Finding of No Significant Impact

1. Description of the Proposed Action: The proposed action is to construct an Infantry Platoon Battle Course (IPBC) west of Jamestown road and north of Sunshine Road near Garnsey range. An IPBC puts infantry platoons through a series of targets and missions in an obstacle course setting. Moving and stationary targets, bunkers, landing zones, mortar simulation devices and buildings provide a realistic training environment that allows for multiple advances, defend, and threat scenarios. This training range is required to provide the active Army, Reserve, and National Guard Units with a permanent facility to exercise live fire training requirements to improve combat readiness for infantry Soldiers.

The projected training load for the Fort Benning Infantry Platoon Battle Course (IPBC), is 7,946 Soldiers per year, to include members of the Infantry Officer Basic Course, Basic Officer Leader Course, Phase I (all branches), and Infantryman Advanced Non-commissioned Officer Course. These units must be trained to standard in platoon level operations tactics, techniques, and procedures that are currently written in the Army's doctrinal and training publications. Without the IPBC, units would be unable to train to the Army's current doctrinal and training standards. If this IPBC is not provided, there would be a significant adverse effort on the unit training and the units would not be able to attain the maximum degree of proficiency required for combat.

The IPBC will allow infantry platoons to maneuver on foot through a series of targets and missions in an obstacle course setting. The range will not utilize vehicles or mechanized elements. Moving and stationary targets, bunkers, landing zones, mortar simulation devices and buildings provide a realistic training environment that allows for multiple advances, defend, and threat scenarios. Fort Benning is currently conducting this training on temporary ranges. However, these temporary training ranges are often missing components that need to be available to provide the full spectrum capability on the range. Although current training meets minimal requirements, the training is segmented and does not allow for fully comprehensive training at one time and the synergistic impacts of the training on the Soldiers that would be provided by the IPBC. The size of the IPBC will be approximately 1,217 acres. The generic IPBC plan was overlaid and oriented on a plan of the Flint and Garnsey Ranges forming the preliminary IPBC layout. Range objectives were moved and reoriented to better fit the topographical conditions across the Flint and Garnsey Ranges to avoid ordnance impact areas and wetlands, and to minimize encroachment on RCW habitat

An "Environmental Assessment for the Construction of the Infantry Platoon Battle Course, Fort Benning, Georgia and Alabama" was prepared and evaluated pursuant to the National Environmental Policy Act (Public law 91-190, 42 USC. 4321 et seq.). This EA concluded that the proposed action does not constitute a "major Federal action significantly affecting the quality of the natural and human environment" when considered individually or cumulatively, including both direct and indirect impacts. Therefore, the preparation of a more detailed environmental document, an Environmental Impact Statement, was not required.

Clarifying Information: The EA and draft FNSI for the IPBC were developed utilizing the July 2005 design; however, during the 30-day public and stakeholder review period, and at the request of the Fort Benning Environmental Attorney, copies of the October 2005 IPBC design

were obtained and reviewed concurrent with the EA/draft FNSI. Discrepancies between the July and October 2005 design documents were summarily noted. For example, the EA/draft FNSI stated that clearing and grubbing would occur in areas for line-of-sight and that clearing would occur in areas marked for construction, which was typically the reverse of what was indicated consistently in the drawings. Meetings between the Fort Benning EMD, OSJA, Range Division, and Engineering reps were held to address how to best incorporate any changes in design, where applicable, into the final FNSI and into future IPBC design documents. In addition, revised, updated design documents were submitted to the DPW on 2 December 2005 that clarified the following issues.

- Clearing and grubbing will occur on approximately 35 acres, for the purpose of construction only, to include road improvements, with clearing only (no grubbing) allowed to achieve line-of-sight purposes.
- Although wetlands are present in the overall area of the IPBC, none are located within the footprint of any range construction areas, and will not be disturbed as the result of any clearing, grubbing, or other activities at the site.
- An existing road, running through these above-mentioned wetland areas, will be utilized for the trenching of utilities for the adjacent administrative buildings, thereby minimizing any potential impact as a result of utility placement on soils and wetlands.
- Although an un-named tributary to Shell Creek will be crossed as a result of a road improvement for the IPBC, no jurisdictional wetland delineation was deemed necessary as this work will consist only of the replacement of an existing culvert and the minor build-up of one side of an existing road, all of which, per prior informal consultation with the COE-Regulatory Branch, still falls under the definition of "road-work." No Individual Permit will therefore be required for the project.

Any changes in the IPBC design must be submitted on a Fort Benning form 144-R to the Fort Benning Environmental Management Division (EMD) and environmental concurrence received at least 2 weeks in advance of design implementation prior to initiating any planned project changes. Unplanned project changes must also be submitted in this manner as soon as practical, after the fact, to the EMD.

2. Summary of Potential Environmental Effects and Proposed Mitigation for the Preferred Alternative (Alternative I: "Construction of the IPBC at Garnsey Range Area"):

RESOURCE	POTENTIAL EFFECT	MITIGATION
Soils & Vegetation	Minor adverse effect	Adherence to Erosion, Sedimentation, Pollutant Control Plan (ESPCP); no additional mitigation proposed
Wetlands	Minor adverse effect	Adherence to ESPCP, Installation SPCCP, and NPDES General Permit for Storm Water

		Discharges; no additional mitigation proposed
Protected Species	Minor adverse effect	Adherence to existing Installation, state, and Federal laws, regulations, and guidelines; no additional mitigation required.
Air Quality	Minor adverse effect	Adherence to existing Installation, state, and Federal laws, regulations, and guidelines; no additional mitigation required.

*NOTE: Resources where there was no potential effect are not listed in the above table.

3. Public Comments:

a. The EA and Draft FNSI for the proposed action were made available to the public for a review period of 30 days starting from the first day of publication (28 August 2005) in "The Columbus Ledger-Enquirer," in accordance with part 1501.4 (e)(1) of Title 40 of the Code of Federal Regulations and 32 CFR Part 651, Environmental Analysis of Army Actions. These documents were available at the Columbus Public Library, South Lumpkin Library, For Benning Main Post Library, and on the Installation website: http://www.benning.army.mil/EMd/_program_mgt/legal/index.htm. A notice of availability (NOA) of the EA and Draft FNSI were also mailed to all agencies/individuals/organizations on the distribution (mailing) list for the proposed action.

b. Summary of Public Comments:

- On 31 August 2005, the Georgia State Clearinghouse (GSC) sent a letter confirming receipt of the EA and draft FNSI and that the documents would be forwarded, through them, for the appropriate state-level reviews.
- On 23 September 2005, the U.S. Fish and Wildlife Service (USFWS), West Georgia sub office, sent an email requesting clarification of discrepancies between information presented in the EA and its accompanying map. The main issues of concern were the potential intrusion into protected species (Red-cockaded woodpecker) (RCW) habitat due to IPBC construction, the clearing of RCW habitat acreage for the IPBC footprint, and the potential (once the IPBC becomes active) for fired rounds to impact RCW habitat. On 29 September 2005, a meeting was held at the offices of the Environmental Management Division (EMD) to discuss and resolve these issues; representatives from the EMD, USFWS, Fort Benning Range Division, and the Office of the Staff Judge Advocate were present.

- On 27 September 2005, the Georgia Department of Natural Resources (GA DNR), Historic Preservation Division, sent a letter concurring that the project would have no effect on historic properties.
- On 29 September 2005, the USFWS, West Georgia sub office, sent a follow-up email confirming the resolution of the issues of concern stated in the 23 September 2005 email, with the understanding that these concerns would be addressed in the FNSI for the EA and in an accompanying revised map (see attachment 1). In summary, the requested text changes consist of the following: the extent of training, i.e. Soldier foot training will occur up to the point of the last target (just east of Lumpkin Trail according to shot projection maps), clear of RCW foraging partitions; the footprint of the IPBC as shown on the maps is the "standard" design, but with design modifications (via EMD, Range Division, and other input), it actually stops short (as indicated by the placement of the last target near Lumpkin Trail) of encroaching into any RCW foraging partitions; in addition, shot projection maps produced by Fort Benning Range Division, show that munitions will be stopped by natural topography before they have a chance to enter RCW habitat.
- On 30 September 2005, the GSC sent an additional letter confirming that its initiated state-level reviews had been completed. This review was confirmed via attached letters from the GA DNR and the Georgia Environmental Protection Division-Floodplain Management Branch. Both indicated that the EA was "consistent with state and regional goals" and was therefore an approved action.

4. Decision:

While the No Action alternative would have the least environmental impacts, it would not meet the needs and purpose of the action to provide quality training to Soldiers who need to train as they fight. Therefore, I have decided to approve implementation of Alternative I with the mitigation described in this FNSI and in the EA which is incorporated by reference. This decision is based upon mission requirements, environmental requirements, and operational constraints at the site of the preferred alternative.

FINDING OF NO SIGNIFICANT IMPACT
REVIEWED AND APPROVED BY:

DEC 14 2005

Date

Ricardo R. Riera
Colonel, IN
Garrison Commander