Record of Environmental Consideration

2014 Aviation Force Structure Realignment

1. Purpose

The purpose of this document is to determine whether several proposed aviation initiatives described below are adequately covered by "existing or previous" National Environmental Policy Act (NEPA) documentation. This analysis concludes the initiatives are so covered and that more formal analysis is not required at the programmatic, Headquarters, Department of the Army level. The implementation of the proposed aviation initiatives at certain installations may require installation-level, site-specific analysis.

2. Proposed Actions

The proposed action consists of three initiatives to be implemented over the next several years. The first is the Aviation Restructure Initiative (ARI). For purposes of discussion in this Record of Environmental Consideration (REC), ARI is considered as three actions: Changes in Combat Aviation Brigade (CAB) sizes and organization, the inactivation of a CAB at Fort Campbell, and relocation of an Attack/Reconnaissance Battalion (ARB) from Fort Carson to Joint Base Lewis McCord (JBLM). The second initiative is the activation of new MQ-1C Gray Eagle unmanned aerial system companies at several installations. The third initiative is conducting Gray Eagle Follow-on Test and Evaluation (FOT&E) at Fort Irwin, CA.

a. Aviation Restructure Initiative (ARI)

In February, 2014, the Secretary of Defense announced that the Army would conduct a reorganization of aviation units across the Army to modernize its fleet and make it more capable and efficient. Following a comprehensive review of its aviation strategy, the Army determined it must restructure aviation units to achieve a leaner, more efficient and capable force that balances operational capability and flexibility across the Total Army. The ARI includes inactivating the 159th CAB and relocating an ARB stationed at Fort Carson to JBLM; these two actions are discussed separately for the purpose of this REC.

Army aviation forces are restructuring for multiple reasons. As the Army decreases the number of its Brigade Combat Teams (BCTs), other units such as CABs must adjust their composition and numbers. In addition, the Army decided in 2013 to restructure BCTs; part of this entailed repurposing the BCTs' Shadow Unmanned Aerial Vehicle (UAV) System. These Shadow units will be added to the CABs, as discussed below. Finally, the Department of Defense and the Army face budgetary pressures due to the

Budget Control Act of 2011 and subsequent budget legislation, which result in an overall decrease in the size of the Army.

Rather than implementing cuts across the board, the Army developed the ARI, to better manage its aviation assets. Under ARI, the Army will divest three entire fleets of aircraft – the OH-58A/C Kiowas, the TH-67 Creek training helicopters, and the OH-58D Kiowa Warriors – an overall reduction of 798 aircraft, avoiding substantial operations and sustainment costs associated with these aging fleets. The low-density, high-demand Apache helicopter will be transferred from the Reserve Component (RC) to the Active Component Army to replace the OH-58D Kiowa Warriors, with the RC receiving UH-60 Blackhawk helicopters. The transfer will enable the teaming of Apaches with unmanned aircraft systems (UAS) such as Shadows and MQ-1C Gray Eagles. This will fill a critical need for an Armed Aerial Scout created by the elimination of the Armed Reconnaissance Helicopter program. ARI achieves necessary cost savings while maintaining the most modern, capable, and ready fleet possible.

ARI avoids approximately $12B in near-term costs. If the Army were to not execute ARI, it would be forced to retain many of its oldest and least capable aircraft while divesting several hundred modernized airframes. Upgrades to the Kiowa Warrior would cost over $10B. Replacing the legacy TH-67 with a new training helicopter would cost another $1.5B. In addition, reduced procurement rates of modernized aircraft would increase the cost per aircraft and cost the Army approximately $15B. These costs would be unbearable for the Army under the current budget constraints and would risk creating a hollow force, with less overall capability and less investment in modernization.

1) CAB Structure Changes

Current CAB Structure. A CAB is a multi-functional unit that fields military helicopters and unmanned aerial systems offering a combination of attack helicopters (AH-64 Apache), reconnaissance helicopters (OH-58 Kiowa Warrior), utility helicopters (UH-60 Black Hawk), cargo helicopters (CH-47 Chinook), air ambulance / medical evacuation (MEDEVAC) helicopters (HH-60 Black Hawk), and UAS (RQ-7 Shadow and MQ-1 Grey Eagle). Army CABs are currently organized utilizing four designs in Active Component (AC) and Reserve Component (RC) units: Heavy (x6; 4x AC, 2x RC), Medium (x8; 8x AC), Full Spectrum (x1; 1x AC), and Expeditionary (x6; 6x RC). Three Medium CABs are structured with an assigned Pathfinder Light Infantry Company (60 Soldiers) organic to the Assault Helicopter Battalion (1x Bragg, 2x Campbell).

The CAB (Heavy) consists of:

- Headquarters and Headquarters Company (HHC)
- General Support Aviation Battalion (GSAB): 8x UH-60 providing command and control capability, 12x CH-47 providing heavy lift capability, 15x HH-

60 providing medical evacuation capability, and an Air Traffic Services Company providing air traffic control
- Assault Helicopter Battalion (AHB): 30x UH-60 providing utility capability
- Two Attack/Reconnaissance Battalions (ARB): 48 AH-64 Apaches providing attack and reconnaissance capability (24 per Battalion)
- Aviation Support Battalion (ASB): providing intermediate level maintenance, signal, and transportation capabilities
- The AC CABs (Heavy) are stationed at: Bliss, Hood, Germany, and Carson; two are RC (CONUS)
- Approximately 2,580 personnel are assigned

The CAB (Medium) consists of:

- Headquarters and Headquarters Company (HHC)
- General Support Aviation Battalion (GSAB): 8x UH-60 providing command and control capability, 12x CH-47 providing heavy lift capability, 15x HH-60 providing medical evacuation capability, and an Air Traffic Services Company providing air traffic control
- Assault Helicopter Battalion (AHB): 30x UH-60 providing utility capability
- Attack/Reconnaissance Battalion (ARB): 24x AH-64 Apaches providing attack and reconnaissance capability
- Attack/Reconnaissance Squadron (ARS): 30x OH-58D Kiowa Warriors providing attack and reconnaissance capability
- Aviation Support Battalion (ASB): providing intermediate level maintenance, signal, and transportation capabilities
- All CABs (Medium) are Active Component and stationed at Riley, ROK, Hunter AAF, Drum, JBLM, Hawaii, Bragg, and Campbell
- Approximately 2,530 personnel are assigned

The CAB (Full Spectrum) consists of:

- Headquarters and Headquarters Company (HHC)
- General Support Aviation Battalion (GSAB): 8x UH-60 providing command and control capability, 12x CH-47 providing heavy lift capability, 15x HH-60 providing medical evacuation capability, and an Air Traffic Services Company providing air traffic control
- Assault Helicopter Battalion (AHB): 30x UH-60 providing utility capability
- Attack/Reconnaissance Battalion (ARB): 24x AH-64 Apaches providing attack and reconnaissance capability
- Attack/Reconnaissance Squadron (ARS): 21x OH-58D Kiowa Warriors providing attack and reconnaissance capability and a UAS company of 8x RQ-7 Shadow UAVs
- Aviation Support Battalion (ASB): providing intermediate level maintenance, signal, and transportation capabilities

- The one Full Spectrum CAB is AC and stationed at Campbell
- Approximately 2,590 personnel are assigned

The CAB (Expeditionary) consists of:

- Headquarters and Headquarters Company (HHC)
- General Support Aviation Battalion (GSAB): 8x UH-60 providing command and control capability, 12x CH-47 providing heavy lift capability, 15x HH-60 providing medical evacuation capability, and an Air Traffic Services Company providing air traffic control
- Assault Helicopter Battalion (AHB): 30x UH-60 providing utility capability
- Attack/Reconnaissance Battalion (ARB): 24x AH-64 Apaches providing attack and reconnaissance capability
- Security and Support Battalion (S&S): 32x LUH-72 Lakotas providing light utility capability
- Aviation Support Battalion (ASB): providing intermediate level maintenance, signal, and transportation capabilities
- The CAB (Expeditionary) are all Reserve Component formations and stationed in the continental United States

Current CAB Structure			
CAB (Heavy)	**CAB (Medium)**	**CAB (Full Spectrum)**	**CAB (Expeditionary)**
HHC	HHC	HHC	HHC
GSAB (8xUH, 15xHH, 12xCH)	GSAB (8xUH, 15xHH, 12xCH)	GSAB (8xUH, 15xHH, 12xCH)	GSAB (8xUH, 15xHH, 12xCH)
AHB (30xUH)	AHB (30xUH)	AHB (30xUH)	AHB (30xUH)
ARB (24xAH)	ARB (24xAH)	ARB (24xAH)	S&S (32x LUH)
ARB (24xAH)	ARS (30xOH)	ARS w/ Shadow (21xOH, 8x RQ-7)	ARB (24xAH)
ASB	ASB	ASB	ASB
2,580 Soldiers	2,530 Soldiers	2,590 Soldiers	2,540 Soldiers

Future CAB Structure. Under ARI, proposed Total Army Aviation Brigade formations will become organized into two principal brigade designs: CABs (AC) and Expeditionary CABs (RC). The reorganization centers on the inactivation of aviation force structure, divestiture of the OH-58D Kiowa Warrior helicopter and associated Attack Reconnaissance Squadrons, and the divestiture of the TH-67 Creek training helicopter, to be replaced by LUH-72 Lakotas for basic flight training at Fort Rucker. Equipping changes in order to facilitate and execute ARI include transferring AH-64 Apaches currently equipping RC formations to AC formations to equip Heavy-Armed Reconnaissance Squadrons; moving in excess of 100 UH-60 Black Hawks from the AC to the RC to equip Assault Helicopter Battalions; and RQ-7 Shadow UAS platoons assigned to AH-64 equipped Heavy-Armed Reconnaissance Squadrons (H-ARS).

Three AC CABs will continue to be structured with an assigned Pathfinder Light Infantry Company (60x personnel) organic to the Assault Helicopter Battalion (Bragg, Campbell, Drum[1]).

The CAB will consist of:

- Headquarters and Headquarters Company (HHC)
- General Support Aviation Battalion (GSAB): 8x UH-60 providing command and control capability, 12x CH-47 providing heavy lift capability, 15x HH-60 providing medical evacuation capability, and an Air Traffic Services Company providing air traffic control
- Assault Helicopter Battalion (AHB): 30x UH-60 providing utility capability
- Attack/Reconnaissance Battalion (ARB): 24x AH-64 Apaches providing attack and reconnaissance capability
- Heavy-Attack/Reconnaissance Squadron (H-ARS): 24x AH-64 Apaches providing attack and reconnaissance capability and 12x RQ-7 Shadows providing unmanned reconnaissance capability
- Aviation Support Battalion (ASB): providing intermediate level maintenance, signal, and transportation capabilities
- Unmanned Aerial System Company (UAS): 12x MQ-1 Grey Eagles providing unmanned reconnaissance and attack capability
- CABs, all active Component, will be stationed at Bliss, Hood, Carson, Riley, Hunter AAF, Drum, Lewis, Hawaii, Bragg, and Campbell (a CAB equipment set will remain in ROK for unit rotations)
- Approximately 2,830 personnel are assigned

The Expeditionary CAB will consist of:

- Headquarters and Headquarters Company (HHC)
- General Support Aviation Battalion (GSAB): 8x UH-60 providing command and control capability, 12x CH-47 providing heavy lift capability, 30x HH-60 providing medical evacuation capability, and an Air Traffic Services Company providing air traffic control
- Two Assault Helicopter Battalions (AHB): 60x UH-60 providing medium lift capability (30 per battalion)
- Aviation Support Battalion (ASB): providing intermediate level maintenance, signal, and transportation capabilities
- The Expeditionary CABs are all Reserve Component formations and stationed in the continental United States

[1] Forts Campbell and Bragg already have Pathfinder Companies; the one at Fort Drum will be a new addition.

Future CAB Structure	
CAB	**Expeditionary CAB**
HHC	HHC
GSAB (8x UH, 15xHH, 12xCH)	GSAB (8x UH, 30xHH, 12xCH)
AHB (30x UH)	AHB (30x UH)
ARB (24x AH)	AHB (30x UH)
H-ARS (24x AH, 12x RQ-7)	ASB
ASB	
UAS Company (12x MQ-1)	
2,830 Soldiers	2,102 Soldiers

ARI includes major force management actions utilizing unit inactivation, conversion, reflagging, and restationing actions as required. The following chart depicts approximate Aviation equipment and personnel force structure changes by installation. These figures represent planning assumptions based on pending Force Design Updates currently in staffing to determine final formation personnel numbers. Additionally, these numbers depict long-range planning assumptions with regards to stationing actions.

Impacts by Installation (Equipment / Soldiers)		
	Equipment	Soldiers
Ft Bliss (1AD)	+ 12 Shadows	+ 141
Ft Hood (1CD)	+ 12 Shadows	+ 145
Ft Carson (4ID)	- AH-64 ARB (24x AH) + 12 Shadows	- 323
Ft Riley (1ID)	- OH-58 Squadron (30x OH) + H-ARS (24x AH) + 12 Shadows	+ 181
Hunter Army Airfield (3ID)	- OH-58 Squadron (30x OH) + H-ARS(-) (18x AH) + 12 Shadows	+ 180
Ft Drum (10MTN)	- OH-58 Squadron (30x OH) + H-ARS (24x AH) + 12 Shadows	+ 242
JBLM (16CAB)	- OH-58 Squadron (30x OH) + ARB (24x AH-64) + 12 Shadows	+ 177
Hawaii (25ID)	- OH-58 Squadron (30x OH) + H-ARS (24x AH) + 12 Shadows	+ 189
Ft Bragg (82ABN)	- OH-58 Squadron (30x OH) + H-ARS (24x AH) + 12 Shadows	+ 239
Ft Campbell (101ABN)	- HHC, Brigade	- 2,419

	- GSAB (8x UH, 15x HH, 12x CH) - AHB (30x UH) - 2x OH-58 Squadrons (51x OH) - ASB + 4 Shadows (retain current 8)	
Alaska (25ID)	- ARS (30x OH) + ARB (24x AH)	+ 36

These figures do not necessarily mean that all of these Soldiers will be coming to the installation for the first time. For example, up to 81 members of the 91 Soldier Shadow Platoon could come from BCTs that are already on the installation. At Fort Riley, the net gain could be 114 rather than 181.

This REC covers aviation assets stationed in the United States. There are proposed adjustments to OCONUS aviation force structure; these are outside the scope of the REC because NEPA generally does not apply overseas. Germany and Korea could each lose a CAB, although these decisions have not been finalized.

2) Proposed Inactivation of the 159th CAB at Fort Campbell

This action is part of the ARI. As discussed above, it is described separately to facilitate NEPA consideration. Army personnel reductions associated with the divestiture of OH-58 aircraft and TH-67 aircraft and the repositioning of UH-60 and AH-64 aircraft between the AC and RC necessary to execute ARI result in the proposed inactivation of the 159 CAB at Fort Campbell in FY15. Additionally, stationing actions are intended to ensure Army BCTs are adequately supported by Army Aviation. Fort Campbell currently hosts two CABs: 101 CAB and 159 CAB. Fort Campbell will retain 101 CAB to support training and deployment requirements for the 101st Airborne Division and its subordinate units. The 159 CAB's UH-60 aircraft will be re-assigned to the RC and the AH-64s will be re-assigned to the 101 CAB, replacing its OH-58 Attack/Reconnaissance Squadron by converting to an AH-64 equipped Heavy-Attack/Reconnaissance Squadron. The net personnel loss at Fort Campbell for all aviation force structure initiatives will be 2,419 Soldiers. There will be approximately 116 fewer helicopters flying at Fort Campbell and is assumed to result in a reduction in operational noise. Fort Campbell will determine if further NEPA analysis is needed for facilities or operations.

3) Summary of ARI

The following are approximate CAB Soldier strength changes by installation due to proposed actions:

Fort Bliss, TX	151
Fort Hood, TX	151

Fort Carson, CO	-249
JBLM, WA	285[2]
Fort Wainwright, AK	45
Fort Riley, KS	195
Hunter AAF, GA	160
Fort Drum, NY	255[3]
Wheeler AAF, HI	195
Fort Bragg, NC	192
Fort Campbell, KY	-2419

It is assumed the 24 AH-64s in the new ARB will be authorized a similar number of flying hours as the 30 OH-58s that are now in the ARS. The AH-64 has a larger rotor system and larger engines and therefore makes slightly more noise (about three decibels) than the OH-58. It is not likely that the additional AH-64s will cause noise contours at installations to change substantially. The Army Public Health Command has detailed information on this issue that installations can use to determine whether site-specific NEPA analysis is needed for the effects on noise contours. Noise issues are discussed in items 10 and 11 of the checklist, discussed below. Two noise contour comparisons are attached, showing that there is little difference caused by the replacement of OH-58s with AH-64s.

b. Proposed ARB Relocation from Fort Carson to JBLM

An ARB from Fort Carson will move to JBLM. This battalion could be diverted to Wheeler AAF, Schofield Barracks, Hawaii. The AH-64 equipped Attack/Reconnaissance Battalion would replace the OH-58 equipped Attack/Reconnaissance Squadron at Wheeler Army Airfield. Hawaii would receive the same number of Soldiers described below (195), but on an accelerated timeline.

c. Gray Eagle UAS Stationing

The MQ-1C Gray Eagle UAS, an Extended Range/Multi-Purpose (ER/MP) (Gray Eagle) Company, executes reconnaissance, surveillance, security, attack, and command and

[2] This assumes relocation of an ARB from Fort Carson. If this does not happen, JBLM's gain would be 90.
[3] This includes addition of a 60-Soldier Pathfinder Company.

control missions to provide dedicated mission-configured UAS support to assigned division CABs, Fires Brigades, Battlefield Surveillance Brigades, BCTs, and other Army and joint force units based upon the division commander's mission priorities.

The general purpose forces Gray Eagle Company consists of 128 Soldiers, 12 MQ-1C Gray Eagles, five Universal Ground Control Stations (UGCS), five Ground Data Terminals, one Satellite Communication Ground Data Terminal, four Tactical Automatic Landing Systems, two Portable Ground Control Stations, and two Portable Ground Data Terminals.

There are two other types of AC Gray Eagle Companies. There are two Special Operations Forces companies (12 Gray Eagles and slightly more people). The Special Operations Forces companies will be at Fort Campbell. There also will be three Military Intelligence Gray Eagle Companies (six systems) with one for each Aerial Exploitation Battalion. One of these is at Fort Stewart, GA and two are at Fort Hood, TX.

The Gray Eagle Company at Fort Irwin will not be co-located with a CAB; rather, this new unit will train alongside rotations going through the NTC, thereby meeting the training requirement to support combat units by integrating UAS components in Overseas Contingency Operations. The Fort Irwin Gray Eagle Company will also be aligned and assigned to the 16th CAB at JBLM.

This REC covers the stationing of Gray Eagle Companies at Fort Carson, Fort Irwin, and Fort Drum. It also covers the stationing of a Gray Eagle company in Alaska, although the location is still to be determined. The alternatives include Fort Wainwright and Eielson Air Force Base, AK.

In 2011, the Army added an MQ-1C Gray Eagle UAS, an Extended Range/Multi-Purpose (ER/MP) Company to several CABs. The installations designated to receive the Gray Eagles in 2011 were Forts Bliss, Hood, Campbell, Bragg, Riley, and Stewart. For these installations, this action was previously decided and is not part of this discussion.

The following construction is necessary for Gray Eagle stationing. For Alaska, existing facilities are available at Eielson Air Force Base and Fort Wainwright.

Fort Drum	Small hangar, other minor requirements
Fort Irwin	Small hangar, runway, taxiways/aprons, and other requirements
Fort Campbell	Small hangar, taxiways/aprons
Fort Carson	Small hangar, other minor requirements

The Gray Eagle is relatively quiet compared to helicopters and its operation will not change any existing installation noise contours. The Gray Eagle has a small, 200 horse power engine. The Gray Eagle will primarily be flown in restricted air space over military installations. It may briefly transit unrestricted airspace over off-post areas on its way to training areas. When this happens, however, the Gray Eagle will be at restricted altitudes and will be routed to avoid residential housing. The Gray Eagle will never be armed with weapons during these brief transit flights. In the event of a malfunction, the Gray Eagle is programmed with automatic safety procedures designed to minimize risk to persons on the ground.

d. Gray Eagle Follow-on Test and Evaluation (FOT&E) at Fort Irwin

The Army will conduct a Follow-on Test and Evaluation (FOT&E) at Fort Irwin. The action will last about 90 days. This FOT&E will provide information for Gray Eagle operations Army-wide, and is required to provide the U.S. Army operational data in order to assess the universal ground control station (UGCS)-equipped Gray Eagle's mission effectiveness. Data would be used to evaluate the effectiveness and suitability of systems functionalities and Soldier training (such as maintenance) not tested during the initial operations test (IOT) of the Gray Eagle, implementation of solutions for deficiencies discovered during IOT, and additional functionalities of the latest software version. In addition, data would be collected to verify that the integration of UGCS did not degrade the information assurance of the system, and to support a performance evaluation of the HELLFIRE Romeo missile variant.

Other locations were considered for the FOT&E of the Gray Eagle, such as Fort Hood, TX, and Edwards Air Force Base, CA (where some of the IOT was conducted), but the Army has selected Fort Irwin based on available airspace, and the synergies between the stationing and operation of the Gray Eagle company and the preparation for and execution of the FOT&E. Fort Irwin is also the only installation that has mechanized, Brigade-on-Brigade exercises needed to support the testing. Runway improvements and the fiber optic cable installation necessary to conduct the FOT&E will be useful during subsequent Gray Eagle company training operations.

e. Total Personnel Changes for All Aviation Initiatives

This chart shows the loss or gain at installations under the aviation initiatives[4] as well as the loss or gain scenarios analyzed for each installation in the 2013 PEA.

Installation	Loss or Gain	Gain in 2013 PEA	Loss in 2013 PEA
Fort Bliss, TX	268	3,000	8,000

[4] These numbers include the ARI and Gray Eagle stationing initiatives.

Fort Hood, TX	272	3,000	8,000
Fort Carson, CO	-196	3,000	8,000
JBLM, WA	177	NA[5]	8,000
Fort Wainwright, AK	163[6]	1,000	4,900
Fort Riley, KS	308	3,000	8,000
Hunter AAF, GA	307	3,000	8,000
Fort Drum, NY	369	3,000	8,000
Wheeler AAF, HI	189	NA	8,000[7]
Fort Bragg, NC	366	NA	8,000
Fort Campbell, KY	-1,962	3,000	8,000
Fort Irwin, CA	127	NA	2,400

As shown in the chart above, the changes anticipated under the aviation initiatives are generally within the parameters addressed in the 2013 PEA. The gains at JBLM, Fort Bragg, Hawaii, and Fort Irwin were not covered by the 2013 PEA. Given the total Soldier populations on these installations, the aviation initiative gains represent only minor changes in the number of assigned personnel.

3. Legal Authority & Discussion

The Army's NEPA regulation states at 32 CFR §651.19:

"A Record of Environmental Consideration (REC) is a signed statement submitted with project documentation that briefly documents that an Army action has received environmental review. RECs are prepared for . . . actions covered by existing or previous NEPA documentation."

In addition to documenting that a proposed action is covered by existing environmental documentation, RECs are also used to document the use of Categorical Exclusions (CXs), categories of actions which normally do not require an EIS or EA. The Army's

[5] There were several installations for which the 2013 PEA did not analyze a gain. This was either because the installation did not have the capacity for a large gain or because a gain was not anticipated because there was no Brigade Combat Team at the site.

[6] This includes the Gray Eagle Company that may go to Eielson Air Force Base rather than Fort Wainwright.

[7] This number included potential losses both at Wheeler Army Airfield and at the adjacent Schofield Barracks.

NEPA regulation includes CXs from NEPA coverage in Appendix B. One such CX is b (12), which reads:

> (12) Reductions and realignments of civilian and/or military personnel that: fall below the thresholds for reportable actions as prescribed by statute (10 U.S.C. 2687) and do not involve related activities such as construction, renovation, or demolition activities that would otherwise require an EA or an EIS to implement (REC required). This includes reorganizations and reassignments with no changes in force structure, unit redesignations, and routine administrative reorganizations and consolidations (REC required).

10 U.S.C. §2687 applies to closure of installations or to reductions of more than 1,000 or 50% of civilian personnel employed at an installation.

Appendix B also provides that "before any CXs can be used, Screening Criteria as referenced in § 651.29 must be met." This section of the regulation sets out "extraordinary circumstances" that would preclude use of a CX.

Applicable to all aviation initiatives:

None of the personnel changes in the aviation initiatives exceeds the thresholds set out in CX(b)(12). None of the installations will have civilian employee losses above the thresholds in 10 U.S.C. §2687. There are no extraordinary circumstances that would preclude application of the CX. Therefore, the CX can be appropriately applied to the aviation initiatives, and no further NEPA documentation is required.

a. Existing NEPA Documentation

Both the President's Council on Environmental Quality (CEQ) regulations (40 CFR 1502.20) and the Army's own NEPA regulations (32 CFR 651.14(c)) encourage "tiering" of broad programs such as the aviation initiatives, as is intended by this REC. Recent CEQ guidance also encourages incorporation by reference of existing documents into a current analysis. The relevant, existing NEPA documentation applicable to the aviation initiatives, are:

Life Cycle Environmental Assessment for the Extended Range/Multi-Purpose Unmanned Aerial Vehicle System, 2004 (LCEA).

Programmatic Environmental Impact Statement for Army Growth and Force Structure Realignment (2007)(Army Growth EIS).

NEPA Review of the Extended Range/Multi-Purpose Unmanned Aerial Vehicle System Record of Environmental Consideration, 2010 (2010 REC).

Programmatic Environmental Impact Statement for the Realignment, Growth, and Stationing of Army Aviation Assets, 2011 (2011 Aviation EIS).

Record of Environmental Consideration (REC) for MQ-1C Gray Eagle Unmanned Aircraft System (UAS) Stationing, 2011 (UAS REC).

Programmatic Environmental Assessment for Army 2020 Force Structure Realignment, 2013 (2013 PEA).

b. Application of Existing NEPA Documentation to ARI

The Army Growth EIS looked at growth scenarios for the installations involved in the aviation initiatives, with the exception of Alaska and Hawaii locations. The growth subject to analysis consisted of three components: Implement Army Growth, Realignment, and associated activities between fiscal year 2008 and 2013 to support the Army's Modular Transformation and Global Defense Posture Review decisions; add approximately 30,000 Combat Support and Combat Service Support Soldiers to the Active and Reserve Components of the Army; and add up to six BCTs. For all installations, the potential gain analyzed was far in excess of the gain proposed under these aviation initiatives. Therefore, the aviation initiatives would be covered under the Army Growth EIS at all of the installations, with the exceptions of Fort Wainwright and Hawaii. It is important to note, however, that because of decisions made in 2013 to reorganize Army BCTs and reduce Army end strength, the growth realized at these installations was reduced. In other words, the net growth at these installations added to the ARI growth does not exceed the total growth analyzed in the Army Growth EIS. Therefore, the gains at ARI installations except Fort Wainwright and USAG Hawaii (including Wheeler Army Airfield and Schofield Barracks, where all aviation initiative changes would occur) are adequately covered by existing documentation. In addition, subsequent Army restructuring actions have only continued to reduce the numbers of Active Component Soldiers at these installations.

The 2011 Aviation EIS analyzed the stationing of CABs at Fort Carson and JBLM. The Record of Decision selected a course of action that would station a CAB at each installation, although less than a full CAB was designated for JBLM. This decision was subsequently executed. The Soldier-strength of the CABs at these two installations under the ARI will be less than the population for the CABs analyzed in the EIS. Therefore, the gain at JBLM is adequately covered by existing documentation. The loss at Fort Carson from the 2014 aviation initiatives is within the scope of losses analyzed in the 2013 PEA.

The gains at Fort Wainwright and Hawaii are in each case less than the offsetting losses that were analyzed in 2013 PEA. The 2013 PEA looked at a potential gain of 1,000 Soldiers at Fort Wainwright. The 2014 aviation initiative gain of 45 is within the number analyzed. The gain at Schofield Barracks is offset by other losses announced in 2013, and therefore no additional analysis of the additional aviation initiative

population is necessary; CX b (12) can be applied to the action. Essentially, since there are fewer Soldiers after all changes are implemented, there will be no new environmental impact.

c. Application of Existing NEPA Documentation to the inactivation of the 159th CAB

The 2013 PEA looked at the socioeconomic impacts of the maximum possible reductions that could occur at Fort Campbell as well as possible losses that could occur at 20 other installations. The combined loss at Fort Campbell, including the ARI loss, does not exceed the loss analyzed in the PEA. Therefore, the inactivation of the 159th CAB at Fort Campbell is adequately covered by the PEA.

d. Application of Existing NEPA Documentation to Gray Eagle Stationing

The proposed action in the 2011 Gray Eagle REC was to establish home stations for MQ-1C Gray Eagle companies. This involved stationing companies of 128 Soldiers and associated equipment with up to four companies at any single installation. The REC applied CXs b(4), b(12), c(1), and j(2). It also cited the 2004 LCEA. The REC determined that some hangar construction would be required. The REC found that if construction of a maintenance facility were needed; impacts would be less than significant, however, as the facility would likely be constructed on previously disturbed ground and would be expected to disturb less than 5.0 cumulative acres. The ER/MP UAS was expected to have only minor impacts to air quality, hazardous materials and waste, health and safety, and noise at facilities where the system would be deployed. The REC had an 18-question checklist and stated that if an installation answered all of these questions "no," its proposed action of implementing ER/MP UASs stationing decision would likely qualify for a REC prepared at installation level.

The REC involved a Department of the Army decision to station Gray Eagle companies at Forts Bliss, Hood, Campbell, Bragg, Riley, and Stewart. It did not address the places now proposed for general purpose forces Gray Eagle stationing: Fort Carson, Fort Irwin, Fort Drum, and an Alaskan installation to be selected. In addition, Special Operations Forces Gray Eagle companies go to Fort Campbell and Military Intelligence Gray Eagle companies will be stationed at Fort Hood and Fort Stewart.[8] The aviation initiative will place Gray Eagle companies at these locations, pending completion of the checklist and preparation of a REC or other appropriate NEPA analysis by the installation. The checklist is attached to this REC, with modifications.

These Gray Eagle stationing actions are covered by the same CXs cited in the 2011 Gray Eagle REC. The stationing of the Gray Eagle Company is anticipated to result in

[8] The Gray Eagle REC considered stationing of up four companies at both of these installations. But application of the checklist for the additional companies should be done at both installations.

environmental impacts that may require site-specific, follow-on NEPA analysis. For example, the stationing of the company will require construction of facilities adjacent to an existing runway.

The stationing of a Gray Eagle company in Alaska also may require site-specific, follow-on NEPA, depending on the installation selected.

e. Application of Existing NEPA Documentation and Categorical Exclusions to the Execution of the FOT&E at Fort Irwin

The FOT&E at Fort Irwin together with the stationing and operation of the Gray Eagle Company is the subject of a site-specific Environmental Assessment. This includes analysis of the projects necessary to implement FOT&E. For example, FOT&E will require installation of a fiber optic cable underground. Fort Irwin has programs for dust suppression, soil erosion, and protection of natural and cultural resources. Given this, and the relatively limited scope of FOT&E (90 days in duration and very limited infrastructure), it is fairly certain that there will be no significant impacts. FOT&E will not be undertaken until NEPA analysis at Fort Irwin is complete. Execution of follow-on, site-specific NEPA analysis following preparation of this REC at headquarters level is consistent with the NEPA tiering process.

The stationing of the Gray Eagle Company and execution of FOT&E also involve the transfer of approximately 1,000 acres of leased property from the National Aeronautics and Space Administration (NASA) back to Fort Irwin. CX(f)(3) applies to transfer of real property administrative control from NASA to the Army.

Accordingly, based on this REC, the Army will station the Gray Eagle Company and to conduct the Gray Eagle FOT&E at Fort Irwin while recognizing the need for further, site-specific NEPA analysis of the impacts resulting from implementing this decision.

f. Cumulative Impacts

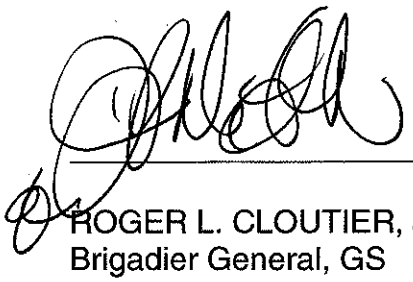
I have considered the cumulative impacts of all 2014 aviation initiatives. There are no cumulative impacts that would preclude application of CXs, and there are no new circumstances or changes in the proposed actions that would require supplementation of any of the existing NEPA documents.

4. Conclusion

This REC is sufficient to cover the aviation initiatives under consideration and no further NEPA analysis is required. The initiatives are covered either by the existing NEPA documents discussed above or by CXs. Individual installations may have to prepare site-specific analyses.

In considering the implementation of these stationing actions, installations should use the checklist[9] attached to this REC to determine whether the use of CXs and reliance on existing NEPA documents as described in this programmatic REC are appropriate, or whether additional NEPA analysis is needed. If the checklist review indicates that no further NEPA analysis is necessary, the action likely qualifies for a REC at the installation level. The installation REC also should cite any applicable documents identified in this REC, any applicable installation-level environmental analyses, and the applicable CX(s). The checklist from this REC should be attached to the installation's REC. If the installation concludes that additional NEPA analysis is necessary, it should be prepared before any implementation of the proposed action.

The aviation initiatives may be implemented without further NEPA analysis (other than the installation-specific REC prepared in conjunction with the checklist below), with three exceptions. The realignment will station a Gray Eagle company at Fort Irwin, California, as well as conduct the Army's Gray Eagle FOT&E there. The implementation of these decisions at Fort Irwin is the subject of ongoing, site-specific, NEPA analysis. Similarly, the aviation initiative will station a Gray Eagle company at an installation in Alaska, and implementation may be the subject of NEPA analysis. Site-specific analysis for Gray Eagle stationing may also be required at Fort Carson.



ROGER L. CLOUTIER, JR.
Brigadier General, GS
Director, Force Management

20140731

Date

[9] This checklist is based on the one used in the 2011 Gray Eagle REC, but has a few adjustments.

REC Annex for Aviation Initiatives

Environmental Checklist. To ensure compliance with the President's Council on Environmental Quality (CEQ) guidance (40 CFR Parts 1500-1508) and the Army's NEPA rule (32 CFR Part 651), a specific REC checklist is included. The environmental checklist facilitates the consideration of environmental effects of aviation initiatives and provides a framework for identifying site-specific NEPA requirements.

This checklist is intended to be used as follows:

The statements appearing after each environmental resource listed below are intended to serve as a general description of the threshold for application of a REC for the listed resources.

If the statements as applied to the installation are FALSE, the installation should conclude that implementation of the aviation initiatives described in the programmatic Aviation Force Structure Realignment REC above may be adequately covered by creation of a site-specific REC.

If garrison staff concludes that any of the statements are or may be TRUE, the staff must explain within their REC why, in spite of that statement, additional NEPA analysis is unwarranted in light of 32 CFR 651.29 (for example, that the potential impact has been or will be resolved through another environmental legal or regulatory process), or how existing environmental analysis is adequate.

If garrison staff find any of the below statements TRUE but will remain unresolved by another environmental legal/regulatory process, and that no existing NEPA analysis adequately covers the potential impact, the garrison would then conduct a site-specific Environmental Assessment or Environmental Impact Statement, as appropriate.

[Insert description of installation's proposed action to include number of new personnel, new equipment, construction requirements, range requirements, airspace, proposed training and operations, and proposed dates.]

a. Soil Resources

1. Off-road operations of aviation initiative support vehicles are likely to significantly increase soil compaction, rutting, or conditions above that caused by current level of activities on training ranges and maneuver areas.

b. Air Quality

2. Using aviation initiative equipment at this installation will contribute to a change in the air quality compliance status (e.g., from attainment to nonattainment) in the region and would not be subject to a Clean Air Act record of non-applicability.

c. Water Resources

3. The Proposed Action will result in unpermitted direct impacts to waters of the U.S.

d. Biological Resources (including Threatened and Endangered Species and Wetlands)

4. Off-road operations of aviation initiative support vehicles are likely to significantly increase the level of damage to vegetation on training ranges and maneuver areas above that caused by current level of activities on training ranges and maneuver areas.

5. Construction of facilities for the Proposed Action will jeopardize the continued existence of any threatened or endangered species or result in the destruction or adverse modification of their designated critical habitat.

6. Normal operational or training use of aviation initiative equipment will jeopardize the continued existence of any threatened or endangered species or result in the destruction or adverse modification of their designated critical habitat.

7. The Proposed Action will result in construction of one or more aviation initiative facilities in jurisdictional wetlands.

8. The Proposed Action will require aviation initiative support vehicles to operate in areas not previously traveled by tactical vehicles, and require additional surveys to identify and delineate jurisdictional wetlands.

e. Cultural Resources

9. The Proposed Action will require aviation initiative support vehicles to operate in areas not previously traveled by tactical vehicles, and thus require additional cultural resource surveys.

f. Noise

10. Noise generated by normal operations of aviation initiative equipment and weapons systems will likely affect sensitive wildlife populations, to include threatened and endangered species.

11. Noise generated by the normal operations of aviation initiative equipment and weapons systems will substantially change existing noise contours on the installations.

g. Hazardous Materials and Used Oil

12. The installation will need to build, or significantly modify, facilities necessary to store waste petroleum, oil, and lubricant products in accordance with local/state/federal regulations.

13. The proposed action will require substantial modification for the installation's Spill Prevention, Control and Countermeasures Plan.

h. Facilities, Utilities and Energy

14. The Proposed Action will require expansion of existing facilities for maintaining or parking aviation initiative aircraft and support vehicles involving more than 5.0 cumulative acres of land.

15. The Proposed Action will require substantial modification of the installation's Stormwater Discharge Prevention Plan.

16. More frequent delivery of fuel will require revision of existing emergency response or spill response plans.

i. Airspace

18. The Proposed Action would require the Army to propose an addition to, or modification of, existing airspace.

19. The Proposed Action would have substantial adverse impacts to commercial and/or general aviation.

j. Cumulative Effects

20. Other actions are underway, or proposed, that when combined with the potential effects of operating and maintaining aviation initiative equipment on the installation, could have a significant effect on human health or the environment.