

**DRAFT FINDING OF NO SIGNIFICANT IMPACT (FNSI)
FOR
APPROVAL OF THE ORCHARD COMBAT TRAINING CENTER REAL
PROPERTY MASTER PLAN, MODERNIZATION AND
INFRASTRUCTURE IMPROVEMENTS, AND OPTIMIZED ANNUAL
THROUGHPUT OF BRIGADE COMBAT TEAM TRAINING**

Introduction

The Idaho Army National Guard (IDARNG) and Bureau of Land Management (BLM) prepared an Environmental Assessment (EA) to identify and evaluate potential environmental effects of approval of the Orchard Combat Training Center (OCTC) Real Property Master Plan (RPMP) modernization and infrastructure improvements on Gowen Field, the Cantonment Areas, and the OCTC identified in the RPMP, and optimization of the annual throughput of brigade-level training on the OCTC in Idaho. Because the OCTC lies within BLM's Morley Nelson Snake River Birds of Prey National Conservation Area (NCA), any actions proposed to occur within the OCTC boundary are governed by the 2002 IDARNG and BLM Memorandum of Understanding (MOU). Therefore, IDARNG and BLM jointly prepared this EA in accordance with the National Environmental Policy Act (NEPA, 42 United States Code [USC] § 4321-4370e.), the Council on Environmental Quality Regulations for Implementing the Procedural Provisions of NEPA (CEQ Regulations, 40 Code of Federal Regulations [CFR] § 1500-1508), *Environmental Analysis of Army Actions* (32 CFR § 651), and *BLM NEPA Handbook* (H-1790-1).

1. Description of Proposed Action and Alternatives

Proposed Action. Three distinct, but integrally-linked Army National Guard (ARNG) Component Actions comprise the Proposed Action. **Component Action 1 (*Approve the United Facilities Criteria [UFC] 2-100-01 RPMP*)** would approve the 2018 UFC 2-100-01 RPMP for Gowen Field, Cantonment Area, and the OCTC. **Component Action 2 (*Implement Modernization and Infrastructure Improvements*)** would implement fiscal year 2018 (FY18) through fiscal year 2022 (FY22) infrastructure and facilities modernization development projects on Gowen Field, the Cantonment Area, and the OCTC. **Component Action 3 (*Optimize Annual BCT Training Throughput*)** would optimize the annual training throughput on the OCTC to support the training of multiple brigade-sized units per calendar year per the authorized mission of the IDARNG and the OCTC (i.e., the Proposed Action). Once implemented, the annual BCT training throughput on the OCTC would be optimized to support the equivalent of three BCTs at 85 percent strength (up to 10,500 soldiers and associated equipment), per calendar year. This conforms with the OCTC's current training mission, which supports up to 10,000 soldiers per calendar year. Approval of the RPMP (Component Action 1) would provide guidance for future planning and programming decisions for real property construction, renovation, maintenance, and repair at Gowen Field and the Cantonment Area (both IDARNG-managed lands), and the OCTC (BLM-administered land) in accordance with UFC 2-100-01 and state and federal environmental regulations. UFC 2-100-01 is a Department of Defense (DoD) document that sets standards and guidelines for planning

at military installations. By memorandum dated September 25, 2018, the ARNG Installations and Environment Directorate (ARNG-G-9) determined that this IDARNG plan includes all UFC 2-100-01 RPMP required elements.

Additionally, the RPMP establishes development districts with specified land uses and associated types of development at Gowen Field, the Cantonment Area, and the OCTC. The RPMP details plans for 83 individual projects to be constructed between FY18 and FY22. Implementation of modernization and infrastructure improvements (Component Action 2) include new facility construction and additions to existing range facilities; building renovations, repairs, and alterations, demolition paired with construction within the same footprint; and infrastructure, and range improvements required to support training operations. All siting and construction of new facilities would be consistent and in accordance with the Gowen Field, Cantonment Area, and OCTC land use areas to maintain compatibility with or enhance existing land uses.

The proposed optimized throughput of training on the OCTC (Component Action 3) would add training days, personnel, railhead operations, vehicles, and materiel into the existing regime for troop support and would intensify the annual tempo of brigade-level training. Although the level of brigade training operations on the OCTC would increase, the type and manner of operations would be relatively unchanged and would continue to be conducted in accordance with the 2008 *Snake River Birds of Prey National Conservation Area Resource Management Plan and Record of Decision*. This EA constitutes the NEPA analysis for each of the 83 individual FY18 to FY22 RPMP projects. Additionally, this EA may be tiered for future environmental analysis of brigade-level mission and training requirements.

The ***purpose*** of the Proposed Action is to ensure the long-term sustainability of IDARNG troop support, installation and range functions, and mission training capabilities at OCTC and for BLM to respond to a request for approval of the construction, operation, and maintenances of range improvement projects that are necessary to accommodate current and projected training operations on the OCTC. The Proposed Action is ***needed*** because trained and ready operational ARNG forces must meet current and future mission requirements per *Army National Guard 2014-2020 Strategic Planning Guidance*. The ARNG requires reliable, economically efficient, and operationally sustainable access to installation and training spaces that can be used to meet and sustain its platoon-, company-, and brigade-level mission training requirements into the future.

The need for the Proposed Action is established under BLM's responsibility under the Federal Land Policy and Management Act of 1976 (FLPMA), 43 USC § 1701 et seq. and BLM's right-of-way (ROW) regulations, 43 CFR § 2800, to respond to a request for a ROW grant for legal access and use. IDARNG is an applicant in good standing and is qualified to hold a ROW as per 43 CFR 2803. BLM has issued IDARNG numerous ROWs with which IDARNG has complied and, when necessary, has resolved any compliance issues in a timely and responsive manner.

Alternatives Considered. Based upon existing policy requirements to prepare and implement a UFC-200-01-compliant RPMP, and OCTC's facility and infrastructure capacity requirements as a Level I Regional Collective Training Capabilities (RCTC) Garrison Training Center to support the current and future training of multiple brigades per year, the IDARNG determined it was appropriate to evaluate the Proposed Action components 1 and 2 against only the No Action

Alternative. For Proposed Action Component 3, the IDARNG reviewed 5 operational alternatives (including consideration of 11 training location alternatives) to achieve the mission requirements for training multiple brigade-sized teams per year. Only approval of the RPMP and implementation of the proposed development projects meet the purpose and need to modernize infrastructure and facilities on Gowen Field, the Cantonment area, and the OCTC. Therefore, these component alternatives were carried forward for detailed environmental analysis.

In selecting the operational alternative, IDARNG's primary screening criteria consisted of:

- unconstrained long-term land availability
- adequate acreage to support multiple brigade-sized units
- adequate range capabilities to support multiple brigade-sized units training back-to-back
- adequate support for multiple-purpose range training operations
- prioritized availability to ARNG

Only the operational alternative described in the Proposed Action met all the primary screening criteria and, therefore, was carried forward for detailed environmental analysis. ARNG and the BLM considered, but decided not to fully analyze, three other operational alternatives because they did not meet the primary screening criteria as identified and explained in the EA.

The No Action Alternative was also carried forward for analysis in the EA and served as a baseline against which the potential environmental impacts of the Proposed Action and other action alternatives could be evaluated. Under the No Action Alternative, IDARNG would not approve the RPMP, facility and infrastructure renovations, demolitions, and construction would not occur, and the types and tempo of brigade-level training operations on the OCTC would remain unchanged. A Level I RCTC Garrison Training Center must have its own RPMP per National Guard Regulation (NGR) 5-3, *Army National Guard Training Centers*. Without approval of the RPMP, IDARNG would be out of compliance with NGR 5-3. Gowen Field, the Cantonment Area, and the OCTC lack adequate facility and infrastructure capacities to provide billeting and lodging to support multiple brigade-sized units, acreage to support defined light and heavy maneuver areas, and live-fire ranges to support individual and collective training for multiple brigades per NGR 5-3 and Army Training Circular 25-8, *Training Ranges*. ARNG would have to continue the costly and logistically challenging practice of transporting brigade-sized units, including 7,000 soldiers and associated materiel, to other installations across the United States so they can complete their required proficiency training. Because primacy for training operations at other installations is afforded to the units based there, visiting units may be denied access, once arrived, if the local units have their own training orders to meet. This alternative would limit ARNG's ability to conduct adequate training and maintained brigade-level readiness over the long term and IDARNG Installation Support Units and OCTC would not meet their specified missions. The No Action Alternative fails to meet the purpose of and need for the Proposed Action, therefore it is not a viable alternative.

2. Environmental Analysis

The EA's analysis of potential environmental effects focused on the following environmental resources: land use, air quality, noise, geology, topography and soils, water resources, biological resources, cultural resources, socioeconomics, environmental justice, infrastructure, and

hazardous and toxic materials/wastes. A cumulative effects assessment was also conducted. Details of the environmental consequences can be found in the EA. The analysis in the EA determined that the potential adverse impacts from the Proposed Action on the referenced environmental resources would not be significant.

Mitigation. No mitigation measures will be necessary to reduce potential adverse environmental impacts to below significant levels. To address minor adverse environmental impacts the IDARNG will implement appropriate best management practices, standard operating procedures, BLM's required design features, and applicable IDARNG construction guidelines for new facilities. Additionally, the IDARNG will obtain all necessary permits and construction site approvals prior to implementation of this action.

3. Regulations

The Proposed Action will not violate NEPA, the CEQ Regulations, 32 CFR § 651, or any other federal, state, or local environmental regulations.

4. Commitment to Implementation

The National Guard Bureau (NGB) and IDARNG affirm their commitment to implement this EA in accordance with NEPA. Implementation is dependent on funding. The IDARNG and the NGB's Installations and Environment Directorate will ensure that adequate funds are requested in future years' budgets to achieve the goals and objectives set forth in this EA.

5. Public Review and Comment

Based on the description of the Proposed Action as set forth in the EA, all activities were found to comply with the criteria or standards of environmental quality and were coordinated with the appropriate federal, state, and local agencies. There was coordination with agencies throughout the EA development process, and agency comments were incorporated into the analysis of potential environmental impacts performed as part of the EA. The final EA was made available for public review and comment from [date range] at the locations listed in the final EA's public notice. [TBD #] comments were received, and information was incorporated into the analysis, as appropriate.

6. ARNG draft Finding of No Significant Impact

Based on the information and analysis presented in the EA and based on review of the public and agency comments submitted during the 15-day public comment period, I conclude that the environmental effects of approving the OCTC RPMP, modernization and infrastructure improvements, and optimized annual throughput of BCT training are not significant, that preparation of an Environmental Impact Statement is unnecessary, and that concluding the NEPA effort with a FNSI is appropriate.

Date

ANTHONY HAMMET
COL, EN
Chief, ARNG G-9