

**FINAL
FINDING OF NO SIGNIFICANT IMPACT**

**3D 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 3d Infantry Division (3d 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facilities are unable to accommodate the size and maintenance requirements of current standard military vehicles due to outdated design features, and lack a sufficient number of maintenance bays to accommodate the mission.

The proposed HBCT project was identified in the Maneuver Center of Excellence Environmental Impact Statement (MCoE EIS, June 2009), and was 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 3d ID. As the Kelley Hill Cantonment Area acts as the "Command and Control" center for the 3d Brigade, centrally locating the HBCT Complex to the operations and training centers for the 3d 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 3d ID at Kelley Hill. The main complex would consist of a Tactical Equipment Maintenance Facility (TEMF); an unmanned aerial vehicle (UAV) maintenance hangar; organizational storage buildings for equipment and materials; and organizational vehicle parking. This Proposed HBCT Action also 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 would also occur as part of the Proposed HBCT Action. The current facilities and structures proposed for demolition will be replaced with newer, 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 building materials and wastes generated 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 the 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 Alternative 2 and Alternative 1 would be *moderate* as pine plantations at these locations are of an older age class and have been designated as future potential habitat.

The EA analyses 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. Mitigation measures have been identified in the EA to minimize potential adverse impacts to Cultural Resources and Biological Resources. Implementation of these measures will further reduce potential impacts to these identified environmental resources, or avoid the impacts altogether. This determination is based on the following:

- 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 Ochiltee 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, including archeological sites, that are eligible, or may be eligible, for inclusion in the National Register of Historic Places (NRHP). If avoidance is not possible through project design, then excavation and data recovery would be implemented.

6.0 PUBLIC AVAILABILITY

The Final EA and a Draft Finding of No Significant Impact (FNSI) were made available to the public for a 30-day public comment period from 13 July through 12 August, 2011. An announcement that these documents were 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 were also made available at several local libraries, and were 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 were mailed to all agencies/individuals/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 provided each Tribe with a copy of these documents for consultation via review and comment.

Fort Benning received three (3) comments during the 30-day public comment period, and have been summarized below. No substantive comments or issues were raised during the public comment period that affected the Final EA's analysis or the decision of a FNSI.

1. The *State of Alabama, Alabama Historical Commission (AHC)* responded in writing on 27 July 2011. The AHC acknowledged that the Proposed Action would occur entirely within the State of Georgia.
2. The *Seminole Tribe of Florida, Tribal Historic Preservation Office (STOF-THPO)* responded in writing on 4 August 2011. The letter stated that there was 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 the construction process. As discussed in the EA, the Army would follow specific mitigation measures to minimize the effects to cultural resources. In the event of an inadvertent discovery of human remains or cultural items, construction activities in that area would be halted and Fort Benning Cultural Resources Management would be contacted to identify, and appropriately treat all discovered items in accordance with applicable laws and regulations. As appropriate, notification of concerned Tribes would occur once a qualified archaeologist makes a determination.

3. The *Georgia Office of Budget and Planning, Georgia State Clearinghouse (State)* provided a Memorandum, Executive Order 12372 Review Process, on 15 of July 2011 (State ID # GA110715002). This Memorandum indicated the State's intent to provide comments on or before 12 August 2011. On 5 August 2011, the State provided written comments. These comments included:

- No comments were provided by the *Georgia Department of Natural Resources* or *The Georgia Forestry Commission*. The State assumed neither agency had any issues with the Proposed Action as the State identified that: "this project is considered to be consistent with those state or regional goals, policies, plans, fiscal resources, criteria for developments of regional impacts, environmental impacts, federal executive orders, acts and/or rules and regulations with which this organization is concerned.
- Based on the comments provided, the State concurs with the analysis presented in the Final EA.


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 3d 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 3d 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 of an Environmental Impact Statement.

FINDING OF NO SIGNIFICANT IMPACT
REVIEWED AND APPROVED BY:

13 Sep '11
Date


JEFFREY FLETCHER
Colonel, AG
Garrison Commander