will involve (check all that apply):		
<input type="checkbox"/> Training activities/areas <input type="checkbox"/> Construction <input type="checkbox"/> Natural resource management <input type="checkbox"/> Maintenance/repair/rehabilitation <input type="checkbox"/> Real estate action <input type="checkbox"/> Environmental plans/surveys <input type="checkbox"/> Innovative readiness training project <input type="checkbox"/> Other (Specify):		
d. Project size (acres): Acres of new surface disturbance (proposed) (if applicable) (if applicable)		
5. START DATE OF PROPOSED ACTION (dd-mm-yy): Note: This must be a future date		
6. PROGRAMMED FISCAL YEAR (if applicable):		
7. END DATE (if applicable):		
PART B - DECISION ANALYSIS GUIDE		
To use a categorical exclusion, the project must satisfy the following three screening criteria: no segmentation, no exceptional circumstances and a qualifying categorical exclusion that covers the project. The following decision tree will guide the application and documentation of these three screening criteria. The criteria were extracted from 32 CFR Section 651.29 and represent the most common screening conditions experienced in the ARNG. NOTE: Each question in Part B must have an applicable block checked for concurrence with REC.		
1. Is this action segmented (the scope of the action must include the consideration of connected, cumulative, and similar actions)?		
<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #2)		
2. Is there reasonable likelihood of significant environmental effects (direct, indirect and cumulative)? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.		
<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #3)		
3. Is there a reasonable likelihood of significant effects on public health, safety or the environment? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.		
<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #3)		
4. Is there an imposition of uncertain or unique environmental risks? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.		
<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #3)		
5. Is the project of greater scope or size than is normal for the category of action? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.		
<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #6)		
6. Does the project introduce or employ unproven technology? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.		
<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #7)		

ARNG Checklist FEB 12 Previous Editions Are Obsolete After DEC 12 Page 1

Sample ARNG Environmental Checklist Form.

It is also the intent of this Nationwide EA to facilitate future, site-specific analyses of impacts through the tiering process. As described in **Section 1.1**, tiering is the process of conducting multiple levels of environmental review. In this case, general impacts associated with the proposed fielding of these vehicles are addressed within this Nationwide EA. Subsequent smaller scale, site-specific NEPA documents that build off of this analysis may later be developed by installation personnel to address site-specific actions. These subsequent documents will incorporate this Nationwide EA by reference.

Subsequent tiered NEPA documentation will likely consist of a completed ARNG REC Form, also known as "REC and Checklist" (an example is shown here to the left and is provided in **Appendix C**). Alternatively, installation personnel may develop a tiered EA that incorporates the discussions in this Nationwide EA but concentrates on site-specific issues and resources

that may experience significant effects not addressed specifically within this Nationwide EA. Developing a tiered EA rather than completing a REC form depends on the specific potential resource impacts at each installation. Any subsequent analyses to be prepared for site- and project-specific fielding (e.g., air conformity analysis and associated RONA) are described in this EA.

As described previously in **Section 2.2.1**, proposed storage, maintenance, and training would occur within existing facilities and established training areas. These ARNG facilities have previously been evaluated with regard to the environmental impacts of their operations, and have plans in place (e.g., ICRMPs, IONMPs, INRMPs, Storm Water Pollution Prevention Plans [SWPPPs], etc.) that ensure environmental stewardship is a priority on par with achievement of the military mission.

Table 3-1 lists potential environmental effects identified by State ARNGs (installations). Table 4-1 identifies existing installation-specific management plans that are in-place to address these potential effects. These plans are used in this analysis, and are cited throughout this Section. These plans would also be cited by installation personnel when preparing subsequent tiered NEPA documentation.

Table 4-1. Summary of Site-Specific Requirements and Plans that Support Environmental Goals		
State	Site	Document(s)/Statement(s) Received
AR	Camp Robinson	<ul style="list-style-type: none"> Unreceived
	Fort Chaffee Joint Maneuver Training Center	<ul style="list-style-type: none"> Unreceived
CA	Camp Roberts	<ul style="list-style-type: none"> Unreceived
	Manhattan Beach	<ul style="list-style-type: none"> Unreceived
FL	Camp Blanding	<ul style="list-style-type: none"> Camp Blanding ICRMP, April 2012 FLARNG IONMP, February 2012 Camp Blanding INRMP, December 2014
GA	Fort Stewart	<ul style="list-style-type: none"> Unreceived
HI	Kilauea Military Camp	<ul style="list-style-type: none"> Unreceived
	Pohakuloa Training Area	<ul style="list-style-type: none"> Unreceived
IA	Camp Dodge	<ul style="list-style-type: none"> Iowa National Guard Regulation (INGR) 1-1, Camp Dodge Joint Maneuver Training Center, Camp Dodge Range and Training Area Regulation, February 2010 Camp Dodge ICRMP, October 2012 Camp Dodge INRMP, February 2014
ID	Orchard Combat Training Center	<ul style="list-style-type: none"> IDARNG ICRMP, 2013 IDARNG INRMP, January 2013
IL	Marseilles Training Area	<ul style="list-style-type: none"> ILARNG ICRMP, July 2011 ILARNG Operational Noise Consultation, Marseilles Training Area, April 2010
IN	Camp Atterbury	<ul style="list-style-type: none"> Environmental Awareness (information for units using training site)
KY	Fort Campbell	<ul style="list-style-type: none"> Unreceived
LA	Baton Rouge	<ul style="list-style-type: none"> Unreceived
	Fort Polk	<ul style="list-style-type: none"> Unreceived
MN	Camp Ripley	<ul style="list-style-type: none"> Conservation Program Report, 2014
MS	Camp Shelby	<ul style="list-style-type: none"> Camp Shelby Joint Forces Training Center Regulations, Annex C – Range Regulations MSARNG ICRMP, September 2011 MSARNG IONMP, September 2012 Camp Shelby Joint Forces Training Center INRMP, April 2014
MO	Camp Crowder	<ul style="list-style-type: none"> Camp Crowder INRMP, September 2009
	Fort Leonard Wood	<ul style="list-style-type: none"> Fort Leonard Wood SWPPP, September 2013

Table 4-1. Summary of Site-Specific Requirements and Plans that Support Environmental Goals		
State	Site	Document(s)/Statement(s) Received
NJ	Fort Dix (including Lakehurst Consolidated Logistics Training Facility)	<ul style="list-style-type: none"> Unreceived
NY	Fort Drum	<ul style="list-style-type: none"> Unreceived
OH	Camp Ravenna	<ul style="list-style-type: none"> Unreceived
OK	Camp Gruber	<ul style="list-style-type: none"> Environmental Management SOPs
OR	Camp Rilea	<ul style="list-style-type: none"> State-Wide IONMP, 2010
	Camp Umatilla	<ul style="list-style-type: none"> Unreceived
	Biak Training Center	<ul style="list-style-type: none"> INRMP and EA, 2001
	Camp Adair	<ul style="list-style-type: none"> INRMP and EA, 2011
PA	Fort Indiantown Gap	<ul style="list-style-type: none"> PAARNG ICRMP PAARNG ONMP, 2012 Fort Indiantown Gap INRMP, November 2015
SC	McCrary Training Center, Fort Jackson	<ul style="list-style-type: none"> INRMP, 2015 ICRMP, 2015 IONMP, 2009 SWPPP, 2015
TX	Camp Bowie	<ul style="list-style-type: none"> TXARNH ICRMP TXARNG ONMP, September 2014 Camp Bowie INRMP, February 2010
VA	Fort Pickett	<ul style="list-style-type: none"> Camp Pickett Draft INRMP
VT	Fort Johnson, Colchester	<ul style="list-style-type: none"> Unreceived
WA	Yakima	<ul style="list-style-type: none"> Unreceived
WI	Fort McCoy	<ul style="list-style-type: none"> Unreceived

4.1 Air Quality

4.1.1 Effects of the Preferred Action Alternative

4.1.1.1 Unit and Soldier Training Operations

As shown on **Table 3-1**, nine State ARNGs identified air quality as a Technical Resource Area of concern. Potential effects on air quality resulting from implementation of the Proposed Action would primarily be a result of engine combustion emissions from vehicles and dust generation from vehicle training. Combustion emissions resulting from training activities would be considered mobile sources and would produce localized short-term elevated air pollutant concentrations that would not result in any significant impacts on regional air quality. The MC-V, MV-4, and VMMD meet the EPA definition of a combat vehicle; therefore, as outlined in 40 CFR § 85.1703 and § 89.908, their engines are exempt from both on-highway and non-road diesel engine emission standards. Although exempt, each of the engines is certified to a particular EPA emission standard. **Table 4-2** lists the engine types and emission standards to which these engines have been certified.

Table 4-2. Engine Types Associated with the Proposed Action

Vehicle	Engine	HP
MC-V	Two Diesel Perkins 1006-6TW	180
MV-4	Perkins 1106C-E60 TA, 6-cylinder, in-line, turbo-charged diesel, 4-stroke, direct injection, water cooled	174
VMMD	Mercedes Benz OM 906 LA 6.4L 6-cylinder turbo diesel engine	201

EPA emission standards for heavy-duty Highway compression-Ignition engines (for years after 2007) in grams per brake horse power hour are 0.14 (non-methane hydrocarbons [NMHC]), 2.4 (NMHC + NOx), 0.2 (NOx), 0.01 (PM), 15.5 CO, and 0.5 (idle CO).



The MC-V operates on unpaved trails and established engineer training areas.

Training events using the MC-V, MV-4, and VMMD would occur on a periodic basis and for a limited duration, often in conjunction with the operation of a variety of other heavy vehicles during training activities. Unit and Soldier training operations require the operation of the MC-V, MV-4, and VMMD on unpaved trails and training areas (shown left). These areas include expanses of soil that would become airborne as dust due to the nature of the training. The volume of dust generated would depend on the type of soil, the extent and type of vegetation cover, recent precipitation, and the type of vehicle.

The MC-V would cause disturbance to the soil with its rotating flail head equipped with 72 chains with hammers (shown right). When the arm spins, it whips the heavy-duty chains at 3,500 revolutions per minute that strike the ground to demolish, or even detonate, mines in its path.



The MC-V is equipped with 72 chains with hammers.

Similarly, the MV-4 Light Flail system would also cause disturbance to the soil with its rotating chains. The flail digs into soil to a depth of 9.4 to 12.6 inches, depending on the type of soil. The system can also be fitted with additional attachments such as a tiller, roller, gripper, or blade for a wide range of operations. The tiller serves as a clearing tool for field control or mine clearance. It can clear AP mines laid to a depth of up to 13 inches. The tool is suitable for mine clearance in areas with little or no vegetation.



Husky Vehicle Mounted Mine Detector.

Unlike the MC-V and MV-4 (flailed vehicles), the VMMD's soil disturbance would be minimal due to lack of a flail. The vehicle is equipped with a sensor that is controlled automatically to adjust in various terrains (shown left).

For all three types of vehicles, operators would comply with installation-specific requirements and procedures to minimize the generation of dust. For example, INGR 1-1, *Camp Dodge Ranges and Training Areas Regulation* (INGR 2010), States that "lesser speed limits may be established by Plans and Operations due to dust or other road conditions" and "when conditions

require dust control, Plans and Operations will prescribe methods approved by the Directorate of Installation Management Office - Environmental Branch."

Given the short duration and infrequency of proposed training events, coupled with the geographic separation between training sites proposed (see Figures 1-1, 1-2, 1-3, and 1-4), the Proposed Action would not generate significant adverse effects on regional air quality; effects would be localized, short-term, and focused in training areas that are already exposed to vehicle use, soil disturbance, and fugitive dust emissions.

However, each State ARNG should evaluate the potential, site-specific effects of training with the MC-V, MV-4, and VMMD, as based on the proposed operational use of these vehicles and the local and regional air quality conditions. In particular, installations with air emissions inventories that document pollutant levels approaching current regulatory thresholds would be required to incorporate potential vehicle emissions into their inventory of mobile emissions and monitor the potential effects these vehicles might have on the local airshed. Other BMPs, such as postponing training activities during high wind conditions, would minimize the potential for training to result in adverse offsite air quality impacts (see **Section 4.7**).

Tied NEPA analyses prepared for site- and project-specific fielding would include full compliance with the General Conformity Rule (40 CFR Parts 6, 51, and 93). Installations classified as major sources of air pollutants in NAAQS nonattainment or maintenance areas are regulated by the General Conformity Rule. Installation personnel would perform an air conformity analysis, as required, to ensure that the introduction of additional vehicles and activities associated with those vehicles would not impact conformance to the air quality initiatives established in the applicable SIP. As discussed in **Section 3**, even if the Proposed Action meets the definition of one of the exemptions, or in situations where emissions would not exceed *de minimis* thresholds, the preparation of a RONA is required to reflect a proponent's consideration of the General Conformity Rule's requirements in accordance with the US Army's *General Conformity Under the Clean Air Act – Policy and Guidance* (dated 27 June 1995) and *Technical Guidance for Compliance with the General Conformity Rule* (Webber and Polyak 2013). As such, each installation would be required to complete, at a minimum, a RONA as part of their tiered NEPA documentation.

Army and ARNG installations are required to maintain appropriate programs to ensure and document compliance with local and State air quality requirements. The Air Pollution Abatement Program established in AR 200-1 (US Army 2007a) outlines programs and activities intended to control emissions and ensure cooperation with appropriate regulatory agencies. Site-specific analyses and further coordination with Federal, State, and local regulators may be required at some installations in order to address vehicle emissions and particulate matter. If analyses show that fielding vehicles at a particular location would not violate the CAA or EPA standards, such as NAAQS or the General Conformity Rule, air quality impacts would not trigger the need to prepare detailed quantitative analysis, and a RONA would be sufficient. Based on a preliminary analysis of existing data, it is unlikely that a general conformity determination would be required at any location involved in the Proposed Action.

4.1.1.2 Maintenance and Storage

Maintenance and repair requirements associated with the MC-V, MV-4, and VMMD include the use of POL, cleaning solvents, and adhesives. For example, the Expendable and Durable Item List of the MC-V includes: antifreeze, POL (lubricating oil, grease, and hydraulic fluid), cleaning compound solvent type IV, and sealing compound. Although some of these compounds may emit HAPs and VOCs, MC-V, MV-4, and VMMD maintenance would not require the use of any unique materials; therefore, emissions of criteria pollutants, VOCs, and HAPs would be similar to those that are currently used in existing maintenance areas, and only less-than-significant air quality effects would be anticipated.

4.1.1.3 Conclusion of Effect

Because no additional HAPs and VOCs would be required for the storage and maintenance of the MC-V, MV-4, and VMMD, no impacts on air quality would be anticipated from the storage or maintenance of these vehicles.

Because the VMMD is non-intrusive (e.g., deploys no flails), use of this vehicle would have no additional impact on air quality with respect to fugitive dust generation. Although the MC-V and MV-4, due to their flails, would generate fugitive dust emissions at training locations, the impact to local air quality would be localized, short-term, and focused in training areas that are already exposed to vehicle use, soil disturbance, and fugitive dust emissions.

Overall, fielding of the MC-V, MV-4, and VMMD would have no significant adverse effects on air quality at receiving installations. Training would occur within established training areas that would be operated in a manner consistent with established environmental SOPs (where applicable) that would minimize potential impacts to air quality.

4.1.2 Effects of the No Action Alternative

Under the No Action Alternative, fielding of the MC-V, MV-4, and VMMD would not occur and no additional emissions would be produced at ARNG installations.

4.1.3 Mitigation Measures

None.

4.2 Noise

4.2.1 Effects of the Preferred Action Alternative

4.2.1.1 Unit and Soldier Training Operations

As shown in **Table 3-1**, one ARNG State (IAARNG) identified noise as a Technical Resource Area of concern. Unit and Soldier training operations would occur within the existing boundary of established training areas, generally within Zone II and Zone III noise areas. Training events using the MC-V, MV-4, and VMMD would occur on a periodic basis and for a limited duration, often in conjunction with the operation of a variety of other heavy vehicles during training activities.

Operations at these training areas would be consistent with the IONMP and other applicable SOPs, where applicable, which would establish training periods, limit noise impacts, and maintain land use compatibility. An IONMP includes and depicts noise contour footprints associated with ongoing and forecast operations, taking into account both location and intensity.

For example, the TXARNG IONMP (TXARNG 2014) provides a strategy for noise management at TXARNG facilities, including Camp Bowie. With respect to demolitions at Camp Bowie, according to complaint risk guidelines, there is low risk of noise complaints. The High Complaint Risk area is nearly contained within the training site boundary. The Moderate Complaint Risk areas extend beyond the boundary.

With respect to engine noise, noise from training activities is typically not an issue because noise from the vehicles does not normally exceed background sound levels beyond 500 feet from the source. Additionally, training does not produce sufficient noise to create a Noise Zone that can be shown on a map, so most adjacent land uses are compatible. INGR 1-1 (ING 2010), Section 4-16b, for example, prohibits revving vehicle engines when within 650 feet of the installation boundaries.

Detonations associated with proposed training would be simulated, and would consist of powder-marking objects. Such objects simulate mines or other explosives, mark the strike with a highly visible powder discharge, and do not produce an explosion. As such, explosive noise would not be anticipated.

Based on the above, fielding of the MC-V, MV-4, and VMMD would not substantially change the location or timing of noise-generating events within each installation (i.e., in areas where night-time training does not already occur, the Proposed Action would not introduce new night-time training), Proposed training with these vehicles would generate localized, short-term, less-than-significant noise effects in areas already subject to similar effects. These effects would be controlled through ongoing compliance with existing SOPs included in applicable IONMPs and similar management plans. Overall, Soldier and unit training noise impacts would be less-than-significant.

4.2.1.2 Maintenance and Storage

Maintenance of the MC-V, MV-4, and VMMD would not generate substantial noise. As explained in **Section 2.1.1**, normal PMCS will be conducted within, or in the vicinity of, installation maintenance facilities, which are typically and intentionally located away from noise-sensitive receptors. There would be no noise associated with storing the MC-V, MV-4, and VMMD. Therefore, any increases in noise levels from maintenance and storage would be negligible and impacts would be less-than-significant.

4.2.1.3 Conclusion of Effect

Overall, fielding of the MC-V, MV-4, and VMMD would have no significant adverse effects on the noise environment at receiving installations. Proposed training with these vehicles would generate localized, short-term, less-than-significant noise effects in areas already subject to similar effects. These effects would be controlled through ongoing compliance with existing SOPs included in applicable IONMPs and similar management plans (see **Section 4.7**).

4.2.2 Effects of the No Action Alternative

Implementation of the No Action Alternative would have no effect on the current local noise environments at ARNG installations. Training and operations at ARNG installations would continue under current conditions at current locations and levels.

4.2.3 Mitigation Measures

None.

4.3 Water Resources

4.3.1 Effects of the Preferred Action Alternative

4.3.1.1 Unit and Soldier Training Operations

As shown in **Table 3-1**, eight State ARNGs identified surface water and associated sediment/erosion from proposed training as a Technical Resource Area of concern. Unit and Soldier training operations would require the operation of the MC-V, MV-4, and VMMD along approved routes on installation roads, and within established training areas. Roads and trails used during training can include or cross surface waters; although the majority of operations would occur on established roadways, the potential for local stream channels and banks to be degraded during fording operations could occur due to the size and weight of the vehicles.

Training would occur within designated training areas with existing water resource management measures in place, such as interceptor ditches, sedimentation ponds, and other controls. These measures are part of existing NPDES permits and associated ESCPs, or equivalent plans such as SWPPPs. Such site-specific plans are designed and implemented to ensure offsite erosion and

sedimentation impacts are minimized or avoided. Therefore, operating these vehicles on paved roads, unpaved roads, and in established and designated training areas during training operations would potentially have minimal (and temporary) effects on surface water quality.

Monitoring the condition of training lands, and developing and implementing corrective/restorative actions, is required at ARNG installations (US Army 2005). The SRP and its component ITAM program would require an assessment of site-specific risks from MC-V, MV-4, and VMMD training operations on natural resources, including surface waters. If the MC-V, MV-4, and/or VMMD training operations are determined to result in adverse impacts to water resources within training areas at any fielding location, the SRP and ITAM program would assess the conditions, identify corrective actions, and program/fund/implement restoration, as needed.

In addition, potential water quality impacts could result from releases into groundwater, wetlands, and surface waterways from leaking or spilled fluids (e.g., POLs) from the vehicles during training operations. These effects would be maintained at less-than-significant levels through compliance with applicable Spill Prevention Control and Countermeasures Plans (SPCCPs), SOPs, and management plans.

Ongoing implementation of the above-referenced existing plans would limit potential adverse direct and indirect effects to water resources during training operations, including from soil disturbance, consequent erosion and sedimentation, and potential spills and releases (see **Section 4.7**). These plans are required based on applicable State, Federal, and Army regulations. As such, direct and indirect effects to water resources due to proposed training would be maintained at less-than-significant levels.

4.3.1.2 Maintenance and Storage

Maintenance would occur within existing maintenance facilities and storage would occur within existing and designated vehicle storage areas. As described above for training operations, potential water quality impacts could result from accidental releases of leaking or spilled fluids (e.g., POLs) from existing maintenance and/or storage facilities. In the event of a spill, installation personnel would isolate and clean-up the spill in accordance with established contingency plans and spill response procedures. Implementation of SOPs and BMPs would minimize or eliminate potential adverse effects to water resources from proposed maintenance and storage.

4.3.1.3 Conclusion of Effect

Overall, fielding of the MC-V, MV-4, and VMMD would have no significant adverse effects on water resources at receiving installations. Proposed training with these vehicles would generate localized, short-term, less-than-significant effects in areas already subject to similar effects. These effects would be controlled through ongoing compliance with existing SOPs, the SRP, ESCPs, SWPPPs, SPCCPs, and similar management plans (see **Section 4.7**).

4.3.2 Effects of the No Action Alternative

Under the No Action Alternative, fielding of the MC-V, MV-4, and VMMD would not occur, and there would be no change in current water resources effects at involved installations.

4.3.3 Mitigation Measures

None.

4.4 Biological Resources

4.4.1 Effects of the Preferred Action Alternative

4.4.1.1 Unit and Soldier Training Operations

As shown in **Table 3-1**, two State ARNGs (IAARNG and IDARNG) identified Federally listed species as a Technical Resource Area of concern. In addition, the PAARNG identified species proposed for listing under the ESA with critical habitat potential at Fort Indiantown Gap (PAARNG 2015). Based on the data submitted by the involved State ARNGs, Federally listed species and designated critical habitats identified at the training sites are not anticipated to be affected by the proposed fielding.

MC-V, MV-4, and VMMD training operations would occur on existing training areas that currently support similar heavy vehicles in similar training capacities. Potential indirect impacts would include soil compaction, erosion, and damage to vegetation; however, these impacts would be similar to impacts resulting from existing vehicle use of these training areas. Such effects are currently controlled by existing management plans as discussed in **Section 4.3**.

Proposed use of these training areas would be consistent with operations covered by, and management procedures outlined in, site-specific INRMPs and IPM Plans. Compliance with INRMP and IPM Plan requirements would minimize impacts to natural resources and protected species, as well as migratory birds and species protected under the BGEPA. Furthermore, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR § 1502.20 for site-specific fielding and training. Should any potential site-specific affect to protected species or their habitats be identified, Section 7 consultation with the USFWS would occur prior to implementing the site-specific action. As such, no significant impacts to biological resources would be anticipated.

INRMPs support the SRP and ITAM Programs. These programs fund and execute INRMP-identified conservation and restoration measures, measures that are directly related to training activities. Implementation of these measures avoids or minimizes impacts on protected species and their habitat to ensure compliance with the ESA and promote mission sustainability. Other existing management measures include restrictions on the locations and types of training in sensitive locations or seasons (i.e., nesting or breeding season).

The Proposed Action would be implemented in a manner consistent with each installation's INRMP, IPM Plan, and other natural resources protection and avoidance measures. Consequently, the Proposed Action would result in minimal, if any, effects to biological resources, including vegetation, wildlife, protected species, critical habitat, and sensitive habitat areas.

4.4.1.2 Maintenance and Storage

Maintenance and storage would occur within existing maintenance and storage facilities; therefore, no impacts to biological resources would be anticipated.

4.4.1.3 Conclusion of Effect

Overall, fielding of the MC-V, MV-4, and VMMD would have no significant adverse effects on biological resources at receiving installations. Proposed training with these vehicles would generate localized, short-term, less-than-significant effects in areas already subject to similar effects. These effects would be controlled through ongoing compliance with existing SOPs, the installation INRMP, the installation IPM Plan, the SRP and ITAM programs, and similar management plans (see **Section 4.7**).

4.4.2 Effects of the No Action Alternative

Under the No Action Alternative, fielding of the MC-V, MV-4, and VMMD would not occur. No habitat disturbance or impacts to T&E species beyond that which is currently taking place would occur at the proposed fielding locations.

4.4.3 Mitigation Measures

None.

4.5 Cultural Resources

4.5.1 Effects of the Preferred Action Alternative

4.5.1.1 Native American Consultation

As shown on **Table 3-1**, the IAARNG identified cultural resources as a Technical Resource Area of concern. Native American Consultation (NAC) in support of this Nationwide EA has been initiated by the ARNG in accordance with NEPA, NHPA, NAGPRA, ARPA, and DoDI 4710.02, which implements the *Annotated DoD American Indian and Alaska Native Policy* (dated 27 October 1999); EO 13175, *Consultation and Coordination with Indian Tribal Governments*; and AR 200-1 (US Army 2007a). Potentially affected Federally recognized Tribes have been invited to participate in the Nationwide EA and NHPA Section 106 processes as Sovereign Nations per EO 13175. A sample of the NAC letter sent to the Tribes on 8 January 2016 and copies of responses received are provided in **Appendix B**. All correspondence was conducted by certified mail.

Of the 141 Tribes consulted with for the Nationwide EA and identified in **Section 9**, six Tribes provided a response: the Choctaw Nation of Oklahoma, Comanche Nation, Miami Tribe of Oklahoma, Mille Lacs Band of Ojibwe, Santa Ynez Band of Mission Indians, and Winnebago Tribe of Nebraska. The Comanche Nation and Miami Tribe of Oklahoma responded that there would be no historic properties affected and no further consultation was needed regarding the Proposed Action. The Mille Lacs Band of Ojibwe concurred that no historic properties would be affected. However, if human remains or suspected human remains are encountered, the work would cease and the Mille Lacs Band of the Ojibwe would be contacted. The Choctaw Nation of Oklahoma and Santa Ynez Band of Mission Indians requested to be a consulting party and to receive a copy of the EA. The Winnebago Tribe of Nebraska also requested a copy of the EA for their records. However, the Winnebago Tribe of Nebraska concurred that no historic properties would be affected. However, if human remains or cultural artifacts are encountered, the work would cease and the Winnebago Tribe of Nebraska would be contacted. As the Tribes requested, a copy of the Final Nationwide EA was provided to the Choctaw Nation of Oklahoma, Santa Ynez Band of Mission Indians, and Winnebago Tribe of Nebraska.

The ARNG sent a second letter to the six responding Tribes and other 135 Federally recognized Tribes on 7 August 2016, which included a link to the Final EA and Draft FNSI for this Proposed Action. The ARNG requested comments from the Tribes by 6 September 2016. A copy of the ARNG correspondence to the Tribes is included in **Appendix B**. No further comments have been received from any Tribe.

4.5.1.2 SHPO Consultation

In addition, the ARNG is consulting with pertinent SHPOs associated with this Proposed Action in accordance with Section 106 of the NHPA. As shown in **Appendix B**, the ARNG has determined pursuant to 36 CFR § 800.4(d)(1), based on research conducted pursuant to 36 CFR § 800.4(a) and (b) to identify and evaluate historic properties, that there would be no historic properties affected as a result of the Proposed Action. The ARNG based this determination on the following considerations:

1. No new construction or other alteration to existing structures or the landscape is proposed.
2. Only existing ARNG and Army storage areas, training areas, training rooms, and other logistical support facilities would be used, similar to the manner in which they are currently used. No new construction or building alterations are proposed.
3. For site-specific fielding and training, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR § 1502.20. Should any potential site-specific affect to historic properties protected under Section 106 be identified, further consultation with the SHPO would occur prior to implementing the site-specific action.

As described in **Section 1.5.2**, this consultation resulted in responses from 18 of the 26 SHPOs. Seventeen (17) SHPOs concurred that no historic properties would likely be affected as a result of the Proposed Action (see **Table 1-2**). No response was received from the SHPOs in Arkansas, Florida, Hawaii, Idaho, Illinois, Missouri, South Carolina, and Virginia. Per 36 CFR 800.5(c)(1), the ARNG may proceed with the Proposed Action “after the close of the 30-day review period if the SHPO has agreed

with the finding or has not provided a response.” As such, Section 106 consultation has been fulfilled for these 25 State ARNGs.

The California SHPO, however, requested further site-specific consultation prior to implementing the Proposed Action in California. As described in **Section 1.3**, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR § 1502.20 for site-specific fielding and training. As requested by the California SHPO, the California ARNG would conduct further, site-specific Section 106 consultation as part of their tiered NEPA documentation prior to fielding the MV-4 and VMMD. This would ensure compliance with Section 106 of the NHPA. Therefore, no significant impacts to cultural resources would be anticipated.

4.5.1.3 Unit and Soldier Training Operations

Training operations of the MC-V, MV-4, and VMMD – within the boundaries of well-established training areas – would have no effect on historic and cultural resources. Operations of these vehicles would be consistent with each installation’s ICRMP, which includes measures to avoid and/or minimize impacts to known or potential historic properties. Operation of the MC-V, MV-4, and VMMD vehicles on paved or unpaved roads would not disturb historical or cultural resources. Off-road operations of the MC-V, MV-4, and VMMD would not result in disturbance to archaeological resources; at proposed installations, existing training areas have been used previously by other, heavier tactical vehicles. In the unlikely event areas proposed by use by the MC-V, MV-4, and VMMD have not undergone NHPA review, the ARNG would complete the Section 106 consultation process in accordance with the NHPA before off-road vehicle use would be initiated, and consultation would be documented in a tiered EA or REC and Checklist.

As an example, INGR 1-1 (ING 2010), Section 4-16, *Historical and Archeological and Archeological Sites*, imposes controls to protect such sites (e.g., vehicles are not allowed within 100 meters of a marked historical or archeological site). IARRNG’s ICRMP (IAARNG 2012) contains an Environmental Checklist (ING PAM Form 200-1-1-R) that outlines potential environmental impacts to the site, including the effects to cultural resources. Included in the environmental checklist is a Cultural Resource section, which aids in compliance with the NHPA and other cultural resource laws and regulations.

4.5.1.4 Maintenance and Storage

Maintenance of these vehicles would occur within existing maintenance facilities; therefore, no impacts to cultural resources would be anticipated. Storage would occur within designated vehicle storage areas. No construction, demolition, or renovation of facilities would be required to support implementation of the Proposed Action; therefore, no impacts to historic buildings or structures would be anticipated. Potential effects on historic properties from any required minor facility modifications or construction to accommodate fielded vehicles would be evaluated in a tiered EA or REC and Checklist.

4.5.1.5 Conclusion of Effect

Training would occur within established training areas that would be operated in a manner consistent with the established ICRMP, where applicable, that would avoid potential impacts to cultural resources. With

adherence to the ICRMP and implementation of site-specific measures, as necessary, the Proposed Action is not anticipated to affect cultural resources at receiving installations. As noted above, Section 106 consultation is complete for 25 of the 26 State ARNGs, and further site-specific consultation would be completed by the California ARNG as part of their tiered NEPA documentation prior to implementing the Proposed Action.

4.5.1.6 Effects of the No Action Alternative

Under the No Action Alternative, fielding of the MC-V, MV-4, and VMMD would not occur, and there would be no impacts to cultural resources at ARNG installations as a result of the Proposed Action. Ongoing, proper management of local cultural resources would continue in accordance with the applicable ICRMP.

4.5.2 Mitigation Measures

None.

4.6 Hazardous and Toxic Materials and Wastes

4.6.1 Effects of the Preferred Action Alternative

4.6.1.1 Unit and Soldier Training Operations

As shown on **Table 3-1**, no State ARNG identified HTMW as a Technical Resource Area of concern. This resource area was retained for further analysis due to the potential for HTMW spills and releases associated with the Proposed Action, as well as the potential to increase the generation of hazardous wastes. This potential would be minor.

Hazardous materials associated with the MC-V, MV-4, and VMMD would be either consumed (i.e., diesel fuel), or used within closed systems and changed only during maintenance operations. No hazardous materials or wastes would be generated or released during training operations. In the event of a spill, installation personnel would isolate and clean up spills in accordance with contingency plans and spill response procedures (i.e., the installation's SPCCP).

4.6.1.2 Maintenance and Storage

Regularly scheduled preventive maintenance services associated with the MC-V, MV-4, and/or VMMD would generate hazardous wastes. The principal hazardous wastes would be engine oil and hydraulic fluid, as well as solvents used to clean vehicle parts. Rags are used liberally in maintenance procedures and, upon completion of maintenance activities, spent fluids and rags would be collected and stored for disposal in accordance with regulatory requirements. MC-V, MV-4, and VMMD vehicles use many of the same POL products as other tactical vehicles; therefore, the presence of a limited number of MC-V, MV-4, and VMMD vehicles on an installation would result in a minor, proportional increase in the waste oil generated, petroleum products required to service and maintain the vehicle, and the volume of POL

products, rags, and waste oil an installation would need to manage. This increase would not require an installation to develop new education or environmental compliance programs, but may require an installation to provide either additional storage or facilitate more frequent collection of wastes.

Implementation of existing hazardous waste management requirements, such as consistency with installation HWMP required by AR 200-1 (US Army 2007a) would minimize the potential for adverse impacts associated with generation of additional waste. As a large-quantity generator of used oil, installations must comply with provision of 40 CFR Part 279, *Standards for Management of Used Oil*. This regulation prescribes all aspects of managing waste oil and waste oil filters. SOPs used to control the release of POL products would include using drip pans to prevent fluids from falling on the ground.

4.6.1.3 Conclusion of Effect

MC-V, MV-4, and VMMD vehicles use many of the same POL products as other tactical vehicles; therefore, the presence of a limited number of MC-V, MV-4, and VMMD vehicles on an installation would cause a minor, proportional increase in the waste oil generated, petroleum products required to service and maintain the vehicle, and the volume of POL products, rags, and waste oil an installation has to manage. Implementation of existing hazardous waste management procedures, such as those outlined in existing HWMPs, would reduce the impacts associated with generation of additional waste. Therefore, fielding the MC-V, MV-4, and/or VMMD would result in less-than-significant effects from the storage, transport, and use of hazardous and toxic materials and wastes.

4.6.2 Effects of the No Action Alternative

Implementation of the No Action Alternative would result in no changes to existing HTMW management, generation, or use at the involved installations.

4.6.3 Mitigation Measures

None.

4.7 Summary of Best Management Practices

In accordance with established protocols, procedures, and requirements, the ARNG would implement BMPs and would comply with applicable regulatory requirements relevant to the operation, maintenance, and storage of the MC-V, MV-4, and/or VMMD at receiving installations. Management measures are defined as routine BMPs and/or regulatory compliance measures that the ARNG regularly implements as part of their activities, as appropriate, at each installation. Management measures are described in this EA, and are included as components of the Proposed Action. Mitigation measures are defined as project-specific requirements that are not routinely implemented by the ARNG, but would be necessary to reduce potentially significant adverse environmental impacts to less-than-significant levels. Because the ARNG does not anticipate significant impacts from the Proposed Action (as described in **Sections 4.1** through **4.6** of this EA), no project-specific mitigation measures would be required to reduce impacts to less-than-significant levels.

Air Quality. Vehicle operators would comply with existing installation requirements and procedures to minimize the generation of airborne particulate matter (i.e., fugitive dust), such as obeying speed limits. Project-specific BMPs for dust suppression would be implemented as needed to minimize fugitive dust and may include the following:

- Water spray of vehicle tracks/roads
- Wind breaks
- Palliatives (substances applied to roads/surfaces to minimize dust)
- Mulching
- Stone

The preparation of a RONA is required to reflect a proponent's consideration of the General Conformity Rule's requirements in accordance with the US Army's *General Conformity Under the Clean Air Act – Policy and Guidance* (dated 27 June 1995) and *Technical Guidance for Compliance with the General Conformity Rule* (Webber and Polyak 2013). As such, each installation would complete, at a minimum, a RONA as part of their tiered NEPA documentation.

Noise. Training would occur within established training areas, and would be conducted in a manner consistent with the IONMP, where applicable, which would limit noise impacts and maintain land use compatibility through adherence to installation-specific BMPs.

Water Resources. Vehicle operations would be consistent with operations covered by, and management procedures outlined in, the INRMP and associated ITAM program. Proposed operations of the MC-V, MV-4, and VMMD would be monitored and controlled through the SRP and ITAM programs. These programs assess the conditions, identify corrective actions, and program/fund restoration, as needed. Installation personnel would isolate and clean-up spills in accordance with established contingency plans and spill response procedures (i.e., installation-specific SPCCP).

Biological Resources. Vehicle operations would be consistent with operations covered by, and management procedures outlined in, the relevant, site-specific INRMP. The INRMP supports the SRP and ITAM programs, which fund and execute conservation and restoration measures that can include restrictions on the location and types of training in sensitive locations or seasons (i.e., nesting or breeding season).

Cultural Resources. Vehicle operations would be consistent with the installations' ICRMPs that include SOPs to avoid, minimize, or mitigate impacts on known or potential archaeological sites and historic properties. In the unlikely event that areas proposed for use by the MC-V, MV-4, and VMMD have not previously been inventoried to identify and document cultural resources, appropriate inventory and evaluation would be required before implementation of the Proposed Action.

As requested by the California SHPO, the California ARNG would conduct further, site-specific Section 106 consultation as part of their tiered NEPA documentation prior to fielding the MV-4 and VMMD. This would ensure compliance with Section 106 of the NHPA. **HTMW.** Units would comply with existing

hazardous waste management requirements, such as installation HWMPs prepared under AR 200-1 (US Army 2007a). As a large-quantity generator of used oil, installations must comply with the provision of 40 CFR § 279, Standards for *Management of Used Oil*. Units would implement SOPs to control the release of POL products, such as using drip pans to prevent hazardous waste fluids from falling on the ground.

4.8 Cumulative Effects

4.8.1 Introduction

As defined by CEQ Regulations in 40 CFR § 1508.7, cumulative impacts are those that “result from the incremental impact of the Proposed Action when added to other past, present and reasonably foreseeable future actions, without regard to the agency (Federal or non-Federal) or individual who undertakes such other actions.” The analysis of cumulative impacts captures the effects that result from the Proposed Action(s) in combination with the effects of other actions in the same geographic area.

Impacts on resources from implementation of a Proposed Action may only occur at a cumulative level, such as impacts on air quality, noise, biological resources, cultural resources, utility system capacities, and others. Because this EA comprises a nationwide level of analysis, the ARNG has not identified a specific geographic area to be assessed for cumulative impacts; however, the section below provides a qualitative analysis of potential cumulative effects as a result of the Proposed Action, and why cumulative impacts would not be expected to be significant.

4.8.2 Cumulative Effects of the Proposed Action

The Preferred Action Alternative would result in the impacts identified throughout **Section 4**. As described under air quality, water resources, biological resources, cultural resources, and HTMW in **Section 4**, all impacts identified would be less-than-significant. As described below, the ARNG does not anticipate that the Proposed Action would result in or contribute to significant cumulative impacts at a local, regional, or national level.

Air Quality and Noise. The Preferred Action Alternative would not contribute to significant cumulative impacts to air quality and noise in the vicinity of the involved installations. As the equipment would be fielded to existing military training areas, the Preferred Action Alternative would not substantially change the intensity or type of use at these locations. Air quality emissions, primarily in the form of vehicle exhaust and fugitive dust from earth disturbance, would be short-term and similar to existing training activities. In addition, the State ARNG would continue to work with local government agencies and communities in identifying potential noise and land use incompatibility, and to address possible noise impacts to nearby residences or other sensitive receptors along the installation boundaries as part of the IONMP.

Under Section 176(c)(1) of the Federal CAA, Federal agencies that “engage in, support in any way or provide financial assistance for, license or permit, or approve any activity” must demonstrate that such actions do not interfere with State and local plans to bring an area into attainment with the NAAQS (42 USC § 7506(c)). Emissions under this Proposed Action would be *de minimis*. In order to comply with the

General Conformity Rule (40 CFR Part 51, Subpart W) and NEPA (42 USC 4231 *et seq.*), a RONA must be prepared for Federal Actions where proposed emissions are clearly *de minimis* in accordance with the US Army's *General Conformity Under the Clean Air Act – Policy and Guidance* (dated 27 June 1995) and *Technical Guidance for Compliance with the General Conformity Rule* (Webber and Polyak 2013). Each State ARNG would prepare a RONA for the Proposed Action in their State.

Noise from existing engineer equipment training activity is already a part of the local noise environment. Fielding of the MC-V, MV-4, and/or VMMD would not be anticipated to change the location or timing of noise-generating events within each installation (i.e., in areas where night-time training does not already occur, the Proposed Action would not introduce new night-time training). As such, neither individual nor cumulative effects would be anticipated to be significant.

Water Resources. The Preferred Action Alternative would not contribute to significant cumulative impacts to water resources in the vicinity of the involved installations. Avoidance of waters of the US, adherence to existing permit conditions, and ongoing implementation of standard BMPs, including NPDES permits, ESCPs, SWPPPs, and SPCCPs, for soil erosion, sedimentation, and proper water resources management would protect local and regional water resources. No new or additional individual or cumulative effects would be anticipated.

Biological Resources. The Preferred Action Alternative would not require construction of new facilities, roads, or training areas and would, therefore, not result in conversion of habitat. Training operations would occur within established training areas, which operate in a manner consistent with each installation's INRMP to minimize effects to local biological resources. The noise and vibration associated with NET would be generally consistent with that generated by currently fielded vehicles at the proposed sites. Therefore, the Proposed Action would not contribute to cumulative conversion of habitat within an installation or region. Measures to protect Federally listed T&E species would continue to be implemented, where applicable. Therefore, no significant individual or cumulative effects to biological resources would be anticipated.

Cultural Resources. The Preferred Action Alternative would not require construction of new facilities, roads, or training areas and would, therefore, not result in excavation or conversion of structures that could individually or cumulatively affect cultural resources, either directly or indirectly (e.g., through noise or view shed changes). Training operations would occur within established training areas, which operate in a manner consistent with each installation's existing ICRMP to minimize effects to local cultural resources. No individual or cumulative effects to cultural resources would be anticipated.

HTMW. The ARNG would adhere to regulatory requirements and implement standard BMPs to minimize direct, indirect, individual, and cumulative effects to the environment from accidental releases of HTMW or from disturbing existing HTMW sites of concern. The Proposed Action would not contribute to a significant cumulative increase in HTMW in the areas affected. As such, no individual or cumulative HTMW effects would be anticipated.

No Action Alternative. Under the No Action Alternative, the ARNG would not field the MC-V, MV-4, and VMMD and would continue with training operations as currently conducted. ARNG units would remain as

under current conditions and continue to operate under current, effective environmental management plans, resulting in no ongoing significant cumulative effects.

4.8.3 Inter-relationship of Cumulative Effects

Installations must ensure that Proposed Actions are compatible with the surrounding area and region, including regional needs for land to accommodate an area's increasing population and economic development (i.e., additional industrial uses, businesses, homes, and related services and infrastructure). In combination with military land use requirements, regional development could produce environmental effects. Interrelated cumulative impacts place demands on the local region, planning organizations, and the military's natural resource management, cultural resource management, and public work personnel. Through sound, integrated, long-range planning, these impacts are minimized.

The ARNG does not anticipate that implementation of the Proposed Action would result in significant adverse cumulative impacts to the environment within any region. Close coordination between the ARNG installations and local planning authorities and community representatives would help ameliorate the potential for future land use conflicts. Implementation of land use and resource management plans would serve to control the extent of environmental impacts, and proper planning would ensure that future conditions maintain the quality of life that area residents currently enjoy. Implementation of effective environmental management plans and programs should minimize or eliminate any potential cumulative degradation of the natural ecosystem.

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SECTION 5: Comparison of Alternatives and Conclusions

5.1 Introduction

This Nationwide EA analyzed the potential physical, environmental, and cultural effects of the ARNG's proposal for new equipment fielding of, and training with, three distinct vehicles: MC-V, MV-4, and VMMD at 26 State ARNGs, including 48 ARNG units. The ARNG proposes fielding six MC-Vs to three State ARNGs, 18 MV-4s to 13 State ARNGs, and 152 VMMDs to 26 State ARNGs; three State ARNGs (Texas, Missouri, and South Carolina) would receive all three vehicle types. Two alternatives were considered:

- **Preferred Action Alternative** – Under the Preferred Action Alternative, the MC-V, MV-4, and/or VMMD would be fielded to the identified 26 ARNG States that met all of the screening criteria. The fielding locations identified contain existing training facilities, training areas, storage areas, maintenance facilities, and staffing to support the fielding without alteration. This alternative effectively provides the best combination of fielding locations to establish and sustain quality military training and maintain and improve units' readiness postures nationwide, in accordance with the purpose of and need for the Proposed Action.
- **No Action Alternative** – Under the No Action Alternative, the MC-V, the MV-4, and the VMMD would not be fielded by the ARNG. This alternative would limit the capability of the ARNG to carry out its assigned mission; the purpose of and need for the Proposed Action would not be met. This would result in the continuation of existing conditions that place the affected ARNG units at risk for not meeting training requirements for mine detection and clearance, potentially resulting in an inability to meet proficiency standards and support the Army. However, the No Action Alternative is carried forward in this EA to serve as a comparative baseline, or *status quo*, in accordance with 40 CFR § 1502.14(d).

5.2 Comparison of the Environmental Consequences of the Alternatives

Implementation of the Preferred Action Alternative would result in no significant direct, indirect, or cumulative effects. The No Action Alternative would result in no significant direct, indirect, or cumulative effects. Effects associated with each alternative are presented in **Table 2-5**.

In accordance with established protocols, procedures, and requirements, the ARNG would implement BMPs and would comply with applicable regulatory requirements relevant to the operation, maintenance, and storage of the MC-V, MV-4, and/or VMMD at receiving installations in association with implementation of the Preferred Action Alternative. These BMPs are described in **Section 4.7**.

5.3 Conclusions

This EA's analysis determines, therefore, that an EIS is unnecessary for implementation of the Preferred Action Alternative, and that a FNSI is appropriate. No project-specific NEPA mitigation measures would be necessary to reduce adverse impacts to less-than-significant levels. The ARNG would maintain their

stewardship posture by implementing the BMPs and appropriate Management Plans as discussed in **Section 4.0** for each Technical Resource Area.

For site-specific fielding and training, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR § 1502.20 and would incorporate this Nationwide EA by reference. In most cases, this tiered NEPA document would be a standard ARNG REC/Environmental Checklist. The development of a tiered EA, rather than the completion of a REC/Environmental Checklist, would depend on the degree of specific potential resource impacts at each involved installation. Actions that would not qualify for a REC per the Army's NEPA implementing regulation (32 CFR Part 651) will be evaluated within a tiered EA. Each site-specific ARNG Proposed Action will be evaluated within either a REC/Environmental Checklist or an EA.

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SECTION 7: Glossary

100-Year Flood – A flood event of such magnitude that it occurs, on average, every 100 years; this equates to a one percent chance of its occurring in a given year.

Ambient – The environment as it exists around people, plants, and structures.

Ambient Air Quality Standards – Those standards established according to the CAA to protect health and welfare (AR 200-1).

Aquifer – An underground geological formation containing usable amounts of groundwater which can supply wells and springs.

Archaeological Resource – Any material of human life or activities that is at least 100 years of age and is of archaeological interest (32 CFR § 229.3(a)).

Area of Potential Effect (APE) – The geographical area within which the undertaking may cause changes in the character of or use of historic properties, if any such properties exist. The APE may change according to the regulation under which it is being applied and should be established in coordination with consulting parties.

Asbestos – Incombustible, chemical-resistant, fibrous mineral forms of impure magnesium silicate used for fireproofing, electrical insulation, building materials, brake linings, and chemical filters. Asbestos is a carcinogenic substance.

Attainment Area – Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the CAA.

Bedrock – The solid rock that underlies all soil, sand, clay, gravel and loose material on the earth's surface.

Best Management Practices (BMPs) – Methods, measures, or practices to prevent or reduce the contributions of pollutants to United States waters. Best management practices may be imposed in addition to, or in the absence of, effluent limitations, standards, or prohibitions (AR 200-1).

Collections – Material remains that are excavated or removed during a survey, excavation or other study of a prehistoric or historic resource, and associated records that are prepared or assembled in connection with the survey, excavation or other study. §79.4 provides detailed definitions of the kinds of material remains that fall under the regulation.

Commercial land use – Land use that includes private and public businesses (retail, wholesale, etc.), institutions (schools, churches, etc.), health services (hospitals, clinics, etc.) and military buildings and installations.

Compaction – The packing of soil together into a firmer, denser mass, generally caused by the pressure of great weight.

Contaminants – Any physical, chemical, biological or radiological substances that have an adverse effect on air, water or soil.

Council on Environmental Quality (CEQ) – An Executive Office of the President composed of three members appointed by the President, subject to approval by the Senate. Each member shall be exceptionally qualified to analyze and interpret environmental trends; to appraise programs and activities of the Federal government. Members are to be conscious of and responsive to the scientific, economic, social, aesthetic, and cultural needs of the Nation; and to formulate and recommend national policies to promote the improvement of the quality of the environment.

Criteria Pollutants – The CAA of 1970 required the EPA to set air quality standards for common and widespread pollutants in order to protect human health and welfare. There are six "criteria pollutants": ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), lead (Pb), nitrogen dioxide (NO₂), and particulate matter.

Cultural Items – As defined by NAGPRA, human remains and associated funerary objects, unassociated funerary objects (at one time associated with human remains as part of a death rite or ceremony, but no longer in possession or control of the Federal agency or museum), sacred objects (ceremonial objects needed by traditional Native American religious leaders for practicing traditional Native American religions), or objects of cultural patrimony (having ongoing historical, traditional, or cultural importance central to a federally recognized Tribe or Native Hawaiian organization, rather than property owned by an individual Native American, and which, therefore, cannot be alienated, appropriated, or conveyed by any individual of the Tribe or group).

Cultural Resources – Historic properties as defined by the NHPA; cultural items as defined by NAGPRA; archaeological resources as defined by ARPA; sites and sacred objects to which access is afforded under AIRFA; and collections and associated records as defined in 36 CFR Part 79. Included are: traditional cultural properties and objects; archaeological sites; historic buildings, structures, and districts; and localities with social significance to the human community.

Cumulative Impact – The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from

individually minor but collectively significant actions taking place over a period of time (40 CFR § 1508.7).

dB – “A-weighted” non-impulse noise measurement in decibels, weighted to match human hearing frequency response.

Decibel (dB) – A unit of measurement of sound pressure level.

Direct Impact – A direct impact is caused by a Proposed Action, and occurs at the same time and place.

Elevation – Raising a building and placing it on a higher foundation so the first or lowest floor is above flood levels.

Emission – A release of a pollutant.

Endangered Species – Any species which is in danger of extinction throughout all or a significant portion of its range.

Environmental Assessment (EA) – An EA is a publication that provides sufficient evidence and analysis to show whether a proposed system would adversely affect the environment or be environmentally controversial.

Ephemeral Stream – A stream that flows only during and immediately after a rainfall event.

Erosion – The wearing away of the land surface by detachment and movement of soil and rock fragments through the action of moving water and other geological agents.

Farmland – Cropland, pastures, meadows, and planted woodland.

Fauna – Animal life, especially the animal characteristics of a region, period, or special environment.

Fielding – Process of providing new weapons or equipment and their required support materiel systems to using units.

Flora – Vegetation; plant life characteristic of a region, period, or special environment.

Floodplain – The relatively flat area or lowlands adjoining a river, stream, ocean, lake, or other body of water that is susceptible to being inundated by floodwaters.

FNSI – Finding of No Significant Impact, a NEPA document.

Fugitive Dust – Particles light enough to be suspended in air, which are not caught in a capture or filtering system. For this document, this refers to particles put in the air by moving vehicles and air movement over disturbed soils at construction sites.

Geology – Science which deals with the physical history of the earth, the rocks of which it is composed, and physical changes in the earth.

Groundwater – Water found below the ground surface. Groundwater may be geologic in origin and as pristine as it was when it was entrapped by the surrounding rock or it may be subject to daily or seasonal effects depending on the local hydrologic cycle. Groundwater may be pumped from wells and used for drinking water, irrigation and other purposes. It is recharged by precipitation or irrigation water soaking into the ground. Thus, any contaminant in precipitation or irrigation water may be carried into groundwater.

Hazardous Substance – Hazardous materials are defined within several laws and regulations to have certain meanings. For this document, a hazardous material is any one of the following:

Any substance designated pursuant to section 311 (b)(2) (A) of the Clean Water Act.

Any element, compound, mixture, solution or substance designated pursuant to Section 102 of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Any hazardous as defined under the Resource Conservation and Recovery Act (RCRA).

Any toxic pollutant listed under Toxic Substances Control Act.

Any hazardous air pollutant listed under Section 112 of CAA.

Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of Toxic Substances Control Act.

The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in a above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). c. A list of hazardous substances is found in 40 CFR § 302.4.

Hazardous Waste – A solid waste, which when improperly treated, stored, transported or disposed of poses a substantial hazard to human health or the environment. Hazardous wastes are identified in 40 CFR § 261.3 or applicable foreign law, rule, or regulation (see also solid waste).

Hazardous Waste Storage – As defined in 40 CFR § 260.10, “. . . the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.”

Historic Property – Any material or human life or activities that is at least 50 years of age and is of cultural interest.

Historic resources – Any real or personal property, record, or lifeway. Includes: historic real property such as archaeological and architectural places, monuments, designed landscapes, works of engineering or other property that may meet the criteria for inclusion in the

NRHP; historic personal property such as any artifact or relic; historic records to include any historical, oral-historical, ethnographic, architectural, or other document that provides a record of the past; and community resources/lifeways to include any resource that a community or interested group ascribes cultural value (references to historic real or personal property such as natural landscapes and cemeteries; references to real property such as vistas or viewsheds; or, references to the nonmaterial such as certain aspects of folk life, cultural or religious practices, languages, or traditions).

Indirect Impact – An indirect impact is caused by a Proposed Action, but occurs later in time or farther removed in distance, but is still reasonably foreseeable. Indirect impacts may include induced changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural and social systems. For example, referring to the possible direct impacts described above, the clearing of trees for new development may have an indirect impact on area wildlife by decreasing available habitat.

Industrial Land Use – Land uses of a relatively higher intensity that are generally not compatible with residential development. Examples include light and heavy manufacturing, mining, and chemical refining.

Intermittent Stream – A stream that flows only portions of the year, typically during and after the regional rainy season.

Isolated Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, but do not have a direct connection to the Waters of the United States.

Jurisdictional wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, and have a direct connection to the Waters of the United States. These wetlands are regulated by the USACE.

Listed Species – Any plant or animal designated as a State or Federal threatened, endangered, special concern, or candidate species.

Major Impact – An impact which would be particularly large in magnitude, considering both context and intensity.

Minor Impact – An impact which would be of a smaller scale or would be more readily mitigated than impacts categorized as major.

Mitigation – Measures taken to reduce adverse impacts on the environment.

Mobile Sources – Vehicles, aircraft, watercraft, construction equipment, and other equipment that use internal combustion engines for energy sources.

Monitoring – A process of inspecting and recording the progress of mitigation measures implemented.

National Ambient Air Quality Standards (NAAQS) – Nationwide standards set up by the EPA for widespread air pollutants, as required by Section 109 of the Clean

Air Act (CAA). Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide (CO), lead, (Pb), nitrogen dioxide (NO₂), ozone (O₃), particulate matter, and sulfur dioxide (SO₂).

National Environmental Policy Act (NEPA) – United States statute that requires all Federal agencies to consider the potential effects of Proposed Actions on the human and natural environment.

Nonattainment Area – An area that has been designated by the EPA or the appropriate State air quality agency as exceeding one or more national or State ambient air quality standards.

Parcel – A plot of land, usually a division of a larger area.

Particulates or Particulate Matter – Fine liquid or solid particles such as dust, smoke, mist, fumes or smog found in air.

Physiographic Region – A portion of the Earth's surface with a basically common topography and common morphology.

Pollutant – A substance introduced into the environment that adversely affects the usefulness of a resource.

Potable Water – Water which is suitable for drinking.

Real Property – A building, the land on which it sits, and any permanent improvements or fixtures made to the property (for example, addition of built-in bookshelves).

Remediation – A long-term action that reduces or eliminates a threat to the environment.

Riparian Areas – Areas adjacent to rivers and streams that have a high density, diversity and productivity of plant and animal species relative to nearby uplands.

River Basin – The land area drained by a river and its tributaries.

Sacred Site – Any specific, discrete, narrowly delineated location on Federal land that is identified by an Indian Tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion, provided that the Tribe or appropriately authorized representative of an Indian religion has informed the agency of the existence of such a site. Further, EO 13007 directs each executive branch to (1) accommodate access to and ceremonial use of Indian sacred sites by Indian practitioners and (2) avoid adversely affecting the physical integrity of such sacred sites. Agency heads also are directed to report actions and activities related to sacred sites on their property.

Sensitive Receptors – Include, but are not limited to, asthmatics, children, and the elderly, as well as specific facilities, such as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, and childcare centers.

Surface Danger Zone (SDZ) – The area where projectiles fired on a range would land. Size of SDZ is based on the types of weapons and ammunition used.

Significant Impact – According to 40 CFR § 1508.27, "significance" as used in NEPA requires consideration of both context and intensity.

Context. The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the Proposed Action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

Soil – The mixture of altered mineral and organic material at the earth's surface that supports plant life.

Solid Waste – Any discarded material that is not excluded by section 261.4(a) or that is not excluded by variance granted under sections 260.30 and 260.31.

Threatened species – Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Topography – The relief features or surface configuration of an area.

Toxic Substance – A harmful substance which includes elements, compounds, mixtures, and materials of complex composition.

Traditional Cultural Property – A property that is eligible for inclusion in the NRHP because of its association with cultural practices or beliefs of a living

community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community. In order for a traditional cultural property to be found eligible for the NRHP, it must meet the existing criteria for eligibility as a building, site, structure, object, or district.

Undertaking – "An undertaking is a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; those requiring a Federal permit, license, or approval; and those subject to State or local regulation administered pursuant to a delegation or approval by a Federal agency" (36 CFR § 800.16{y}).

Waters of the United States include the following: (1) All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide. (2) All interstate waters including interstate wetlands. (3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce.

Watershed – The region draining into a particular stream, river, or entire river system.

Wetlands – Areas that are regularly saturated by surface or groundwater and, thus, are characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Examples include swamps, bogs, fens, marshes and estuaries.

Wildlife Habitat – Set of living communities in which a wildlife population lives.

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SECTION 9: Agencies and Individuals Consulted

Copies of all correspondence, including sample data request letters and responses, are included in **Appendix A** (non-SHPO agencies) and **Appendix B** (SHPO and Native American Tribes).

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Environment and Natural Resources Director
29 Highway 69A
P.O. Box 189
Miami, OK 74355

Shoshone-Bannock Tribes
Nathan Small, Chairman
P.O. Box 306
Fort Hall, ID 83203

Shoshone-Paiute Tribes of the Duck Valley
Indian Reservation
Lindsey Manning, Chairman
P.O. Box 219
Owyhee, NV 89832

Sisseton/Wahpeton Oyate
Robert Shepherd
Tribal Chairman
45657 Veterans Memorial Drive
Sisseton, SD 57262

Sokaogon Chippewa Band of Lake Superior
Chippewa
Chris McGeshick, Chairman
3051 Sand Lake Rd
Crandon, WI 54520

Southern Cheyenne
Eddie Hamilton
Governor
100 Red Moon Circle
Concho, OK 730022

Spirit Lake Sioux Tribe
Myra Pearson
Tribal Chairperson
P.O. Box 359
Fort Totten, ND 58335

St. Croix Chippewa Indians of Wisconsin
David Merrill, President
24663 Angeline Ave
Webster, WI 54893

St. Regis Mohawk Tribe
Beverly Cook, Chief
412 State Route 37
Akwesasne, NY 13655

St. Regis Mohawk Tribe
Paul O. Thompson, Chief
412 State Route 37
Akwesasne, NY 13655

Standing Rock Sioux Tribe
Dave Archambault II
Chairman
Bldg. #1 N Standing Rock Ave.
P.O. Box D
Fort Yates, ND 58538

Stockbridge-Munsee Band of the Mohican
Nation
Wally Miller, President
P.O. Box 70
Bowler, WI 54416

Thlopthlocco Tribal Town
George Coleman
Tribal Historic Preservation Officer
109095 Okemah St
P. O. Box 188
Okemah, OK 74859

Thlopthlocco Tribal Town
George Scott, Town King
109095 Okemah St
P. O. Box 188
Okemah, OK 74859

Tonawanda Band of Seneca Indians of New York
Roger Hill, Chief
7027 Meadville Road
Basom, NY 14013

Tonkawa Tribe
Don Patterson
President
1 Rush Buffalo Road
Tonkawa, OK 74653

Tunica-Biloxi Indian Tribe of Louisiana
Earl Barbry, Jr., Tribal Chairman
151 Melacon Dr.
Markville, LA 71351

Turtle Mountain Band of Chippewa
David Brien, Chairman
P.O. Box 900
Belcourt, ND 58316

Tuscarora Nation
Leo Henry, Chief
2006 Mt Hope Road
Lewiston, NY 14092

United Keetoowah Band of Cherokee Indians
George Wickliffe, Chief
4444 S. Whittmore Lane
P.O. Box 746
Talequah, OK 74465

Upper Sioux Community of Minnesota
Kevin Jensvold, Chairman
5722 Travelers Lane
P.O. Box 147
Granite Falls, MN 56421-0417

Wahpekute Band of Dakota
Dennis Gill
Title Spokesperson
3322 Gill Road
Waubay, SD 57273

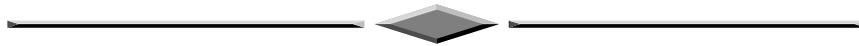
Wanapum Band
Rex Buck
Grant County Public Utility District
15655 Wanapum Village Lane SW
Beverly, WA 99321

White Earth Nation
Erma Vizenor, Chairperson
P.O. Box 418
White Earth, MN 56591

Wichita & Affiliated Tribes
Terry Parton
President
P.O. Box 729
Anadarko, OK 73005

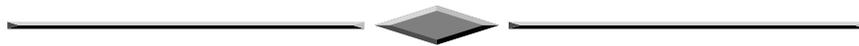
Winnebago Tribal Council
John Blackhawk, Chairman
100 Bluff Street
P.O. Box 687
Winnebago, NE 68071

Wyandotte Nation
Billy Friend, Chief
64790 E. Highway 60
P.O. Box 250
Wyandotte, OK 74370



APPENDIX A

AGENCY CONSULTATION AND CORRESPONDENCE



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NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

DATE

Environmental Programs Division, Army National Guard

**[INSERT NAME]
[INSERT TITLE]
[INSERT OFFICE]
[INSERT ADDRESS]
[INSERT CITY/ZIP CODE]**

Dear **[INSERT NAME]**:

The Army National Guard (ARNG) is preparing a Nationwide Environmental Assessment (EA) for proposed fielding and training of three new types of vehicles: the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) at multiple locations in the United States (see **Attachment 1**). We are seeking your agency's input into this National Environmental Policy Act (NEPA) process.

The ARNG proposes to field and train with the above-referenced vehicles in 26 States. No new construction, training areas, or changes in personnel is proposed; existing facilities, including storage areas, training areas, training rooms, and other logistical support facilities, would be utilized. **Attachments 2 and 3** provide a listing of Installations involved, as well as maps depicting locations of the Proposed Action. As this is a Federal Proposed Action, the ARNG is preparing a Nationwide EA in accordance with the NEPA.

The purpose of the Proposed Action is to provide necessary mine detection and clearance equipment, training, and proficiency to ARNG units. This action will strengthen ARNG mission readiness and capability. Proposed fielding locations are based on ARNG training requirements.

The vehicles would be stored at existing ARNG Armories and existing training sites in secure areas. Training would occur on existing ARNG and Army training sites on drill weekends and during two-week Annual Training events. Training during most drill weekends would only involve preventive maintenance checks and services. Generally, the vehicles would only be used in a training capacity two or three times per year. Vehicles would be transported from storage location(s) to the training site(s) via trailer on public roads. The vehicles would be cleaned at existing wash racks upon return and inspection. Maintenance would occur at the nearest ARNG maintenance facility.

The NEPA of 1969, as amended; the Council on Environmental Quality (CEQ) Regulations (40

Code of Federal Regulations [CFR] Parts 1500-1508); and 32 CFR Part 651 Environmental Analysis of Army Actions; as well as the ARNG NEPA Handbook – *Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with NEPA* (2011), require us to complete an EA for this Proposed Action.

In association with this EA, we are consulting separately with pertinent State Historic Preservation Offices, Federally recognized Indian Tribes, as well as other environmental regulatory agencies and organizations in each of the 26 involved States.

Based on the nature of the Proposed Action and our preliminary research, we do not anticipate significant effects to environmental resources. We base our determination on the following considerations:

4. No new construction or other alteration to existing structures, training areas, or the landscape is proposed.
5. Only existing ARNG and Army storage areas, training areas, training rooms, and other logistical support facilities would be used, similar to the manner in which they are currently used. No new construction is proposed.
6. For site-specific fielding and training, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR § 1502.20. Should any potential significant site-specific affect to an environmental resource be identified, further consultation with the appropriate agencies would occur prior to implementing the site-specific action.

In accordance with Executive Order 12372, *Intergovernmental Review of Federal Programs*, we request your assistance in identifying key issues and regulatory requirements to be addressed in the EA. Please provide comments and data your office may have with regard to the Proposed Action within thirty (30) days of receipt of this letter. All responses shall be considered for incorporation into the EA. Please send your written responses via mail to:

NAME/ADDRESS

mailto:

or via email to [email](#)

If you have any questions about the Proposed Action, please contact **NAME** at **NUMBER**, or via e-mail to [mailto:name](#)

Sincerely,

NAME

Enclosures

Attachment 1. MCV, MV-4 and VMMD Vehicles
Attachment 2. Proposed Fielding and Training Location Maps
Attachment 3. Tables of Proposed Fielding Locations

From: Hilburn, David C SWL <David.C.Hilburn@usace.army.mil>
Sent: Wednesday, March 30, 2016 8:27 AM
To: NG NCR NGB ARNG Mailbox Husky Flail EA
Subject: Comments on Nationwide EA for Proposed Fielding and Training of New Vehicle Types

Good morning Major Harris,

We received your letter dated 11 March 2016 addressed to Col. Paul Courtney, requesting identification of key issues and regulatory requirements to be addressed in the Nationwide EA for proposed fielding and training of three new types of vehicles. The Little Rock District, Corps of Engineers, has no key issues to recommend at this time. As each installation develops their site-specific NEPA documentation, a determination of potential impacts to wetlands or waters of the U.S. will be necessary. The Little Rock District Regulatory Division can assist with this determination at the appropriate time.

Thank you for the opportunity to review and comment on the proposed EA.

Craig Hilburn
Environmental Branch Chief
Planning and Environmental Division
U.S. Army Corps of Engineers
Little Rock District
P.O. Box 867
Little Rock, Arkansas 72203-0867

Office: (501) 324-5735
Mobile: (501) 366-3133
David.C.Hilburn@usace.army.mil

"Tell them what you know. Tell them what you don't know. And only then, tell them what you think.
And be sure you distinguish among them."
~ Colin Powell



United States Department of Agriculture

Animal and
Plant Health
Inspection
Service

Policy and Program
Development

Environmental and Risk
Analysis
Services, Unit 149
4700 River Road
Riverdale, MD 20737

April 19, 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

Dear Sir,

This letter provides comments from USDA-APHIS on the scoping materials circulated by the Environmental Programs Division of the Army National Guard on March 22, 2016 concerning a Nationwide Environmental Assessment for fielding and training of three new types of mine sweeper vehicles.

Our concern focuses on the proposed timing for vehicle cleaning. Your materials state, "The vehicles would be cleaned at existing wash racks upon return and inspection." When vehicles are moved either inter- or intra-state from an area under a plant pest quarantine, there is the potential for the movement of pests in soil adhering to the vehicles. APHIS finds that to mitigate this pest risk, there are some locations where removal of soil from vehicles may need to occur prior to leaving a quarantined area. That is, vehicle cleaning may need to be adjusted to occur prior to movement to storage areas.

In particular, this pest risk may occur for Imported Fire Ants and a pathogen in California, *Phytophthora ramorum*. Maps of pertinent quarantines are at:

https://www.aphis.usda.gov/plant_health/plant_pest_info/pram/downloads/pdf_files/quarantine_map.pdf and
https://www.aphis.usda.gov/plant_health/plant_pest_info/fireants/downloads/fireant.pdf.

In your environmental assessment, we also suggest consideration of the potential for the movement of noxious weeds because seed also may be in soil adhering to the uncleaned vehicles, and state regulations may apply. We find that quarantines for witchweed, pale cyst nematode, and golden nematode are not likely to be at issue. So long as wood and wood products are not moved with the vehicles, we find your activities are unlikely to need to consider the requirements of the Cooperative Emerald Ash Borer Project. We find your proposed activities do not include importing

**United States Department of Agriculture**

equipment, and consequently are unlikely to impact pest inspection activities at U.S. ports.

By expressing our concerns during this scoping interval, APHIS does not believe it is necessary for us to serve as a Cooperating Agency on this EA. We would, however, appreciate the opportunity to review the Draft EA prior to publication to ensure our concerns about the potential for pest movement are adequately addressed.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth E. Nelson".

Elizabeth E. Nelson, Chief
Environmental and Risk Analysis Services
USDA-APHIS-PPD
4700 River Rd. Unit 149
Riverdale, MD 20737
(301) 851-3089



United States Department of the Interior

Fish and Wildlife Service

105 West Park Drive, Suite D
Athens, Georgia 30606
Phone: (706) 613-9493
Fax: (706) 613-6059

West Georgia Sub-Office
Post Office Box 52560
Fort Benning, Georgia 31995-2560
Phone: (706) 544-6428
Fax: (706) 544-6419

Coastal Sub-Office
4980 Wildlife Drive
Townsend, Georgia 31331
Phone: (912) 832-8739
Fax: (912) 832-8744

April 14, 2016

Major Samuel A. Harris
C/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, Maryland 20876

Re: USFWS File Number 2016-0363

Dear Major Harris:

Thank you for your letter initiating early coordination for the proposed fielding and training of new types of vehicles on Fort Stewart in Bryan County, Georgia. We submit the following comments in accordance with provisions of the Endangered Species Act of 1973, as amended; (16 U.S.C. 1531 *et seq.*) (ESA), the Bald and Golden Eagle Protection Act of 1940 (BGEPA), and the Migratory Bird Treaty Act of 1918 (MBTA), to further the conservation of fish and wildlife resources and their habitat, including federally listed threatened and endangered species.

Your letter states that the Army National Guard (ARNG) is in the process of preparing a nationwide Fielding Environmental Assessment (EA) to evaluate potential environmental impacts associated with locating the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4) and the Vehicle Mounted Mine Detection Vehicle (VMMD) and associated training at multiple locations in the United States. Your letter identifies Fort Stewart, Georgia as one of those locations. Your letter also states that no new training areas would be developed associated with the proposed action.

Based on the information provided in your letter, there are four federally listed species that may be affected by the proposed action: frosted flatwoods salamander (*Ambystoma cingulatum*), red-cockaded woodpecker (*Picoides borealis*), wood stork (*Mycteria*

americana), and the Eastern indigo snake (*Drymarchon corais couperi*). There are also two candidate species that may be affected by the proposed action: striped newt (*Notophthalmus perstriatus*) and gopher tortoise (*Gopherus polyphemus*). Additionally, the bald eagle (*Haliaeetus leucocephalus*) is protected under the BGEPA and the MBTA and may be affected by the proposed action.

We appreciate the opportunity to comment during the planning stages of your project. If you have any additional questions, please write or call staff biologist Gail Martinez at 912-832-8739 extension 7.

Sincerely,



Strant Colwell
Coastal Georgia Supervisor



United States Department of Agriculture

#3

March 31, 2016

MAJ Samuel A. Harris
Chief, Assessments and Evaluations Branch
Environmental Programs Division
National Guard Bureau
111 South George Mason Drive
Arlington, VA 22204-1373

Re: Army National Guard EA for MCV, MC-4m and VMMD vehicle fielding and training

Dear Major Harris:

This letter is in response to your request for assistance in identifying “key issues and regulatory requirements” concerning your proposal for vehicle fielding and training in the state of Georgia. Thank you for the opportunity to review your proposal and provide a response.

The concerns of NRCS, if any, would be primarily related to farmland protection and/or NRCS watershed dams or project easements.

In your 3-11-16 letter describing the proposed action of vehicle fielding and training, you stated that “No new construction, training areas...is proposed; existing facilities ...would be utilized.

Since there are no proposed construction activities or conversion of farmland acres involved, there seem to be no site-specific concerns with the proposed project for the NRCS.

Please call me with any questions or comments at 706-546-2077. The Natural Resources Conservation Service looks forward to serving you on future projects.

Respectfully,

A handwritten signature in black ink, appearing to read "JL", written over a horizontal line.

Jim Lathem
NRCS State Soil Scientist

Natural Resources Conservation Service
Athens State Office
355 East Hancock Ave - Mail Stop 208 - Athens, GA 30601
Voice: 706-546-2077

An Equal Opportunity Provider and Employer

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

April 15, 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive, Suite 150
Germantown, MD 20876

via email: ng.ncr.ngb-armg.mbx.huskey-flail-ea@mail.mil

Dear MAJ Harris:

SUBJECT: National Environmental Policy Act (NEPA) Review of the Army National Guard's Proposed Fielding and Training of Three (3) New Vehicles to Provide Mine Detection and Clearance

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments.

At this time, enclosed are comments from the Land Division – Hawaii District on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell Y. Tsuji".

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSIONER OF WATER RESOURCE MANAGEMENT



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

75 Aupuni Street, Room 204
Hilo, Hawaii 96720
PHONE: (808) 961-9590
FAX: (808) 961-9599

April 8, 2016

MEMORANDUM

TO: Russell Y. Tsuji, Administrator

FROM: Gordon C. Heit, Hawaii District Land Agent 

SUBJECT: National Environmental Policy Act (NEPA) Review of the Army National Guard's Proposed Fielding and Training of Three (3) New Vehicles to Provide Mine Detection and Clearance.

LOCATION: Pohakuloa Training Area, Island of Hawaii, TMK: (3) 4-4-015:008, 4-4-016:005, 7-1-004:007

APPLICANT: U.S. Department of Defense, National Guard Bureau

Pursuant to your request for comments on the above matter, we offer the following:

The properties identified above are encumbered under General Lease No. S-3849, to the U.S. Department of Defense. The proposed fielding and training exercises are in compliance with the terms and conditions of the lease and the Hawaii District Land Office has no objection to the proposed project.

Please contact me should you have any questions.

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

April 21, 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive, Suite 150
Germantown, MD 20876

via email: ng.ncr.ngb-armg.mbx.husky-flail-ea@mail.mil

Dear MAJ Harris:

SUBJECT: National Environmental Policy Act (NEPA) Review of the Army National Guard's Proposed Fielding and Training of Three (3) New Vehicles to Provide Mine Detection and Clearance

Thank you for the opportunity to review and comment on the subject matter. In addition to the comments previously sent you on April 15, 2016, enclosed are comments from the Engineering Division on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII



16 MAR 31 AM 10:52 ENGINEERING

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

March 31, 2016

MEMORANDUM

RECEIVED
LAND DIVISION
2016 APR 20 AM 11:02
DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

TO:
FR:

- DLNR Agencies:**
- Div. of Aquatic Resources
 - Div. of Boating & Ocean Recreation
 - Engineering Division**
 - Div. of Forestry & Wildlife
 - Div. of State Parks
 - Commission on Water Resource Management
 - Office of Conservation & Coastal Lands
 - Land Division – Hawaii District
 - Historic Preservation
 - Land Division Administration – Barbara Lee

TO:
FROM:
SUBJECT:

[Signature] Russell Y. Tsuji, Land Administrator
National Environmental Policy Act (NEPA) Review of the Army National Guard's proposed Fielding and Training of Three (3) New Vehicles to Provide Mine Detection and Clearance

LOCATION: Kilauea Military Camp and Pohakuloa Training Area, Island of Hawaii;

TMK: (3) various

APPLICANT: U.S. Department of Defense, National Guard Bureau

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any comments by **April 15, 2016**.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *[Signature]*
Carty S. Chang, Chief Engineer

Print Name: _____
Date: 4/15/16

cc: Central Files

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

To: Land Division/ Russell Y. Tsuji
Ref: NEPA Review ANG proposed Field and Trng, Kilauea Camp, Hawaii

COMMENTS

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a designated Flood Hazard.

The owner or the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zone designations can be found using the Flood Insurance Rate Map (FIRM), which can be accessed through the Flood Hazard Assessment Tool (FHAT) (<http://gis.hawaiiinfip.org/FHAT>).

National Flood Insurance Program establishes the rules and regulations of the NFIP - Title 44 of the Code of Federal Regulations (44CFR). The NFIP Zone X is a designation where there is no perceived flood impact. Therefore, the NFIP does not regulate any development within a Zone X designation.

Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may take precedence over the NFIP standards as local designations prove to be more restrictive. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- o Oahu: City and County of Honolulu, Department of Planning and Permitting
(808) 768-8098.
- o Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- o Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7253.
- o Kauai: County of Kauai, Department of Public Works (808) 241-4846.

Signed: 
CARTY S. CHANG, CHIEF ENGINEER

Date: 
4/18/16

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

19 EAST KAWILI STREET
HILO, HAWAII 96720
PH: (808) 974-4221 FAX: (808) 974-4226

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

JEFFREY T. PEARSON
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

April 20, 2016

TO: Russell Tsuji, Land Administrator

FROM: Steve Bergfeld, Hawaii Branch Manager *SB*

SUBJECT: NEPA review of the Army National Guards's Fielding and Training of Three New Vehicles to Provide Mine Detection and Clearance.

We would ask that the Army National Guard follow all sanitation protocols for invasive species. In particular little fire ant and Rapid Ohia Death.

Attachments:

RECEIVED
LAND DIVISION
2016 APR 25 PM 12: 56
DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULULI HAWAII 96809

April 26, 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive, Suite 150
Germantown, MD 20876

via email: ng.ncr.ngb-arng.mbx.husky-flail-ea@mail.mil

Dear MAJ Harris:

SUBJECT: National Environmental Policy Act (NEPA) Review of the Army National Guard's Proposed Fielding and Training of Three (3) New Vehicles to Provide Mine Detection and Clearance

Thank you for the opportunity to review and comment on the subject matter. In addition to the comments previously sent you on April 15, and April 21, 2016, enclosed are comments from the Division of Forestry & Wildlife on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,


Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

March 31, 2016

MEMORANDUM

TO:

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Hawaii District
- Historic Preservation
- Land Division Administration – Barbara Lee

FROM:

[Signature] Russell Y. Tsuji, Land Administrator

SUBJECT:

National Environmental Policy Act (NEPA) Review of the Army National Guard's proposed Fielding and Training of Three (3) New Vehicles to Provide Mine Detection and Clearance

LOCATION:

Kilauea Military Camp and Pohakuloa Training Area, Island of Hawaii;
TMK: (3) various

APPLICANT:

U.S. Department of Defense, National Guard Bureau

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any comments by **April 15, 2016**.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed:

[Signature: Steve Bergfeld]

Print Name:

Steve Bergfeld

Date:

4/20/16

cc: Central Files

Little Fire Ant

Wasmannia auropunctata

Actual LFA Size
(1/16 inch)



Stop the spread of the little fire ant (LFA) in Hawaii!



Help protect Hawaii!
Know them. Name them.
Report them. Stop them.

What is the Little Fire Ant?

Little Fire Ant (LFA), is an **invasive stinging ant that is spreading across the Hawaiian islands.**



Eli Sarnat

Report Suspected LFA IMMEDIATELY!

Hawaii Department of Agriculture
Statewide Hotline: 643-PEST (7378)

- O'ahu**
O'ahu Invasive Species Committee:
266-7994
- Maui**
Maui Invasive Species Committee:
573-6472
- Kauai**
Kauai Invasive Species Committee:
821-1490
- Moloka'i**
Moloka'i Invasive Species Committee:
553-5236
- Big Island**
Big Island Invasive Species Committee:
933-3340

The first infestations of LFA were discovered on Hawaii island in 1999. LFA have hitchhiked on material from infested areas and are now spreading across the Big Island. Newly introduced and controllable colonies of LFA have been found on Kauai and Maui.



Ellen Van Gelder, USGS

LFA are **small, slow-moving ants**, averaging 1/16" in size. They are as long as a penny is thick.

LFA **nest in trees and in leaf litter on the ground.** They do **not** form mounds.

Hawaii Department of Agriculture

Little Fire Ant

Impacts to Hawaii

Quality of life: LFA deliver a powerful sting causing large, painful welts. Welts can last days, followed by an intense itching sensation. These stinging ants will infest yards, gardens, and homes.

Domesticated animals: Stings to pets and livestock can lead to blindness.

Agriculture: LFA invade agricultural areas and nurseries making exporting of goods difficult. The ants sting farm workers and flower pickers and reduce plant health.

Wildlife: Elsewhere in the world, little fire ants are attacking and killing the hatchlings of ground-nesting birds and sea turtles.



Identifying LFA

LFA characteristics:

- Tiny ants: 1/16 inch, as long as a penny is thick
- Yellow-red in color
- Slow-moving

Misidentification:

- Don't confuse LFA with the tropical fire ant. The tropical fire ant is a common stinging ant in Hawaii. The tropical fire ant is 3-times the size of LFA.



Tropical fire ant (top) compared to LFA (bottom)

USDA



LFA deliver a powerful sting

Cas Vanderwoude

How does LFA spread?

LFA hide in shipments from infested areas. They can hitchhike undetected into yards, homes, and businesses.

Caution should also be taken as they can accidentally spread by hiding in clothing and gear.

An entire LFA colony can fit inside a macadamia nut shell. The ants can build colonies in any small empty cavity: under or in logs, branches, plant debris, rocks, or even inside furniture.



LFA colony in leaf litter

TAKE ACTION: Help protect Hawaii!

Join the Sting Operation. Test new soil, plants, mulch, or other landscaping materials, and any items that have been stored in known infestation zones.

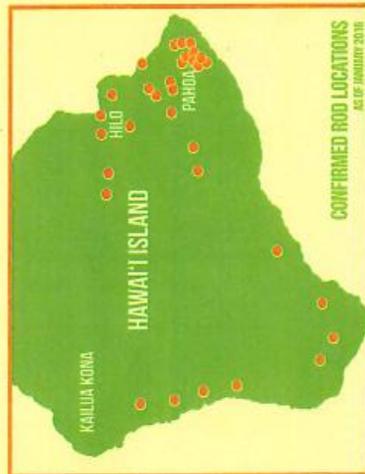
Testing is as easy as a chopstick and peanut butter. Go to www.lfa-hawaii.org to find more information on detecting and testing for new introductions of LFA

RAPID 'ŌHI'A DEATH
A NEWLY IDENTIFIED DISEASE

A disease that is new to science and new to Hawai'i has killed hundreds of thousands of 'ōhi'a trees (*Metrosideros polymorpha*) across more than 34,000 acres of Hawai'i Island. Known as Rapid 'Ōhi'a Death (ROD), it is caused by a fungus called *Ceratocystis fimbriata*. We can all help minimize further spread, and buy time to help researchers find answers and potential treatments. New information is being uncovered almost every week.

This disease has the potential to kill 'ōhi'a trees statewide. The most important thing we can all do now is help prevent ROD from spreading.

'Ōhi'a lehua is the backbone of Hawai'i's native forests and watersheds which are our source of fresh water in these islands. 'Ōhi'a trees cover more than 1 million acres statewide—they are perhaps the most important tree in Hawai'i.



FOR THE LATEST INFORMATION, MAPS, AND UPDATES ON RAPID 'ŌHI'A DEATH PLEASE VISIT:
www.rapidohiadeath.org
 www.facebook.com/rapidohiadeath

IF YOU SUSPECT ROD IN YOUR AREA PLEASE CONTACT:

Dr. J.B. Friday
 UH Cooperative Extension Service
 Email: jbrfriday@hawaii.edu
 Phone: (808) 969-8254

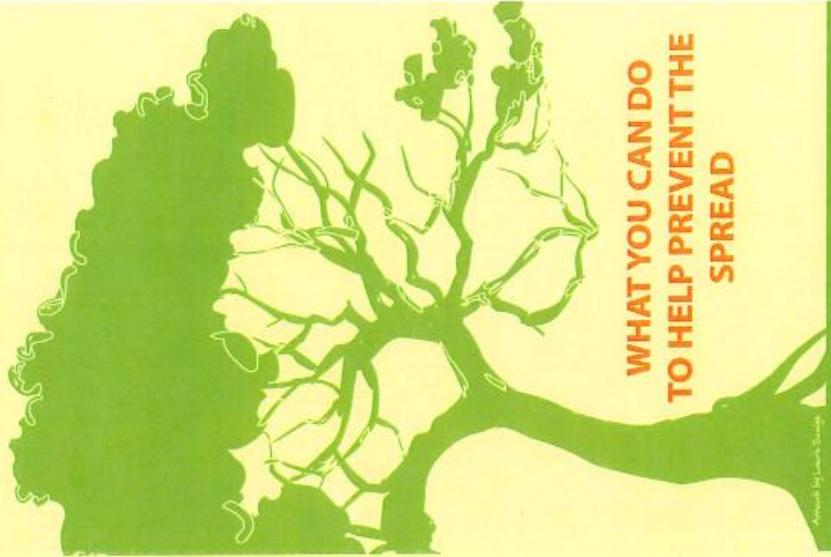
Dr. Flint Hughes
 USDA Forest Service
 Email: fhughes@fs.fed.us
 Phone: (808) 854-2617

Dr. Lisa Keith
 USDA Agriculture Research Service
 Email: Lisa.Keith@ars.usda.gov
 Phone: (808) 959-4357



UH MĀNOA COLLEGE OF TROPICAL AGRICULTURE AND HUMAN RESOURCES
 USDA INSTITUTE OF PACIFIC ISLANDS FORESTRY
 DEPARTMENT OF LAND AND NATURAL RESOURCES, DIVISION OF FORESTRY AND WILDLIFE

RAPID 'ŌHI'A DEATH



WHAT YOU CAN DO TO HELP PREVENT THE SPREAD

Artwork by Laura Smith



Symptoms of the Disease

- Crowns of 'ōhi'a trees that appear healthy turn yellowish or brown within days to weeks; dead leaves remain on branches for some time.
- All ages of 'ōhi'a trees can be affected and can have symptoms of browning of branches and/or leaves.
- If a tree with ROD is cut down, or a section of the tree is removed, the fungus shows up as dark staining in the sapwood along the outer edge, and there may be an over-ripe fruit-like odor.
- Trees within a given stand die in a haphazard pattern; the disease does not appear to radiate out directly from infected or dead trees.

Radial staining of sapwood.

FOR MORE INFORMATION:
rapidohiadeath.org

NEW QUARANTINE RULE

Because this disease could have devastating impacts on Hawai'i's 'ōhi'a forests, and people could accidentally spread it, the Hawai'i Department of Agriculture passed a new quarantine rule that prohibits interisland movement except by permit of all 'ōhi'a plant or plant parts including:

- Logs, wood, leaves, twigs, flowers, seeds, stems, cuttings.
- Untreated wood, green waste, mulch, sawdust, wood chips and frass (wood dust from boring beetles).

The movement of soil is also prohibited except by permit.

All these materials could carry the fungus and spread the disease. The fungus can stay viable for over a year.

To apply for permits to move 'ōhi'a products that can be demonstrated to be free of disease or soil, please visit: HDOA.HAWAII.GOV

5 THINGS YOU CAN DO

- ### 1 DON'T MOVE 'ŌHI'A

Do not move 'ōhi'a wood, firewood or posts, especially from an area known to have ROD. If you don't know where the wood is from, don't move it.
- ### 2 DON'T TRANSPORT 'ŌHI'A INTER-ISLAND

Comply with the new quarantine rule to help prevent ROD from spreading. Don't move 'ōhi'a plants, wood, or other 'ōhi'a plant parts inter-island without a permit.
- ### 3 CLEAN YOUR TOOLS

Use only these proven cleaning methods—other methods have been tested and they don't kill the fungus. Tools used for cutting 'ōhi'a trees (especially infected ones) should be cleaned with 70% rubbing alcohol.
- ### 4 CLEAN YOUR GEAR

Clean your shoes, and clothing. Decontaminate shoes by dipping in 70% rubbing alcohol to kill the ROD fungus. Other gear can also be sprayed with 70% rubbing alcohol. Wash clothing in hot water and detergent.
- ### 5 WASH YOUR VEHICLE

Wash the tires and undercarriage of your vehicles with detergent and remove all soil or mud, especially after traveling from an area with ROD and/or if you have traveled off-road.



United States Department of Agriculture

VIA Certified Mail: Return Receipt Requested

MAR 25 2016

MAJ Samuel A. Harris
C/O AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

Dear Mr. Harris,

NRCS has reviewed the provided documentation for the Army National Guard Nationwide (ARNG) Environmental Assessment (EA) for the proposed fielding and training of three new types of vehicles. Based on no new construction is proposed, existing storage and training areas will be used, and site specific NEPA documents will be created for field and training in each state, NRCS has no comment.

We appreciate the opportunity to review and comment on the proposed action of field and training three new types of vehicles. If you have any questions on these comments, please contact Trisha Cracraft, State Biologist, NRCS, at 208-378-5725.

for 
Curtis F. Elke
State Conservationist

Cc: James Eller, State Resource Conservationist, Boise, ID
Tony Sunseri, ASTC, Field Operations West, Moscow, ID
Connie Tharp, District Conservationist, Mountain Home, ID
Andree DuVarney, National Environmental Coordinator, Washington, DC

Natural Resources Conservation Service
9173 W. Barnes Drive, Suite C, Boise, ID 83709
Voice: 208.378.5700 Fax: 855.524.1691

Helping People Help the Land
An Equal Opportunity Provider and Employer

REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
WALLA WALLA DISTRICT, CORPS OF ENGINEERS
BOISE REGULATORY OFFICE
720 PARK BLVD. SUITE 245
BOISE, IDAHO 83704-9754

April 6, 2016

Regulatory Division

SUBJECT: NWW-2015-00204, Army National Guard Vehicle Training (MVVD)

MAJ Samuel A. Harris
Environmental Programs Division
12420 Milestone Center Drive Suite 150
Germantown, MD 20876

Dear Major Harris:

This is in response to your March 11, 2016 letter requesting comments on your proposed Army National Guard Vehicle Training (VMMD). Thank you for providing the Corps of Engineers (Corps) the opportunity to provide comment. According to information provided, the proposed project is to field and train with the VMMD vehicle at the Orchard Combat Training Center near Boise, Idaho.

The site is located at Gowen Field/Orchard Combat Training Center, near Section 11 of Township 2 South, Range 2 East, near latitude 43° 24.259' N and longitude -116° 21.499 W, in Ada County, Idaho. Your project has been assigned Department of Army (DA) File # NWW-2015-00204, which should be referred to in all future correspondence.

AUTHORITY

The DA exerts regulatory jurisdiction over waters of the United States (U.S.), including wetlands, pursuant to Section 404 of the Clean Water Act (33 U.S.C. 1344). Section 404 of the Clean Water Act requires a DA permit be obtained prior to discharging dredged or fill material into Waters of the U.S., which includes most perennial and intermittent rivers and streams, natural and man-made lakes and ponds, irrigation and drainage canals and ditches that are tributaries to other waters, and wetlands. Section 10 requires that a DA permit be obtained prior to building structures or conducting work within, above or below navigable waters of the U.S.

Based on review of the information provided in your 11 March 2016 letter, deployment of the VMMD vehicle at the Orchard Combat Training Center would not require any new facility construction, development, or other activity that may be regulated by the Corps. Therefore, DA authorization is not required for your proposed action.



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
www.dnr.illinois.gov

Bruce Rauner, Governor

Wayne A. Rosenthal, Director

March 30, 2016

Major Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

RE: NEPA EA for Training Deployment of MCV, MV-4, and VMMD Vehicles

Dear Major Harris:

The Illinois Department of Natural Resources has evaluated the proposed deployment of MV-4 and VMMD vehicles at the Marseilles IANG Training Center in LaSalle County, IL.

Both the federally-listed endangered **Indiana Bat**, *Myotis sodalis*, and the federally-listed threatened **Northern Long-Eared Bat**, *Myotis septentrionalis*, have been documented to be present in woodlands at the Marseilles training facility. The Department does not perceive any adverse impacts to these species related to deployment of these vehicles.

Because this is already a military training area entailing the operation of other military vehicles, the Department anticipates no significant impacts related to deployment and operations involving these vehicles. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Keith M. Shank".

Keith M. Shank
Acting Chief, Division of Ecosystems & Environment
Office of Realty and Environmental Planning

cc: Wayne Rosenthal, Director



Natural Resources Conservation Service
Indiana State Office
6013 Lakeside Boulevard
Indianapolis, IN 46278
317-290-3200

#2

March 28, 2016

Major Samuel A. Harris
Chief, Assessments and Evaluations Branch
Environmental Programs Division
National Guard Bureau
111 South George Mason Drive
Arlington, Virginia 22204-1373

Dear Major Harris:

The proposed project to field and train new types of vehicles at Camp Atterbury, Johnson County, Indiana, as referred to in your letter received March 22, 2016, will not cause a conversion of prime farmland.

If you need additional information, please contact Rick Neilson at 317-295-5875.

Sincerely,

JANE E. HARDISTY
State Conservationist

Helping People Help the Land.



USDA is an equal opportunity provider and employer.



April 8, 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

Dear Major Harris:

In response to your inquiry dated March 11, 2016, for information to do an environmental assessment for proposed fielding and training activities for mine related vehicles. Natural Resource Conservation Service (NRCS) will comment on two of our agency's interest, 1) the Farmland Protection Policy Act (FPPA), and 2) wetland easements. Because there is no planned construction, and training would occur on existing training sites, and it is for national defense purposes, this is not subject to the Farmland Protection Policy Act (FPPA). Because, other than transportation on existing roads, it will be on existing federal property, there should be no conflict with existing wetland easements.

Thank you for your inquiry with the Iowa NRCS regarding your project proposal. It is our sincere expectation that the information provided is helpful to you. Should you require any further assistance please contact James Cronin, State Biologist, at (515) 323-2221.

Sincerely,

A handwritten signature in blue ink that reads "Grover DePriest".

Grover DePriest
State Resource Conservationist

From: Conroy, Colleen [DNR] <Colleen.Conroy@dnr.iowa.gov>
Sent: Friday, April 01, 2016 1:20 PM
To: Coron, Jeffrey L CTR NG NGB (US) Cc: Sipe, Stacey [DNR]; DNR Sov Land and Env Review
Subject: [Non-DoD Source] (SL 12840) Environmental Review for Natural Resources

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

Storage of large vehicles at existing sites

Thank you for inviting Department comment on the impact of this project. The Department has searched for records of rare species and significant natural communities in the project area and found no site-specific records that would be impacted by this project. However, these records and data are not the result of thorough field surveys. If listed species or rare communities are found during the planning or construction phases, additional studies and/or mitigation may be required.

This letter is a record of review for protected species, rare natural communities, state lands and waters in the project area, including review by personnel representing state parks, preserves, recreation areas, fisheries and wildlife but does not include comment from the Environmental Services Division of this Department. This letter does not constitute a permit. Other permits may be required from the Department or other state or federal agencies before work begins on this project.

Please reference the following DNR Environmental Review/Sovereign Land Program tracking number assigned to this project in all future correspondence related to this project: 12840. If you have questions about this letter or require further information, please contact me at (515) 725-8464. Environmental Review requests can be submitted electronically to: SLER@dnr.iowa.gov < Cautionmailto:SLER@dnr.iowa.gov > .

SETH MOORE Sovereign Lands & Environmental Review Coordinator
Iowa Department of Natural Resources
515.725-8464|F 515.725-8201|Seth.Moore@dnr.iowa.gov
< Caution-mailto:Seth.Moore@dnr.iowa.gov >
Wallace Building | 502 E 9th St | Des Moines IA 50319

Caution- WWW.IOWADNR.GOV < Caution- http://www.iowadnr.gov/ >
< Caution- https://www.facebook.com/iowadnr >
< Caution- https://twitter.com/iowadnr >
< Caution- http://pinterest.com/iowadnr/ >

Leading Iowans in Caring for Our Natural Resources.



United States Department of Agriculture

March 22, 2016

MAJ Samuel A. Harris
C/O AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

RE: Army National Guard _ Nationwide Environmental Assessment _ proposed fielding/training for new vehicle types

Dear Maj. Harris,

I have reviewed the above referenced project for potential requirements of the Farmland Protection Policy Act (FPPA) and potential impact to Natural Resource Conservation Service projects in the immediate vicinity.

Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a federal agency or with assistance from a federal agency. For the purpose of FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements can be forest land, pastureland, cropland, or other land, but not water or urban built-up land.

The project narrative submitted with your request indicates that all activities will occur on existing facilities and training areas. Additionally, NRCS policy clarifies that construction for national defense purposes is exempt from the rules and regulations of the Farmland Protection Policy Act (FPPA)—Subtitle I of Title XV, Section 1539-1549. Furthermore, we do not predict impacts to NRCS work in the vicinity.

For specific information about the soils found in the project area, please visit our Web Soil Survey at the following location: <http://websoilsurvey.nrcs.usda.gov/>

Please direct all future correspondence to me at the address shown above.

Respectfully,

A handwritten signature in black ink, appearing to read "W. Norton".

ACTING FOR

Kevin D. Norton
State Conservationist

Natural Resources Conservation Service
State Office
3737 Government Street
Alexandria, Louisiana 71302
Voice: (318) 473-7751 Fax: 1-844-325-6947
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U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request 3/11/16			
Name Of Project Nationwide EA - Fielding new types of vehicle		Federal Agency Involved Army National Guard			
Proposed Land Use Fielding/training w/ MCV, MV-4 & VMMD		County And State Nationwide			
PART II (To be completed by NRCS)		Date Request Received By NRCS 3/18/16			
Does the site contain prime, unique, statewide or local important farmland? <i>(If no, the FPPA does not apply -- do not complete additional parts of this form).</i>		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Acres Irrigated	Average Farm Size
Major Crop(s)	Farmable Land In Govt. Jurisdiction Acres: %	Amount Of Farmland As Defined in FPPA Acres: %			
Name Of Land Evaluation System Used	Name Of Local Site Assessment System	Date Land Evaluation Returned By NRCS			
PART III (To be completed by Federal Agency)		Alternative Site Rating			
		Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly					
B. Total Acres To Be Converted Indirectly					
C. Total Acres In Site		0.0	0.0	0.0	0.0
PART IV (To be completed by NRCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland					
B. Total Acres Statewide And Local Important Farmland					
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted		0.001			
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value					
PART V (To be completed by NRCS) Land Evaluation Criterion					
Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)		0	0	0	0
PART VI (To be completed by Federal Agency)		Maximum Points			
Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))					
1. Area In Nonurban Use					
2. Perimeter In Nonurban Use					
3. Percent Of Site Being Farmed					
4. Protection Provided By State And Local Government					
5. Distance From Urban Builtup Area					
6. Distance To Urban Support Services					
7. Size Of Present Farm Unit Compared To Average					
8. Creation Of Nonfarmable Farmland					
9. Availability Of Farm Support Services					
10. On-Farm Investments					
11. Effects Of Conversion On Farm Support Services					
12. Compatibility With Existing Agricultural Use					
TOTAL SITE ASSESSMENT POINTS		160	0	0	0
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100	0	0	0
Total Site Assessment (From Part VI above or a local site assessment)		160	0	0	0
TOTAL POINTS (Total of above 2 lines)		260	0	0	0
Site Selected:	Date Of Selection	Was A Local Site Assessment Used? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
Reason For Selection:					

(See Instructions on reverse side)

This form was electronically produced by National Production Services Staff

Form AD-1006 (10-83)

STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

Step 1 – Federal agencies involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form.

Step 2 – Originator will send copies A, B and C together with maps indicating locations of site(s), to the Natural Resources Conservation Service (NRCS) local field office and retain copy D for their files. (Note: NRCS has a field office in most counties in the U.S. The field office is usually located in the county seat. A list of field office locations are available from the NRCS State Conservationist in each state).

Step 3 – NRCS will, within 45 calendar days after receipt of form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland.

Step 4 – In cases where farmland covered by the FPPA will be converted by the proposed project, NRCS field offices will complete Parts II, IV and V of the form.

Step 5 – NRCS will return copy A and B of the form to the Federal agency involved in the project. (Copy C will be retained for NRCS records).

Step 6 – The Federal agency involved in the proposed project will complete Parts VI and VII of the form.

Step 7 – The Federal agency involved in the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA and the agency's internal policies.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM

Part I: In completing the "County And State" questions list all the local governments that are responsible for local land controls where site(s) are to be evaluated.

Part III: In completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities) that will cause a direct conversion.

Part VI: Do not complete Part VI if a local site assessment is used.

Assign the maximum points for each site assessment criterion as shown in § 658.5 (b) of CFR. In cases of corridor-type projects such as transportation, powerline and flood control, criteria #5 and #6 will not apply and will, be weighed zero, however, criterion #8 will be weighed a maximum of 25 points, and criterion #11 a maximum of 25 points.

Individual Federal agencies at the national level, may assign relative weights among the 12 site assessment criteria other than those shown in the FPPA rule. In all cases where other weights are assigned relative adjustments must be made to maintain the maximum total weight points at 160.

In rating alternative sites, Federal agencies shall consider each of the criteria and assign points within the limits established in the FPPA rule. Sites most suitable for protection under these criteria will receive the highest total scores, and sites least suitable, the lowest scores.

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, adjust the site assessment points to a base of 160. Example: if the Site Assessment maximum is 200 points, and alternative Site "A" is rated 180 points:

$\frac{\text{Total points assigned Site A}}{\text{Maximum points possible}} = \frac{180}{200} \times 160 = 144$ points for Site "A."

From: Linda (Brown) Hardy <Linda.Hardy@la.gov>
Sent: Thursday, April 21, 2016 12:22 PM
To: NG NCR NGB ARNG Mailbox Husky Flail EA
Cc: Yasoob Zia
Subject: [Non-DoD Source] DEQ SOV 160329/0260 Army National Guard
Nationwide EA

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

April 21, 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive, Suite 150
Germantown, MD 20876
ng.ncr.ngb-arng.mbx.husky-flail-
ea@mail.mil < Caution-mailto:ng.ncr.ngb-
arng.mbx.husky-flail-ea@mail.mil >

RE: 160329/0260
Army National Guard Nationwide EA

Army National Guard Funding

East Baton Rouge & Vernon Parishes

Dear Maj. Harris:

The Department of Environmental Quality (LDEQ), Business and Community Outreach Division has received your request for comments on the above referenced project.

After reviewing your request, the Department has no objections based on the information provided in your submittal. However, for your information, the following general comments have been included. Please be advised that if you should encounter a problem during the implementation of this project, you should immediately notify LDEQ's Single-Point-of-contact (SPOC) at (225) 219-3640.

- * Please take any necessary steps to obtain and/or update all necessary approvals and environmental permits regarding this proposed project.
- * If your project results in a discharge to waters of the state, submittal of a Louisiana Pollutant Discharge Elimination System (LPDES) application may be necessary.
- * If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater.
- * All precautions should be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that you contact the LDEQ Water Permits Division at (225) 219-9371 to determine if your proposed project requires a permit.
- * If your project will include a sanitary wastewater treatment facility, a Sewage Sludge and

Biosolids Use or Disposal Permit is required. An application or Notice of Intent will be required if the sludge management practice includes preparing biosolids for land application or preparing sewage sludge to be hauled to a landfill. Additional information may be obtained on the LDEQ website at <http://www.deq.louisiana.gov/portal/tabid/2296/Default.aspx> < Caution-<http://www.deq.louisiana.gov/portal/tabid/2296/Default.aspx> > or by contacting the LDEQ Water Permits Division at (225) 219- 9371.

* If any of the proposed work is located in wetlands or other areas subject to the jurisdiction of the U.S. Army Corps of Engineers, you should contact the Corps directly regarding permitting issues. If a Corps permit is required, part of the application process may involve a water quality certification from LDEQ.

* All precautions should be observed to protect the groundwater of the region.

* Please be advised that water softeners generate wastewaters that may require special limitations depending on local water quality considerations. Therefore if your water system improvements include water softeners, you are advised to contact the LDEQ Water Permits to determine if special water quality-based limitations will be necessary.

* Any renovation or remodeling must comply with LAC 33:III.Chapter 28, Lead-Based Paint Activities; LAC 33:III.Chapter 27, Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation); and LAC 33:III.5151, Emission Standard for Asbestos for any renovations or demolitions.

* If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's Single-Point-of-Contact (SPOC) at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents.

Currently, East Baton Rouge is classified as nonattainment with the National Ambient Air Quality Standards. The Department has no objections regarding this project based on the information provided; however, if the project scope changes in the future, please notify LDEQ before implementation.

Please send all future requests to my attention. If you have any questions, please feel free to contact me at (225) 219-3954 or by email at linda.hardy@la.gov < Caution-<mailto:linda.hardy@la.gov> > .

Sincerely,

Linda M. Hardy
Louisiana Department of Environmental Quality
Office of the Secretary
P.O. Box 4301
Baton Rouge, LA 70821-4301
Ph: (225) 219-3954
Fax: (225) 219-3971
Email: linda.hardy@la.gov < Caution-<mailto:linda.hardy@la.gov> >

REPLY TO
ATTENTION OF:DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2288
MOBILE, AL 36628-0001

March 31, 2016

#1

Mississippi Branch
Regulatory DivisionNational Guard Bureau
Attention: Mr. Jeffrey Coron
111 South George Mason Drive
Arlington, Virginia 22204-1373

Dear Mr. Coron:

I refer to your recent submittal of a request for a Department of the Army jurisdictional determination in Camp Shelby, Perry County, Mississippi. This project has been assigned file number **SAM-2016-00329-ALM**. It is important that you refer to the assigned number in all communication with this office concerning this matter.

If after reviewing your submittal we determine that additional information is required, we will contact you. However, should you have any questions, please feel free to contact me at (251) 694-3780, or by email at Arthur.L.Middleton@usace.army.mil.

Sincerely,

A handwritten signature in black ink that reads "Arch Middleton".

Arch Middleton
Project Manager
Regulatory Division



MISSOURI DEPARTMENT OF CONSERVATION

Headquarters

2901 West Truman Boulevard, P.O. Box 180, Jefferson City, Missouri 65102-0180

Telephone: 573-751-4115 ▲ www.MissouriConservation.org

ROBERT L. ZIEHMER, Director

April 8, 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

**RE: ENVIRONMENTAL ASSESSMENT FOR PROPOSED MINE DETECTION AND
CLEARANCE EQUIPMENT**

Dear Major Harris,

Thank you for contacting the Missouri Department of Conservation (Department) regarding a Nationwide Environmental Assessment (EA) for proposed fielding and training of new types of mine detection and clearance equipment on Army National Guard property. I am writing in response to your request for identifying key issues and regulatory requirements to be addressed in the EA, specifically regarding the Camp Crowder and Fort Leonard Wood training sites in Missouri.

The Department is the agency responsible for fish, forest, and wildlife resources in Missouri. As such, we actively participate in project review when projects might affect those resources. The Department has no regulatory role; however our comments and recommendations are for your consideration and are offered to reduce impacts to the fish, forest, and wildlife resources in the project area.

There are numerous federal and state-listed species of concern on Fort Leonard Wood and Camp Crowder, including bats, mussels, fish, plants, and natural communities such as glades and marshes. Coordination with the U.S. Fish and Wildlife Service may be required for assessment of impacts to federal-listed species. The Department offers assistance in identifying and preventing impacts to state listed species and communities of conservation concern.

The Big Piney River and Roubidoux Creek on Fort Leonard Wood are two high quality streams hosting many of these species of concern. As a result, the Department recommends additional best management practices for sensitive species recovery and habitat protection, depending upon the specific activity and location. In-stream activity at Fort Leonard Wood or Camp Crowder may also require coordination with the U.S. Army Corps of Engineers to obtain any necessary Clean Water Act permits.

COMMISSION

DON C. BEDELL
Sikeston

JAMES T. BLAIR, IV
St. Louis

MARILYNN J. BRADFORD
Jefferson City

DAVID W. MURPHY
Columbia

Major Harris
April 8, 2016
Page 2

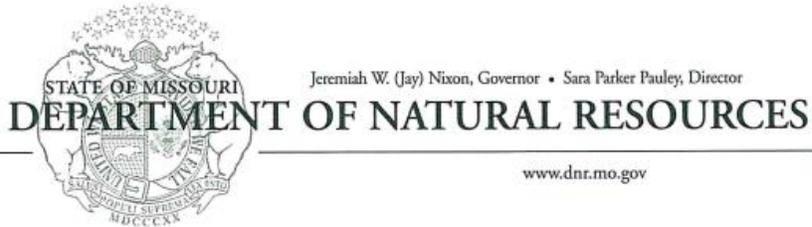
The Department also recognizes two special areas that cover parts of Fort Leonard Wood – the Ryden Cave Focus Area and the Big Piney Breaks Conservation Opportunity Area. These areas have been identified based on the diversity and rarity of species and habitats present, and the comparative likelihood/importance of projects to maintain them in the area over time. The areas have no regulatory role, but do reflect interest from multiple government agencies and citizen groups to work for conservation in the area.

Please contact Audrey Beres, Policy Coordinator (Audrey.Beres@mdc.mo.gov or 573-522-4115 Extension 3346) if you need additional information on the fish, forest and wildlife resources in the Camp Crowder and Fort Leonard Wood areas.

Sincerely,



ROBERT L. ZIEMMER
DIRECTOR



April 18, 2016

MAJ Samuel A Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

Dear MAJ Harris:

The Missouri Department of Natural Resources (department) appreciates the opportunity to review the materials for the proposed action to field and station the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) in Missouri. The department notes that Table 2. Proposed Fielding Locations lists Fort Leonard Wood, however it is not identified in the Figure 2 map. Although it is not clear if Fort Leonard Wood will be impacted by this proposed action, the department has included both Fort Leonard Wood and Camp Crowder in our review of this proposed action. The department offers the following comments for consideration.

Hazardous Waste

Camp Crowder: There are a couple areas within Camp Crowder that contain legacy environmental contamination. Camp Crowder contains both a National Priorities List site and several Non NPL sites (see enclosed maps). The Engine Testing Area is located on Camp Crowder and is part of the NPL Pools Prairie Superfund site. The Non-NPL sites consist of the Hillside Dump Site, Incinerator/Ash Piles, and the Vehicle Maintenance Areas.

Current Status of Camp Crowder Legacy Sites:

- Hillside Dumpsite – Remedy in Place signed August 24, 2007 – Remedy Consists of site delineation, establishment of LUCs, posting of signage, Long-term Management, and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 5 Year Reviews
- Incinerator/Ash Piles – No Further Remedial Action signed February 8, 2007
- Vehicle Maintenance Areas – Addressed and No Further Remedial Action signed February 8, 2007 for VMA #7
- Engine Test Area – Removal actions were conducted within the Engine Test Area to remove source material in 2006 and 2007-2009. Groundwater and residual soil investigations are being performed by Boeing as part of the NPL Pools Prairie Superfund Site.



ARNG Vehicle Field and Train NEPA
Page Two

While the department does not anticipate any issues or concerns with the proposed action, we want to make the National Guard aware of the land use controls implemented at the Hillside Dump Site and the on-going groundwater and residual soil investigations currently being performed at the Engine Test Area.

Fort Leonard Wood: There are more than 100 current/legacy sites that include former small arms, strafing, mortar, grenade and mine practice ranges (see enclosed maps). Legacy sites include former landfills, open dumps, dry cleaning facilities, pesticide storage and mixing, vehicle motor pools, underground storage tank sites at Fort Leonard Wood. Approximately 15 investigations are currently in progress. Most of Fort Leonard Wood's current vehicle training occurs on the southern portion of the Fort away from the cantonment area where the majority of environmental restoration sites are located.

- There are land-use controls (LUCs) around FLW-056, a former dry cleaning laundry facility, under remedial investigation and cleanup that prohibits digging without expressed Fort Leonard Wood consent, LUCs on landfills FLW-002 and FLW-003 and potentially FLW-012 if they have been implemented.
- There are institutional controls and signs on former ranges as part of the Fort's Military Munitions Response Clean-up Program sites being investigated that prohibit digging.
- The wheeled vehicle motor pool shop has an investigation underway for groundwater contamination, soil contamination, and vapor intrusion.
- There are multiple wells on the property (primarily focused in the north and eastern portions of the installation) that should not be disturbed.

The department does not anticipate any issues or concerns with the proposed action, but due to the above mentioned items, recommend close coordination with Fort Leonard Wood's environmental branch chief and Manager for the Installation Restoration Program, Mark Lennox (573) 596-0882.

We appreciate the opportunity to provide comments on the proposed actions to field and station the specified military vehicles. If you have any questions or need clarification, please contact me or Ms. Kay Craig, at (573) 751-3195. The address for correspondence is Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102. Thank you.

Sincerely,

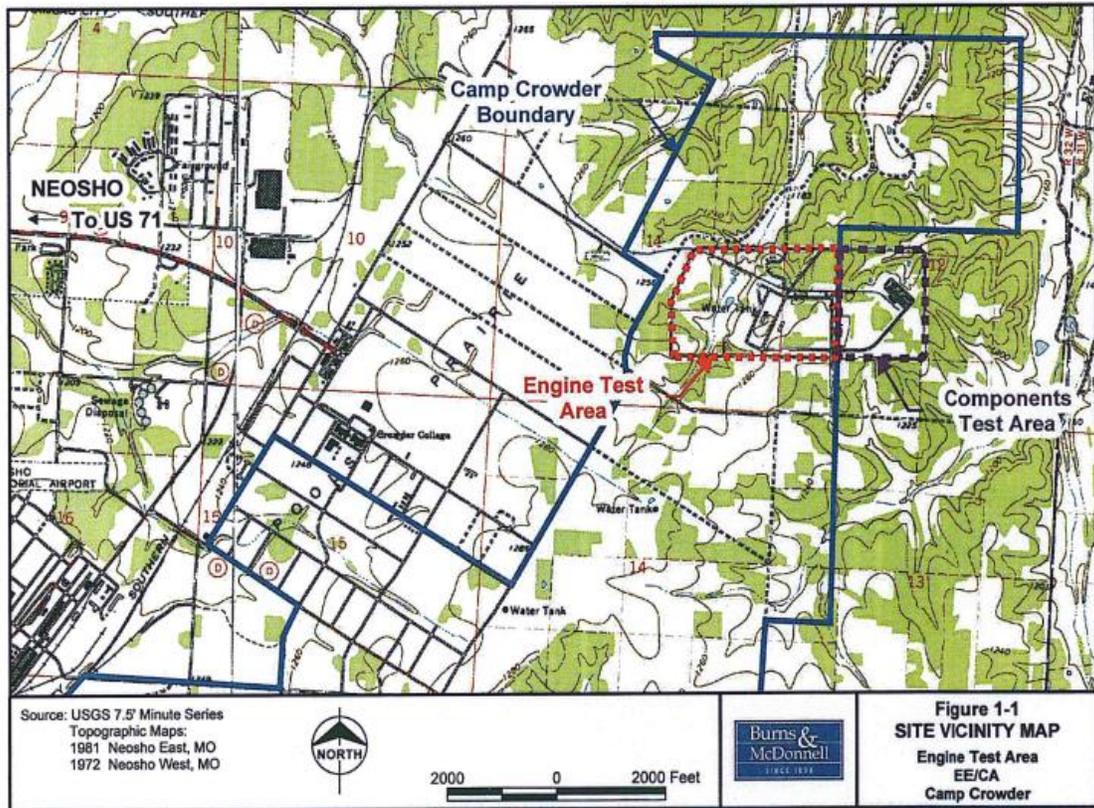
DEPARTMENT OF NATURAL RESOURCES

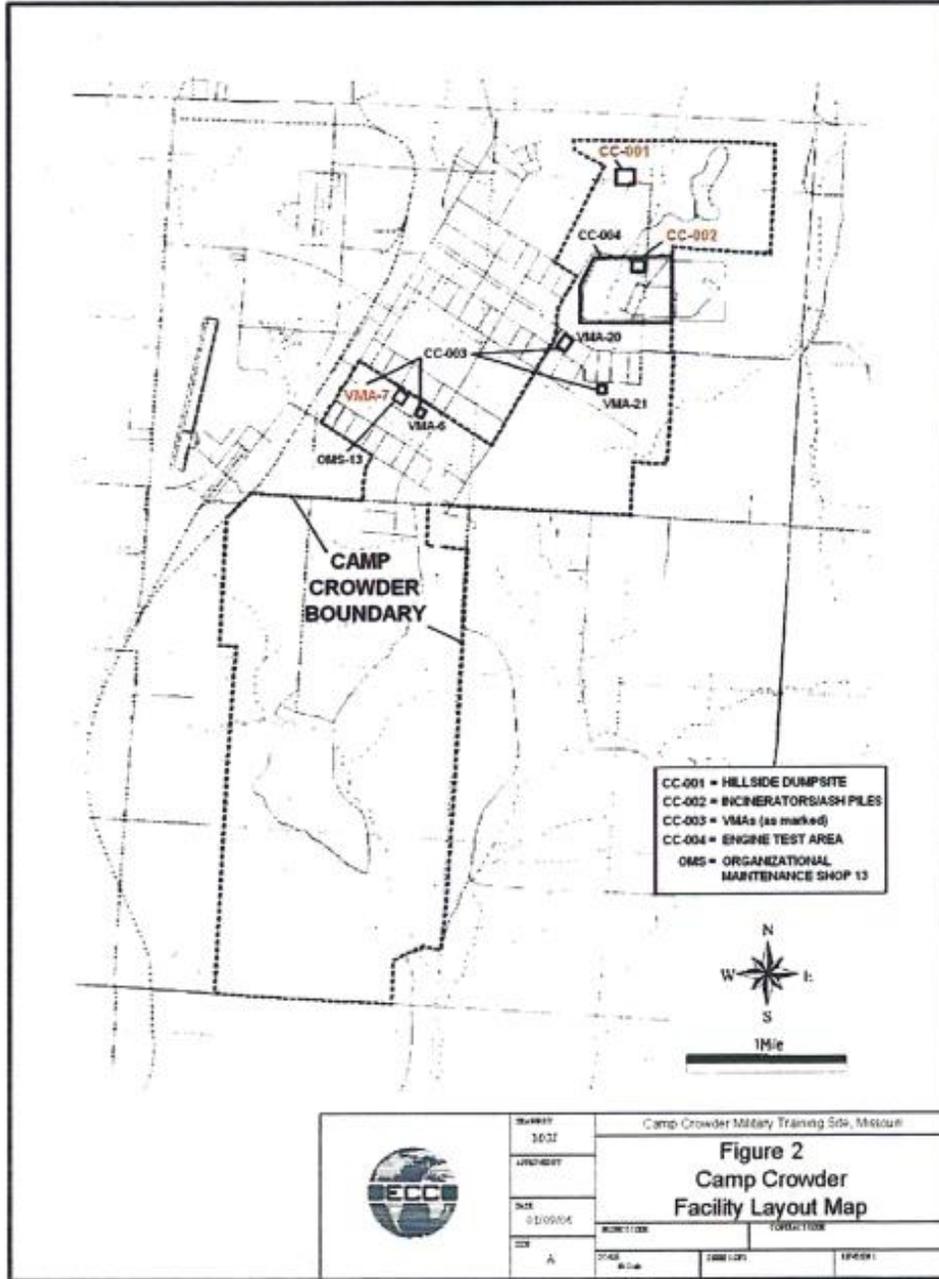


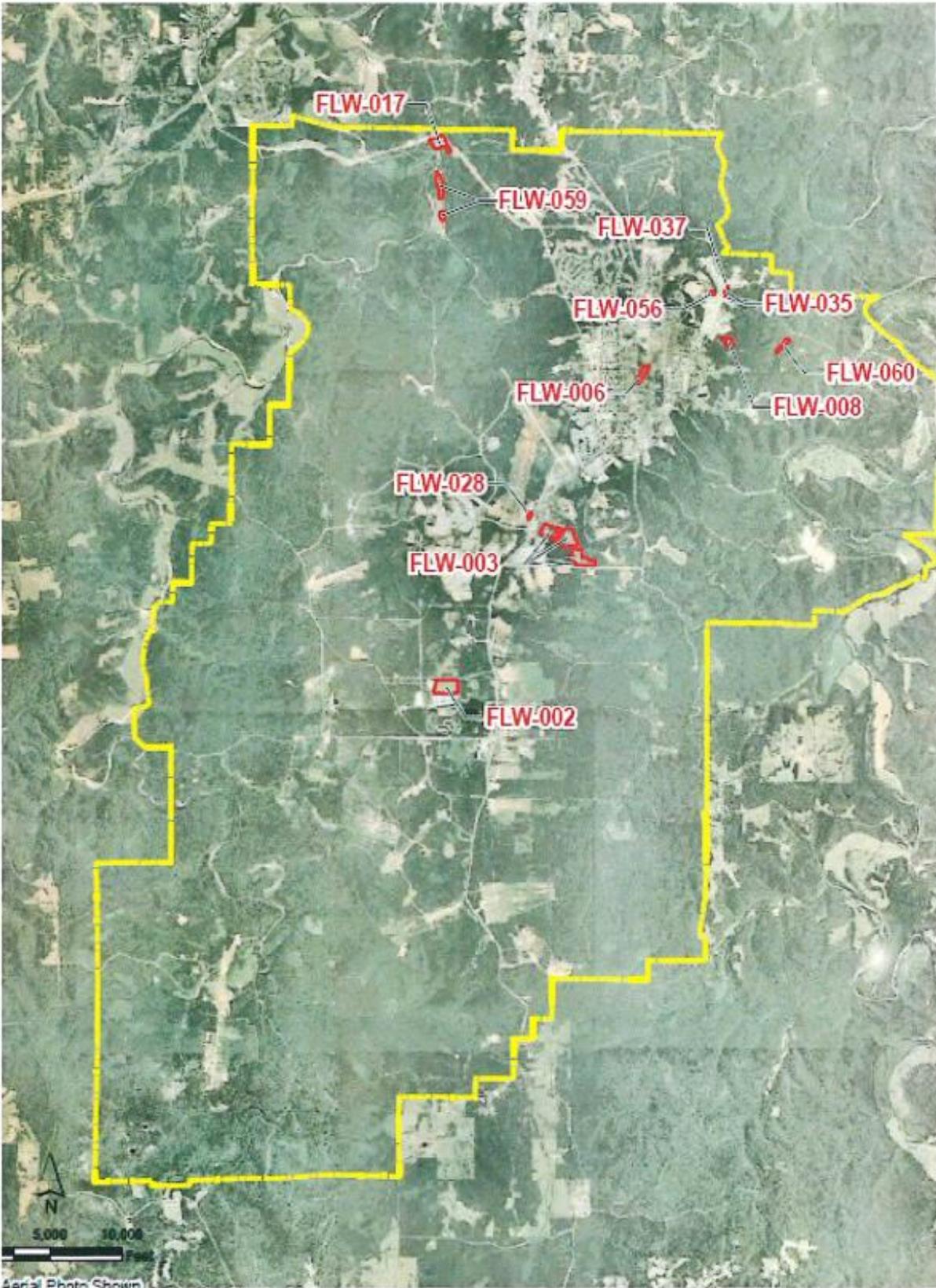
Lorisa S. Smith
Policy Coordinator

LSS/mkc

Enclosures









From: Foster, Ruth <Ruth.Foster@dep.nj.gov>
Sent: Tuesday, April 26, 2016 4:11 PM
To: Coron, Jeffrey L CTR NG NGB (US)
Cc: Foster, Ruth; Brunatti, Megan
Subject: [Non-DoD Source] Army National Guard scoping document MCV, MV-4, VMMD

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

The NJ Department of Environmental Protection's Office of Permit Coordination and Environmental Review has reviewed the scoping document dated March 11, 2016 for the preparation of an environmental assessment (EA) for fielding of and training with several new types of mine detection vehicles. The Mine Clearance Vehicle, Mine Vehicle, and Vehicle Mounted Mine Detection Vehicle will be stored at existing facilities with no new construction.

Based on the information presented to date, the Department has no comment. However, we look forward to reviewing the EA when it is prepared. Please note that Scott Brubaker no longer works for this office and forward all documents for review to me at the address below. I look forward to working with you in the future.

Ruth

Ruth W. Foster, PhD., P.G., Acting Director
New Jersey Department of Environmental Protection
Office of Permit Coordination and Environmental Review
Mail Code 401-07J
401 East State Street – PO Box 420
Trenton, NJ 08625
Office # 609-292-3600
Fax # 609-292-1921
Ruth.Foster@dep.nj.gov < Caution-mailto:Ruth.Foster@dep.nj.gov >



United States Department of the Interior

FISH AND WILDLIFE SERVICE
New York Field Office
3817 Luker Road
Cortland, NY 13045
Phone: (607) 753-9334 Fax: (607) 753-9699
http://www.fws.gov/northeast/nyfo



To: Jeffrey Coron Date: Mar 21, 2016

USFWS File No: 161230

Regarding your: X Letter Fax Email Dated: Mar 11, 2016

For project: fielding and training of new DOD vehicles at Fort Drum

Located: at Fort Drum

In Town/County: Fort Drum, Jefferson County

Pursuant to the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.), the U.S. Fish and Wildlife Service:

- Acknowledges receipt of your "no effect" and/or no impact determination. No further ESA coordination or consultation is required.
Acknowledges receipt of your determination. Please provide a copy of your determination and supporting materials to any involved Federal agency for their final ESA determination.
X Is taking no action pursuant to ESA or any legislation at this time, but would like to be kept informed of project developments.

As a reminder, until the proposed project is complete, we recommend that you check our website (http://www.fws.gov/northeast/nyfo/es/section7.htm) every 90 days from the date of this letter to ensure that listed species presence/absence information for the proposed project is current. Should project plans change or if additional information on listed or proposed species or critical habitat becomes available, this determination may be reconsidered.

USFWS Contact(s): [Signature]

Supervisor: [Signature] Date: 3/21/16

From: susan_zimmermann@fws.gov on behalf of Ohio, FW3 <ohio@fws.gov>
Sent: Monday, March 21, 2016 1:58 PM
To: Coron, Jeffrey L CTR NG NGB (US)
Subject: [Non-DoD Source] ARNG - Environmental Assessment for VMMD
Vehicle at Camp Ravenna Ohio

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

TAILS# 03E15000-2016-TA-0817

Dear Mr. Coron,

We have received your recent correspondence requesting information about the subject proposal. There are no Federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area.

FEDERALLY LISTED, PROPOSED, AND CANDIDATE SPECIES COMMENTS: Due to the project, type, size, and location, we do not anticipate adverse effects to federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be initiated to assess any potential impacts.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov < Caution-mailto:ohio@fws.gov > .

Sincerely,

Dan Everson
Field Supervisor



Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

Office of Real Estate

Paul R. Baldrige, Chief
 2045 Morse Road – Bldg. E-2
 Columbus, OH 43229
 Phone: (614) 265-6649
 Fax: (614) 267-4764

April 26, 2016

MAJ Samuel A. Harris
 AECOM
 12420 Milestone Center Drive, Suite 150
 Germantown, MD 20876

Re: 16-232; MCV Fielding and Training

Project: The proposed project involves providing necessary mine detection and clearance equipment, training, and proficiency to ARNG units.

Location: The proposed project is located in Ravenna Township, Portage County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Natural Heritage Database: The Natural Heritage Database has the following data at or within a one mile radius of the project area.

Carex albolutescens – Pale Straw Sedge, P
Carex formosa – Handsome Sedge, E, FSC
Carex lupuliformis – False Hop Sedge, P
Carex pallescens – Pale Sedge, P
Carex straminea – Straw Sedge, P
Epilobium strictum – Simple Willow-herb, T
Equisetum sylvaticum – Woodland Horsetail, P
Equisetum variegatum – Variegated Scouring-rush, E
Eupatorium hyssopifolium – Hyssop Thoroughwort, E
Geum rivale – Water Avens, P
Glyceria acutiflora – Sharp-glumed Manna-grass, T
Isoetes engelmannii – Appalachian Quillwort, E
Panicum philadelphicum – Philadelphia Panic Grass, E
Phegopteris connectilis – Long Beech Fern, P
Plagiothecium latebricola – Lurking Leskea, T
Pohlia elongate – Narrow-necked Pohl's Moss, E

2045 Morse Rd • Columbus, OH 43229-6693 • ohiodnr.com

Sisyrinchium montanum – Northern Blue-eyed-grass, T
Spiranthes lucida – Shining Ladies'-tresses, P
Turritis glabra – Tower Mustard, A
Viburnum alnifolium – Hobblebush, T
 Hemlock-Hardwood Forest Plant Community
 Floodplain Forest Plant Community
Accipiter striatus – Sharp-shinned Hawk, SC
Ammocrypta pellucida – Eastern Sand Darter, SC, FSC
Catocala gracilis – Graceful Underwing, E
Circus cyaneus – Northern Harrier, E
Condylura cristata – Star-nosed Mole, SC
Dendroica cerulean – Cerulean Warbler, SC, FSC
Dolichonyx oryzivorous – Bobolink, SC
Empidonax minimus – Least Flycatcher, SI
Enallagma cyathigerum – Northern Bluet, T
Haliaeetus leucocephalus – Bald Eagle, FSC
Hemidactylium scutatum – Four-toed Salamander, SC
Ichthyomyzon greeleyi – Mountain Brook Lamprey, E
Napaeozapus insignis – Woodland Jumping Mouse, SC
Opheodrys vernalis – Smooth Greensnake, SC
Orconectes obscurus – Allegheny Crayfish, SC
Porzana carolina – Sora Rail, SC
Psilotreta indecisa – a caddisfly, T
Rallus limicola – Virginia Rail, SC
Somatochlora walshii – Brush-tipped Emerald, E
Sphyrapicus varius – Yellow-bellied Sapsucker, SC
Terrapene carolina – Eastern Box Turtle, SC
Vermivora chrysoptera – Golden-winged Warbler, X
 Great Blue Heron Rookery (breeding animal concentration)
 Shaw Woods – Portage Park District
 Jennings Woods – Kent State University
 West Branch State Park – ODNr Division of Parks & Recreation
 Newton Falls Woods Conservation Site

The review was performed on the project area specified in the request as well as an additional one mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity. Additional comments on some of the features may be found in pertinent sections below.

A Conservation Site is an area deemed by the Natural Heritage Database to be a high quality natural area not currently under formal protection. It may, for example, harbor one or more rare species, be an outstanding example of a plant community or have geologically significant features, etc. These sites may be in private ownership and our listing of them does not imply permission for access.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

Statuses are defined as: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; A = species recently added

to state inventory, status not yet determined; X = presumed extirpated in Ohio; FE = federal endangered, FT = federal threatened, FSC = federal species of concern, FC = federal candidate species.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees to include: shagbark hickory (*Carya ovata*), shellbark hickory (*Carya laciniosa*), bitternut hickory (*Carya cordiformis*), black ash (*Fraxinus nigra*), green ash (*Fraxinus pennsylvanica*), white ash (*Fraxinus americana*), shingle oak (*Quercus imbricaria*), northern red oak (*Quercus rubra*), slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharinum*), sassafras (*Sassafras albidum*), post oak (*Quercus stellata*), and white oak (*Quercus alba*). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to any cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.

The project is within the range of the sharp-ridged pocketbook (*Lampsilis ovata*), a state endangered mussel, and the eastern pondmussel (*Ligumia nasuta*), a state endangered mussel. Due to the type of project being proposed, this project is not likely to impact these species.

The project is within the range of the Iowa darter (*Etheostoma exile*), a state endangered fish, the mountain brook lamprey (*Ichthyomyzon greeleyi*), a state endangered fish, and the lake chubsucker (*Erimyzon sucetta*), a state threatened fish. Due to the type of project being proposed, this project is not likely to impact these species.

The project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and a federal candidate snake species. The eastern massasauga uses a range of habitats including wet prairies, fens, and other wetlands, as well as drier upland habitat. Due to the type of project being proposed, this project is not likely to impact this species.

The Natural Heritage database has records at Camp Ravenna for the smooth greensnake (*Opheodrys vernalis*), a state endangered species. This species is primarily a prairie inhabitant, but also found in marshy meadows and roadside ditches. Due to the type of project being proposed, this project is not likely to impact this species.

The project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows,

pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the type of project being proposed, this project is not likely to impact this species.

The Natural Heritage database has records at Camp Ravenna for the northern harrier (*Circus cyaneus*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. Due to the type of project being proposed, this project is not likely to impact this species.

The project is within the range of the American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. Due to the type of project being proposed, this project is not likely to impact this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). Due to the type of project being proposed, this project is not likely to impact this species.

The project is within the range of the black bear (*Ursus americanus*), a state endangered species. Due to the type of project being proposed, this project is not likely to impact this species.

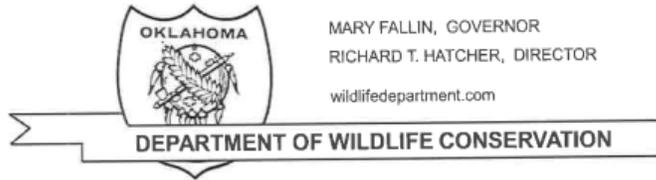
Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the U.S. Fish & Wildlife Service.

ODNR appreciates the opportunity to provide these comments. Please contact John Kessler at (614) 265-6621 if you have questions about these comments or need additional information.

John Kessler
ODNR Office of Real Estate
2045 Morse Road, Building E-2
Columbus, Ohio 43229-6693
John.Kessler@dnr.state.oh.us

WILDLIFE CONSERVATION COMMISSION

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RICHARD T. HATCHER, DIRECTOR
wildlifedepartment.com

P.O. Box 53465 Oklahoma City, OK 73152 PH. (405) 521-3851

March 23, 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

Re: Nationwide EA for proposed fielding and training of three new types of vehicles: MVC, MV-4, VMMD

Dear Major Harris,

This letter is written in response to your request for reviews of proposed mine clearance vehicle fielding and training projects for potential effects on Threatened (T) and Endangered (E) species. At this time all state-listed threatened and endangered species that are not also federally listed occur within 6 Oklahoma counties; Cherokee, Adair, Sequoyah, Delaware, LeFlore and McCurtain. The Oklahoma Department of Wildlife Conservation does not have environmental concerns regarding the specific actions proposed in your review request at this time as Camp Gruber (Muskogee County) does not fall within the afore mentioned counties where Threatened or Endangered species are known to occur.

According to OS §29-2-109, federally listed endangered species are also listed as Oklahoma endangered by reference. However, the Oklahoma Department of Wildlife Conservation is not the US Fish and Wildlife Service and defers primary management authority over federal listed threatened or endangered species. For information on federally listed threatened or endangered species, you will need to contact the USFWS, Ecological Services, 9014 E. 21st St, Tulsa, OK 74129 or visit them online at <http://www.fws.gov/southwest/es/oklahoma>.

We appreciate the opportunity to respond to your environmental review request. If you have any questions please do not hesitate to call the Oklahoma Fishery Research Laboratory at (405) 325-7288. Thank you for your service to our country.

Respectfully,

Kurt Kuklinski
Fisheries Research Supervisor
500 East Constellation
Norman, OK 73072

The Oklahoma Department of Wildlife Conservation is the state agency responsible for managing fish and wildlife. The Wildlife Department receives no general tax appropriations and is supported by hunting and fishing license fees and federal excise taxes on hunting and fishing equipment.



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Oregon Fish and Wildlife Office
2600 SE 98th Avenue, Suite 100
Portland, Oregon 97266
Phone: (503) 231-6179 FAX: (503) 231-6195

Reply To: 8181.0510
File Name: Final ANG letter.docx
TS Number: 16-351
TAILS: n/a
Doc Type: Final

APR 12 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

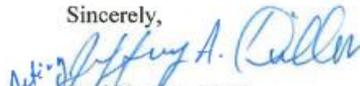
Dear MAJ Harris,

Thank you for your invitation to provide input on the development of an Environmental Assessment (EA) for the proposed fielding and training of three new types of vehicles: the Mine Clearance Vehicle, Mine Vehicle, and the Vehicle Mounted Mine Detection Vehicle, at several locations in Oregon. Your letter and supporting materials were received by my office on March 18th, 2016.

Our review of your letter and supporting materials indicates that no new construction, training areas, or changes in personnel is expected, and that existing facilities including storage areas, training areas, training rooms and other logistical support activities would be utilized. We believe from our preliminary review that no listed species will be impacted by the use of these vehicles in the manner you described. However, we encourage you to go to the Information for Planning and Conservation website at <https://ecos.fws.gov/ipac/> for a list of federally threatened and endangered species in the areas of Oregon for which you will be using the vehicles. This information can be used in the preparation of your EA and any analysis for potential impacts to listed species. If your analysis does find that there are some potential impacts to listed species, we would be happy to provide further review.

Thank you for your coordination on this project. If you have any further questions regarding this project, please contact Jeff Everett in my office at 503-231-6179 or Jeff_Everett@fws.gov.

Sincerely,

Acting for

Paul Henson, Ph.D.
State Supervisor

Printed on 100 percent chlorine-free/100 percent post-consumer content recycled paper

From: Coron, Jeff L CTR NG NGB (US)
Sent: Monday, April 11, 2016 2:10 PM
To: Dunn, Kevin
Cc: Boose, Brian; Bowins, Jade
Subject: RE: Husky Flail phone calls received (UNCLASSIFIED)

Follow Up Flag: Follow up
Flag Status: Flagged.com

Mr. Sean (Shaun) Woods, Manager (mssg received 7 APR 2016) E.E. Wilson Wildlife Area
Adjacent to Camp Adair, OR 541-745-5334

* He wanted to confirm that none of the ORARNG training will not occur on the E.E. Wilson Wildlife Area. I spoke with CW4 Eric Boyles, the ORARNG Force Integration Readiness Offices (FIRO), on 11 APR 2016 and confirmed that the ORARNG will not train with the Husky or Flails on the E.E. Wilson Wildlife Area. CW4 Boyles tel # (503-584-3619).

From: Scofield, Brian <brian_scofield@fws.gov>
Sent: Tuesday, March 29, 2016 9:51 AM
To: NG NCR NGB ARNG Mailbox Husky Flail EA
Subject: [Non-DoD Source] proposed fielding and training of three new types of vehicles

MAJ Harris,

This email is in response to your letter dated March 11, 2016, regarding the proposed fielding and training of three new types of vehicles. The proposed project will not result in the new construction, new training areas, or changes in personnel. Only existing facilities, training areas, training rooms, and other logistical support facilities will be utilized; therefore, we do not anticipate adverse effects to federally listed species under our jurisdiction.

Brian Scofield
Biologist
U.S. Fish & Wildlife Service
Pennsylvania Field Office

110 Radnor Rd; Suite 101
State College, PA 16801
814-234-4090 x7471



United States Department of Agriculture

MAR 24 2016

Major Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

Dear Major Harris,

Thank you for your letter dated, March 11, 2016 concerning the Nationwide Environmental Assessment (EA) for the proposed fielding and training of three new types of vehicles. The areas listed below are already in the urban development or in existing right-of-ways.

*1220th Area Clearance Platoon
McCrary Training Center, Fort Jackson, SC*

*1220th Engineer Battalion
McCrary Training Center, SC*

*1221st Clearance Company
McCrary Training Center, SC*

As a result, there is no significant impact on Prime or Statewide Important Farmlands.

For future reference, NRCS policy and procedures on prime and unique farmlands are published in the Code of Federal Regulations 7CFR657. The website is: http://www.access.gpo.gov/nara/cfr/waisidx_00/7cfr657_00.html. Detailed information can be found in Section 657.5 on this website.

If you require further information, please contact Kamara Holmes, State Soil Scientist at (803) 253-3896 or by e-mail kamara.holmes@sc.usda.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann English".

ANN ENGLISH
State Conservationist

Natural Resources Conservation Service
1835 Assembly Street, Room 950
Columbia, South Carolina 29201
(803) 253-3935
Fax: (855) 565-9308
Helping People Help the Land
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United States Department of the Interior

FISH AND WILDLIFE SERVICE

176 Croghan Spur Road, Suite 200
Charleston, South Carolina 29407



March 28, 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

Re: Environmental Assessment, Army National Guard Mine Vehicle Deployment, McCrady Training Center, Richland County, SC
FWS Log No. 2016-CPA-0078

Dear Major Harris:

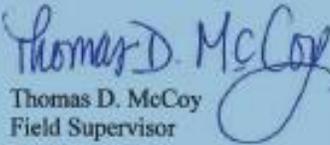
The U.S. Fish and Wildlife Service (Service) has received your letter seeking comments on the Army National Guard's (ARNG) proposed training at various installations across the United States. The ARNG is preparing an Environmental Assessment (EA) for the proposed fielding and training of three new types of vehicles: the Mine Clearance Vehicle, Mine Vehicle, and the Vehicle Mounted Mine Detection Vehicle at multiple locations in 26 States of the United States including the McCrady Training Center in South Carolina. Pursuant to the National Environmental Policy Act comments received will be incorporated into the ARNG EA.

Training activities will occur on the existing McCrady ARNG installation during drill weekends and annual, two-week training events. No new training areas or modifications to existing training areas are proposed. Existing facilities, including storage areas, training areas, training rooms, and other logistical support facilities, will be utilized during training exercises. The mine vehicles will be stored at existing McCrady ARNG Armory in secured areas. Mine vehicles will be transported from storage locations to the training site via trailer on public roads, if necessary. The vehicles will be cleaned at existing wash racks upon return. The purpose of the proposed action is to provide necessary mine detection and clearance equipment, training, and proficiency to ARNG units.

Upon consideration that there will be no expansion of training areas which may result in the loss of previously undisturbed habitat, the Service offers no objection to fielding or operating the new mine vehicles at the McCrady ARNG installation. However, due to obligations under the Endangered Species Act of 1973, potential impacts of this project must be reconsidered if: (1) new information reveals impacts of this identified action may affect any listed species or critical habitat in a manner not previously considered; (2) this action is subsequently modified in a manner, which was not considered in this assessment; or (3) a new species is listed or critical habitat is designated that may be affected by the identified action.

The Service appreciates the opportunity to provide comments for the EA and stands ready to provide further assistance if required. If you have any questions on the Service's comments please contact Mr. Mark Caldwell at 843-727-4707 ext. 215 and reference FWS Log No. 2016-CPA-0078.

Sincerely,


Thomas D. McCoy
Field Supervisor

TDM/MAC

37.9% ▼





NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

MAR 22 2016

#0133

11 March 2016

Environmental Programs Division, Army National Guard

No significant impacts to wetlands are anticipated from this proposal. No federally listed endangered or threatened species, or habitat suitable for such species, are known to exist in the project area.

Mary Jennings
US FWS Tennessee Regional Contact
446 Neal Street
Cookeville, TN 38501-4027

Mary E. Jennings 4/4/16
Field Supervisor Date
U.S. Fish and Wildlife Service
Cookeville, TN 38501

Dear Ms. Jennings:

The Army National Guard (ARNG) is preparing a Nationwide Environmental Assessment (EA) for proposed fielding and training of three new types of vehicles: the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) at multiple locations in the United States (see **Attachment 1**). We are seeking your agency's input into this National Environmental Policy Act (NEPA) process.

The ARNG proposes to field and train with the above-referenced vehicles in 26 States. No new construction, training areas, or changes in personnel is proposed; existing facilities, including storage areas, training areas, training rooms, and other logistical support facilities, would be utilized. **Attachments 2 and 3** provide a listing of Installations involved, as well as maps depicting locations of the Proposed Action. As this is a Federal Proposed Action, the ARNG is preparing a Nationwide EA in accordance with the NEPA.

The purpose of the Proposed Action is to provide necessary mine detection and clearance equipment, training, and proficiency to ARNG units. This action will strengthen ARNG mission readiness and capability. Proposed fielding locations are based on ARNG training requirements.

The vehicles would be stored at existing ARNG Armories and existing training sites in secure areas. Training would occur on existing ARNG and Army training sites on drill weekends and during two-week Annual Training events. Training during most drill weekends would only involve preventive maintenance checks and services. Generally, the vehicles would only be used in a training capacity two or three times per year. Vehicles would be transported from storage location(s) to the training site(s) via trailer on public roads. The vehicles would be cleaned at existing wash racks upon return and inspection. Maintenance would occur at the nearest ARNG maintenance facility.

The NEPA of 1969, as amended; the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508); and 32 CFR Part 651 Environmental Analysis of Army Actions; as well as the ARNG NEPA Handbook – *Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with NEPA* (2011), require us to complete an EA for this Proposed Action.

In association with this EA, we are consulting separately with pertinent State Historic Preservation Offices, Federally recognized Indian Tribes, as well as other environmental regulatory agencies and organizations in each of the 26 involved States.

Based on the nature of the Proposed Action and our preliminary research, we do not anticipate significant effects to environmental resources. We base our determination on the following considerations:

1. No new construction or other alteration to existing structures, training areas, or the landscape is proposed.
2. Only existing ARNG and Army storage areas, training areas, training rooms, and other logistical support facilities would be used, similar to the manner in which they are currently used. No new construction is proposed.
3. For site-specific fielding and training, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR Part 1502.20. Should any potential significant site-specific affect to an environmental resource be identified, further consultation with the appropriate agencies would occur prior to implementing the site-specific action.

In accordance with Executive Order 12372, *Intergovernmental Review of Federal Programs*, we request your assistance in identifying key issues and regulatory requirements to be addressed in the EA. Please provide comments and data your office may have with regard to the Proposed Action within thirty (30) days of receipt of this letter. All responses shall be considered for incorporation into the EA. Please send your written responses via mail to:

MAJ Samuel A. Harris
% AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

or via email to ng.ncr.ngb-arng.mbx.husky-flail-ea@mail.mil.

If you have any questions about the Proposed Action, please contact Mr. Jeffrey Coron at 703.607.9157, or via e-mail to jeffrey.l.coron.ctr@mail.mil.

Sincerely,



MAJ Samuel A. Harris
Chief, Assessments and
Evaluations Branch
Environmental Programs Division

Enclosures

Attachment 1. MCV, MV-4 and VMMD Vehicles

Attachment 2. Proposed Fielding and Training Location Maps

Attachment 3. Tables of Proposed Fielding Locations



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

April 8, 2016

Major Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

re: Mine Clearance Vehicle Deployment for Training

Dear Major Harris:

The Division has reviewed the information that was submitted to our Division on March 30, 2016, regarding the proposed fielding and training for mine clearance vehicles, mine vehicles, and vehicle mounted mine detection vehicles in 26 states.

The request for environmental assessment states that the vehicles would be stored at existing armories and training sites and used at existing ARNG and Army sites for the training. This project as proposed does not pose a significant impact on programs regulated by the Division of Water Resources.

If you have any further questions, I will be glad to try to assist you. You may reach me at (615) 532-0170 or tom.moss@tn.gov.

Sincerely,

A handwritten signature in blue ink that reads "Thomas A. Moss".

Thomas A. Moss
Environmental Review Coordinator
Compliance and Enforcement Unit



United States Department of Agriculture

Natural Resources
Conservation Service

State Office

101 S. Main Street
Temple, TX 76501
Voice 254.742.9800
Fax 254.742.9819

March 28, 2016

AECOM
12420 Milestone Center Drive
Suite 150
Germantown, Maryland 20876

Attention: MAJ Samuel Harris

Subject: LNU-Farmland Protection
Proposed Utilization of Field Location
Brown County, Texas

We have reviewed the information provided in your correspondence dated March 11, 2016 concerning the utilization of field locations in Brown County, Texas. This review is part of the National Environmental Policy Act (NEPA) evaluation for Department of the Army, Army National Guard (DOA/ARNG). We have evaluated the proposed site as required by the Farmland Protection Policy Act (FPPA).

The proposed project is considered to be "prior converted" and is exempt. The Farmland Conversion Impact Rating (Form AD-1006) indicating the exemption is enclosed. We encourage the use of accepted erosion control methods during the construction of this project.

If you have any questions, please contact me at (254) 742-9826 or by email at micki.yoder@tx.usda.gov.

Sincerely,

A handwritten signature in blue ink that reads "Micki Yoder".

Micki Yoder
NRCS Soil Conservationist

Attachment

An Equal Opportunity Provider and Employer

U.S. Department of Agriculture								
FARMLAND CONVERSION IMPACT RATING								
PART I (To be completed by Federal Agency)			Date Of Land Evaluation Request March 11, 2016					
Name of Project Utilization of Field Location			Federal Agency Involved DOA/ARNG					
Proposed Land Use			County and State Brown					
PART II (To be completed by NRCS)			Date Request Received By NRCS March 21, 2016					
Does the site contain prime, unique, statewide or local important farmland? <i>(If no, the FPPA does not apply - do not complete additional parts of this form)</i>				YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	Acres Irrigated	Average Farm Size	
Major Crop(s)		Farmable Land In Govt. Jurisdiction Acres: %		Amount of Farmland As Defined in FPPA Acres: %				
Name of Land Evaluation System Used		Name of State or Local Site Assessment System		Date Land Evaluation Returned by NRCS March 28, 2016				
PART III (To be completed by Federal Agency)				Alternative Site Rating				
				Site A	Site B	Site C	Site D	
A. Total Acres To Be Converted Directly								
B. Total Acres To Be Converted Indirectly								
C. Total Acres In Site								
PART IV (To be completed by NRCS) Land Evaluation Information								
A. Total Acres Prime And Unique Farmland								
B. Total Acres Statewide Important or Local Important Farmland								
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted								
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value								
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)								
PART VI (To be completed by Federal Agency) Site Assessment Criteria <i>(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)</i>				Maximum Points	Site A	Site B	Site C	Site D
1. Area In Non-urban Use				(15)				
2. Perimeter In Non-urban Use				(10)				
3. Percent Of Site Being Farmed				(20)				
4. Protection Provided By State and Local Government				(20)				
5. Distance From Urban Built-up Area				(15)				
6. Distance To Urban Support Services				(15)				
7. Size Of Present Farm Unit Compared To Average				(10)				
8. Creation Of Non-farmable Farmland				(10)				
9. Availability Of Farm Support Services				(5)				
10. On-Farm Investments				(20)				
11. Effects Of Conversion On Farm Support Services				(10)				
12. Compatibility With Existing Agricultural Use				(10)				
TOTAL SITE ASSESSMENT POINTS				160				
PART VII (To be completed by Federal Agency)								
Relative Value Of Farmland (From Part V)				100				
Total Site Assessment (From Part VI above or local site assessment)				160				
TOTAL POINTS (Total of above 2 lines)				260				
Site Selected:			Date Of Selection		Was A Local Site Assessment Used?			
					YES <input type="checkbox"/> NO <input type="checkbox"/>			
Reason For Selection:								
Name of Federal agency representative completing this form:						Date:		
(See Instructions on reverse side)						Form AD-1006 (03-02)		

From: Edwards, Sean <sean_edwards@fws.gov>
Sent: Thursday, May 05, 2016 12:26 PM
To: Bowins, Jade
Subject: Re: Army National Guard Environmental Assessment

Ms. Bowins,

Thank you for your May 4, 2016 e-mail and attachments inviting our participation in the preparation of a National Environmental Assessment for the fielding and training of three new mine detection and clearance vehicles at various military installations across the United States. Your attached letter indicates that there would be no anticipated adverse environmental impacts for the following reasons:

1. No new construction or other alteration to existing structures, training areas, or the landscape is proposed.
2. Only existing ARNG and Army storage areas, training areas, training rooms, and other logistical support facilities would be used, similar to the manner in which they are currently used. No new construction is proposed.
3. For site-specific fielding and training, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR Part 1502.20. Should any potential significant site-specific affect to an environmental resource be identified, further consultation with the appropriate agencies would occur prior to implementing the site-specific action.

Based upon the information provided, we believe that your conclusion that the proposed actions would not result in additional adverse impacts to environmental resources is sound and well supported. We look forward to addressing any site-specific project needs if necessary in the future. Thank you again for the opportunity to participate in this process. Please contact me with any additional needs.

Kind Regards,

Sean Edwards
Biologist - Environmental Review, Classification & Recovery
U.S. Fish & Wildlife Service
2005 NE Green Oaks Blvd., Ste 140
Arlington, Texas 76006
(817) 277-1100

On Wed, May 4, 2016 at 9:45 AM, Bowins, Jade <Jade.Bowins@aecom.com> wrote:
Good Morning Mr. Edwards,

I am working with the Army National Guard (ARNG) in Arlington, VA to send a notice of availability for a Nationwide Environmental Assessment for proposed fielding and training of three new types of Mine Clearance Vehicles. The proposed action was mailed to: US FWS Pacific Region, 1205 Royal Lane #120, Dallas, TX, 75229, but the documents were returned to sender.

I spoke with the Dallas FWS Office at 972-574-3254 and they directed me to the Ecological Services Office in Arlington, TX. I then spoke with Jacob Lewis and was instructed to send the documents to your email address for your review and comment. If you have any further questions or feel as though I have contacted you in error please feel free to contact me.

Sincerely,
Jade Bowins

Jade L. Bowins
Environmental Scientist, NEPA/Natural Resources

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 31, 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, Maryland 20876
Via: ng.ncr.ngb-arng.mbx.husky-flail-ea@mail.mil

Re: TCEQ NEPA Request #2016-055, Fielding and Training of three New Types of Vehicles,
City of Camp Bowie, Brown County

Dear MAJ Harris:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced project and offers the following comments:

A review of the project for general conformity impact in accordance with 40 CFR Part 93 indicates that the proposed action is located in Brown County, which is currently unclassified or in attainment of the National Ambient Air Quality Standards for all six criteria air pollutants. Therefore, general conformity rules do not apply.

Any debris or waste disposal should be at an appropriately authorized disposal facility.

Thank you for the opportunity to review this project. If you have any questions, please contact the agency NEPA Coordinator, at (512) 239-3500 or NEPA@tceq.texas.gov.

Sincerely,

A handwritten signature in cursive script that reads "Mark Harmon".

Mark Harmon
Division Director
Intergovernmental Relations

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

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April 5, 2016

MAJ Samuel A. Harris
 % AECOM
 12420 Milestone Center Drive
 Suite 150
 Germantown, MD 20876

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Bill Jones
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Jeanne W. Latimer
 San Antonio

James H. Lee
 Houston

S. Reed Morlan
 Houston

Dick Scott
 Wimberley

Kelcy L. Warren
 Dallas

Lee M. Bass
 Chairman-Emeritus
 Fort Worth

Carter P. Smith
 Executive Director

RE: Army National Guard (ARNG) Nationwide Environmental Assessment (EA) for proposed fielding and training of three new types of vehicles

Dear MAJ Harris:

Texas Parks and Wildlife Department (TPWD) has received request for assistance in identifying key issues and regulatory requirements to be addressed in the above EA. TPWD staff has reviewed the information provided and offers the following comments and recommendations concerning this project.

Project Description

The ARNG is preparing a Nationwide EA for proposed fielding and training of three new types of vehicles: the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) in 26 states. The ARNG proposes to field and train with 2-MCV's, 4-MV-4's, and 20-VMMD's at Camp Bowie, Texas.

No new construction, training areas, or changes in personnel is proposed. The vehicles would be stored at existing ARNG armories and existing training sites. Generally the vehicles would only be used in training capacity two or three times per year.

Recommendation: Based on the information provided, TPWD does not anticipate significant adverse impacts to rare, threatened or endangered species or other fish and wildlife resources at Camp Bowie, Texas from the project as proposed.

4200 SMITH SCHOOL ROAD
 AUSTIN, TEXAS 78744-3291
 512.389.4800
 www.tpwd.texas.gov

To manage and conserve the natural and cultural resources of Texas and to provide hunting, fishing and outdoor recreation opportunities for the use and enjoyment of present and future generations.

MAJ Samuel A. Harris
Page 2
April 5, 2016

TPWD appreciates the opportunity to provide comments on the proposed EA. Please contact me at (806) 761-4936 or Richard.Hanson@tpwd.texas.gov if you have any questions or need additional assistance.

Sincerely,



Rick Hanson
Wildlife Habitat Assessment Program
Wildlife Division

RH: gg.ERCS-12697

From: Adams, Michael S NAE <Michael.S.Adams@usace.army.mil>
Sent: Tuesday, April 05, 2016 7:59 AM
To: NG NCR NGB ARNG Mailbox Husky Flail EA
Cc: Coron, Jeffrey L CTR NG NGB (US)
Subject: MV-4 and VMMD located at Camp Johnson, Vermont

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

Regulatory Division
File No: NAE-2016-00709
MAJ Samuel A. Harris
Chief, Assessments and Evaluations Branch Environmental Programs Division

Dear Sir:

This is in reference to your letter concerning the Army National Guard's plans to field and train with the Mine Vehicle (MV-4) and the Vehicle Mounted Mine Detection Vehicle (VMMD) at Camp Johnson in Colchester, Vermont. Our regulatory jurisdiction encompasses all work in or affecting navigable waters of the United States under Section 10 of the Rivers and Harbors Act of 1899 and the discharge of dredged or fill material into all waters of the United States, including adjacent wetlands, as well as discharges associated with excavation and grading within those waters, under Section 404 of the Clean Water Act.

Based on your letter it does not appear that the project will involve any new work in waters of the U.S. Therefore, a Department of the Army permit would not be required.

If you have any questions please contact me at (802) 872-2893.

Best Regards,
Michael Adams

Michael S. Adams
Senior Project Manager
U.S. Army Corps of Engineers
New England District
11 Lincoln Street, Room 210
Essex Junction, Vermont 05452
(802) 872-2893 OR (978) 318-8860

In order for us to better serve you, we would appreciate your completing our Customer Service Survey located at http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey



Fish & Wildlife Department
Essex District Natural Resources Office
111 West Street
Essex Jct, VT 05452
[www. VtFishandWildlife.com](http://www.VtFishandWildlife.com)

[phone] 802-878-1564
[fax] 802-879-5649
[tdd] 802-828-3345

Agency Of Natural Resources

April 14, 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

Re: EA – Fielding and training of MCV, MV-4, and VMMD vehicles at Camp Johnson, VT

Dear Mr. Harris,

We have reviewed the Environmental Assessment for the portion of the project at Camp Johnson, VT. We would like to provide comment to address the wildlife concerns which we have documented at this site,

This area is noted for one of the few breeding habitats in Vermont for the state threatened grasshopper sparrow (*Ammodramus savannarum*). Recent surveys for the last several years have revealed that the open grassland areas at the camp are important for this species. We would recommend that any training with these new vehicles not be conducted during the May 1- August 1 time period in these open areas in order to protect their continued nesting at the camp. We would also recommend that any grass mowing or other site preparation activities in these areas not occur during this same period.

If you have any questions, please contact me. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "John Gobeille".

John Gobeille
Wildlife Biologist
Vermont Fish and Wildlife Department
111 West Street
Essex Jct., VT 05452
Ph:802-876-5696
e-mail: john.gobeille@vermont.gov



Conserving fish, wildlife, plants, and their habitats for the people of Vermont.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Virginia Field Office
6669 Short Lane
Gloucester, VA 23061

October 30, 2015



Greetings:

Due to increased workload and refinement of our priorities in Virginia, this office will no longer provide individual responses to requests for environmental reviews. However, we want to ensure that U.S. Fish and Wildlife Service trust resources continue to be conserved. When that is not possible, we want to ensure that impacts to these important natural resources are minimized and appropriate permits are applied for and received. We have developed a website that provides the steps and information necessary to allow any individual or entity requiring review/approval of their project to complete a review and come to the appropriate conclusion. This site can be accessed at: <http://www.fws.gov/northeast/virginiafield/endangered/projectreviews.html>.

The website is frequently updated to provide new species/trust resource information and methods to review projects. Refer to the website for each project review to ensure that current information and methods are utilized.

If you have any questions about project reviews or need assistance, please contact Troy Andersen of this office at (804) 824-2428 or troy_andersen@fws.gov.

Sincerely,

A handwritten signature in blue ink that reads "Cynthia A. Schulz".

Cindy Schulz
Field Supervisor
Virginia Ecological Services



Molly J. Ward
Secretary of Natural Resources

COMMONWEALTH of VIRGINIA
Department of Game and Inland Fisheries

Bob Duncan
Executive Director

March 23, 2016

Mr. Jeffrey I Coron
National Guard Bureau
111 South George Mason Drive
Arlington, VA 22204-1373

Re: Request for Determination of Impact upon Wildlife Resources: Vehicle Training Project – 11 March 2016 Letter

Dear Mr. Coron:

We appreciate that you submitted your project(s) for review by VDGIF to ensure the protection of sensitive wildlife resources during project development. Due to current staffing limitations within our Fish and Wildlife Information Services (FWIS) and Environmental Services sections, we are unable to review and provide comments on projects that are not currently involved in one of the regulatory review processes for which we are a consultatory agency (see <http://www.dgif.virginia.gov/environmental-programs/environmental-services-section.asp>). Please note that no response from VDGIF does not constitute “no comment” nor does it imply support of the project or associated activities. It simply means VDGIF has not been able to respond to your request.

To assist you in determining which, if any, wildlife resources under our jurisdiction, including threatened and endangered wildlife, may be present on or near your project site, we recommend that you access the Virginia Fish and Wildlife Information System (VAFWIS) at <http://vafwis.org/fwis/>.

If you should have further questions or need additional information about VDGIF’s Environmental Programs, please visit: <http://www.dgif.virginia.gov/environmental-programs/>.

Please feel free to attach a copy of this correspondence and any reports from VAFWIS with your project paper work to document your correspondence with us regarding this project.

Thank you,

A handwritten signature in black ink, appearing to read 'Shirl Dressler', written over a horizontal line.

Shirl Dressler, Program Support Technician
Acting Environmental Services Admin.

7870 Villa Park Drive, Ste 400, P.O. Box 90778, Henrico, VA 23228-0778
(804) 367-1000 (V/TDD) Equal Opportunity Employment, Programs and Facilities

From: GAMON, JOHN (DNR) <JOHN.GAMON@dnr.wa.gov>
Sent: Monday, April 11, 2016 1:14 PM
To: NG NCR NGB ARNG Mailbox Husky Flail EA
Subject: [Non-DoD Source] Nationwide EA for new types of vehicles

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

Sir:

Thank you for the opportunity to comment on the ARNG proposal to field and train three new types of vehicles. The Washington Natural Heritage Program manages information on the plant and animal species and ecosystems of conservation concern in the State of Washington, including the Yakima Training Center and other installations in Washington. We have enjoyed a good working relationship with the various installations in terms of sharing information on biological resources.

We do not have any key issues to add to the conversation at this point. However, as site-specific plans are developed for the Yakima Training Center, we would welcome an opportunity to provide site-specific information, as well as our expertise on the species and ecosystems of conservation concern, within the project area. Please let us know when and how we can be of assistance.

Sincerely,

John Gamon
Natural Heritage Conservation
Washington State Department of Natural Resources
1111 Washington Street SE
Olympia, Washington 98504-7014
(360) 902-1661
(360) 701-5184 (cell)
john.gamon@dnr.wa.gov



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
South Central Region • Region 3 • 1701 South 24th Avenue, Yakima, WA 98902-5720
Telephone: (509) 575-2740 • Fax: (509) 575-2474

April 18, 2016

MAJ Samuel A. Harris
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

Subject: Scoping Comments for an Environmental Assessment for fielding and training of Army National Guard personnel for Vehicle Mounted Mine Detection (VMMD) Vehicle on the Yakima Training Center (YTC)

Dear Mr. Harris:

Thank you for the opportunity to provide scoping comments on the draft Environmental Assessment (EA) for using mine clearance and detection vehicles on installations throughout the United States by Army National Guard personnel. One of the potential training opportunities identified in your letter was using Vehicle Mounted Mine Detection (VMMD) Vehicles on the Yakima Training Center (YTC). Washington Department of Fish and Wildlife (WDFW) have reviewed the letter of scoping that was received by our office on March 21, 2016. We have the following comments of areas that we would like to have addressed in the draft EA to be able to fully determine the impacts that this proposed project would have on fish and wildlife and their habitats.

Background

The YTC is part of one of the largest intact blocks of shrub-steppe native habitat left in Washington State and is home to a variety of wildlife species, including several that are currently on the Washington State candidate list. The YTC is also home to the only sustaining population of greater sage-grouse in south-central Washington State (the other populations are in north-central Washington). Greater sage-grouse is listed as a threatened species in Washington State by WDFW and was recently proposed for listing under the Endangered Species Act (ESA), though the decision was made to not list the species. While training is the primary focus of the YTC, it is critical that any proposed training efforts do not compromise the shrub-steppe habitats that these species rely on for survival.

Scope of the EA for the YTC portion

If the YTC is part of the draft EA, the following aspects need to be incorporated to ensure that the proposed training activities will not have significant impact to the fish and wildlife habitat on the YTC.

- *Fully identify the areas of training.*
To assess impacts to habitat, the proposed training areas as well as associated impacts such as vehicle haul routes and any areas where vehicles might be getting cleaned need to be identified. As the proposed training using VMMD could have damaging impacts to habitat if not conducted in previously disturbed areas devoid of native vegetation. Training areas should target these

Page 2

disturbed areas, as a measure of impact avoidance, rather than impacting existing shrub-steppe habitat.

- *Identify all species of concern near proposed training areas.*
Greater sage-grouse is the species of highest priority on the YTC and the draft EA should fully evaluate how the training will affect their biology, including lekking, nesting, rearing and winter foraging. In addition to the greater sage-grouse, all species of concern both State and Federal should be considered. Species of concern at a minimum should be defined as those listed and proposed for listing (candidate).
- *Identify all critical habitat areas near the proposed training areas.*
In addition to review of sensitive and listed wildlife species near the proposed training areas, and impacts to upland shrub-steppe habitat, the scope of the draft EA should also evaluate if other critical habitats may be impacted. Is the proposed action close enough to streams or wetlands so as to potentially cause erosion or discharge issues during periodic rain events on the YTC from training activities?
- *Fire risk and weed control.*
The draft EA also needs to address how fire prevention and weed control measures are being implemented as part of the proposed action to ensure that the habitat is not exposed to increased risk from noxious weeds and wildfires. Wildfires and spread of noxious weeds are two of the largest continuing threats to shrub-steppe habitat in the Columbia Basin and any proposed action needs to identify how that action will not lead to increased risk from fires or weeds.
- *Mitigation.*
If impacts to habitat and fish and wildlife species cannot be fully avoided and minimized, the draft EA should identify plans to mitigate for impacts. WDFW can be consulted for ideas on habitat mitigation if the need arises.

Again, thank you for the opportunity to provide scoping comments for this EA. Please send us a copy of the draft EA when it is ready for comment as we would like to review the draft EA and be involved in commenting on the fish and wildlife habitat impacts of the project. Please contact me at 509-457-9307 or Scott.Downes@dfw.wa.gov if you have questions or comments regarding this letter or other issues.

Sincerely,



Scott Downes
Area Habitat Biologist

cc: Perry Harvester, WDFW
Dan Doty, WDFW
Darric Lowery, WDFW

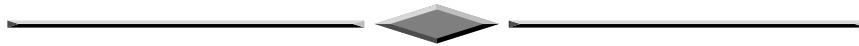
From: Yaeger, Aaron J CIV USARMY USAG (US) <aaron.j.yaeger.civ@mail.mil>
Sent: Friday, March 18, 2016 1:05 PM
To: NG NCR NGB ARNG Mailbox Husky Flail EA
Subject: Nationwide EA

Mr. Harris,

Fort McCoy does not have any additional comments on the nationwide EA. The use of the three mine vehicles will not change the goals, objectives, or natural resource protections that are outline in our Integrated Natural Resource Management Plan (INRMP). These vehicles are similar to vehicles that already operate on our installation.

Please supply us with a copy of the final EA/FNSI for our files. Thanks you.

Aaron J. Yaeger
DPW - Environmental Division
2171 South 8th Avenue
Fort McCoy, WI 54656
Office: (608)388-8985



APPENDIX B

STATE HISTORIC PRESERVATION OFFICE (SHPO) CONSULTATION AND NATIVE AMERICAN CONSULTATION (NAC)





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NATIONAL GUARD BUREAU

111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

DATE

Environmental Programs Division, Army National Guard

[INSERT NAME]
[INSERT TITLE]
[INSERT OFFICE]
[INSERT ADDRESS]
[INSERT CITY/ZIP CODE]

Dear [INSERT NAME]:

The Army National Guard (ARNG) is preparing a Nationwide Environmental Assessment (EA) for proposed fielding and training of three new types of vehicles: the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) at multiple locations in the United States (see **Attachment 1**). We are seeking your Tribe's input into this National Environmental Policy Act (NEPA) process.

The ARNG proposes to field and train with the above-referenced vehicles in 26 States. No new construction, training areas, or changes in personnel is proposed; existing facilities, including storage areas, training areas, training rooms, and other logistical support facilities, would be utilized. **Attachments 2 and 3** provide a listing of Installations involved, as well as maps depicting locations of the Proposed Action. As this is a Federal Proposed Action, the ARNG is preparing a Nationwide EA in accordance with the NEPA.

The purpose of the Proposed Action is to provide necessary mine detection and clearance equipment, training, and proficiency to ARNG units. This action will strengthen ARNG mission readiness and capability. Proposed fielding location is based on ARNG training requirements.

The vehicles would be stored at existing ARNG Armories and existing training sites in secure areas. Training would occur on existing ARNG and Army training sites on drill weekends and during two-week Annual Training events. Training during most drill weekends would only involve preventive maintenance checks and services. Generally, the vehicles would only be used in a training capacity two or three times per year. Vehicles would be transported from storage location(s) to the training site(s) via trailer on public roads. The vehicles would be cleaned at existing wash racks upon return and inspection. Maintenance would occur at the nearest ARNG maintenance facility.

The NEPA of 1969, as amended; the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508); and 32 CFR Part 651 Environmental

Analysis of Army Actions; as well as the ARNG NEPA Handbook – *Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with NEPA* (2011), require us to complete an EA for this Proposed Action.

Prior to implementing the Proposed Action, we wish to consult with Federally recognized Indian Tribes that may have ancestral ties to locations within the identified Installations in the 26 States.

We invite you to join us as a consulting party as we conduct this EA in accordance with 36 CFR § 800.2, Executive Order (EO) 13175, and Department of Defense Instruction (DoDI) 4710.02 – Interactions with Federally Recognized Tribes. Please provide any comments, concerns, information, studies, or other data you and/or your staff may have regarding the Proposed Action. All responses shall be considered for incorporation into the EA. Please direct your correspondence to:

NAME/ADDRESS

or via email to [email](#)

Upon your written request, a copy of the EA will be provided to you when available. Thank you for your assistance.

Sincerely,

NAME

Enclosures

- Attachment 1. MCV, MV-4 and VMMD Vehicles
- Attachment 2. Proposed Fielding and Training Location Maps
- Attachment 3. Tables of Proposed Fielding Locations

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY

EDMUND G. BROWN, JR., Governor

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**1725 23rd Street, Suite 100
SACRAMENTO, CA 95818-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov

#9

April 20, 2016

Refer to: USA_2016_0318_001

MAJ Samuel A. Harris
Chief, Assessments and Evaluations Branch
Environmental Programs Division
National Guard Bureau
111 South George Mason Drive
Arlington, VA 22204-1373

RE: Vehicle Training Field Proposal in 26 States

Dear Major Harris:

The National Guard Bureau (Guard) is consulting with the State Historic Preservation Officer (SHPO) in an effort to comply with Section 106 of the National Historic Preservation Act of 1966, as amended. The Guard is seeking concurrence with a finding of No Historic Properties Affected.

The Guard proposes to field and train with three new types of vehicles: a Mine Clearance Vehicle, Mine Vehicle, and a Vehicle-Mounted Mine Detection Vehicle. The vehicles will be employed in 26 states, including California. No new construction, training areas, or changes in personnel is proposed. For site-specific fielding and training, each state's Guard will develop a tiered NEPA document in accordance with 40 CFR Part 1502.20. Should any potential site-specific affect to historic properties protected under Section 106 be identified, further consultation with the SHPO will occur prior to implementing the action.

Having reviewed the proposal, SHPO has the following comments:

- The Guard's submittal does not include sufficient information to concur that the vehicle training program will not affect historic properties.
- SHPO recommends the Guard consult with the SHPO, the Native American community, and any interested parties prior to implementing training exercises that have the potential to affect historic properties. Please refer to the Section 106 Consultation Checklist on our website, at ohp.parks.ca.gov.

If the Guard has any questions or comments, please contact State Historian Tristan Tozer at (916) 445-7027 or at Tristan.Tozer@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer



MARK WILLIAMS
COMMISSIONER

DR. DAVID CRASS
DIVISION DIRECTOR

April 20, 2016

MAJ Samuel A. Harris
Chief, Assessments and Evaluations Branch
Environmental Programs Division
National Guard Bureau
111 South George Mason Drive
Arlington, Virginia 22204-1373
Attn: Eric Beckley

**RE: ARNG: Field and Train Mine-Related Vehicles, Fort Stewart
Nationwide
HP-160329-005**

Dear Major Harris:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced undertaking. Our comments are offered to assist the National Guard Bureau and the Army National Guard (ARNG) in complying with provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of fielding and training with three new types of mine-related vehicles at Fort Stewart, utilizing existing facilities and therefore, not requiring any new construction, training areas or changes in personnel. Based on the information provided, HPD concurs that no historic properties that are listed or eligible for listing in the National Register of Historic Places will be affected by this undertaking, as defined in 36 CFR Part 800.4(d)(1), due to the scope of work. Should any future construction, training areas or personnel changes be needed, as it relates to the subject undertaking, HPD should be given the opportunity to review and comment on the proposed project.

This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any future changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies to discuss such changes with our office to ensure that potential effects to historic resources are adequately considered in project planning.

Please refer to project number **HP-160329-005** in any future correspondence regarding this project. If we may be of further assistance, please do not hesitate to contact me at (770) 389-7851 or jennifer.dixon@dnr.ga.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "JD", is written over a faint, larger signature.

Jennifer Dixon, MHP, LEED Green Associate
Program Manager
Environmental Review & Preservation Planning

JEWETT CENTER FOR HISTORIC PRESERVATION
2610 GA HWY 155, SW | STOCKBRIDGE, GA 30281
770.389.7844 | FAX 770.389.7878 | WWW.GEORGIAHPO.ORG



NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

14 March 2016

Environmental Programs Division, Army National Guard

Ac*150477004
RECEIVED

MAR 22 2016

by SHPO

Steve King
Iowa State Historic Preservation Office
600 East Locust, 3-Floor East
Des Moines, IA 50319

Dear Mr. King:

We are seeking your agency's review and concurrence under Section 106 of the National Historic Preservation Act (NHPA; 36 CFR Part 800) that the Proposed Action, as described below, **would not affect** historic properties in your state, including archaeological and historic resources, eligible for listing on the National Register of Historic Places (NRHP). We respectfully request your review of the details below and a written response.

The Army National Guard (ARNG) proposes to field and train with three new types of vehicles: the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) in 26 States (see **Attachment 1**). No new construction, training areas, or changes in personnel is proposed; existing facilities, including storage areas, training areas, training rooms, and other logistical support facilities, would be utilized. **Attachments 2 and 3** provide a listing of Installations involved, as well as maps depicting locations of the Proposed Action. As this is a Federal Proposed Action, the ARNG is preparing a Nationwide EA in accordance with the National Environmental Policy Act (NEPA).

The purpose of the Proposed Action is to provide necessary mine detection and clearance equipment, training, and proficiency to ARNG units. This action will strengthen ARNG mission readiness and capability. Proposed fielding locations are based on ARNG training requirements.

The vehicles would be stored at existing ARNG Armories and existing training sites in secure areas. Training would occur on existing ARNG and Army training sites on drill weekends and during two-week Annual Training events. Training during most drill weekends would only involve preventive maintenance checks and services. Generally, the vehicles would only be used in a training capacity two or three times per year. Vehicles would be transported from storage location(s) to the training site(s) via trailer on public roads. The vehicles would be cleaned at existing wash racks upon return and inspection. Maintenance would occur at the nearest ARNG maintenance facility.

The NEPA of 1969, as amended; the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508); and 32 CFR Part 651 Environmental Analysis of Army Actions; as well as the ARNG NEPA Handbook – *Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with NEPA* (2011), require us to complete an EA for this Proposed Action.

In association with this EA, we are consulting with the State Historic Preservation Office (SHPO) in each of the 26 involved States under Section 106 of the NHPA, as well as with Federally recognized Indian Tribes.

Based on our research conducted pursuant to 36 CFR Part 800.4(a) and (b) to identify and evaluate historic properties, we have determined, pursuant to 36 CFR Part 800.4(d)(1), that there would be **no historic properties affected** as a result of our Proposed Action. We base our determination on the following considerations:

1. No new construction or other alteration to existing structures or the landscape is proposed.
2. Only existing ARNG and Army storage areas, training areas, training rooms, and other logistical support facilities would be used, similar to the manner in which they are currently used. No new construction or building alterations are proposed.
3. For site-specific fielding and training, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR Part 1502.20. Should any potential site-specific affect to historic properties protected under Section 106 be identified, further consultation with the SHPO would occur prior to implementing the site-specific action.

We respectfully request your response within thirty (30) days pursuant to 36 CFR Part 800.3(c)(4). Your response will become part of our written record documenting this concurrence and included within the associated NEPA documentation.

Please send your written responses via regular mail to:

Mr. Eric Beckley
% AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

or via email to ng.ncr.ngb-armg.mbx.husky-flail-ea@mail.mil.

If you have any questions about the Proposed Action, please contact Mr. Beckley at 703.601.7036, or via e-mail eric.r.beckley.civ@mail.mil.

Sincerely,



MAJ Samuel A. Harris
Chief, Assessments and
Evaluations Branch
Environmental Programs Division

Enclosures
Attachment 1. MCV, MV-4 and VMMD Vehicles
Attachment 2. Proposed Fielding and Training Location Maps
Attachment 3. Tables of Proposed Fielding Locations

CONCUR

NAME Douglas W. Jones
REVIEW & COMPLIANCE PROGRAM MANAGER
DATE 4/6/2016 SFTI

DNR

 Indiana Department of Natural Resources

Division of Historic Preservation & Archaeology • 402 W. Washington Street, W274 • Indianapolis, IN 46204-2739
Phone 317-232-1646 • Fax 317-232-0693 • dhpa@dnr.IN.gov



Michael R. Pence, Governor
Cameron F. Clark, Director

April 18, 2016

Eric Beckley
AECOM
12420 Milestone Center Drive, Suite 150
Germantown, Maryland 20876

Federal Agency: National Guard Bureau

Re: Project information and the National Guard Bureau's finding of "no historic properties affected" concerning the proposed fielding and training with three types of vehicles (DHPA #18997)

Dear Mr. Beckley:

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials dated March 14, 2016 and received on March 18, 2016, for the above indicated project at Camp Atterbury, Johnson County, Indiana.

We concur with the National Guard Bureau's March 14, 2016 finding of No Historic Properties Affected for the above indicated project.

If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and 29) requires that the discovery must be reported to the Department of Natural Resources within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and 29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. 800.

A copy of the revised 36 C.F.R. Part 800 that went into effect on August 5, 2004, may be found on the Internet at www.achp.gov for your reference. If you have questions about this determination, please contact Chad Slider at (317) 234-5366 or cslider@dnr.IN.gov. Additionally, in all future correspondence regarding the above indicated project, please refer to DHPA #18997.

Very truly yours,

Mitchell K. Zoll
Deputy State Historic Preservation Officer

MKZ:CWS:cws

The DNR mission: Protect, enhance, preserve and wisely use natural, cultural and recreational resources for the benefit of Indiana's citizens through professional leadership, management and education.

www.DNR.IN.gov
An Equal Opportunity Employer



NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

14 March 2016

Environmental Programs Division, Army National Guard

NEPA Contact
Louisiana Division of Historic Preservation
P.O. Box 44247
Baton Rouge, LA 70804

Dear NEPA Contact:

We are seeking your agency's review and concurrence under Section 106 of the National Historic Preservation Act (NHPA; 36 CFR Part 800) that the Proposed Action, as described below, **would not affect** historic properties in your state, including archaeological and historic resources, eligible for listing on the National Register of Historic Places (NRHP). We respectfully request your review of the details below and a written response.

The Army National Guard (ARNG) proposes to field and train with three new types of vehicles: the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) in 26 States (see **Attachment 1**). No new construction, training areas, or changes in personnel is proposed; existing facilities, including storage areas, training areas, training rooms, and other logistical support facilities, would be utilized. **Attachments 2 and 3** provide a listing of Installations involved, as well as maps depicting locations of the Proposed Action. As this is a Federal Proposed Action, the ARNG is preparing a Nationwide EA in accordance with the National Environmental Policy Act (NEPA).

The purpose of the Proposed Action is to provide necessary mine detection and clearance equipment, training, and proficiency to ARNG units. This action will strengthen ARNG mission readiness and capability. Proposed fielding locations are based on ARNG training requirements.

The vehicles would be stored at existing ARNG Armories and existing training sites in secure areas. Training would occur on existing ARNG and Army training sites on drill weekends and during two-week Annual Training events. Training during most drill weekends would only involve preventive maintenance checks and services. Generally, the vehicles would only be used in a training capacity two or three times per year. Vehicles would be transported from storage location(s) to the training site(s) via trailer on public roads. The vehicles would be cleaned at existing wash racks upon return and inspection. Maintenance would occur at the nearest ARNG maintenance facility.

RECEIVED

MAR 18 2016

ARCHAEOLOGY

If you have any questions about the Proposed Action, please contact Mr. Beckley at 703.601.7036, or via e-mail eric.r.beckley.civ@mail.mil.

Sincerely,



MAJ Samuel A. Harris
Chief, Assessments and
Evaluations Branch
Environmental Programs Division

Enclosures

- Attachment 1. MCV, MV-4 and VMMD Vehicles
- Attachment 2. Proposed Fielding and Training Location Maps
- Attachment 3. Tables of Proposed Fielding Locations

No known historic properties will be affected by this undertaking. Therefore, our office has no objection to the implementation of this project. This effect determination could change should new information come to our attention.



Phil Boggan
State Historic Preservation Officer

Date

04/13/2016



Using the Power of History to Transform Lives
PRESERVING > SHARING > CONNECTING

MINNESOTA HISTORIC PRESERVATION OFFICE

April 11, 2016

MAJ Samuel A. Harris, Chief
Assessments and Evaluations Branch
Environmental Programs Division
National Guard Bureau
111 South George Mason Drive
Arlington, VA 22204-1373

RE: Army National Guard proposal to field and train with three new types of vehicles:
Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection
Vehicle (VMMD)
Camp Ripley, Morrison County, Minnesota
MnHPO Number: 2016-1943

Dear MAJ Samuel A. Harris:

Thank you for the opportunity to comment on the above project. Information received in our office on 18 March 2016 has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by Section 106 of the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800.

Based on available information, we concur with your agency's determination that **no historic properties will be affected** by this project.

Please contact our Compliance Section at (651) 259-3455 if you have any questions regarding our review of this project.

Sincerely,

A handwritten signature in cursive script that reads 'Sarah J. Beimers'.

Sarah J. Beimers, Manager
Government Programs and Compliance

cc: Eric Beckley, AECOM - Germantown, MD

MISSISSIPPI DEPARTMENT *of* ARCHIVES AND HISTORY

HISTORIC PRESERVATION
Jim Woodrick, director
PO Box 571, Jackson, MS 39205-0571
601-576-6940 • Fax 601-576-6955
mdah.state.ms.us

April 14, 2016

Mr. Eric Beckley
AECOM
12420 Milestone Center Drive, Suite 150
Germantown, MD 20876

RE: Proposed fielding and training for three vehicle training programs, specifically the Mounted Mine Detection Vehicle (VMMD) National Guard Bureau, in Camp Shelby, Mississippi, MDAH Project Log #03-141-16, Forrest County

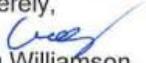
Dear Mr. Beckley:

We have reviewed the National Guard Bureau's request for a cultural resources assessment, received on March 21, 2016, for the preparation of an environmental assessment for the above referenced project in accordance with our responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR Part 800. After review, it is our determination that, while there are multiple National Register listed and eligible resources in Camp Shelby, the proposed programs as described are unlikely to have an effect on these resources. As such, we would concur with the National Guard Bureau's determination of no effect to cultural resources.

Should the nature of the programs change in such a way that would require new earth-disturbing work, or the demolition or alteration of historic structures, we would like the opportunity to reassess the program implementation and comment on the potential for effects to eligible cultural resources.

If you have any questions, please contact me at 601-576-6538.

Sincerely,


Greg Williamson
Review and Compliance Officer

FOR: Katie Blount
State Historic Preservation Officer



NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

14 March 2016

16-1400-1 mc
HPO-D2016-139

#10

MAR 21 2016

Environmental Programs Division, Army National Guard

Daniel Saunders
New Jersey DEP Historic Preservation Office
501 E. State St., Plaza Building 5, 4th Floor
Trenton, NJ 08625

Dear Mr. Saunders:

We are seeking your agency's review and concurrence under Section 106 of the National Historic Preservation Act (NHPA; 36 CFR Part 800) that the Proposed Action, as described below, **would not affect** historic properties in your state, including archaeological and historic resources, eligible for listing on the National Register of Historic Places (NRHP). We respectfully request your review of the details below and a written response.

The Army National Guard (ARNG) proposes to field and train with three new types of vehicles: the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) in 26 States (see **Attachment 1**). No new construction, training areas, or changes in personnel is proposed; existing facilities, including storage areas, training areas, training rooms, and other logistical support facilities, would be utilized. **Attachments 2 and 3** provide a listing of Installations involved, as well as maps depicting locations of the Proposed Action. As this is a Federal Proposed Action, the ARNG is preparing a Nationwide EA in accordance with the National Environmental Policy Act (NEPA).

The purpose of the Proposed Action is to provide necessary mine detection and clearance equipment, training, and proficiency to ARNG units. This action will strengthen ARNG mission readiness and capability. Proposed fielding locations are based on ARNG training requirements.

The vehicles would be stored at existing ARNG Armories and existing training sites in secure areas. Training would occur on existing ARNG and Army training sites on drill weekends and during two-week Annual Training events. Training during most drill weekends would only involve preventive maintenance checks and services. Generally, the vehicles would only be used in a training capacity two or three times per year. Vehicles would be transported from storage location(s) to the training site(s) via trailer on public roads. The vehicles would be cleaned at existing wash racks upon return and inspection. Maintenance would occur at the nearest ARNG maintenance facility.

100-1400-1
HPO-D901e-139

The NEPA of 1969, as amended; the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508); and 32 CFR Part 651 Environmental Analysis of Army Actions; as well as the ARNG NEPA Handbook – *Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with NEPA* (2011), require us to complete an EA for this Proposed Action.

In association with this EA, we are consulting with the State Historic Preservation Office (SHPO) in each of the 26 involved States under Section 106 of the NHPA, as well as with Federally recognized Indian Tribes.

Based on our research conducted pursuant to 36 CFR Part 800.4(a) and (b) to identify and evaluate historic properties, we have determined, pursuant to 36 CFR Part 800.4(d)(1), that there would be **no historic properties affected** as a result of our Proposed Action. We base our determination on the following considerations:

1. No new construction or other alteration to existing structures or the landscape is proposed.
2. Only existing ARNG and Army storage areas, training areas, training rooms, and other logistical support facilities would be used, similar to the manner in which they are currently used. No new construction or building alterations are proposed.
3. For site-specific fielding and training, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR Part 1502.20. Should any potential site-specific affect to historic properties protected under Section 106 be identified, further consultation with the SHPO would occur prior to implementing the site-specific action.

We respectfully request your response within thirty (30) days pursuant to 36 CFR Part 800.3(c)(4). Your response will become part of our written record documenting this concurrence and included within the associated NEPA documentation.

Please send your written responses via regular mail to:

Mr. Eric Beckley
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

or via email to ng.ncr.ngb-arng.mbx.husky-flail-ea@mail.mil.

16-1700-1
HPO-Doole-139

If you have any questions about the Proposed Action, please contact Mr. Beckley at 703.601.7036, or via e-mail eric.r.beckley.civ@mail.mil.

Sincerely,



MAJ Samuel A. Harris
Chief, Assessments and
Evaluations Branch
Environmental Programs Division

Enclosures
Attachment 1. MCV, MV-4 and VMMD Vehicles
Attachment 2. Proposed Fielding and Training Location Maps
Attachment 3. Tables of Proposed Fielding Locations

CONCUR

 4/18/16
DATE

DEPUTY STATE HISTORIC
PRESERVATION OFFICER
DANIEL D. SAUNDERS



ANDREW M. CUOMO
Governor

**Parks, Recreation,
and Historic Preservation**

ROSE HARVEY
Commissioner

April 04, 2016

Mr. Eric Beckley
AECOM
12420 Milestone Center Dr, Suite 150
Germantown, MD 20876

Re: ANG
ARNG training with 3 types of vehicles
, NY
16PR02152

Dear Mr. Beckley:

Thank you for requesting the comments of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the project in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the OPRHP and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (6 NYCRR Part 617).

Based upon this review, it is the New York State Office of Parks, Recreation and Historic Preservation's opinion that your project will have no impact on archaeological and/or historic resources listed in or eligible for the New York State and National Registers of Historic Places.

If further correspondence is required regarding this project, please be sure to refer to the OPRHP Project Review (PR) number noted above.

Sincerely,

Ruth L. Pierpont

Deputy Commissioner for Historic Preservation

Division for Historic Preservation

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • www.nysparks.com



April 13, 2016

In reply, please refer to:
2016-POR-34604

Mr. Eric Beckley
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, Maryland 20876

RE: Mine Vehicle Fielding and Training – Camp Ravenna, Portage County, Ohio

Dear Mr. Beckley:

This letter is in response to correspondence received on March 17, 2016 regarding the above referenced project. Our comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

The Army National Guard (ARNG) proposes to field and train with three new types of vehicles: the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) in 26 States, including Ohio. No new construction, training areas, or changes in personnel is proposed. Existing facilities, including storage areas, training areas, training rooms, and other logistical support facilities will be utilized. The vehicles will be stored at existing ARNG Armories and existing training sites in secure areas.

Based on the information submitted, we agree with your finding that no historic properties will be affected. Should any site-specific effects to historic properties protected under Section 106 be identified, further consultation with our office should occur prior to implementing the site-specific action.

If you have any questions about this letter or our review of this project, please contact me at jwilliams@ohiohistory.org or (614) 298-2000. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Joy Williams".

Joy Williams, Project Reviews Manager
Resource Protection and Review

RPR Serial No: 1062667

800 E. 17th Ave., Columbus, OH 43211-2474 • 614.297.2300 • ohiohistory.org

**Oklahoma Historical Society**

Founded May 27, 1893

#4

State Historic Preservation OfficeOklahoma History Center • 800 Nazih Zuhdi Drive • Oklahoma City, OK 73105-7917
(405) 521-6249 • Fax (405) 522-0816 • www.okhistory.org/shpo/shpom.htm

April 8, 2016

Major Samuel Harris
Chief, Assessments & Evaluations Branch
National Guard Bureau
111 South George Mason Drive
Arlington, VA 22204-1373RE: File #1165-16; Army National Guard Proposed Use of VMMD Vehicles at Camp Gruber,
Muskogee County, Oklahoma

Dear Major Harris:

We have received and reviewed the documentation concerning the referenced project in Muskogee County, Oklahoma. We concur with your opinion that no historic properties will be affected by the distribution of equipment to the Army National Guard Installation (ARNG), Camp Gruber Training Center as no construction or ground-disturbing activity is involved in the project.

If you have any questions, please contact Catharine M. Wood, Historical Archaeologist, at 405/521-6381. Should further correspondence pertaining to this project be necessary, please reference the above underlined file number. Thank you.

Sincerely,

Melvena Heisch
Deputy State Historic
Preservation Officer

MH:pm

cc: Mr. Eric Beckley, AECOM, Germantown, MD
Major Terry C. Hale, Jr., Oklahoma Army National Guard, Oklahoma City



Oregon

Kate Brown, Governor

Parks and Recreation Department

State Historic Preservation Office

725 Summer St NE Ste C

Salem, OR 97301-1266

Phone (503) 986-0690

Fax (503) 986-0793

www.oregonheritage.org



April 20, 2016

Mr. Erick Beckley
c/o AECOM
12420 Milestone Center Dr
Germantown, MD 20876

RE: SHPO Case No. 16-0503

DOD, National Guard Bureau, Training With Vehicles MCV, MV-4 and VMMD Project

Field training

Camp Rilea, Camp Adair, Biak Training Center, Multiple County

Dear Mr. Beckley:

Our office recently received a request to review the project referenced above. We have reviewed the request and concur that the project will likely have no effect on any significant historic properties. Based on the information provided, additional NHPA research is not anticipated for this project.

If you have not already done so, be sure to consult with all appropriate Indian tribes regarding your proposed project. If you have any questions regarding any future discovery or this letter, feel free to contact me at your convenience.

Sincerely,

Matt Diederich, MAIS
SHPO Archaeologist
(503) 986-0577
Matthew.Diederich@oregon.gov



Pennsylvania State Historic Preservation Office
PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

April 6, 2016

Mr. Eric Beckley
AECOM
12420 Milestone Center Drive, Suite 150
Germantown, MD 20876

NO EXTENSIVE REVIEW USE
ORP REFERENCE NUMBER

Re: File No. ER 2016-1019-042-A
DOD: MCV, MV-4 & VMMD Vehicles Proposed Equipment Fielding, Dauphin & Lebanon
Counties

Dear Mr. Beckley:

Thank you for submitting information concerning the above referenced project. The PA State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 *et seq.* (1988) is the primary state legislation. These laws include consideration of the project's McLearen, Chief

Archaeology

There is a high probability that archaeological resources are located in this project area. In our opinion, the activity described in your proposal should have no effect on such resources. Should the scope of the project be amended to include additional ground disturbing activity, this office should be contacted immediately and a Phase I Archaeological Survey may be necessary to locate all potentially significant archaeological resources.

Above Ground Resources

The properties listed below, listed in or eligible for the National Register of Historic Places, are located near the project area. In our opinion, the activity described in your proposal will have no effect on such resources. Should the scope and/or nature of the project activities change, the Pennsylvania State Historic Preservation Office (PA SHPO) should be contacted immediately.

Fort Indiantown Gap Historic District

Commonwealth Keystone Building | 400 North Street | 2nd Floor | Harrisburg, PA 17120 | 717.783.8947

Page 2
April 6, 2016
ER No. 2016-1019-042-A

If you need further information concerning archaeological issues please consult Doug McLearen at (717) 772-0925 or dmclearen@pa.gov. If you need further information on above ground resources please consult Cheryl Nagle at (717) 772-4519 or chnagle@pa.gov.

Sincerely,



Douglas C. McLearen, Chief
Division of Archaeology &
Protection

DCM/tmw



#6

TENNESSEE HISTORICAL COMMISSION
STATE HISTORIC PRESERVATION OFFICE
2941 LEBANON ROAD
NASHVILLE, TENNESSEE 37243-0442
OFFICE: (615) 532-1550

April 12, 2016

Maj Samuel A. Harris
National Guard Bureau
111 S. George Mason Dr.
Arlington, Virginia, 22204-1373

RE: DOD, TRAINING/MCV/MV-4/VMMMD, FT. CAMPBELL, MONTGOMERY COUNTY

Dear Maj Harris:

In response to your request, received on Friday, April 1, 2016, we have reviewed the documents you submitted regarding your proposed undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicant for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800. You may wish to familiarize yourself with these procedures (Federal Register, December 12, 2000, pages 77698-77739) if you are unsure about the Section 106 process.

After considering the documents you submitted, we determine that THERE ARE NO NATIONAL REGISTER OF HISTORIC PLACES LISTED OR ELIGIBLE PROPERTIES AFFECTED BY THIS UNDERTAKING. We have made this determination either because: the undertaking will not alter any characteristics of an identified eligible or listed Historic Property that qualify the property for listing in the National Register, the undertaking will not alter an eligible Historic Property's location, setting or use, the specific location, scope and/or nature of the undertaking precluded affect to Historic Properties, the size and nature of the undertaking's area of potential effects precluded affect to Historic Properties, or, no National Register listed or eligible Historic Properties exist within the undertaking's area of potential effects. Therefore, we have no objections to your proceeding with your undertaking.

If your agency proposes any modifications in current project plans or discovers any archaeological remains during the ground disturbance or construction phase, please contact this office to determine what further action, if any, will be necessary to comply with Section 106 of the National Historic Preservation Act. If you are applying for federal funds, license or permit, you should submit this letter as evidence of consultation under Section 106 to the appropriate federal agency, which, in turn, should contact us as required by 36 CFR 800. If you represent a federal agency, you should submit a formal determination of eligibility and effect to us for comment. You may find additional information concerning the Section 106 process and the Tennessee SHPO's documentation requirements at <http://www.tennessee.gov/environment/hist/federal/sect106.shtm>. You may direct questions or comments to Joe Garrison (615) 770-1092. This office appreciates your cooperation.

Sincerely,

E. Patrick McIntyre, Jr.
Executive Director and
State Historic Preservation Officer

EPM/jyg

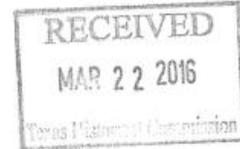


NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

14 March 2016

Environmental Programs Division, Army National Guard

NEPA Contact
Texas Historical Commission
P.O. Box 12276
Austin, TX 78711



Dear NEPA Contact:

We are seeking your agency's review and concurrence under Section 106 of the National Historic Preservation Act (NHPA; 36 CFR Part 800) that the Proposed Action, as described below, **would not affect** historic properties in your state, including archaeological and historic resources, eligible for listing on the National Register of Historic Places (NRHP). We respectfully request your review of the details below and a written response.

The Army National Guard (ARNG) proposes to field and train with three new types of vehicles: the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) in 26 States (see **Attachment 1**). No new construction, training areas, or changes in personnel is proposed; existing facilities, including storage areas, training areas, training rooms, and other logistical support facilities, would be utilized. **Attachments 2 and 3** provide a listing of Installations involved, as well as maps depicting locations of the Proposed Action. As this is a Federal Proposed Action, the ARNG is preparing a Nationwide EA in accordance with the National Environmental Policy Act (NEPA).

The purpose of the Proposed Action is to provide necessary mine detection and clearance equipment, training, and proficiency to ARNG units. This action will strengthen ARNG mission readiness and capability. Proposed fielding locations are based on ARNG training requirements.

The vehicles would be stored at existing ARNG Armories and existing training sites in secure areas. Training would occur on existing ARNG and Army training sites on drill weekends and during two-week Annual Training events. Training during most drill weekends would only involve preventive maintenance checks and services. Generally, the vehicles would only be used in a training capacity two or three times per year. Vehicles would be transported from storage location(s) to the training site(s) via trailer on public roads. The vehicles would be cleaned at existing wash racks upon return and inspection. Maintenance would occur at the nearest ARNG maintenance facility.

If you have any questions about the Proposed Action, please contact Mr. Beckley at 703.601.7036, or via e-mail eric.r.beckley.civ@mail.mil.

Sincerely,



MAJ Samuel A. Harris
Chief, Assessments and
Evaluations Branch
Environmental Programs Division

Enclosures
Attachment 1. MCV, MV-4 and VMMD Vehicles
Attachment 2. Proposed Fielding and Training Location Maps
Attachment 3. Tables of Proposed Fielding Locations

CONCUR	
by	
for	Mark Wolfe
	State Historic Preservation Officer
Date	4/6/16
Track#	



NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

14 March 2016

Environmental Programs Division, Army National Guard

Laura Trieschmann
Vermont Division for Historic Preservation
National Life Building, Drawer 2
Montpelier, VT 05620



Dear Ms. Trieschmann:

We are seeking your agency's review and concurrence under Section 106 of the National Historic Preservation Act (NHPA; 36 CFR Part 800) that the Proposed Action, as described below, **would not affect** historic properties in your state, including archaeological and historic resources, eligible for listing on the National Register of Historic Places (NRHP). We respectfully request your review of the details below and a written response.

The Army National Guard (ARNG) proposes to field and train with three new types of vehicles: the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) in 26 States (see **Attachment 1**). No new construction, training areas, or changes in personnel is proposed; existing facilities, including storage areas, training areas, training rooms, and other logistical support facilities, would be utilized. **Attachments 2 and 3** provide a listing of Installations involved, as well as maps depicting locations of the Proposed Action. As this is a Federal Proposed Action, the ARNG is preparing a Nationwide EA in accordance with the National Environmental Policy Act (NEPA).

The purpose of the Proposed Action is to provide necessary mine detection and clearance equipment, training, and proficiency to ARNG units. This action will strengthen ARNG mission readiness and capability. Proposed fielding locations are based on ARNG training requirements.

The vehicles would be stored at existing ARNG Armories and existing training sites in secure areas. Training would occur on existing ARNG and Army training sites on drill weekends and during two-week Annual Training events. Training during most drill weekends would only involve preventive maintenance checks and services. Generally, the vehicles would only be used in a training capacity two or three times per year. Vehicles would be transported from storage location(s) to the training site(s) via trailer on public roads. The vehicles would be cleaned at existing wash racks upon return and inspection. Maintenance would occur at the nearest ARNG maintenance facility.

The NEPA of 1969, as amended; the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508); and 32 CFR Part 651 Environmental Analysis of Army Actions; as well as the ARNG NEPA Handbook – *Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with NEPA* (2011), require us to complete an EA for this Proposed Action.

In association with this EA, we are consulting with the State Historic Preservation Office (SHPO) in each of the 26 involved States under Section 106 of the NHPA, as well as with Federally recognized Indian Tribes.

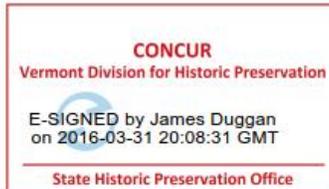
Based on our research conducted pursuant to 36 CFR Part 800.4(a) and (b) to identify and evaluate historic properties, we have determined, pursuant to 36 CFR Part 800.4(d)(1), that there would be **no historic properties affected** as a result of our Proposed Action. We base our determination on the following considerations:

1. No new construction or other alteration to existing structures or the landscape is proposed.
2. Only existing ARNG and Army storage areas, training areas, training rooms, and other logistical support facilities would be used, similar to the manner in which they are currently used. No new construction or building alterations are proposed.
3. For site-specific fielding and training, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR Part 1502.20. Should any potential site-specific affect to historic properties protected under Section 106 be identified, further consultation with the SHPO would occur prior to implementing the site-specific action.

We respectfully request your response within thirty (30) days pursuant to 36 CFR Part 800.3(c)(4). Your response will become part of our written record documenting this concurrence and included within the associated NEPA documentation.

Please send your written responses via regular mail to:

Mr. Eric Beckley
% AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876



or via email to ng.ncr.ngb-armg.mbx.husky-flail-ea@mail.mil.

If you have any questions about the Proposed Action, please contact Mr. Beckley at 703.601.7036, or via e-mail eric.r.beckley.civ@mail.mil.

Sincerely,



MAJ Samuel A. Harris
Chief, Assessments and
Evaluations Branch
Environmental Programs Division

Enclosures

- Attachment 1. MCV, MV-4 and VMMD Vehicles
- Attachment 2. Proposed Fielding and Training Location Maps
- Attachment 3. Tables of Proposed Fielding Locations



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

March 21, 2016

Major Samuel A. Harris
Environmental Programs Division
National Guard Bureau
111 South George Mason Drive
Arlington, Virginia 22204-1371

Re: Vehicle Mounted Mine Detection (VMMD)
Log No.: 2016-03-01887-DOA

Dear Major Harris:

Thank you for contacting our department. We have reviewed the information you provided for the proposed Vehicle Mounted Mine Detection (VMMD) Stationing at the Yakima Training Center, Yakima County, Washington.

We concur with your Determination of No Historic Properties Affected.

We would also request receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and the concerned tribes and this department notified.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4.).

Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rob Whitlam', is written over a horizontal line.

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 890-2615
email: rob.whitlam@dahp.wa.gov

State of Washington • Department of Archaeology & Historic Preservation
P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 586-3065
www.dahp.wa.gov



HP-05-07 (8/15/03)

For SHPO Use Only. Case # 15-0414/Mo

REQUEST FOR SHPO COMMENT AND CONSULTATION ON A FEDERAL UNDERTAKING

#8

Submit one copy with each undertaking for which our comment is requested. Please print or type. Return to:

Wisconsin Historical Society, Division of Historic Preservation, Office of Preservation Planning, 816 State Street, Madison, WI 53706

RECEIVED
APR 06 2016

Please Check All Boxes and Include All of the Following Information, as Applicable:

I. GENERAL INFORMATION

- This is a new submittal.
 - This is supplemental information relating to Case #: _____ and title: _____
 - This project is being undertaken pursuant to the terms and conditions of a programmatic or other interagency agreement.
- The title of the agreement is _____

BY: _____

- a. Federal Agency Jurisdiction (Agency providing funds, assistance, license, permit): Army National Guard
- b. Federal Agency Contact Person: Eric Beckley Phone: 703-601-7036
- c. Project Contact Person: Eric Beckley Phone: 703-601-7036
- d. Return Address: ATTN: ARNG-IEN, 111 S. George Mason Dr. Arlington VA Zip Code: 22201
- e. Email Address: eric.r.beckley.civ@mail.mil
- f. Project Name: ARNG Equipment Fielding - VMMD and MV-4 Stationing
- g. Project Street Address: Fort McCoy, 1654 South 11th Avenue, Fort McCoy, WI
- h. County: Monroe City: _____ Zip Code: 54656
- i. Project Location: Township _____, Range _____, E/W (circle one), Section _____, Quarter Sections _____
- j. Project Narrative Description—Attach Information as Necessary.
- k. Area of Potential Effect (APE). Attach Copy of U.S.G.S. 7.5 Minute Topographic Quadrangle Showing APE.

II. IDENTIFICATION OF HISTORIC PROPERTIES

- Historic Properties are located within the project APE per 36 CFR 800.4. Attach supporting materials.
- Historic Properties are not located within the project APE per 36 CFR 800.4. Attach supporting materials.

III. FINDINGS

- No historic properties will be affected (i.e., none is present or there are historic properties present but the project will have no effect upon them). Attach necessary documentation, as described at 36 CFR 800.11.
- The proposed undertaking will have no adverse effect on one or more historic properties located within the project APE under 36 CFR 800.5. Attach necessary documentation, as described at 36 CFR 800.11.
- The proposed undertaking will result in an adverse effect to one or more historic properties and the applicant, or other federally authorized representative, will consult with the SHPO and other consulting parties to resolve the adverse effect per 36 CFR 800.6. Attach necessary documentation, as described at 36 CFR 800.11, with a proposed plan to resolve adverse effect(s).

Authorized Signature: BECKLEY.ERIC.R.1378990293 Date: 4/5/2016

Type or print name: Eric Beckley

IV. STATE HISTORIC PRESERVATION OFFICE COMMENTS

- Agree with the finding in section III above.
- Object to the finding for reasons indicated in attached letter.
- Cannot review until information is sent as follows: _____

Authorized Signature: _____ Date: 4-6-16

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NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

DATE

Environmental Programs Division, Army National Guard

**[INSERT NAME]
[INSERT TITLE]
[INSERT OFFICE]
[INSERT ADDRESS]
[INSERT CITY/ZIP CODE]**

Dear **[INSERT NAME]**:

We are seeking your agency's review and concurrence under Section 106 of the National Historic Preservation Act (NHPA; 36 CFR Part 800) that the Proposed Action, as described below, **would not affect** historic properties in your state, including archaeological and historic resources, eligible for listing on the National Register of Historic Places (NRHP). We respectfully request your review of the details below and a written response.

The Army National Guard (ARNG) proposes to field and train with three new types of vehicles: the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) in 26 States (see **Attachment 1**). No new construction, training areas, or changes in personnel is proposed; existing facilities, including storage areas, training areas, training rooms, and other logistical support facilities, would be utilized. **Attachments 2 and 3** provide a listing of Installations involved, as well as maps depicting locations of the Proposed Action. As this is a Federal Proposed Action, the ARNG is preparing a Nationwide EA in accordance with the National Environmental Policy Act (NEPA).

The purpose of the Proposed Action is to provide necessary mine detection and clearance equipment, training, and proficiency to ARNG units. This action will strengthen ARNG mission readiness and capability. Proposed fielding locations are based on ARNG training requirements.

The vehicles would be stored at existing ARNG Armories and existing training sites in secure areas. Training would occur on existing ARNG and Army training sites on drill weekends and during two-week Annual Training events. Training during most drill weekends would only involve preventive maintenance checks and services. Generally, the vehicles would only be used in a training capacity two or three times per year. Vehicles would be transported from storage location(s) to the training site(s) via trailer on public roads. The vehicles would be cleaned at existing wash racks upon return and inspection. Maintenance would occur at the nearest ARNG maintenance facility.

The NEPA of 1969, as amended; the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508); and 32 CFR Part 651 Environmental Analysis of Army Actions; as well as the ARNG NEPA Handbook – *Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with NEPA* (2011), require us to complete an EA for this Proposed Action.

In association with this EA, we are consulting with the State Historic Preservation Office (SHPO) in each of the 26 involved States under Section 106 of the NHPA, as well as with Federally recognized Indian Tribes.

Based on our research conducted pursuant to 36 CFR § 800.4(a) and (b) to identify and evaluate historic properties, we have determined, pursuant to 36 CFR § 800.4(d)(1), that there would be **no historic properties affected** as a result of our Proposed Action. We base our determination on the following considerations:

1. No new construction or other alteration to existing structures or the landscape is proposed.
2. Only existing ARNG and Army storage areas, training areas, training rooms, and other logistical support facilities would be used, similar to the manner in which they are currently used. No new construction or building alterations are proposed.
3. For site-specific fielding and training, each involved State ARNG would develop a tiered NEPA document in accordance with 40 CFR § 1502.20. Should any potential site-specific affect to historic properties protected under Section 106 be identified, further consultation with the SHPO would occur prior to implementing the site-specific action.

We respectfully request your response within thirty (30) days pursuant to 36 CFR § 800.3(c)(4). Your response will become part of our written record documenting this concurrence and included within the associated NEPA documentation.

Please send your written responses via regular mail to:

NAME/ADDRESS

or via email to [email](#)

If you have any questions about the Proposed Action, please contact **Name** at **NUMBER**, or via e-mail [email](#)

Sincerely,

NAME

Enclosures

Attachment 1. MCV, MV-4 and VMMD Vehicles
Attachment 2. Proposed Fielding and Training Location Maps
Attachment 3. Tables of Proposed Fielding Locations

From: Daniel R. Ragle <dragle@choctawnation.com>
Sent: Thursday, April 21, 2016 10:14 AM
To: NG NCR NGB ARNG Mailbox Husky Flail EA
Subject: [Non-DoD Source] RE: Nationwide Environmental Assessment for Fielding and Training of the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD)

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

Mr. Beckley,

Thank you for the correspondence regarding the above referenced project. Since a couple of these training areas are located within our homelands, the Choctaw Nation of Oklahoma would like to be a consulting party on this project. There are several sites near Camp Shelby, in Mississippi, that the National Guard is already aware of, however we are unaware of any sites located near the other bases. I look forward to reviewing the Environmental Assessment once it is available. If you have any questions, please contact me by email.

Daniel Ragle
Compliance Review Officer
Historic Preservation Dept.
Choctaw Nation of Oklahoma
(800) 522-6170 Ext. 2727
dragle@choctawnation.com < Caution-mailto:dragle@choctawnation.com >
Caution-www.choctawnation.com < Caution-http://www.choctawnation.com >
Caution-www.choctawnationculture.com < Caution-http://www.choctawnationculture.com >

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure. If you have received this message in error, you are hereby notified that we do not consent to any reading, dissemination, distribution or copying of this message. If you have received this communication in error, please notify the sender immediately and destroy the transmitted information. Please note that any view or opinions presented in this email are solely those of the author and do not necessarily represent those of the Choctaw Nation.

COMANCHE NATION



National Guard Bureau
Attn: Eric Beckley
111 South George Mason Drive
Virginia 22204-1373

March 30, 2016

Re: The Army National Guard (ARNG) is preparing a
Nationwide Environmental Assessment (EA)

Dear Mr. Beckley:

In response to your request, the above reference project has been reviewed by staff of this office to identify areas that may potentially contain prehistoric or historic archeological materials. The location of your project has been cross referenced with the Comanche Nation site files, where an indication of "*No Properties*" have been identified.

Please contact this office at (580) 595-9960/9618 if you require additional information on this project.

This review is performed in order to identify and preserve the Comanche Nation and State cultural heritage, in conjunction with the State Historic Preservation Office.

Regards

Comanche Nation Historic Preservation Office
Theodore E. Villicana ,Resource Technician
#6 SW "D" Avenue , Suite C
Lawton, OK. 73502

COMANCHE NATION P.O. BOX 908 / LAWTON, OK 73502
PHONE: 580-492-4988 TOLL FREE:1-877-492-4988

From: Diane Hunter <dhunter@miamination.com>
Sent: Monday, April 04, 2016 1:52 PM
To: NG NCR NGB ARNG Mailbox Husky Flail EA
Subject: [Non-DoD Source] Nationwide EA for new types of vehicles

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

Dear Mr. Beckley:

Aya, kikwehsitoole. My name is Diane Hunter, and I am the Acting Tribal Historic Preservation Officer for the Federally Recognized Miami Tribe of Oklahoma. In this capacity, I am the Miami Tribe's point of contact for all Section 106 issues.

Thank you for letting us know about the above-mentioned project. I have reviewed the information provided and have no further need to consult on this project.

Sincerely,

Diane Hunter
Acting Tribal Historic Preservation Officer
Miami Tribe of Oklahoma
P.O. Box 1326
Miami, OK 74355
dhunter@miamination.com < Caution-mailto:dhunter@miamination.com >
918-541-8966



MILLE LACS BAND OF OJIBWE

Executive Branch of Tribal Government

#7

March 31, 2016

Samuel A. Harris, MAJ, U.S. Army
National Guard Bureau
111 South George Mason Drive
Arlington, VA 22204-1373

Re: Section 106 NHPA, Tribal Review and Consultation: U.S. Army, National Guard Bureau

DNR/THPO-16-0323-02: Preparing a Nationwide Environmental Assessment for Proposed fielding and training of three new types of vehicles at multiple locations in the United States, seeking Tribe's input into this NEPA process.

Dear MAJ Harris:

Thank you for the opportunity to comment on the above referenced project. It has been reviewed pursuant to the responsibilities given the Tribal Historic Preservation Officer (THPO) by the National Historic Preservation Act of 1966, as amended in 1992 and the Procedures of the Advisory Council on Historic Preservation (38CFR800).

I have reviewed the documentation: after careful consideration of our records, I have determined that the Mille Lacs Band of Ojibwe (DNR/E) concurs that there will be no historic properties affected in the areas described.

Should any human remains or suspected human remains be encountered, all work shall cease and the following personnel should be notified immediately in this order: County Sheriff's Office and the Office of the State Archaeologist. If any human remains or culturally affiliated objects are inadvertently discovered this will prompt the process to which the Band will become informed.

Please note: The above determination does not "exempt" future projects from Section 106 review. In the event any other tribe notifying us of concerns for a specific project, we may re-enter into the consultation process.

You may contact my staff at (320) 532-7450 if you have questions regarding our review of these projects. Please refer to the MLB-THPO Number as stated above in all correspondence with these projects.

Respectfully Submitted,

Susan Klapel
Commissioner of Natural Resources

DISTRICT I

43408 Odena Drive • Onamia, MN 56359
(320) 532-4181 • Fax (320) 532-4209

DISTRICT II

36666 State Highway 65 • McGregor, MN 55760
(218) 768-3311 • Fax (218) 768-3903

DISTRICT IIA

2605 Chiminissing Drive • Isle, MN 56342
(320) 676-1102 • Fax (320) 676-3432

DISTRICT III

45749 Grace Lake Road • Sandstone, MN 55072
(320) 384-6240 • Fax (320) 384-6190

URBAN OFFICE

1433 E. Franklin Avenue, Ste. 7c • Minneapolis, MN 55072
(612) 872-1424 • Fax (612) 872-1257



SANTA YNEZ BAND OF MISSION INDIANS
Tribal Elders Council

April 22, 2016

Mr. Eric Beckley
AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

Re: EA for training and fielding of MCV, MV-4, & VMMD

Mr. Beckley,

The SYBCI Elders Council has received notice that CARANG is preparing an AE for this project and they request that a copy be sent to their office.

The Elders Council would like to engage in consultation for this project prior to it rolling out. We would to have a dialog about the location that is being proposed and areas within proposed base that this training will take place.

SYBCI Elders Council thanks you for this opportunity to comment and looks forward to future conversations concerning this project.

Should you have any questions, feel free to call Freddie Romero at 805-688-7997 or you can email at freddyromero1959@yahoo.com.

Sincerely,



Freddie R. Romero
Cultural Resources Coordinator
SYBCI Elders Council

From: [Beckley, Eric R CTV NG NGB ARNG \(US\)](#)
To: [Coron, Jeffrey L CTR NG NGB \(US\)](#)
Subject: Santa Ynez Chumash - Husky

Sir-

This morning I spoke with Freddy Romero, the Cultural Resources Coordinator, with the Santa Ynez Band of Mission Indians in California.

I discussed the programmatic nature of the current Husky/Flail EA, and that at this time no new buildings, roads, or training areas were planned for development as the vehicles will be using existing resources. However, if new roads, training areas, or facilities were planned to support these vehicles; the California ARNG would be consulting the Tribe, SHPO, and complete all necessary permitting and NEPA documents.

I told Mr. Romero we would send him a copy of the EA and if he has any concerns or comments he could submit them at that time. Mr. Romero concurred with this plan.

V/r

Eric Beckley
Army National Guard
Natural & Cultural Resources Program Manager
111 South George Mason Drive
Arlington, VA 22204
W: 703.601.7036

WINNEBAGO TRIBE OF NEBRASKA

Tribal Historic Preservation Office * P.O. Box 687 Winnebago, NE 68071

henry.payer@winnebago-tribe.com

402-878-3313

Mr. Eric Beckley
c/o AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

March 31, 2016

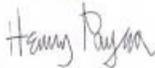
RE: Environmental Programs Division, Army National Guard

Mr. Eric Beckley,

We have reviewed the documentation for the referenced project(s). Based on the information provided, we would like to notify you the Winnebago Tribe of Nebraska has religious and culturally significant ties to the historic property that may be affected by the proposed area of Installation and Proposed Action. Specifically to locations in the identified Installation found within the States of Wisconsin, Illinois, Iowa and Minnesota. You may proceed as planned with the understanding that if cultural artifacts or burial remains/sites are uncovered or disturbed, you will stop progression and contact us immediately. We have high regard and concern for these locations that are inherent to our history with these locations; please take the utmost caution and respect that we possess for our land and country.

Please retain this letter in your files as compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. As per the document states, we request a copy of the EA for our records. We thank you for your cooperation and if there are questions or concerns please don't hesitate to contact us.

Sincerely,



Henry Payer, THPO Director
Tribal Historic Preservation Office
Winnebago Tribe of Nebraska



NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

DATE

Installations and Environment Directorate, Army National Guard

[INSERT NAME]
[INSERT TITLE]
[INSERT OFFICE]
[INSERT ADDRESS]
[INSERT CITY/ZIP CODE]

Dear **[INSERT NAME]**:

The Army National Guard (ARNG) has prepared a Nationwide Environmental Assessment (EA) and draft Finding of No Significant Impact (FNSI) for proposed fielding and training of three new types of vehicles: the Mine Clearance Vehicle (MCV), Mine Vehicle (MV-4), and the Vehicle Mounted Mine Detection Vehicle (VMMD) at multiple locations in the United States (see Enclosures). We are seeking Tribe input on the Proposed Action and the National Environmental Policy Act (NEPA) process.

The Nationwide EA evaluates potential environmental, cultural, and socioeconomic effects of the proposed nationwide fielding and training of the MC-V, MV-4, and VMMD in 26 States. No new construction, training areas, or changes in personnel are proposed. Existing maintenance facilities, storage areas, training areas, and other logistical support facilities will be used. Implementation of the Proposed Action will provide necessary mine detection and clearance equipment, training, and proficiency for appropriate ARNG units, strengthen ARNG mission readiness and capability. The EA will undergo a 30-day public comment period from 7 August through 6 September 2016 in accordance with 32 Code of Federal Regulations (CFR) § 651.14, Environmental Analysis of Army Actions.

Prior to implementing the Proposed Action, we wish to consult with Federally recognized Indian Tribes that may have ancestral ties to locations within the identified Installations in the 26 States.

We are seeking your Tribe's input on this action and any potential impacts to tribal resources or treaty resources as we conduct this EA in accordance with 36 CFR § 800.2, Executive Order (EO) 13175, and Department of Defense Instruction (DoDI) 4710.02 – Interactions with Federally Recognized Tribes. The EA and draft FNSI can be accessed on the ARNG website at: <https://arng.admin.ng.mil/Shared%20Documents/FinalEAandFNSINationwideFieldingofHuskyandFlailVehicles.pdf>

Please provide any comments, concerns, information, studies, or other data you and/or your staff may have regarding the Proposed Action within the 30-day comment period. All responses shall be considered for incorporation into the EA. Please direct your correspondence to:

Mr. Eric Beckley
% AECOM
12420 Milestone Center Drive
Suite 150
Germantown, MD 20876

or via email to ng.ncr.ngb-arng.mbx.husky-flail-ea@mail.mil.

Upon written request, a hard copy of the EA will be provided to you. Thank you for your assistance.

Sincerely,

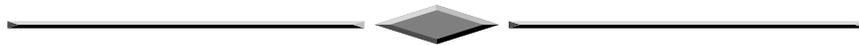


MAJ Samuel A. Harris
NEPA Team Lead
ARNG-IEM

Enclosures

- Attachment 1. MCV, MV-4 and VMMD Vehicles
- Attachment 2. Proposed Fielding and Training Location Maps
- Attachment 3. Tables of Proposed Fielding Locations

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APPENDIX C
STANDARD ARNG RECORD OF ENVIRONMENTAL
CONSIDERATION AND ENVIRONMENTAL CHECKLIST FORM



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Enviro Tracking #:	ARNG ENVIRONMENTAL CHECKLIST	State ARNG
Enter information in the yellow shaded areas.		
PART A - PROJECT INFORMATION		
1. PROJECT NAME:		
2. PROJECT NUMBER: (MILCON if applicable)		3. DATE PREPARED:
4. DESCRIPTION AND LOCATION OF THE PROJECT/PROPOSED ACTION:		
a. Location (Include a detailed map, if applicable):		
b. Description:		
c. The proposed action will involve (check all that apply):		
<input type="checkbox"/> Training activities/areas <input type="checkbox"/> Construction <input type="checkbox"/> Natural resource management <input type="checkbox"/> Maintenance/repair/rehabilitation <input type="checkbox"/> Real estate action <input type="checkbox"/> Environmental plans/surveys <input type="checkbox"/> Innovative readiness training project <input type="checkbox"/> Other (Explain):		
d. Project size (acres):		Acres of new surface disturbance (proposed):
(if applicable)		(if applicable)
5. START DATE of PROPOSED ACTION (dd-mmm-yy):		
Note: This must be a future date.		
6. PROGRAMMED FISCAL YEAR (if applicable):		
7. END DATE (if applicable):		
PART B - DECISION ANALYSIS GUIDE		
To use a categorical exclusion, the project must satisfy the following three screening criteria: no segmentation, no exceptional circumstances and a qualifying categorical exclusion that covers the project. The following decision tree will guide the application and documentation of these three screening criteria. The criteria were extracted from 32 CFR Section 651.29 and represent the most common screening conditions experienced in the ARNG. NOTE: Each question in Part B must have an applicable block checked for concurrence with REC.		
1. Is this action segmented (the scope of the action must include the consideration of connected, cumulative, and similar actions)?		
<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #2)		
2. Is there reasonable likelihood of significant environmental effects (direct, indirect, and cumulative)? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.		
<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #3)		
3. Is there a reasonable likelihood of significant effects on public health, safety or the environment? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.		
<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #4)		
4. Is there an imposition of uncertain or unique environmental risks? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.		
<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #5)		
5. Is the project of greater scope or size than is normal for the category of action? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.		
<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #6)		
6. Does the project introduce or employ unproven technology? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.		
<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #7)		

PART B - DECISION ANALYSIS (continued)	
7. Will there be reportable releases of hazardous or toxic substances as specified in 40 CFR Part 302? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.	<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #8)
8. If proposed action is in a non-attainment or maintenance area, will air emissions exceed de minimus levels or otherwise require a formal Clean Air Act (CAA) conformity determination? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.	<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #9) <input type="checkbox"/> NA (go to #9)
9. Will the project have effects on the quality of the environment that are likely to be highly controversial? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.	<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #10)
10. Will the project establish a precedent (or make decisions in principle) for future or subsequent actions that are reasonably likely to have future significant effects? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.	<input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO (go to #11)
11. Has federal funding been secured for the Innovative Readiness Training (IRT) project?	<input type="checkbox"/> N/A (go to #13) <input type="checkbox"/> YES (go to #13) <input type="checkbox"/> NO (go to #12)
12. NOTE: IRT projects not currently funded can secure approved NEPA documentation. However, once funding is secured State ARNG is required to coordinate with ARNG-ILE-T to complete natural and cultural surveys via proponent funding.	<input type="checkbox"/> CONFIRMED (go to #27)
13. Do you have a species list from the U.S. Fish and Wildlife Service that is less than 90 days old?	<input type="checkbox"/> YES (go to #14) Date of List: <input type="text"/> <input type="checkbox"/> NO (update species list return to #13)
14. In reviewing the species list, what determination was made by the State ARNG?	<input type="checkbox"/> No species present (go to #16) <input type="checkbox"/> No affect (go to #16) <input type="checkbox"/> May affect but not likely to adversely affect (go to #15) Date of USFWS concurrence: <input type="text"/> <input type="checkbox"/> May affect likely to adversely affect (go to #15)
15. Does an existing Biological Opinion cover the action?	<input type="checkbox"/> YES (go to #16) Date of BO: <input type="text"/> <input type="checkbox"/> NO (go to #30)
16. Have the Endangered Species Act, Section 7 requirements completed?	<input type="checkbox"/> YES (go to #17) Date of Documentation: <input type="text"/> <input type="checkbox"/> NO (complete documentation, return to #16)
17. Does the project involve an undertaking to a building or structure that is 50 years of age or older?	<input type="checkbox"/> YES (go to #18) <input type="checkbox"/> NO (go to #20)
18. Has the building or structure been surveyed for the National Register of Historic Places?	<input type="checkbox"/> YES (go to #19) <input type="checkbox"/> NO (complete inventory, return to #18)
19. Is the building or structure eligible for or listed on the National Register of Historic Places?	<input type="checkbox"/> YES (go to #20) <input type="checkbox"/> NO (go to #20)
20. Does the action involve ground disturbing activities?	<input type="checkbox"/> YES (go to #21) <input type="checkbox"/> NO (go to #22)
21. Has an archaeological inventory or research been completed to determine if there are any archeological resources present?	<input type="checkbox"/> YES (go to #22) <input type="checkbox"/> NO (complete inventory or conduct research, return to #21)
22. In reviewing the undertaking, under the National Historic Preservation Act (NHPA) (for both above and below ground resources), what determination was made by the State ARNG?	<input type="checkbox"/> No 106 undertaking; no additional consultation required under NHPA (go to question #27) <input type="checkbox"/> No properties affected (go to #24) Date of SHPO Concurrence: <input type="text"/> <input type="checkbox"/> No adverse effect (go to #24) Date of SHPO Concurrence: <input type="text"/> <input type="checkbox"/> Adverse effect (go to #23)
23. Has the State ARNG addressed the adverse effect?	<input type="checkbox"/> YES (place date of MOA or existing PA and explanation of mitigation in box below, go to #24) <input type="checkbox"/> NO (go to #30)
23a. <input type="text"/>	

PART C - DETERMINATION	
On the basis of this initial evaluation, the following is appropriate:	
<input type="checkbox"/> IAW 32 CFR 651 Appendix B, the proposed action qualifies for a Categorical Exclusion (CX) that does not require a Record of Environmental Consideration.	
<input type="checkbox"/> A Record of Environmental Consideration (REC).	
<input type="checkbox"/> An Environmental Assessment (EA).	
<input type="checkbox"/> A Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS).	
<div style="background-color: yellow; height: 15px; margin-bottom: 5px;"></div> Signature of Proponent (Requester)	<div style="background-color: yellow; height: 15px; margin-bottom: 5px;"></div> Environmental Program Manager
<div style="background-color: yellow; height: 15px; margin-bottom: 5px;"></div> Printed Name of Proponent (Requester)	<div style="background-color: yellow; height: 15px; margin-bottom: 5px;"></div> Printed Name of Env. Program Manager
<div style="background-color: yellow; height: 15px; margin-bottom: 5px;"></div> Date Signed	<div style="background-color: yellow; height: 15px; margin-bottom: 5px;"></div> Date Signed
Other concurrence (as needed):	
_____ Signature	_____ Signature
_____ Printed Name	_____ Printed Name
_____ Date Signed	_____ Date Signed
_____ Signature	_____ Signature
_____ Printed Name	_____ Printed Name
_____ Date Signed	_____ Date Signed
_____ Signature	_____ Signature
_____ Printed Name	_____ Printed Name
_____ Date Signed	_____ Date Signed

Enviro Tracking #:	ARNG Record of Environmental Consideration	State ARNG
Enter information in the yellow shaded areas.		
1. PROJECT NAME:		
2. PROJECT NUMBER: (MILCON if applicable)		3. DATE PREPARED:
4. START DATE of PROPOSED ACTION (dd-mmm-yy):		Note: This must be a future date
5. PROGRAMMED FISCAL YEAR:		
6. END DATE (if applicable):		
7. DESCRIPTION AND LOCATION OF THE PROPOSED ACTION:		
a. Location (Include a detailed map, if applicable):		
b. Description:		
8. CHOOSE ONE OF THE FOLLOWING:		
<input type="checkbox"/> An existing environmental assessment* adequately covers the scope of this project. Attach FNSI if EA was completed by another federal agency (non-ARNG). EA Date (dd-mmm-yy): Lead Agency: 		
<input type="checkbox"/> An existing environmental impact statement* adequately covers the scope of this project. EIS Date (dd-mmm-yy): Lead Agency: 		
<input type="checkbox"/> After reviewing the screening criteria and completing the ARNG environmental checklist, this project qualifies for a Categorical Exclusion Code: See 32 CFR 651 App. B Categorical Exclusion Code: See 32 CFR 651 App. B Categorical Exclusion Code: See 32 CFR 651 App. B		
<input type="checkbox"/> This project is exempt from NEPA requirements under the provisions of: Cite superseding law: 		
*Copies of the referenced EA or EIS can be found in the ARNG Environmental Office within each state.		
9. REMARKS:		
 Signature of Proponent (Requester)		 Environmental Program Manager
 Printed Name of Proponent (Requester)		 Printed Name of Env. Program Manager
 Date Signed		 Date Signed
Proponent Information:		
10. Proponent:		
11. Address:		
12. POC:		
13. Comm. Voice:		
14. Proponent POC e-mail:		

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Draft
Finding of No Significant Impact

**Army National Guard Nationwide Environmental Assessment
for Fielding of the Mine Clearance Vehicle (MC-V), Unmanned
Mine Vehicle (MV-4), and Vehicle Mounted Mine Detection
(VMMD) System at Multiple Locations**

The National Guard Bureau (NGB) has prepared a Nationwide Environmental Assessment (EA) to evaluate the potential physical, environmental, cultural, and socioeconomic effects associated with the proposed fielding of, and training with, the Mine Clearance Vehicle (MC-V or “Flail”), Mine Vehicle (MV-4), and Vehicle Mounted Mine Detection (VMMD or “Husky”) System by the Army National Guard (ARNG) at a national level. The NGB prepared this Nationwide EA in accordance with the National Environmental Policy Act (NEPA, 42 United States Code [USC] §§ 4321-4370e), the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (CEQ Regulations, 40 Code of Federal Regulations [CFR] Parts 1500-1508), and *Environmental Analysis of Army Actions* (32 CFR Part 651).

1. Description of Proposed Action and Alternatives

Proposed Action

The ARNG proposes fielding three types of equipment, the MC-V, MV-4, and VMMD. All three types of equipment are currently used by the US Army, but are new to the ARNG inventory.

The ARNG proposes fielding six MC-Vs to three State ARNGs, 18 MV-4s to 13 State ARNGs, and 152 VMMDs to 26 State ARNGs; three State ARNGs (Texas, Missouri, and South Carolina) would receive all three types of equipment.

The equipment would be stored at existing, secure storage facilities and would be used for training on existing, approved ARNG and Army training sites. The equipment would only be used on drill weekends (i.e., Inactive Duty Training) and during two-week Annual Training events. Training during most drill weekends would only involve soldier familiarization and routine maintenance and inspections. Generally, the vehicles would only be used in a training capacity two or three times per year.

The *purpose* of the Proposed Action is to provide the requisite mine detection and clearance training and proficiency for appropriate ARNG units on each piece of equipment. The Proposed Action is *needed* to ensure the involved ARNG units are able to accomplish the requisite mine detection and clearance training in order to maintain parallel capabilities to US Army Soldiers. This ensures the involved ARNG units' mission readiness and preparedness, as well as their ability to effectively integrate with other components of the US Army on the battlefield in support of Outside the Continental US

operations. All of the involved ARNG units, consisting of Engineer Battalions, Mine Clearance Companies, Brigade Combat Teams, and Area Clearance Platoons, have training, staffing, and equipment requirements, called Mission Table of Organization and Equipment (MTOE) requirements, that include fielding and training with the MC-V, MV-4, and/or VMMD, as appropriate.

Alternatives

The NGB initially considered three alternatives to the Proposed Action.

- *Use Other Existing Active Duty, ARNG, or Reserve Facilities.* The ARNG evaluated other existing Active Duty, National Guard, and Army Reserve installations nationwide to determine their potential suitability for supporting the needs associated with the Proposed Action. The use of other potentially available sites would limit the capability of the ARNG to carry out its assigned mission to provide adequate training facilities and would not fully achieve the purpose of and need for the Proposed Action. Due to scheduling conflicts, distance, and limited available space and facilities, the use of other sites would potentially cause ARNG units to risk not meeting training requirements and to lose valuable training time. Alternatively, this alternative could result in the need to construct and operate new or additional training and support facilities, resulting in additional costs and environmental effects. For these reasons, the ARNG eliminated this alternative from further analysis.
- *Establish New Training Sites.* This alternative was considered but eliminated due to the fact that, as a primary component of Base Realignment and Closure (BRAC) recommendations, the Department of Defense (DoD) is eliminating and/or consolidating many installations throughout the US. As sufficient maneuver and training areas are available at identified locations to accommodate the Proposed Action, the ARNG determined that, in accordance with DoD directives and vision, establishment of new training sites was neither feasible nor necessary.
- *Reduced Scale.* In accordance with Army planning policy and regulations, the ARNG considered and evaluated the potential for a reduced-scale alternative that involved fewer ARNG States, ARNG units, and/or installations. The use of fewer training locations would limit the capability of the ARNG to carry out its assigned mission to provide adequate training facilities and the purpose of and need for the Proposed Action would be compromised. Use of fewer sites would potentially cause ARNG units to risk not meeting training requirements, as well as result in loss of excessive training time during travel to and from appropriate training areas. Further, involving fewer ARNG units would not meet required proficiency levels nationwide, and would result in an imbalance in trained forces. For these reasons, the ARNG eliminated this alternative from further analysis.

These alternatives were found not to support the purpose and need for the Proposed Action and, accordingly, they were not fully evaluated in detail in the Nationwide EA.

Consistent with guidance issued by the CEQ (40 CFR § 1502.14), the Nationwide EA evaluated the No Action Alternative. While the No Action Alternative would not meet the

purpose of or need for the Proposed Action, this alternative is analyzed to provide a comparative baseline, or *status quo*, for the analysis of the Proposed Action, in accordance with 40 CFR § 1502.14(d).

2. Environmental Analysis

The potential environmental impacts associated with the Proposed Action are fully described in the Nationwide EA. The Nationwide EA identifies the environmental resources that could be affected by the Proposed Action, and determines the significance of the impacts, if any, to each of these resources. Based on the Nationwide EA's analysis, the ARNG determined that the known and potential adverse impacts from the Proposed Action on air quality, noise, water resources, biological resources, cultural resources, and hazardous/toxic materials and waste would not be significant.

Mitigation

Implementing the Proposed Action would be expected to result in minor adverse effects on a limited number of environmental resources. To guard against circumstances developing that could, in limited cases, result in site-specific minor adverse effects, the NGB and State ARNGs will maintain their stewardship posture by ensuring enforcement and implementation of necessary measures unique to their particular cases and locations.

Mitigation does not include legal, regulatory, or policy-driven environmental protections and Best Management Practices (BMPs), which are already part of the Proposed Action; these also include Federal and State laws and Army and NGB policies with which the ARNG is required to comply. No mitigation measures will be required to reduce potentially significant effects at project sites to less-than-significant levels.

As described in the Nationwide EA, this EA was designed to facilitate future, site-specific analyses of impacts through the tiering process (40 CFR § 1502.20). General impacts associated with the proposed fielding of these vehicles were addressed within the Nationwide EA. Subsequent smaller scale, site-specific NEPA documents that build off of this analysis will be developed by installation personnel to address site-specific actions and impacts, as identified in the EA.

These subsequent documents, likely consisting of an ARNG Record of Environmental Consideration/Environmental Checklist (REC and Checklist), will incorporate this Nationwide EA by reference. Alternatively, installation personnel may develop a tiered EA that incorporates the discussions in this Nationwide EA, but concentrates on site-specific issues and resources that may experience significant effects not addressed specifically within this Nationwide EA. To develop a tiered EA rather than completing a REC would depend on the degree of specific potential resource impacts at each installation. Actions that would not qualify for a REC per Army's NEPA implementation

regulation (32 CFR Part 651) will be evaluated with a tiered EA. Each site-specific ARNG Proposed Action will be evaluated with either a REC or an EA.

3. Regulations

The Proposed Action will not violate NEPA, CEQ Regulations, 32 CFR Part 651, or any other Federal, State, or local environmental regulations.

4. Commitment to Implementation

The NGB affirms its commitment to implement the Proposed Action as described in the Nationwide EA in accordance with NEPA. Implementation of the Proposed Action is dependent on funding; however, the NGB will ensure that adequate funds are requested in future years' budgets to achieve its implementation.

5. Public Review and Comment

The final Nationwide EA and draft Finding of No Significant Impact (FNSI) are available for public review and comment from 7 August through 6 September 2016. The final Nationwide EA and draft FNSI are available at the ARNG public website at <http://arng.ng.mil/Shared%20Documents/FinalEAandFNSINationwideFieldingofHuskyandFlailVehicles.pdf>

Per 32 CFR Part 651, the final Nationwide EA and draft FNSI are being made available for a 30-day public review and comment period. Once any substantive public comments have been addressed, and if a determination is made that the Proposed Action will have no significant impact, the FNSI will be signed and the action will be implemented.

For further information, please contact MAJ James E. Caldwell, Assessments and Evaluation Branch Chief, Army National Guard, at (703) 607-7990 or james.e.caldwell36.mil@mail.mil.

6. Finding of No Significant Impact

After careful review of the Nationwide EA, I have concluded that implementation of the Proposed Action would not generate significant controversy or have a significant impact on the quality of the human or natural environment. This analysis fulfills the requirements of the NEPA and the CEQ Regulations. An Environmental Impact Statement will not be prepared, and the NGB is issuing this FNSI.

Date

Erik T. Gordon
Colonel, US Army
Chief, Installations & Environment