

DRAFT
FINDING OF NO SIGNIFICANT IMPACT
3RD INFANTRY DIVISION (3ID)
HEAVY BRIGADE COMBAT TEAM (HBCT) COMPLEX
AND
UPGRADE TO TANK TRAIL
FORT BENNING, GEORGIA

1.0 INTRODUCTION

Fort Benning has prepared an Environmental Assessment (EA) to identify and evaluate potential environmental and socioeconomic effects from the construction of the proposed Heavy Brigade Combat Team (HBCT) Complex in the Kelley Hill Cantonment Area at Fort Benning, Georgia. Under the Proposed HBCT Action, Fort Benning would construct, operate and maintain a HBCT Complex and upgrade existing tank trail infrastructure. This EA was prepared in accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations at 40 Code of Federal Regulations (CFR) Parts 1500-1508, and the Army NEPA Regulation at 32 CFR Part 651 (*Environmental Analysis of Army Actions*).

2.0 PURPOSE AND NEED

The Proposed HBCT Action is needed to provide adequate unit maintenance facilities to support the reorganization and stationing of a HBCT at Kelley Hill. The 3rd Infantry Division (3rd ID) currently occupies existing maintenance and operations facilities in the Kelley Hill Cantonment Area on Fort Benning. The existing Brigade is transforming from three battalions into six battalions, and will require adequate unit maintenance facilities to accommodate current and projected increases in support operations. The existing facilities have become inadequate for maintenance operations due to outdated design features and are unable to accommodate the size and maintenance requirements of current standard military vehicles. The existing facilities also lack adequate heavy lift capabilities, do not provide a sufficient number of maintenance bays to accommodate the mission, and do not meet current electrical and mechanical codes.

This proposed project was originally identified in the Maneuver Center of Excellence Environmental Impact Statement (MCoE EIS, June 2009). The Record of Decision (ROD) for the MCoE EIS included the construction of a HBCT Complex originally to be located in the Harmony Church Cantonment Area in conjunction with support facilities for the relocation of the Armor School. However, this original siting was not centrally located to support the main functions and operations of the 3rd ID. As the Kelley Hill Cantonment Area acts as the “Command and Control” center for the 3rd Brigade, centrally locating the HBCT Complex to the operations and training centers for the 3rd ID would reduce the expense of having to move military equipment and Soldiers for maintenance and training operations.

3.0 DESCRIPTION OF THE PROPOSED ACTION

Under the Proposed HBCT Action, Fort Benning would construct, operate, and maintain an Army standard design HBCT Complex in support of maintenance and training operations for the 3rd ID at Kelley Hill. The main complex would consist of a Tactical Equipment Maintenance Facility (TEMF); arms room; organizational storage buildings; access roads; hazardous waste storage; oil storage; shop aprons; tank trails; organizational vehicle parking and an unmanned aerial vehicle (UAV) maintenance hangar. This Proposed HBCT Action includes the upgrade of existing tank trail infrastructure that starts in the Kelley Hill Cantonment Area and runs eastward towards the Ochiltee Railhead Loading Facility in the Harmony Church area. The repair and upgrade of this tank trail infrastructure will help to maintain operational and training efficiency.

In addition, demolition of 29 buildings and structures totaling approximately 61,300 square feet will also occur as part of the Proposed HBCT Action. The current facilities and structures, (e.g. grease racks, oils storage buildings, maintenance shops, etc.), proposed for demolition will no longer be needed as they will be replaced with the newer and updated facilities for the operation of the Proposed HBCT Complex. As the majority of these facilities were constructed in the 1950's, it is assumed that lead-based paint (LBP) and asbestos containing materials (ACM) are present. All buildings and structures will be inspected for LBP and ACM prior to any demolition activities. All building materials and wastes generated prior to and during demolition would be disposed of in accordance with all applicable Federal, State and Army regulations.

4.0 DESCRIPTION OF THE ALTERNATIVES

The NEPA, CEQ, and the Army NEPA Regulation require a range of reasonable alternatives to be considered and evaluated. The Army used screening criteria to determine which Action Alternatives are reasonable. Satisfaction of these screening criteria would provide a location suited to meet the purpose of and need for the Proposed HBCT Action, while potentially minimizing adverse environmental and operational effects. For purposes of analysis, an Alternative was considered reasonable only if it enabled Fort Benning to accomplish the primary mission of providing an adequate, on-Post maintenance shop complex and support facilities necessary for the 3ID HBCT. Project components for all of the Action Alternatives would consist of construction of a HBCT Complex to include a TEMF and other operational support facilities, and include upgrades and repairs to the Kelley Hill and Ochiltee Tank Trails. Alternatives to the Proposed HBCT Action were developed as part of the planning process and include:

- **Alternative 3 (Preferred Alternative):** The proposed location for this Alternative is directly northwest of the Kelley Hill Cantonment Area. The total proposed acreage impacted by this Alternative projection is 236 acres.

- **Alternative 2:** The proposed location for the Alternative is directly north of the Kelley Hill Cantonment Area. The total proposed acreage impacted by this alternative projection is 319 acres.
- **Alternative 1:** The proposed location for this Alternative is directly northeast of the Kelley Hill Cantonment Area. The total proposed acreage impacted by this alternative projection is 245 acres.
- **No Action Alternative:** Under this Alternative, the Proposed HBCT Action would not be implemented.

While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, the No Action Alternative reflects the *status quo* and serves as a benchmark against which the Action Alternatives were evaluated. The No Action Alternative reflects the baseline environmental and socioeconomic conditions on Fort Benning as analyzed in the MCoE EIS.

5.0 ANTICIPATED ENVIRONMENTAL EFFECTS

No significant adverse impacts to any of the resources fully analyzed are anticipated either on a *long-* or *short-term* basis. The analysis contained in this EA indicates that for all of the Proposed HBCT Action Alternatives, only *short-term, minor* adverse effects may occur to Soils, Water Resources and Wetlands, Cultural Resources, and Hazardous and Toxic Materials and Wastes due to demolition, construction, and operational activities.

Potential impacts to biological resources, specifically the Red-cockaded Woodpecker, (a Federally listed Endangered Species), would vary between the Proposed HBCT Action Alternatives. Potential impacts for Alternative 3 (Preferred Alternative) to the Red-cockaded Woodpecker (RCW) would be *minor* as current pine plantations at this location have not been designated as current or future potential habitat. Potential impacts to RCWs for Alternatives 2 and 1 would be *moderate* as pine plantations at these locations are of an older age class and have been designated as future potential habitat.

Mitigation measures have been identified in this EA to minimize potential adverse impacts to Soils, Water Resources and Wetlands, Cultural Resources, Biological Resources, and Hazardous and Toxic Materials and Wastes. Implementation of these measures will further reduce potential impacts to these identified environmental resources or avoid the impacts altogether. The EA analyses also demonstrates that adherence to applicable Federal and State environmental laws, regulations, and permitting processes would minimize significant adverse environmental impacts resulting from implementation of any of the Proposed HBCT Action Alternatives. This determination is based on the following:

- Application of Federal and State erosion control measures and NPDES permitting requirements to include preparation of an ESPCP detailing erosion and sedimentation

control BMPs, and a minimum 25-foot surface water buffer to minimize soil impacts during construction would be required prior to any construction activities.

- Minimize removal and damage to pine trees measuring equal to or greater than 10 inch diameter breast height (dbh) to reduce impacts to existing and designated RCW habitat.
- Adverse effects associated with pine trees are even further limited to allow only the removal of scrub-brush overgrowth and pine trees of 6 inch dbh or less to avoid impacts to RCW habitat in the vicinity of the Ochillee Tank Trail footprint.
- Construction activities would be prohibited within 200-feet of all RCW cluster trees during the 1 April through 31 July breeding season.
- Avoid historic properties through project design where feasible.
- Avoid archeological sites that are eligible, or may be eligible, for inclusion in the National Register of Historic Places (NRHP) If avoidance is not possible, then excavation and data recovery would be implemented.
- Under all of the Action Alternatives, the handling, disposal, use, and storage of solid materials and waste as well as hazardous and toxic materials/wastes would be in accordance with all applicable Federal and State laws and requirements.

6.0 PUBLIC AVAILABILITY

The Final EA and this draft FNSI are available to the public for a 30-day public comment period. An announcement that these documents are available was published via a Notice of Availability (NOA) in *The Columbus Ledger-Enquirer* and Fort Benning's *The Bayonet* in accordance with the Army NEPA Regulation (32 CFR Part 651.36). These documents are also available at several local libraries and are posted on the Fort Benning website at <https://www.benning.army.mil/garrison/DPW/EMD/legal.htm>. The NOA of the Final EA and Draft FNSI has been mailed to all agencies/individuals/organizations on the Fort Benning NEPA distribution (mailing) list for the Proposed Action, as identified in **Section 8.0** of the Final EA. As part of Fort Benning's on-going, established process and dialogue with the Federally recognized Native American Tribes affiliated with the Fort Benning area, the Army has provided each Tribe with a copy of these documents for consultation via review and comment.

Written public comments should be addressed to:

- **Mr. John Brent**; Environmental Management Division Chief; IMSE-BEN-PWE-P; 6650 Meloy Drive; Building 6, Room 309; Fort Benning, Georgia 31905; or via-email at john.brent@us.army.mil.

For further information or to request a copy of the documents, please contact **Mr. John E. Brown**; 6650 Meloy Drive; Building 6, Room 309; Fort Benning, Georgia 31905; or call (706) 545-7549.

7.0 CONCLUSION

After evaluation of impacts it is concluded that the all of the Proposed HBCT Action Alternatives, with its associated facility construction, demolition, and tank trail upgrades would meet the purpose and need for the 3rd ID HBCT Complex. However, comparison of potential impacts between the Alternatives indicates that Alternative 3 (Preferred Alternative) would have the least impact to RCW habitat. The No Action Alternative would not meet the purpose and need for providing adequate maintenance facilities to support operations of the 3rd ID.

Pursuant to NEPA, CEQ, and Army NEPA regulations, the implementation of Alternative 3 for the Proposed Action would not have a significant environmental or socioeconomic impact on the quality of the human or natural environment. As such, a “Finding of No Significant Impact” is warranted for this Proposed Action and will not require the preparation on an Environmental Impact Statement.

FINDING OF NO SIGNIFICANT IMPACT
REVIEWED AND APPROVED BY:

Date

JEFFREY FLETCHER
Colonel, AG
Garrison Commander