FINDING OF NO SIGNIFICANT IMPACT

ENHANCED TRAINING ENVIRONMENTAL ASSESSMENT FORT BENNING, GEORGIA

Introduction

Fort Benning plays a pivotal role in supporting the United States Department of the Army's (Army's) mission. As the Maneuver Center of Excellent (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.

The Army has prepared an environmental assessment (EA) to analyze the environmental impacts associated with the conversion of the 3rd Armor Brigade Combat Team to a smaller Infantry unit, re-location of the Army Reconnaissance Course (ARC) to the Good Hope Maneuver Training Area (GHMTA), and enhancement of maneuver boxes in the GHMTA. This document is called the Enhanced Training EA.

The Army recently decided to convert Fort Benning's Armored Brigade Combat Team (ABCT) to an Infantry Battalion Task Force (IBTF) rather than the Infantry Brigade Combat Team (IBCT) addressed in the EA. Although the environmental impacts of the IBTF unit will be less than those from the IBCT, the EA is adequate to analyze these impacts, as explained below, and supplementation is not required.

This Finding of No Significant Impact (FNSI) summarizes the Purpose and Need for the Proposed Action, the Alternatives analyzed and the basis for the FNSI. The EA provides more information, and is incorporated by reference.

1 Purpose and Need

The purpose of the Proposed Action is to implement the Army Force Structure decision to convert the ABCT to an IBTF[1], re-locate the Army Reconnaissance Course (ARC) off-road heavy maneuver training to the Good Hope Maneuver Training Area (GHMTA), and enhance already approved off-road heavy maneuver boxes in the GHMTA.

The Proposed Action is needed to improve Soldier training, carry out the Army-directed conversion of the ABCT, improve training area scheduling flexibility, support environmental sustainability of training areas, reduce red-cockaded woodpecker (RCW) impacts, and avoid the expense of acquiring off-road heavy maneuver training land in the era of declining budgets.

[1] As explained below, the Army originally planned to convert the ABCT to an Infantry Brigade Combat Team (IBCT).

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

The Army is in a period of critical transition as the nation has concluded 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 eight Brigade Combat Team (BCTs) from the current total of 45 BCTs. The Army prepared a Programmatic EA (PEA) to analyze the environmental and socioeconomic impacts of those reductions, which included the possible reduction of up to 7,100 Soldiers and Army Civilians at Fort Benning.

On 25 June 2013, the Army announced that the 3rd ABCT would remain at Fort Benning. Furthermore, around that time, 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 Enhanced Training EA addressed the potential impacts from that conversion.

In March 2014, the Army announced it would study further reductions to an end strength of between 440,000 and 450,000 due to fiscal, policy, and strategic conditions. The Army prepared a Supplemental PEA to study the potential environmental and socioeconomic impacts from additional end-strength reductions. 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 was 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. Army realignment decisions to conform to expected budgetary limits would be implemented from FY2016 to FY2020. The Enhanced Training EA addressed the potential impacts from training changes due to inactivation of the 3rd BCT. These programmatic environmental assessments are incorporated by reference and are available at http://aec.army.mil/Services/Support/NEPA/Documents.aspx.

On 9 July 2015, the Army announced that Fort Benning would lose approximately 3,400 Soldiers by FY17. This reduction involves conversion of the 3rd ABCT to an Infantry Battalion Task Force (IBTF) of approximately 1,080 Soldiers at Fort Benning rather than conversion to an IBCT of approximately 4,000 Soldiers. Although a task force is usually a temporary organization, the IBTF proposed for conversion at Fort Benning is actually a permanent part of Army force structure. Such task forces offer commanders the option to grow rapidly to create a BCT, if needed. The task force allows the Army to maintain some combat power capability and also allows "reversibility" without completely eliminating a brigade.

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 Armor School includes the ARC. 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 required 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 initially 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). The TLEP process has been paused due to changing circumstances. The pause in the TLEP process prompted Fort Benning to find another way to meet the requirement of the MCoE BO regarding the ARC off-road heavy maneuver 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 RCW clusters occur in the GHMTA, and currently, no potentially suitable or future habitat is allocated in the GHMTA. The USFWS concluded that locating ARC off-road maneuver training in the GHMTA is equivalent to moving this training off-Post.

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 use of 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 to an Infantry Brigade Combat Team or an Infantry Battalion Task Force

This element of the proposed action appears in the published EA as conversion of the ABCT to an IBCT, the action that Army headquarters had announced at that point. On 9 July 2015, the Army announced that Fort Benning would convert the 3rd ABCT to an IBTF at Fort Benning rather than realignment to an IBCT. Because the IBTF conversion is adequately analyzed in the EA's discussion of IBCT conversion, the two actions are discussed together here.

Converting the 3rd ABCT and associated units 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 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.

The 3rd ABCT conversion to an IBTF would result in a unit of about 1,080 Soldiers, as compared to the full IBCT Soldier strength of about 4,000. The IBTF would train without tracked vehicles in the same general ways and areas as described for the IBCT in the Enhanced Training EA, but on a much-reduced scale. Existing facilities would support the conversion, so no new construction is expected. The change in conversion to the IBTF instead of the IBCT would have no impact on the other parts of the Proposed Action. For example, the MCoE still needs heavy maneuver training areas for the Armor School and other units.

Because the scale of impacts of conversion to an IBTF are within the range of IBCT conversion impacts, the EA adequately covers the IBTF conversion. This EA would also support training of the IBCT if it expands from an IBCT in the future because this is the action analyzed in the EA.

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 Southern Maneuver Training Area (SMTA)[2] where numerous RCW clusters exist to the existing GHMTA footprint that has no known RCW clusters and where no current, potentially suitable or future habitat is managed. 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. Re-locating the ARC off-road heavy maneuver training in the GHMTA from the SMTA will result in the avoidance of off-road heavy maneuver training impacts on the RCWs in the SMTA. Fort Benning has determined there are no other suitable areas on the Installation for the off-road heavy maneuver portion of the ARC training that do not contain RCWs or RCW foraging partitions. Fort Benning consulted with USFWS resulting in confirmation 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. The additional acreage would increase the total contiguous off-road areas available to heavy maneuver training in the GHMTA. This action includes: designing and building the infrastructure, including the construction and upgrade of tank trails, low water crossings, and turn pads within the GHMTA. The action involves the same management practices in the additional maneuver areas that have already been implemented elsewhere in the GHMTA, including: using erosion control measures such as 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 where feasible; using off-road heavy maneuver training restrictions in 50-foot (or wider) stream buffers and 100-foot (or wider) wetland buffers; and minimizing impacts to floodplains where feasible. Monitoring to identify erosion or sedimentation issues in the GHMTA

[2] ARC off-road heavy maneuver training has never occurred in the SMTA due to various factors; therefore, the impacts projected under the MCoE EIS never occurred.

would occur to ensure no significant impacts.

This action also includes timber removal and on-going vegetation maintenance to support off-road heavy maneuver in the new maneuver boxes, as has been done in the previously established maneuver boxes. Since the publication of the Enhanced Training EA, Fort Benning has estimated the amount of timber harvest acres that would be needed. Area 1 at the southern part of the GHMTA is a priority area for initial upgrade, and it may involve 870 acres of timber harvest; that is approximately 56% of this area. Some areas are unsuitable for heavy maneuver, such as wetlands, streams, excessive slopes; and timber/vegetation will remain in these areas except as needed for crossings. Northern parts of the GHMTA have more surface waters, so approximately 50 % of timber may be removed in those areas. Estimates for total GHMTA timber harvest are approximately 2,500 acres.

The GHMTA is the 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 dudded impact areas. Even though the ABCT will now become an IBTF, the MCoE still needs heavy maneuver training area for the Armor School, the ARC, and other units.

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. The ARC training would continue without use of heavy tracked vehicles in the SMTA. Fort Benning would still need to 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 purpose and need of the Proposed Action. The no action alternative also cannot be implemented because of the Army headquarters-directed realignment of the BCT to an IBTF. 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 studied in the EA, the 3rd ABCT would be converted to an IBCT. The ARC off-road heavy maneuver component would be re-located in the GHMTA, and the GHMTA would be enhanced to expand off-road heavy maneuver training capabilities.

  The conversion of the 3rd ABCT to an IBTF is a variation within the scope of the analysis of Alternative 1, which analyzed impacts of an IBCT. The main difference is that the conversion to an IBTF would involve a Soldier strength of approximately 1,080 rather than the IBCT Soldier strength of approximately 4,000. The reduced size of the Infantry unit generally would not change the Enhanced Training EA environmental analysis or conclusions, though the impacts would be substantially reduced. The other parts of the alternative remain the same. For clarity, this FNSI will

specify either Alternative 1 (IBCT) or Alternative 1 (IBTF) where needed to distinguish them.

- **Alternative 2:** Under Alternative 2, the 3rd ABCT would be converted to an IBCT for the short term, and the IBCT would be inactivated sometime between FY2016 and FY2020, resulting in associated reductions in training. This FNSI makes a finding with respect to Alternative 2 because the Army could decide to inactivate the IBTF over the next several years. 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

The EA provides a description of the existing environmental conditions at and surrounding the installation. The regions of influence of the action alternatives, and therefore of the EA, vary by specific Valued Environmental Component (VEC) but are primarily contained within Fort Benning boundaries and surrounding, adjacent lands.

Environmental Impacts of Alternatives: The EA studied the potential environmental impacts of the Proposed Action Alternatives and the No Action Alternative. VECs are categories of environmental and socioeconomic resources that enable a managed and systematic analysis of these resources. Potential environmental impacts, including direct, indirect, and cumulative effects, were analyzed, as appropriate.

The Geology VEC was not fully analyzed, as the Proposed Action would have no impacts to Geology. Other VECs, including Utilities and Energy, Socioeconomics, and Facilities and Infrastructure were previously analyzed in the Programmatic and Supplemental Programmatic EAs for Army Force Structure Realignment. The analysis provided in those incorporated documents is applicable to the Proposed Action Alternatives of this EA, and further site-specific analysis is not needed.

Table 1 summarizes the EA findings on environmental impacts.

Since the EA and draft FNSI were sent out for public comment, the Army received a Biological Opinion (BO) on the proposed action from the USFWS. The BO assumed conversion of the ABCT to a full IBCT; however, the Army informed the USFWS that the ABCT would convert to an IBTF, and the USFWS took that into consideration.

The BO concludes that the transition of the 3rd BDE to an IBCT will significantly reduce the increase in heavy maneuver training that was otherwise evaluated in the 2009 MCoE consultation. The USFWS included a Reasonable and Prudent Alternative (RPA) in the 2009 MCoE BO to remove the likelihood of jeopardy to the RCW. Based on a 2014 revised baseline and the Enhanced Training proposed action, the USFWS considers these actions to functionally meet the purpose of moving the ARC heavy maneuver training out of the SMTA per the 2009 MCoE RPA.

More specifically, the BO agrees that the ARC "heavy mechanized training component" planned for the SMTA (as well as any other like it proposed in these areas) can be moved to the GHMTA, and that this satisfies the intent of the ARC-related component of the RPA (i.e., "Migrate the field training aspects of the Scout Leaders Course (Army Reconnaissance Course), a MCoE-related heavy mechanized training course, from the Southern Maneuver Training Area to training areas located off the FY09 Fort Benning installation boundary

within five years from the training start date of the Scout Leaders Course"). Because the GHMTA does not contain RCW cavity trees, is not being managed as RCW habitat, and is not considered to be necessary for recovery, locating ARC heavy maneuver training in the GHMTA is seen by the USFWS as equivalent to moving this training off-Post.

The USFWS concluded that the effects of conversion and GHMTA training and improvements are not likely to appreciably reduce the survival and recovery of the red-cockaded woodpecker. It also determined that proposed use and improvements to the GHMTA will not affect any other known Federally-listed species.

The USFWS analysis supports the Installation's overall determination that the RCW population will reach its population recovery goal sooner than what was projected in the MCoE consultation. These data show that the Sand Hills Recovery Unit will meet its population recovery objective 57 years prior to the species population recovery goal. The GHMTA action yields a significantly better scenario for RCWs than what was projected in the MCoE consultation.

The BO concludes that the realignment of the 3rd ABCT as an IBCT and the movement of the heavy maneuver portion of the ARC to the GHMTA, as proposed, will reduce the RCW foraging habitat and harassment impacts evaluated in the MCoE and subsequent consultations. Thirty clusters previously included in an incidental take statement will no longer require "take" and can therefore contribute toward the Installation's population recovery goal.

Table 1. Summary of Potential Environmental Impacts for Alternatives[3]

Resource	No Action	Alternative 1: Preferred Alternative	Alternative 2
Air Quality	Minor impacts.	Negligible to minor impacts.	Same as Alternative 1 for up to a 5-year period, then further reduction in impacts from the inactivation of the IBCT.
Airspace	No impact.	Negligible impacts.	Negligible impacts for up to a 5-year period. Beneficial impacts to airspace could occur as a result of the inactivation of the IBCT.
Wildlife and Special Status Species	Impacts would range from no impact to moderate adverse impacts. None to moderate impacts to wildlife, migratory birds, invasive species. Moderate impacts to threatened and endangered species would continue.	Impacts would range from no impact to minor adverse impacts to wildlife, migratory birds, invasive species, and threatened and endangered species.	Same impacts as Alternative 1 for a period of up to 5 years; then minor to beneficial impacts to wildlife, migratory birds, invasive species, and threatened and endangered species after inactivation of the IBCT.

[3] Impacts described for Alternative 1 will be even less with the conversion of the ABCT to an IBTF.

Resource	No Action	Alternative 1: Preferred Alternative	Alternative 2
Cultural Resources	No impact.	Negligible overall impacts to cultural resources; if resources cannot be avoided, Fort Benning would follow specific mitigation measures per the Army Alternate Procedures in place at Fort Benning.	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.	Negligible, adverse effects	Negligible, adverse effects
Land Use	Negligible impact.	No impacts from land use changes, and negligible impacts from encroachment with mitigation (the JLUS and ACUB programs.	Same as Alternative 1 for up to a 5-year period, a reduction in land use conflicts after inactivation of the IBCT.
Noise	Moderate, adverse impacts from operational noise.	Reduction in noise, however continued moderate, adverse impacts. No change in noise zones expected.	Initially, same as Alternative 1, then reduced adverse impact after inactivation of the IBCT and elimination of related training noise.
Vegetation and Soils	Negligible to moderate impacts from training activities with continued mitigation measures.	Negligible to minor impacts to vegetation; negligible impacts to soils .	Same as Alternative 1, then a reduction in adverse impacts after inactivation of the IBCT.
Environmental Justice and Protection of Children	No impact.	No impact.	No impact
Traffic and Transportation	Negligible impacts.	Negligible adverse impacts.	Same as Alternative 1, then Beneficial impacts anticipated due to loss of IBCT traffic.
Water Resources	Minor to moderate impacts	Negligible to moderate impacts.	Same as Alternative 1, then a reduction of adverse impacts after inactivation of the IBCT.

4 Mitigation Measures

The EA did not identify any significant adverse impacts; therefore, no mitigation is required to reduce significant impacts. As part of the Proposed Action, however, Fort Benning will implement the same management practices for Vegetation, Soils and Water Resources in the additional maneuver areas that it has already implemented elsewhere in the GHMTA. Fort Benning also complies with all applicable environmental laws and regulations, resulting in mitigation of potential adverse impacts.

Additional mitigation measures listed in the EA and below may be implemented to mitigate minor and moderate, adverse impacts depending on the actual impacts. Monitoring of mitigation measures will occur.

Wildlife and Special Status Species

The shiny-rayed pocketbook critical habitat and relict trillium and Georgia rockcress populations are managed, monitored, and protected under the Endangered Species Management Components. These management practices will continue minimizing impacts to these populations by dismounted or wheeled traffic associated with the IBTF or IBCT and the ARC.

The USFWS provided the Enhanced Training BO, as summarized above. Fort Benning will follow the mitigation requirements in that BO.

Cultural Resources

Fort Benning has completed historic property surveys of the Installation. The potential for adverse impacts to cultural resources is greatest in the GHMTA due to land disturbing activities associated with infrastructure and erosion control upgrades. If cultural resources cannot entirely be avoided in the GHMTA, mitigation will be completed using the Army Alternate Procedures in place at Fort Benning.

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 continue to be implemented in accordance with the Integrated Natural Resource Management Plan (INRMP). While approximately 50% to 70% of the new off-road maneuver boxes in the GHMTA will undergo timber removal to support the intended training, only minor soil erosion is expected, as all applicable soil erosion and sedimentation requirements will be followed and ground disturbance during timber harvest and on-going maintenance will be avoided. To minimize further potential impacts to vegetation and soils in the GHMTA from training and project ground disturbance, mitigation will be

employed to minimize soil movement, stabilize runoff, and generally control sedimentation. 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 INRMP; 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.

Water Resources

As part of the Proposed Action, Fort Benning will implement the same management practices in the additional maneuver areas that it has already implemented elsewhere in the GHMTA. No additional mitigation measures are required.

5 Public Review and Comments

The EA and a draft Finding of No Significant Impact (FNSI) was made available to the public for a 30-day public comment period. The Notice of Availability for the EA and the draft FNSI was 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 was also made available at three local, public libraries including Columbus, Cussetta-Chattahoochee, and Phenix City-Russell County, as well as the Sayers Memorial Library on Fort Benning.

In addition, the documents have been posted on the Fort Benning website at https://www.benning.army.mil/garrison/DPW/EMD/legal.htm. The Notice of Availability was mailed to all agencies/individuals/organizations on the Fort Benning NEPA distribution (mailing) list for the Proposed Action (see Section 8.0). These documents and the comments below are incorporated by reference.

Fort Benning received two (2) comments during the 30-day public comments period. No substantive comments or issues were raised during the public comment period that affects the Final EA's analysis or the decision of a FNSI. Comments received have been summarized below:

1. The *Alabama Department of Environmental Management* (ADEM) responded in writing on 13 July 2015. ADEM acknowledged that the proposed actions are to take place in the State of Georgia, and therefore has no comments or concerns at this time.

2. The *Seminole Tribe of Florida, Tribal Historic Preservation Office* (STOF) responded in writing on 21 July 2015. The letter stated that there were no objections to the findings of the EA at this time, but requested to be informed if cultural resources of ancestral or historical relevance were inadvertently discovered during ground disturbing activities per the protocols established in Fort Benning's *Integrated Cultural Resources Management Plan (ICRMP)*. In the event that resource avoidance is not feasible and mitigation is required, the STOF requests that consultations with the Tribe be initiated. Fort Benning would consult with Tribes and other stakeholders for inadvertent discoveries that cannot be avoided following regulatory procedures as detailed in the ICRMP and the Army Alternate Procedures.

6 Finding of No Significant Impact

I have reviewed the EA, comments received on the EA and Draft FNSI in the public review and comment period, and Fort Benning's mission. Based on these factors, I have determined that implementation of Alternative 1, to include conversion to an IBTF, will not have a significant impact on the quality of human and natural environment.

The impact analysis for Alternative 1 addresses the impacts associated with locating the ARC off-road heavy maneuver training to the GHMTA, enhancing the GHMTA heavy maneuver training, and the conversion of the 3rd ABCT to an IBCT. The Army has decided instead to convert the ABCT to an IBTF. An IBTF has approximately 1,080 Soldiers, while the IBCT analyzed in the EA has approximately 4,000 Soldiers. The environmental impacts associated with the conversion to an IBTF are expected to decrease as compared to conversion to an IBCT, though the mitigation measures would not change. Consultation under the Endangered Species Act is complete with USFWS's issuance of a BO, and Fort Benning will comply with the BO requirements.

The impact analysis for Alternative 1 addresses the impacts associated with locating the ARC off-road heavy maneuver training to the GHMTA, enhancing the GHMTA heavy maneuver training, and the conversion of the 3rd ABCT to an IBCT. The Army has decided instead to convert the ABCT to an IBTF. An IBTF has approximately 1,080 Soldiers, while the IBCT analyzed in the EA has approximately 4,000 Soldiers. The environmental impacts associated with the conversion to an IBTF are expected to decrease as compared to conversion to an IBCT, though the mitigation measures would not change. Consultation under the Endangered Species Act is complete with USFWS's issuance of a BO, and Fort Benning will comply with the BO requirements.

Implementing Alternative 2 also would not have a significant impact on the quality of human and 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 future Army realignment actions.

Following publication of the EA and Draft FNSI, two additional elements of information came to light, both of which are discussed in detail above. The first was the decision to convert the ABCT to an IBTF. The second was the completion of the USFWS biological opinion. The task force change is not a substantial change relevant to environmental concerns, and the biological opinion, while important, does not constitute significant new information relevant to environmental concerns and bearing on the proposed action or its impacts. For these reasons, supplementation of the EA is not required, and neither the EA nor FNSI need to be released for a second public comment period.

Army Leadership has decided that the 3rd ABCT will be converted to an IBTF by FY17. I have determined that this conversion will not have a significant impact on the human and natural environment. Therefore, I have decided to implement Alternative 1 at Fort Benning by converting the 3rd ABCT to an IBTF, locating the ARC off-road heavy maneuver training component in the GHMTA, and enhancing the GHMTA to expand off-road heavy maneuver training capabilities.

This analysis fulfills the requirements of NEPA, as implemented by the Council on Environmental Quality regulations (40 CFR §§1500–1508), as well as the Army NEPA regulation (32 CFR 651). Because implementation of Alternative 1, as modified, will not significantly affect the environment, as EIS will not be prepared.

Signature: _____ Date: 6 OCT 15

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