

DRAFT FINDING OF NO SIGNIFICANT IMPACT

Introduction

Fort Benning plays a pivotal role in supporting the United States Department of the Army's (Army's) overarching mission. As the Maneuver Center of Excellence (MCoE) and the home to numerous deployable units, Fort Benning must provide sufficient land and facilities for the units to train up to the battalion level. Fort Benning must be able to train and develop highly proficient and cohesive units capable of conducting operations across the full spectrum of conflict.

1 Purpose and Need

The purpose of the Proposed Action is to accommodate Army Force Structure decision to convert the Armored Brigade Combat Team (ABCT) to an Infantry Brigade Combat Team (IBCT), locate the Army Reconnaissance Course (ARC) off-road heavy maneuver training to reduce red-cockaded woodpecker (RCW) impacts, and enhance already approved off-road heavy maneuver boxes in the Good Hope Maneuver Training Area (GHMTA).

The Proposed Action is needed to improve Soldier training, adjust to the conversion of the ABCT, improve training areas scheduling flexibility, support environmental sustainability of training areas, avoid the expense of procuring off-road heavy maneuver training land in the era of declining budgets.

The Proposed Action at Fort Benning includes three components: 1) converting the 3rd (ABCT and other units to an IBCT; 2) locating the off-road heavy maneuver training component of the Army Reconnaissance Course (ARC) in the GHMTA; and 3) enhancing the off-road heavy maneuver training capability in the GHMTA. These training initiatives involve large-scale, interrelated changes in the next 5 years or as funding becomes available.

Convert the 3rd Armored Brigade Combat Team and Other Associated Units to an Infantry Brigade Combat Team

In 1999, the Senior Leadership of the Army proposed a new vision regarding the future readiness, force structure, personnel, and the transformation of the Army to meet the global challenges, demands, and threats of the 21st century. As part of the implementation of this vision, the decision was made to transform the Army from a "division-based" force to a modular integrated "brigade-based" force. More recently, the Army is in a period of critical transition as the Nation has concluded major combat operations in Iraq, assesses force requirements in Afghanistan, and develops new strategy and doctrine for future conflicts. During this transition, the Army must identify prudent measures to reduce spending without sacrificing critical operational capabilities necessary to implement national security and defense priorities. To help achieve mandated spending reductions, the Army is decreasing the current total number of Soldiers and Army civilians, while reorganizing the current force structure. In 2012, the Army proposed to realign the force structure by reducing the Active Duty end-strength from the fiscal year (FY) 2012 end-strength of 562,000 to 490,000 by FY2020, including a reduction of at least 8 Brigade Combat Team (BCTs) from the current total of 45 BCTs.

On 25 June 2013, the Army announced that the 3rd ABCT would remain at Fort Benning. Furthermore, during that timeframe, the Army considered converting the 3rd ABCT to an IBCT at Fort Benning. On 15 October 2014, the Army announced the conversion of the 3rd ABCT to an IBCT. The environmental assessment (EA) addressed the potential impacts from that conversion.

In March 2014, the Army announced it would study further end-strength reductions of between 440,000 and 450,000 due to fiscal, policy, and strategic conditions. The Army prepared a Supplemental Programmatic Environmental Assessment to study the potential environmental and socioeconomic impacts from the end-strength reductions on the 21 installations analyzed in the 2013 Programmatic Environmental Assessment as well as 9 more. Fort Benning was studied for a loss of up to 10,800 permanent party Soldiers and Army civilians. As part of a substantial force reduction at Fort Benning, it is possible that the 3rd BCT would be inactivated because the Army's force structure realignment efforts as studied in the Programmatic EA and Supplemental Programmatic EA have focused on reducing BCTs. Due to uncertainties in Congressional budget restrictions and resultant Army Leadership force reduction decisions, however, it is also possible that other units on Fort Benning could be realigned or inactivated. Other units that may also be involved in a force reduction are undeterminable at this time. Army realignment decisions to conform to expected budgetary limits would be implemented from FY2016 to FY2020. The EA addressed the potential impacts from training changes due to inactivation of the 3rd BCT.

Locate the Off-Road Heavy Maneuver Training Component of the Army Reconnaissance Course in the Good Hope Maneuver Training Area

In 2009, Fort Benning prepared an environmental impact statement (EIS) and biological assessment to study the potential environmental impacts of moving the Armor School to Fort Benning, establishing the MCoE, and implementing other Base Realignment and Closure and Army Transformation actions. The U.S. Fish and Wildlife Service (USFWS) issued a jeopardy biological opinion (BO) on the MCoE biological assessment for the RCW in part due to potential for increased training impacts on the RCW and its habitat. The MCoE BO requires the relocation of the ARC heavy maneuver field training off the current Fort Benning footprint to a location without RCWs within 5 years of that course training start date (i.e., relocation by no later than September 2016).

The Army had proposed to meet this requirement in conjunction with the need for additional heavy maneuver training land by acquiring up to 82,800 acres through the Training Land Expansion Program (TLEP). However, the TLEP process has been paused due to changing circumstances since the beginning of the TLEP proposal. The pause in the TLEP process means that Fort Benning must find another way to meet the requirement of the MCoE BO regarding the ARC off-road heavy maneuver training. To date, the ARC has not conducted off-road heavy maneuver training in the Southern Maneuver Training Area (SMTA); however, ARC training would be enhanced by including such training.

The GHMTA on Fort Benning can accommodate the heavy maneuver portion of the ARC training. Keeping the ARC heavy maneuver training on the Installation would provide mission benefits and cost savings. No RCWs clusters occur in the GHMTA, and currently, no potentially suitable or future habitat is allocated in the GHMTA. Therefore, Fort Benning considers relocating the ARC heavy maneuver training to GHMTA as biologically equivalent to moving that training off the Installation.

Enhance Off-Road Heavy Maneuver Training Capability in the Good Hope Maneuver Training Area

Fort Benning desires to establish more maneuver boxes within the existing footprint of the GHMTA. Although the GHMTA consists of 11,156 acres, only five, non-contiguous maneuver boxes consisting of approximately 2,930 acres are currently authorized for off-road heavy maneuver training. Unless in established maneuver boxes, the Armor School and other users are limited to moving wheeled and tracked vehicles only on roads and tank trails. The Proposed Action includes building the remaining infrastructure and erosion control measures (e.g., tank trails, low water crossings, and turn pads) needed to increase the off-road training area in the GHMTA by approximately 4,700 acres. This increase would allow Fort Benning units enhanced off-road heavy maneuver capabilities to support training and would allow for multiple units to train simultaneously.

2 Description of the Proposed Action and Alternatives

Convert the 3rd Armored Brigade Combat Team and Other Associated Units to an Infantry Brigade Combat Team

Converting the 3rd ABCT to an IBCT would result in substantial differences in equipment and training missions and their impacts on the environment. An IBCT does not use any tracked vehicles or Paladins for off-road heavy maneuvers. A typical IBCT consists of approximately 750 light and medium wheeled vehicles (e.g., high mobility multipurpose wheeled vehicles and cargo trucks) that would be used primarily on roads for Command and Control or logistical purposes. The IBCT would conduct dismounted training versus tracked vehicle training as a main part of its mission. These changes would result in considerable reduction of heavy maneuver training landscape.

Additionally, the 11th Engineer Battalion would execute force structure changes to support the Total Army Analysis restructure of the current 3rd ABCT Brigade Special Troops Battalion to the new Brigade Engineer Battalion (BEB) and its subsequent inclusion in the IBCT. The 11th Engineer Battalion would inactivate its Bridge, Concrete, Vertical, and Horizontal Companies as part of this transition. The 3/3 Brigade's conversion to an IBCT BEB would mean the loss of 31 tracked engineer vehicles (e.g., armored vehicle launched bridges and dozers), while the IBCT BEB would retain approximately six tracked engineer vehicles to support the 3/3 Brigade. The BEB would continue to complete the same type of training, but with fewer tracked vehicles.

The conversion would also add a maneuver battalion to the IBCT, resulting in a small increase in Soldiers from approximately 3,800 to 3,900. The slight personnel increase from the conversion to an IBCT would be offset by the reduction of BCT support personnel so that Fort Benning expects virtually no net change in personnel numbers due to this action.

Existing facilities would support the conversion, so no new construction is expected. An increase in small arms (.50 caliber or less) range usage and a decrease in large arms ranges (larger than .50 caliber) are expected as well.

Locate Off-Road Heavy Maneuver Training Component of the Army Reconnaissance Course in the Good Hope Maneuver Training Area

Fort Benning proposes to move the ARC off-road heavy maneuver training out of the previously approved location in the SMTA (where numerous RCW clusters exist) to within the existing GHMTA footprint that has no known RCW clusters and where no potentially suitable or future habitat is currently allocated. ARC off-road heavy maneuver training has never occurred in the SMTA; therefore, the impacts projected under the MCoE EIS were never realized. Informal consultation with USFWS in 2012 expanded the ARC training area in and around the SMTA, but removed the authorization for off-road heavy maneuver training in this location. The current maneuver area in the GHMTA can accommodate the ARC off-road heavy maneuver training. Locating the ARC off-road heavy maneuver training in the GHMTA from the SMTA is expected to result in the avoidance of off-road heavy maneuver training impacts on the RCWs in that area, which the MCoE BO indicated was the goal for RCW recovery in and near the SMTA. Fort Benning has not identified any other suitable areas on the Installation for the off-road heavy maneuver portion of the ARC training that does not contain RCWs or foraging partitions. Fort Benning will consult with USFWS to ensure that this proposal meets the intent of the MCoE BO provisions regarding the ARC training.

Enhance Off-Road Heavy Maneuver Training Capability in the Good Hope Maneuver Training Area

Fort Benning proposes to enhance off-road heavy maneuver training capability within the existing GHMTA footprint to provide approximately 4,700 additional acres of off-road heavy maneuver area. This action includes designing and building the infrastructure and erosion control measures needed to sustain the training area, including the construction and upgrade of tank trails, low water crossings, and turn pads within the GHMTA. This additional acreage would increase the total contiguous off-road areas available to heavy maneuver training in the GHMTA.

The GHMTA is most suitable area available for off-road heavy maneuver training because it contains no threatened or endangered species and has been partially prepared with erosion control measures to minimize maneuver damage. Tenant units on Fort Benning use areas other than the GHMTA to support heavy vehicle movement (as opposed to maneuver). These areas are in the northern half of the Installation and contain habitat, endangered species, wetlands, and topography (slope) that practically restrict movement to roads and trails. Movement is further limited by frequently active ranges and associated Surface Danger Zones as well as duded impact areas. Therefore, despite the potential inactivation of BCT on Fort Benning, the GHMTA remains critical to meeting requirements of the Armor School.

Alternatives Considered and Evaluated: Based on the screening criteria analysis presented in Section 2.2 of the EA, a No Action Alternative and two Proposed Action alternatives were analyzed.

- **No Action Alternative:** Under the No Action Alternative, the 3rd ABCT would remain as is and no additional maneuver battalion would be added. The ARC training would continue without use of heavy tracked vehicles in the SMTA. Fort Benning would consult with USFWS to determine other possible ways to comply with or revise the MCoE BO requirement to move the ARC off-road heavy maneuver training off the Installation by no later than September 2016. Under this alternative, the GHMTA would not be enhanced to expand off-road heavy maneuver training capabilities. The No Action Alternative describes the status quo, but it does not meet the needs

and purpose of the Proposed Action. The Council on Environmental Quality and Army National Environmental Policy Act (NEPA) regulations require a No Action Alternative for comparison of environmental impacts with the action alternatives.

- **Alternative 1 (Preferred Alternative):** Under Alternative 1, the 3rd ABCT and other associated units would be converted to an IBCT. The ARC off-road heavy maneuver component would be located in the GHMTA, and the GHMTA would be enhanced to expand off-road heavy maneuver training capabilities.
- **Alternative 2:** Under Alternative 2, the 3rd ABCT would be transformed into an IBCT for the short term, and the IBCT would be inactivated sometime between FY2016 and FY2020, resulting in associated reductions in training. It is predicted that any major force reductions at Fort Benning would include inactivation of the BCT; other Fort Benning units that may undergo force reductions cannot be determined at this time and therefore could not be included in the EA. If additional units are inactivated or relocated off Fort Benning in the future, appropriate NEPA analysis will be conducted. The EA focused on environmental impacts due to the changes in training from the loss of the BCT because the BCT is the only large unit that is considered and whose loss is appropriate to look at in a programmatic level.

The ARC off-road heavy maneuver component would be located in the GHMTA, and the GHMTA would be enhanced to expand off-road heavy maneuver training capabilities.

3 Environmental Analysis

Section 3.0 of the EA provides a description of the existing environmental conditions at and surrounding the alternatives under consideration. As described in Section 2.0 of the EA, the alternatives included the No Action Alternative, Alternative 1, and Alternative 2.

Section 3.0 provides information that serves as a baseline from which to identify and evaluate any individual or cumulative environmental and socioeconomic changes likely to result from the implementation of the action alternatives. The region of influence of the action alternatives, and therefore of the EA, varies by specific Valued Environmental Component (VEC) but it is primarily contained within Fort Benning boundaries and surrounding, immediately adjacent lands.

Environmental Impacts and Comparison of Alternatives: The potential environmental impacts of the VECs were analyzed in relationship to the incremental impacts of the Proposed Action alternatives and the No Action Alternative. VECs are categories of environmental and socioeconomic effects where categorization is conducted to enable a managed and systematic analysis of these resources. Table 1 summarizes the findings of Section 3.0.

Cumulative impacts, discussed in Section 4.0 of the EA, are the incremental impacts of the Proposed Action, when added to other past, present, and reasonably foreseeable future actions, regardless of who undertakes those actions (40 Code of Federal Regulations [CFR] 1508.7). Cumulative impacts can result from actions occurring over a period of time that are minor when each is considered individually, but are significant when viewed collectively. Potential environmental impacts, including direct, indirect, and

cumulative effects, were analyzed, as appropriate. No significant cumulative effects are anticipated under any Proposed Action alternative.

4 Mitigation Measures

Fort Benning will comply with all applicable laws and regulations. Adherence to those laws and regulations may result in mitigating potential adverse impacts.

No mitigation measures are required to avoid significant impacts under any of the Proposed Action alternatives. Additional mitigations measures listed below can be implemented to mitigate minor and moderate, adverse impacts.

Wildlife and Special Status Species

The minimization measures put in place to keep students and cadre out of Uchee Creek will remain in effect to prevent impacts to critical habitat for the shiny-rayed pocketbook. Additionally, the signed buffers around relict trillium and Georgia rockcress populations will continue to minimize impacts to these populations by dismounted or wheeled traffic associated with the 3rd Brigade and the ARC.

Per the ARC biological evaluation, Fort Benning personnel have maintained signs along many roads within the ARC training areas to prevent students from traveling into or through RCW clusters. Based on the vehicle tracking data provided by the U.S. Army Corps of Engineers' Construction Engineering Research Laboratory, the time spent within 200 feet of RCW clusters that are not blocked is negligible; therefore, Fort Benning will revise the list of clusters where signs will be maintained in the future.

The Enhanced Training biological assessment is under review by USFWS. Any mitigation measures proposed by the USFWS will be considered for implementation.

Cultural Resources

If cultural resources cannot entirely be avoided in the GHMTA, mitigation will be completed using the Army Alternate Procedures in place at Fort Benning. No additional mitigation will be required.

Noise

Fort Benning will continue to use a noise complaint process to assist in responding to noise complaints in a timely manner. In addition, Fort Benning's Installation Operational Noise Management Plan includes outreach programs to achieve the maximum feasible compatibility between the noise environment and noise-sensitive land uses, both on and off the Installation. The plan is meant to inform the community of the surrounding noise environment and suggest compatible land uses for development within these areas. To mitigate noise complaints and conflicts, Fort Benning also recommends to communities the practice of disclosing to residents the fact they are located in Noise Zones II or III.

Vegetation and Soils

Monitoring and control measures for invasive plant species will be implemented in accordance with the Integrated Natural Resource Management Plan. To minimize potential impacts to vegetation in the GHMTA, mitigation will be employed to minimize soil movement, stabilize runoff, and generally control sedimentation, as described fully in Water Resources mitigation measures (below). Mitigation measures

for vegetation may include avoidance, minimization, repair, rehabilitation, restoration, reduction, and/or conservation. Fort Benning will implement measures from existing plans, such as the Integrated Natural Resource Management Plan; use Range and Land Analysis in conjunction with the Integrated Training Area Management Program protocols; and monitor vegetation and soils to measure the long-term effects of training and to identify and implement impact reduction strategies.

Under all action alternatives, Fort Benning will continue to aggressively pursue proactive, preemptive actions to mitigate the potential impacts to soils in the GHMTA. These mitigation measures include:

- Using sedimentation basins, check dams, and rip rap swales to prevent surface runoff sedimentation into streams
- Installing supplemental upgrades and erosion controls at low water crossings
- Avoiding steep slopes, establishing 50-foot buffers for all streams, and employing silt and erosion control measures

Water Resources

Under all action alternatives, Fort Benning will implement the same proactive management practices in the additional maneuver areas that it has already implemented elsewhere in the GHMTA, including:

- Using off-road heavy maneuver training restrictions in 50-foot stream buffers and 100-foot wetland buffers
- Minimizing impacts to floodplains where feasible
- Developing low impacts erosion control measures such as berms and swales

Table 1. Summary of Potential Environmental Impacts for Alternatives

Resource	No Action	Alternative 1: Preferred Alternative	Alternative 2
Air Quality	Continued minor impacts from vehicle emissions	Negligible to minor impacts from fugitive dust emissions and beneficial impacts from the reduction in heavy equipment associated with the ABCT.	Same as Alternative 1 for up to a 5-year period, then additional beneficial impacts from the deactivation of the IBCT.
Airspace	No impact.	Negligible, adverse impacts resulting from increased loads to Lawson Army Airfield and existing airspace management. Beneficial impacts to airspace could occur as a result of the inactivation of the IBCT as a result of decreased load requirements.	Negligible, adverse impacts for up to a 5-year period resulting from increased loads to Lawson Army Airfield and existing airspace management. Beneficial impacts to airspace could occur as a result of the inactivation of the IBCT as a result of decreased load requirements.
Wildlife and Special Status Species	Impacts would range from no impact to moderate impacts to fish and wildlife, migratory birds, invasive species. Moderate impacts to threatened and endangered species would continue to occur.	Beneficial and minor adverse impacts to fish and wildlife, migratory birds, and invasive species and minor impacts to threatened and endangered species.	Same impacts as Alternative 1 for a period of up to 5 years, then beneficial impacts to fish and wildlife, migratory birds, invasive species, and special status species after inactivation of the IBCT.
Cultural Resources	No impact.	Negligible overall impacts to cultural resources; if resources cannot be avoided, Fort Benning would adhere to standard procedures for data collection, excavation, and relocation.	Initially, same as Alternative 1, then further reduction in cultural resources impacts from training after inactivation of the IBCT.
Hazardous Materials / Hazardous Waste	Negligible, adverse effects continuing normal Installation operations.	Negligible, adverse effects from hazardous materials and hazardous wastes and no impacts from toxic substances or contaminated sites.	Negligible, adverse effects from hazardous materials and hazardous wastes and no impacts from toxic substances or contaminated sites.
Land Use	Negligible impact.	No impacts from land use changes and negligible impacts from encroachment with mitigation (the JLUS and ACUB programs) to minimize potential land use conflicts.	Same as Alternative 1 for up to a 5-year period, a reduction in land use conflicts after inactivation of the IBCT.

Resource	No Action	Alternative 1: Preferred Alternative	Alternative 2
Noise	Continued moderate, adverse impacts from operational noise overlapping areas with sensitive noise receptors.	Reduction in noise, however continued moderate, adverse impacts. No change in noise zones expected.	Initially, same as Alternative 1, then a slight, beneficial impact after inactivation of the IBCT and elimination of training noise.
Vegetation and Soils	Negligible to moderate impacts from training activities with continued mitigation measures.	Negligible to minor, beneficial impacts to vegetation, including invasive species; negligible impacts to soils with mitigation measures and reduction in impact intensity; and beneficial impacts from replacement of heavy equipment with foot traffic.	Same as Alternative 1, then a reduction in adverse impacts after inactivation of the IBCT.
Environmental Justice and Protection of Children	No impact.	No environmental justice impacts and no impacts to children as a result of standard safety measures.	No environmental justice impacts and no impacts to children as a result of standard safety measures.
Traffic and Transportation	Continued negligible impacts from existing congestion.	Negligible, short-term, adverse impacts during construction phase of GHMTA expansion. Negligible, long-term impacts due to minor overlaps in road network and tank trails.	Beneficial impacts anticipated due to loss of IBCT traffic. Negligible, short-term, adverse impacts due to ARC relocation and GHMTA enhancements. No additional long-term impacts.
Water Resources	Continued minor to moderate impacts with mitigation measures.	Minor to moderate impacts. Potential impacts from sedimentation; buffers, NPDES construction BMPs, and permanent sediment control measures used to prevent and limit adverse effects.	Same as Alternative 1, then a reduction of adverse impacts after inactivation of the IBCT.

5 Public Review and Comments

The EA and a draft Finding of No Significant Impact (FNSI) will be available to the public for a 30-day public comment period. The Notice of Availability for the EA and the draft FNSI will be published in the *Columbus Ledger-Enquirer*, Fort Benning's *The Bayonet and Saber*, and *Tri-County Journal* in accordance with the Army NEPA Regulation (32 CFR Part 651.36). The EA and draft FNSI will also be available at the following local libraries:

- 1. Columbus Public Library**
3000 Macon Road
Columbus, Georgia 31906
- 2. Cusseta-Chattahoochee Public Library**
262 Broad Street
P.O Box 539
Cusseta, Georgia 31805
- 3. Sayers Memorial Library**
6870 Wold Avenue, Bldg. 93
Fort Benning, Georgia 31905
- 4. Phenix City – Russell County Library**
1501 17th Avenue
Phenix City, Alabama 36867

In addition, the documents will be posted on the Fort Benning website at <https://www.benning.army.mil/garrison/DPW/EMD/legal.htm>. The Notice of Availability also has been mailed to all agencies/individuals/organizations on the Fort Benning NEPA distribution (mailing) list for the Proposed Action (see Section 8.0). The Army will make revisions, as appropriate, to the EA and draft FNSI based on the comments received.

6 Finding of No Significant Impact

I have considered the results of the analysis in the EA, comments received within the public review period, and Fort Benning's mission. Based on these factors, I have decided to implement proposed Alternative 1 (Preferred Alternative) at Fort Benning by converting the 3rd ABCT and other associated units to an IBCT, locating the ARC off-road heavy maneuver training component in the GHMTA, and enhancing the GHMTA to expand off-road heavy maneuver training capabilities. Implementation of the Preferred Alternative will not have a significant impact on the quality of human life or natural environment.

Implementing Alternative 2 also would not have a significant impact on the quality of human life or the natural environment. Alternative 2 addresses inactivation of Fort Benning's BCT between FY2016 and FY2020 in case Army Leadership makes that decision as part of Army realignment actions. Due to uncertainties in Congressional budget restrictions and resultant Army Leadership force reduction decisions, Alternative 2 cannot be implemented at this time.

This analysis fulfills the requirements of the NEPA of 1969, as implemented by the Council on Environmental Quality regulations (40 CFR 1500–1508), as well as the requirements of the Environmental Analysis of Army Actions (32 CFR 651). Therefore, issuance of a FNSI for both Proposed Action alternatives is warranted and an EIS is not necessary

Signature: _____

Colonel Huerter

Date: _____