

NEPA REVIEW FORM USAG ALASKA		DATE: 20 July 2020	
TITLE: Implementation of 2020 Integrated Natural Resources Management Plan, U.S. Army Garrison Alaska			
PURPOSE AND NEED AND DESCRIPTION OF PROPOSED ACTION: The U.S. Army Garrison (USAG) Alaska proposes to implement a 2020 Integrated Natural Resources Management Plan (INRMP) update for Fort Wainwright, Alaska and Fort Greely, Alaska lands. The 2020 INRMP update is for both Fort Wainwright and Fort Greely, to correspond with the 2018 reorganization of USAG Fort Wainwright and USAG Fort Greely into one garrison organization under USAG Alaska. The INRMP establishes policies, programs, prescriptions, projects, and procedures that USAG Alaska uses to manage natural resources on Army training lands, in accordance with Army Regulation 200-1, and in compliance with the Sikes Act.			
Form Completed By: Laura Sample NEPA Program Manager, Environmental Division USAG Alaska		Signature	
EXCEPTIONAL CIRCUMSTANCE (as defined in 32 CFR 651.29)		Does the action involve extraordinary circumstances that would preclude the use of a Categorical Exclusion?	
		Yes	No
Reasonable likelihood of significant effects on public health, safety, or the environment.		X	
Reasonable likelihood of significant environmental effects (direct, indirect, and cumulative).		X	
Imposition of uncertain or unique environmental risks.		X	
Greater scope or size than is normal for this category of action.		X	
Reportable releases of hazardous or toxic substances as specified in 40 CFR part 302, Designation, Reportable Quantities, and Notification.		X	
Releases of petroleum, oils, and lubricants (POL) except from a properly functioning engine or vehicle, application of pesticides and herbicides, or where the proposed action results in the requirement to develop or amend a Spill Prevention, Control, or Countermeasures Plan.		X	
When a review of an action that might otherwise qualify for a Record of Non-applicability (RONA) reveals that air emissions exceed de minimis levels or otherwise that a formal Clean Air Act conformity determination is required.		X	
Reasonable likelihood of violating any federal, state, or local law or requirements imposed for the protection of the environment.		X	
Unresolved effect on environmentally sensitive resources including: (1) Proposed federally listed, threatened, or endangered species or their designated critical habitats, (2) Properties listed or eligible for listing on the National Register of Historic Places (AR 200-4), (3) Areas having special designation or recognition such as prime or unique agricultural lands; coastal zones; designated wilderness or wilderness study areas; wild and scenic rivers; National Historic Landmarks (designated by the Secretary of the Interior); 100-year floodplains; wetlands; sole source aquifers (potential sources of drinking water); National Wildlife Refuges; National Parks; areas of critical environmental concern; or other areas of high environmental sensitivity, and (4) Cultural Resources as defined in AR 200-4.		X	
Involving effects on the quality of the environment that are likely to be highly controversial.		X	
Involving effects on the environment that are highly uncertain, involve unique or unknown risks, or are scientifically controversial.		X	
Establishes a precedent (or makes decisions in principle) for future or subsequent actions that are reasonably likely to have a future significant effect.		X	
Potential for degradation of already existing poor environmental conditions. Also, initiation of a degrading influence, activity, or effect in areas not already significantly modified from their natural condition.		X	
Introduction/employment of unproven technology.		X	
<p>CONCLUSION: The environmental impacts associated with the implementation of an updated INRMP on Fort Wainwright and Fort Greely lands are comparable with those addressed in the <i>Implementation of an Integrated Natural Resources Management Plan for U.S. Army Alaska, Environmental Assessment, 2007</i>, and <i>Integrated Natural Resources Management Plan 2007-2011 for U.S. Army Garrison, Fort Greely, Alaska, Environmental Assessment, 2007</i>. The proposed changes in the 2020 INRMP renewal do not compel preparation of a supplemental Environmental Assessment or Environmental Impact Statement. No potentially significant direct, indirect, or cumulative impacts as a result of extraordinary circumstances would result as a consequence of this action. All screening criteria have been met.</p> <p>In addition, this action qualifies for Categorical Exclusion (b)(3)[<i>Preparation of regulations, procedures, manuals, and other guidance documents that implement, without substantive change, the applicable HQDA or other federal agency regulations, procedures, manuals, and other guidance documents that have been environmentally evaluated (subject to previous NEPA review)</i>] as listed in Appendix B, part 651 of 32 CFR (Environmental Analysis of Army Actions).</p>			
REMARKS/ATTACHMENTS: See Attached Record of Environmental Consideration			

RECORD OF ENVIRONMENTAL CONSIDERATION

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DESCRIPTION OF AND PURPOSE AND NEED FOR PROPOSED ACTION: The U.S. Army Garrison (USAG) Alaska proposes to implement a 2020 Integrated Natural Resources Management Plan (INRMP) update for Fort Wainwright, Alaska and Fort Greely, Alaska lands. The INRMP establishes policies, programs, prescriptions, projects, and procedures that USAG Alaska uses to manage natural resources on Army training lands, in accordance with Army Regulation 200-1, and in compliance with the Sikes Act. The 2020 INRMP update is for both Fort Wainwright and Fort Greely, to correspond with the 2018 reorganization of USAG Fort Wainwright and USAG Fort Greely into one garrison organization under USAG Alaska.

The initial Fort Wainwright and Fort Greely INRMPs were signed and implemented in 1998. The INRMPs were revised in 2002, 2007, and 2013 due to changes in natural resources management proposals, as well as agency, tribal, and public stakeholder comments. The National Environmental Policy Act (NEPA) process was used to meet the Department of Defense's INRMP public review requirements for the INRMPs in 1998, 2002, and 2007. The implementation of the 2007 INRMP at Fort Wainwright was analyzed in the *Implementation of an Integrated Natural Resources Management Plan for U.S. Army Garrison Alaska, Environmental Assessment, 2007*. The implementation of the 2013 INRMP for Fort Wainwright lands was analyzed in the *Implementation of an Updated Integrated Natural Resources Management Plan, Fort Wainwright, Alaska, Record of Environmental Consideration, 2013*. The implementation of the 2007 INRMP at Fort Greely was analyzed in the *Integrated Natural Resources Management Plan 2007-2011 for U.S. Army Garrison, Fort Greely, Alaska, Environmental Assessment, 2007*.

USAG Alaska has concluded that a major INRMP revision is not necessary for the 2020 INRMP renewal. This is due to there being no changes recommended during the annual 2019 review with the U.S. Fish and Wildlife Service (USFWS) and Alaska Department of Fish and Game; no change in the Fort Wainwright and Fort Greely missions; no changes to USAG Alaska natural resource policies, programs, prescriptions, or procedures; no change to the type of projects proposed in the previous plan; and minor changes to the INRMP document itself. Therefore, USAG Alaska proposes to implement an INRMP update in 2020.

The proposed updates within the 2020 INRMP are:

- a. Including natural resource policies, programs, prescriptions, projects, and procedures for both Fort Wainwright and Fort Greely in one document.
- b. Reformatting the INRMP to match the U.S. Army Environmental Command INRMP template, dated 22 August 2016. The INRMP Memorandum of Understanding is incorporated into the document (most appendices have been removed, and other related plans are incorporated by reference, such as the Integrated Pest Management Plan and Wildlife Aircraft Strike Hazard Plan).
- c. De-emphasizing specific dates for the INRMP. The INRMP must be reviewed annually and evaluated for operation and effect at least once every five years, but if the policies, programs,

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procedures, and practices do not change substantially, with agreement of the Sikes Act partners, the existing plan will remain in effect. Specific projects will be included in an appendix and will be updated annually as they are funded, implemented, and completed. Project updates will not require new signatures from the Army or its Sikes Act partners as long as those projects are the same project types analyzed in previous INRMPs and NEPA documentation.

- d. The updated INRMP (1) adds an analysis of climate change impacts on mission and natural resource management, (2) limits firewood harvests based on annual allowable cut for each major training area, (3) increases prescribe fire acres to the maximum allowable perimeter as defined in approved burn plans and (4) continues to follow USFWS recommendations for Migratory Bird Treaty Act compliance, including options for surveys prior to vegetation clearing during sensitive time frames.
- e. Due to funding constraints and to bring the program into line with IMCOM priorities, the updated INRMP (1) reduces implementation of natural resource projects not expressly required by law, (2) limits planning level surveys to areas impacted by the military mission, (3) removes Special Interest Area designation from Wood River Buttes, Clear Creek Buttes and the Tanana Flats Migratory Bird Area (training areas 202 and 203), (4) removes spring restrictions from Sandhill Crane Roosting Area, (5) considers increasing firewood cutting prices, (6) considers implementing hunting, fishing and trapping fees, (7) focuses natural resource programs and personnel to levels required to comply with applicable state and federal law and regulations.

Implementation of the 2020 INRMP will supersede the existing 2013 INRMP for U.S. Army Garrison Alaska.

ANTICIPATED DATE AND/OR DURATION OF PROPOSED ACTION: The proposed INRMP update will become effective once approved, and will remain in effect as long as policies, programs, procedures, and practices do not change substantially, based on agreement of the Sikes Act partners. The INRMP will continue to be reviewed for applicability every five years.

ENVIRONMENTAL FACTORS, CONSIDERATIONS, MITIGATION AND / OR SPECIAL CONDITIONS:

The environmental impacts associated with implementing an updated 2020 INRMP are comparable to those listed in the *Implementation of an Integrated Natural Resources Management Plan for U.S. Army Alaska, Environmental Assessment, 2007*, and *Integrated Natural Resources Management Plan 2007-2011 for U.S. Army Garrison, Fort Greely, Alaska, Environmental Assessment, 2007*. Implementing an updated INRMP would continue to support the military mission and conserve the environment. For Fort Wainwright lands, it is expected that implementing an updated INRMP would continue to provide mostly beneficial impacts to soils, vegetation, water and fish and wildlife resources, and result in minor to beneficial impacts to recreation, access, and cultural resources. For Fort Greely lands, it is expected that implementing

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an updated INRMP would continue to result in minor to beneficial impacts to wildlife, vegetation, soils, human health and safety, noise, and water quality.

It is not expected that implementation of the updated INRMP will result in significant impacts to the environment. Due to the comprehensive definition of natural resources management activities proposed in the INRMP, Army management actions would take into account all relevant and applicable natural resources statutes, regulations, executive orders, and Presidential memoranda. This would result in clear policy addressing all relevant and applicable requirements for natural resources management.

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CONCLUSION: The environmental impacts associated with the implementation of an updated INRMP on Fort Wainwright and Fort Greely lands are comparable with those addressed in the *Implementation of an Integrated Natural Resources Management Plan for U.S. Army Alaska, Environmental Assessment, 2007*, and *Integrated Natural Resources Management Plan 2007-2011 for U.S. Army Garrison, Fort Greely, Alaska, Environmental Assessment, 2007*. The proposed changes in the 2020 INRMP renewal do not compel preparation of a supplemental Environmental Assessment or Environmental Impact Statement. No potentially significant direct, indirect, or cumulative impacts as a result of extraordinary circumstances would result as a consequence of this action. All screening criteria have been met.

In addition, this action qualifies for Categorical Exclusion **(b)(3)***[Preparation of regulations, procedures, manuals, and other guidance documents that implement, without substantive change, the applicable HQDA or other federal agency regulations, procedures, manuals, and other guidance documents that have been environmentally evaluated (subject to previous NEPA review)]* as listed in Appendix B, part 651 of 32 CFR (Environmental Analysis of Army Actions).

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