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August 22, 2014

U. S. Army Environmental Command
ATTN: SPEA Public Comments
2450 Connell Road (Building 2264)
Joint Base Sand Antonio-Fort Sam Houston, TX 78234-7664

Emailed to: usarmy.jbsa.aec.nepa@mail.mil

Re: Supplemental Programmatic Environmental Assessment for Army 2020 Force Structure Realignment and Draft Finding of No Significant Impact

To Whom It May Concern:

Cochise County is submitting the attached comments on the Supplemental Programmatic Environmental Assessment (SPEA) for the Army 2020 Force Structure Realignment and Finding of No Significant Impact Dated June 2014 primarily with regards to the analysis of the impacts to Fort Huachuca, Arizona, and its surrounding area, including Cochise County.

As noted in the attached comments, this SPEA has many significant flaws that must be addressed in a revised SPEA before a final Finding of No Significant Impact or, if there are significant impacts, an Environmental Impact Statement can be prepared. The key item of concurrence includes a discrepancy in the 2013 workforce numbers and the percentage of workforce in Cochise County attributable to Fort Huachuca used to assess the socioeconomic impacts of the proposed action. As a result, the socioeconomic impacts are significantly understated.

Fort Huachuca prepared an Environmental Impact Report using the more rigorous IMPLAN model based on 2011 data. That report was included as an appendix to the January 2014 Programmatic Biological Assessment (PBA) submitted to the United States Fish and Wildlife Service and in the resulting Biological Opinion issued by the Service. This 2014 PBA was referenced in the report, but the results of the EIFS modeling were not compared to that socioeconomic impact to ensure that there is reasonable concurrence. A simple comparison would have yielded concerns on the part of the Army regarding potential errors in the document.

Cochise County looks forward to providing information and assistance with the Army's collection of correct and appropriate data to properly analyze the effects of the potential reduction of 2,700 positions at Fort Huachuca in the Army 2020 Force Structure Realignment Revised SPEA or EIS.

Respectfully,

Patrick G. Call
Chairman

Ann English
Vice-Chairman

Richard R. Searle
Supervisor