

DRAFT FINDING OF NO SIGNIFICANT IMPACT

1 Introduction

This Supplemental Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 US Code [USC] 4321 et seq.), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Part 1500-1508), and the Army NEPA Regulation (Environmental Analysis of Army Actions; 32 CFR Part 651, 1 January 2007). Under NEPA and its implementing regulations, Federal agencies are required to consider the environmental impacts of major proposed actions in the form of an EA or Environmental Impact Statement (EIS). This NEPA analysis evaluates the potential environmental effects associated with the relocation of the N61919 Navy Operational Support Center (NOSC), or NOSC Columbus, from its current location in downtown Columbus, Georgia (GA) to Army Installation Fort Benning, GA.

Previously proposed site locations for the NOSC were initially proposed and analyzed in the NOSC Relocation EA of August 2015. On September 29, 2015, Fort Benning's Garrison Commander signed a FNSI selecting the Soldiers' Plaza site for relocation, operation, and maintenance of the NOSC. Since that time, demolition of the World War II era buildings under the Army's Infrastructure Footprint Reduction Program (Section 3.1.3) has been completed and coordination of NOSC's relocation has continued. Fort Benning, however, concluded a Department of the Army mandated Area Development Planning (ADP) charrette in October of 2016 to initiate site planning and long-term direction for family housing within the Main Post Cantonment Area. Through the ADP charrette, it was determined that a parcel on the margin of the housing area, previously zoned for community, would be best utilized for general operations and support and designated for such use and development. As well, this parcel met the screening criteria for the NOSC's relocation. Therefore, the preparation of this supplemental EA incorporates the 2015 NOSC Relocation EA and offers the addition of this parcel as the new Preferred Alternative.

2 Background

Naval Operational Support Center

The NOSC Columbus is one of many Naval Reserve Centers located throughout the nation providing reservist both administrative and training facilities. NOSC's are staffed by Navy Full Time Support personnel whose primary role is supporting the Navy Selected Reserve; the largest cohort of Navy Reserve Sailors who traditionally drills one weekend each month and two weeks annually. The NOSC Columbus is currently located south of Victory Drive/U.S.-280 within the South Commons Municipal Complex; approximately five miles northwest of Fort Benning.

Fort Benning

Fort Benning is an Army Installation located outside Columbus, GA, which supports more than 120,000 Active Duty Military, Family Members, Reserve Component

Soldiers, Retirees, and Army Civilian Employees on a daily basis (Figure 1-1). Fort Benning plays a pivotal role in supporting the Army's overarching mission by providing the institutional training of Infantry and Armor Soldiers and leaders, basic and advanced individual training of new enlistees, and functional training in special skills needed to support the operating forces. The Armor and Infantry Centers and Schools were consolidated at Fort Benning to create the Maneuver Center of Excellence (MCoE) for ground forces training and doctrine development. Additionally, Fort Benning serves as the home to numerous deployable Army and other tenant units.

There are four cantonment areas on Fort Benning: Main Post, Kelley Hill, Sand Hill, and Harmony Church. Within these cantonment areas, Fort Benning has its own offices, schools, shopping malls, medical facilities, housing, and churches. Fort Benning also has multiple training facilities, firing ranges, and maneuver training areas on the Installation. The cantonment areas on-Post provide a centralized location for community facilities and support services for Soldiers and their Families.

3 Purpose and Need

The purpose is to fulfill a Stationing Action request on behalf of NOSC Columbus and the U.S. Navy through the Installation providing existing facilities or by constructing a new NOSC building and accompanying parking area for Navy Drill Reservists. Current facilities are undersized and improperly configured for the present mission and essential training needs of the NOSC. Furthermore, the current facilities do not meet Anti-Terrorism/Force Protection (AT/FP) standards per Department of Defense (DoD) Instruction 2000.12 (Department of Defense, 2012). All replacement facilities must comply with AT/FP, Unified Facilities Criteria (UFC) requirements and other DoD Directives. A support service and utilities agreement will be required between the NOSC and the U.S. Army once facilities are occupied.

4 Description of the Proposed Action

The Proposed Action would construct new facilities on-Post (Fort Benning) to support the relocation and operation of the NOSC from its current location near downtown Columbus, GA. From 2012 to 2014, the U.S. Navy and Army coordinated and approved through a Stationing Action, Army Regulation 5-10, the relocation of the NOSC Columbus to Fort Benning. Fort Benning has been tasked to complete the Stationing Action for the Navy and provide a minimum of 21,000 square feet of building space and 36,000 square feet of paved parking in accordance with the NOSC's requirements under the UFC and the Department of Defense Directive 4270.5 for Military Construction.

5 Description of the Alternatives

Army and NEPA regulations require the development and consideration of the Proposed Action and appropriate Alternatives. The Alternative Analysis Process evaluates possible means of meeting the purpose and need for the Proposed Action. Fort Benning developed the screening criteria in an effort to narrow down the field of potential Alternatives for further analysis. Potential Alternatives that failed to meet the

following criteria were eliminated from further analysis. The proposed Action Alternatives to construct a new NOSC are required to:

- Be within Fort Benning's boundary and in close proximity to essential services and facilities to prevent hindering their mission through excessive personnel commuting distances;
- Be available for development (little to no ground preparation or demolition required);
- Have the capability for compliance with AT/FP requirements of UFC 4-010-01.
- Accommodate at a minimum a 21,000 square foot building and 36,000 square feet of paved parking along with additional AT/FP setbacks and potential utility right-of-ways and environmental control structures;
- Not significantly affect environmental resources;
- Not require excessive costs for potential renovation or construction and operations and maintenance.

The Alternatives carried forward for further study include:

- *Alternative 1: Soldiers' Plaza*
Alternative 1 would result in the relocation of the NOSC to Fort Benning's Main Post at Soldiers' Plaza (Figure 2-1), and associated construction maintenance and operation. Soldiers' Plaza is located south off Dixie Road and is a 15 acre parcel available for immediate development and currently designated for administrative and support facilities. Fort Benning would make approximately half of the parcel available to the NOSC for construction, operation, and maintenance. At present, facility configuration and design is unknown; therefore, Alternative 1 analysis includes the entire parcel. Future facilities planned to coexist with the NOSC include Soldier Family Support Center.

Alternative 1's proposed location provides excellent accessibility for commuters during peak hours of traffic flow. Other improvements include approximately 50 paved parking spaces on the western and southern margin of the property. Alternative 1 would meet the purpose and need for the Proposed Action and is considered reasonable according to the screening criteria.

- *Alternative 2: Bradshaw Road Site*
The selection of Alternative 2 would result in the relocation, operation, and maintenance of the NOSC to Fort Benning's Main Post within what is currently a parcel utilized as open green space (Figure 2-2). The Bradshaw Road Site is located on the corner of Bradshaw Road and Goltra Avenue east of Lawson Army Airfield and is a sparsely forested six acre parcel available for immediate development. Necessary utilities are available, but no other improvements exist. Alternative 2 would likewise meet the purpose and need for the Proposed Action and is considered reasonable according to the screening criteria.

- **Alternative 3: Custer Road Site (Preferred Alternative)**

Alternative 3 is considered the Supplemental EA's Preferred Alternative and would result in the relocation, operation, and maintenance of the NOSC to a parcel located to the south of Custer Road, north of Upatoi Creek, and adjacent east of Engineers Road (Figure 2-3). The approximately seven acre parcel is relatively level, undeveloped, and forested. Adjacent utilities are available but no other improvements exist on this site.

The proposed location also provides excellent accessibility for commuters and is approximately 0.5 mile from the Interstate-185/Lindsey Creek Parkway access control point. The Preferred Alternative would likewise meet the purpose and need for the Proposed Action and is considered reasonable according to the screening criteria.

- **No Action Alternative**

Under the No Action Alternative, the NOSC Columbus would not relocate to Fort Benning, GA. Navy personnel would continue to utilize the existing NOSC facilities leased from the City of Columbus, GA. The undersized and functionally inadequate facilities would continue to impact the current mission and training demands. Additionally, the NOSC, at its current location, would continue to operate in facilities that would not meet AT/FP requirements.

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 served as a benchmark against which the Action Alternatives were evaluated in accordance with the requirements of 32 CFR 651.

6 Anticipated Environmental Effects

The analysis contained in this EA indicates that for the most part, implementation of the Proposed Action for either action alternative would have only short-term, minor adverse effects to Air Quality, Soils, and Water Resources due to construction associated with all of the Action Alternatives. Long-term beneficial effects on both air quality and safety and security would occur. Air quality would benefit through the utilization of more energy efficient facilities constructed. Safety and security would benefit as related to force protection and the NOSC's relocation/operation on Fort Benning. Adherence to applicable Federal and State laws, regulations, and GA NPDES and Air Rule BMPs would minimize impacts due to construction and operation related activities.

7 Mitigation Measurements

No mitigation measures are required to avoid significant impacts under any of the Proposed Action alternatives. Additional mitigations identified within the EA are recommended to mitigate minor adverse impacts.

8 Public Availability

The Final EA and Draft FNSI were made available to the public for a 30-day public

comment period from December 22, 2016 – January 20, 2017. An announcement that these documents are available was published via a Notice of Availability (NOA) in The Columbus Ledger-Enquirer, The Journal, and Benning News (online) in accordance with the Army NEPA Regulation. These documents are also available at several local libraries and are posted on the Fort Benning website at <http://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, and organizations on the Fort Benning NEPA distribution (mailing) list for the Proposed Action. 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.

9 Conclusions

I have considered the results of the analysis in the EA and details within the Stationing Action for the relocation of the NOSC Columbus to Fort Benning. Based on these factors, I have decided to implement the Preferred Alternative (Alternative 3) at Fort Benning by selecting the Custer Road Site for the relocation and operation of the NOSC facilities. Implementation of the Preferred Alternative will not have a significant impact on the quality of human life or natural environment.

Implementing Alternative 1 or 2 would also not have a significant impact on the quality of human life or the natural environment. However, Alternative 1 and 2 is less desired in comparison with Alternative 3's commuter accessibility.

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 the Action Alternatives is warranted and an EIS is not necessary.

**FINDING OF NO SIGNIFICANT IMPACT
REVIEWED AND APPROVED BY:**

Date

Andrew C. Hilmes
Colonel, U.S. Army
Garrison Commander