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## NAVY OPERATIONAL SUPPORT CENTER RELOCATION



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## Environmental Assessment

August 2015

Directorate of Public Works  
Environmental Management Division  
Fort Benning, Georgia

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# ENVIRONMENTAL ASSESSMENT

## NAVY OPERATIONAL SUPPORT CENTER RELOCATION

### FORT BENNING, GEORGIA

Prepared by:  
Directorate of Public Works  
Environmental Management Division  
Fort Benning, Georgia

A handwritten signature in black ink, appearing to read 'Andrew C. Hilmes', is written over a horizontal line.

ANDREW C. HILMES  
Colonel, U.S. Army  
Garrison Commander

31 JUL 2015

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## **SUMMARY**

### *Introduction*

This 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 its construction, and operation on Army Installation Fort Benning, GA.

NEPA Regulations collectively establish a process by which Fort Benning considers the potential environmental impacts of its proposed actions and invites the involvement of regulators and interested members of the public prior to deciding on a final course of action. As such, this EA will facilitate the decision-making process regarding the relocation, construction, and operation of the NOSC. This EA will also provide the basis for determining if a Finding of No Significant Impact (FNSI) is appropriate, or if an EIS is required in accordance with the above regulations.

### *Proposed Action*

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

### *Proposed Action Alternatives*

Army and NEPA regulations require the development and consideration of the Proposed Action and appropriate alternatives. The Alternative Analysis Process evaluates alternative means of meeting the purpose and need for the Proposed Action. Fort Benning developed the screening criteria to be measured against the alternatives in an effort to narrow down alternatives for further analysis. Any alternatives that failed to meet the following criteria were eliminated from further analysis. Proposed alternatives for constructing a new NOSC are required to:

- Be within Fort Benning's Installation'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 prep or demolition required);
- Have the capability for compliance with Anti-Terrorism/Force Protection (AT/FP) requirements of UFC 4-010-01;
- Accommodate at a minimum a 21,000 square foot building and provide 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; and
- 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, Fort Benning (Preferred Alternative)*

Alternative 1 is the preferred alternative and 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.

The parcel contains approximately 35 World War II era wooden buildings originally built as barracks. With the exception of the actual NOSC building structure, all necessary infrastructure and utilities are readily available. Primarily, it currently functions as "in processing" facilities; however, the current facilities are scheduled for demolition in late 2015. Future facilities planned to coexist with the NOSC include Soldier Family Support Center. This demolition and action is further discussed in section 3.1.3 under past, present, and reasonably foreseeable actions within the region of influence.

Alternative 1's proposed location is considered to be the best option as it would be more accessible 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, Fort Benning*

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 an open 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.

#### *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 or need for the Proposed Action, this alternative was retained to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required by NEPA regulations. The No Action Alternative reflects the *status quo* and serves as a benchmark against which the effects of the Action Alternative can be evaluated.

#### *Environmental Consequences*

The existing condition of the environmental resources at Fort Benning potentially affected by both the analyzed Alternatives and consequences of their implementation is presented in Chapter 3 of the EA. Analysis consists of a comparison of each Alternative and the potential environmental effects to each environmental resources area, or Valued Environmental Component (VEC). Ten VECs were considered for analysis in the EA. Four were dismissed from full analysis due to effects that are negligible or non-existent, as summarized below. These include Airspace, Energy, Noise, and Socioeconomics and Environmental Justice.

Potential impacts to Airspace and Energy would be considered non-existent as management and existing conditions of those resources would remain unaffected and unchanged by the Proposed Action. Potential adverse effects to Noise would be short-term and localized in nature to the extent of being considered negligible (i.e., below background levels of nearby ranges). Concerning Socioeconomics and Environmental Justice, the effects from dollars spent within the community as a result of construction and property maintenance would have a negligible impact and would not change the economics in the region. Conversely, any financial losses (e.g., rental fees, etc.) by the city of Columbus could be replaced by new tenants. Likewise, there would be no effects to the health and safety of children as the project will conform to required construction safety protocols. There are not Environmental Justice issues as there are no minority or low-income populations on Fort Benning. As a result, additional discussion of these VECs has not been carried further within this EA.

A summation of VECs fully analyzed, environmental effects, and mitigation measures for potential adverse effects to VECs are summarized in Table ES-1.

**Table ES-1: Comparison of Potential Effects to VECs Fully Analyzed for Proposed Action Alternatives**

<b>VEC</b>	<i>No Action Alternative</i>	<i>Alternative 1: Soldiers Plaza, Fort Benning (Preferred Alternative) &amp; Alternative 2: Bradshaw Road Site, Fort Benning</i>
<b>Air Quality</b>	<i>Negligible effects from the utilization of older and less efficient buildings and HVAC systems.</i>	<i>Minor, short-term adverse impacts to air quality during construction, operation will have long-term beneficial effects.</i>
<b>Biological Resources</b>	<i>No Impacts.</i>	<i>No Impacts.</i>
<b>Cultural Resources</b>	<i>No Impacts.</i>	<i>No Impacts.</i>
<b>Facilities (Utilities)</b>	<i>No Impacts.</i>	<i>Negligible effects to as a result of new facility construction and operation.</i>
<b>Hazardous and Toxic Materials and Waste</b>	<i>No Impacts.</i>	<i>Negligible effects as a result of hazardous material storage and handling during construction and operation.</i>
<b>Land Use</b>	<i>No Impacts.</i>	<i>No Impacts.</i>
<b>Safety and Security</b>	<i>Minor, long-term, adverse impacts.</i>	<i>Negligible effects as a result of increased traffic counts, operation will have long-term beneficial effects.</i>



<b>Soils</b>	<i>No Impacts.</i>	<i>Minor, short-term adverse impacts to soils from construction.</i>
<b>Traffic and Transportation</b>	<i>No Impacts.</i>	<i>Negligible effects from increased traffic counts.</i>
<b>Water Resources</b>	<i>No Impacts.</i>	<i>No Impacts.</i>

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. Thus, no significant adverse impacts to these resources are anticipated either in a long- or short-term basis.

In accordance with Army NEPA Regulations, the Army must indicate if any mitigation measures are needed to minimize potential adverse effects. No mitigation measures have been identified in this EA to due to the lack of potential adverse impacts from the Alternatives.

### *Conclusion*

The No Action Alternative would not meet the purpose and need for relocating, constructing, and operating the NOSC to Fort Benning. Although both Action Alternatives met the purpose and need for the Proposed Action, the location proposed for Alternative 1 was considered to be the best option due to accessibility for commuters during peak hours of traffic flow and availability of approximately 50 paved parking spaces on the western and southern margin of the property. The EA analysis demonstrated that with adherence to applicable Federal and State environmental laws, regulations, and permitting processes, no significant adverse environmental impacts would result from the Proposed Action as implemented by the Action Alternatives. Therefore, preparation of and EIS is not warranted for this action.

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## **1.0 PURPOSE AND NEED**

### **1.1 Introduction**

This 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.

NEPA Regulations collectively establishes a process by which Fort Benning considers the potential environmental impacts of its proposed actions and invites the involvement of regulators and interested members of the public prior to deciding on a final course of action. As such, this EA will facilitate the decision-making process regarding the relocation of the NOSC and any associated construction, maintenance, and operations. This EA will also provide the basis for determining if a Finding of No Significant Impact (FNSI) is appropriate, or if an EIS is required in accordance with the above regulations.

### **1.2 Background**

#### *NOSC Columbus*

The NOSC Columbus is one of many Naval Reserve Centers located throughout the nation providing operational, training, and administrative support to the Navy Reserve. Their mission is to deliver mission-capable units and individuals to the Navy's active duty component throughout the full range of operations during peacetime and war. 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 drill 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 (Figure 1-1). The property and facilities have been owned by the City of Columbus for more than 65 years. The U.S. Navy has leased the facilities in Columbus for almost 50 years.

#### *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.

### **1.3 Proposed Action**

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

### **1.4 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. Such 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; Department of Defense (DoD) Instruction 2000.12 (Department of Defense, 2012).

All replacement facilities must comply with AT/FP, 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.

### **1.5 Decision to Be Made**

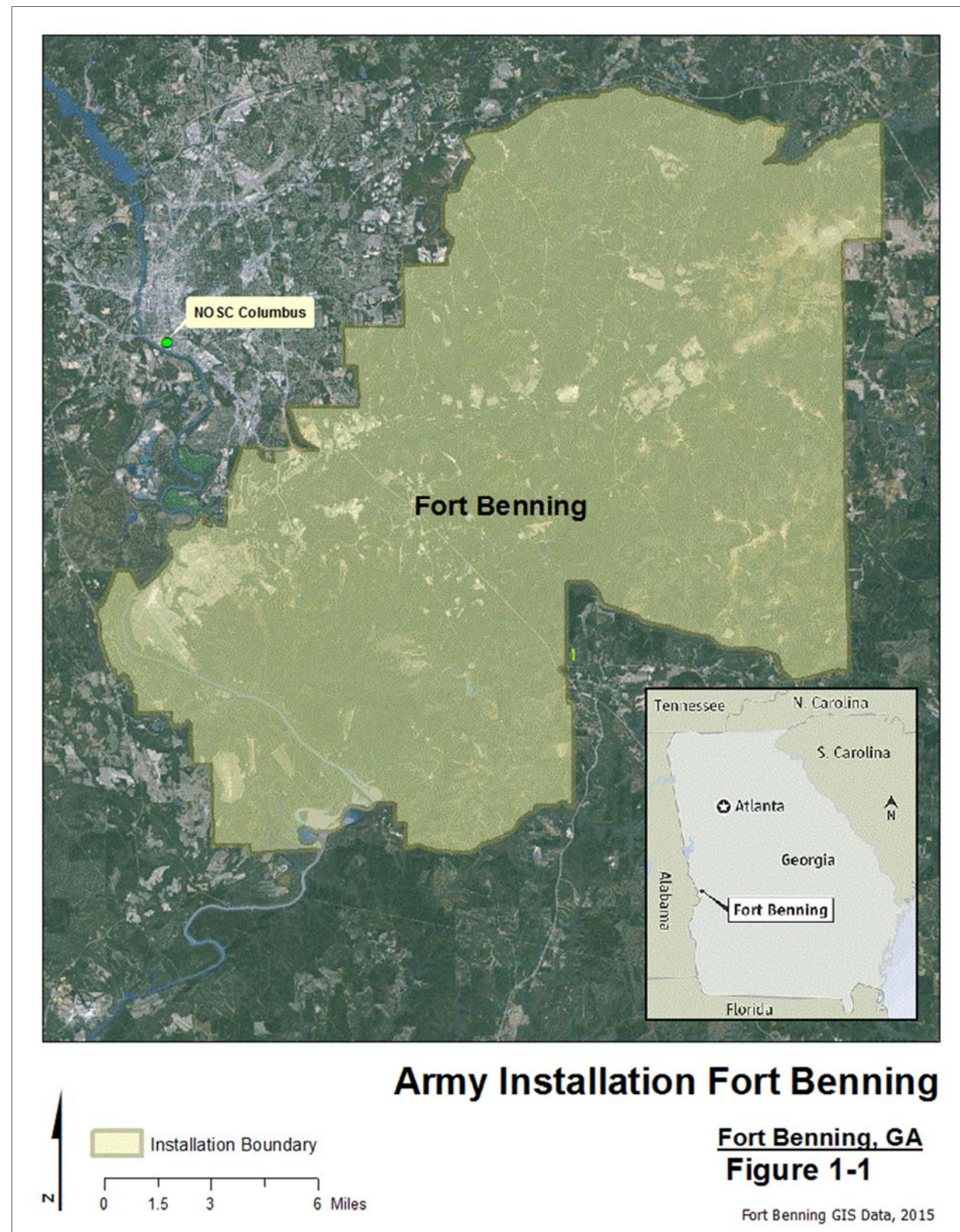
The decision to be made is whether to execute the Proposed Action. This includes the relocation and operation of the NOSC Columbus onto Army Installation Fort Benning, GA and, if so, which alternative to pursue. The Action Alternatives consist of two proposed locations on-post for the NOSC, which are detailed in Chapter 2 along with the No Action Alternative. The final decision of which alternative to implement will be documented in either a Finding of No Significant Impact (FNSI), if no significant

environmental impacts are expected, or a Notice of Intent (NOI) to prepare an EIS, if significant environmental impacts are expected to occur as a result of the alternatives. A FNSI will identify the Army's preferred alternative and mitigation measures that are essential to the reduction of identified impacts.

## **1.6 Scope of the Environmental Assessment**

As stated in section 1.1, this EA analyzes the potential environmental effects associated with the relocation of the NOSC Columbus, from its current location in downtown Columbus, GA onto Army Installation Fort Benning, GA and associated construction maintenance and operation. The Proposed Action does not include specific training activities to be conducted on Fort Benning that would occur following its relocation. Such required site-specific NEPA analysis would be submitted to the Environmental Management Division (EMD) within the Directorate of Public Works (DPW) using the Fort Benning NEPA environmental review process prior to its proposal for implementation. Adhering to this process would be consistent with other training units on Fort Benning and ensure that any future changes in the locations of environmental resources (e.g., changes in the locations of endangered species), utilities, or other elements are addressed with the most current information available.







## **2.0 SCREENING CRITERIA AND POTENTIAL ALTERNATIVES**

### **2.1 Screening Criteria**

Army and NEPA regulations require the development and consideration of the Proposed Action and appropriate alternatives. The Alternative Analysis Process evaluates alternative means of meeting the purpose and need for the Proposed Action. Fort Benning developed the screening criteria to be measured against the alternatives in an effort to narrow down alternatives for further analysis. Any alternatives that failed to meet the following criteria were eliminated from further analysis. Alternatives to construct a new NOSC are required to:

- Be within Fort Benning's Installation'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 prep 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 provide 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; and
- Not require excessive costs for potential renovation or construction and operations and maintenance.

### **2.2 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. The No Action Alternative doesn't meet the purpose and need for this action but NEPA regulations require evaluation for comparison of Action Alternatives.

### **2.3 Alternative 1: Soldiers Plaza (Preferred Alternative)**

Alternative 1 is the preferred alternative and 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.

The parcel current contains approximately 35 World War II era wooden buildings that were originally built as temporary facilities and scheduled for demolition later this year. With the exception of the actual NOSC building structure, all necessary infrastructure and utilities are readily available. Over more recent years, this location has primarily functioned as “in processing” facilities. Future facilities planned to coexist with the NOSC include Soldier Family Support Center. This demolition and action is further discussed in section 3.1.3 under past, present, and reasonably foreseeable actions within the ROI.

Alternative 1’s proposed location is considered to be the best option as it would be more accessible 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.

## **2.4 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 an open 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.

## **2.5 Alternatives Considered but Eliminated from Further Study**

### **2.5.1 Rebuilding/Renovation of Current NOSC Columbus**

Rebuilding/Renovation of the current NOSC facilities, owned by the city of Columbus, would require major renovations and adversely impact/disrupt on-going training and readiness efforts. Additionally, the NOSC’s building footprint would require more of the leased parcel to meet current mission and training demands. Such efforts would entail excessive rebuilding and renovations and further impact already inadequate parking space for government and Reservist vehicles during drill weekends. Rebuilding and/or renovations at the NOSC Columbus site would require demolition and therefore, the parcel is not available for immediate development. Furthermore, AT/FP requirements would be impossible due to limited space and other setbacks required by UFC.

### **2.5.2 Acquiring New Real Estate Within Columbus, Georgia**

Acquiring real estate within the city of Columbus to construct a new NOSC facilities or acquiring existing facilities to meet the mission and training demands of the NOSC would not be considered a cost effective approach. In addition, it would remain highly unlikely that any available real estate meeting the NOSC's demands exists nearby the NOSC's current location in downtown Columbus.

### **2.5.3 Acquiring Existing Facilities Within Fort Benning, Georgia**

Fort Benning has been unable to identify any existing facilities on-Post that would satisfy the NOSC's requirements. At present, Fort Benning continues to execute its Facility Footprint Reduction Program. This program refocuses cost away from maintenance of unusable or vacated buildings and toward the demolition of these building. Consequently, potential buildings that would have met the NOSC's requirements in the past are currently being reutilized or previously demolished.





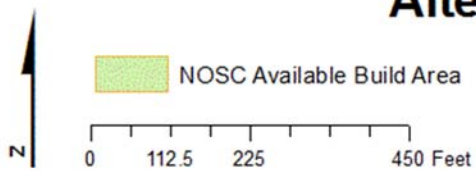
Fort Benning GIS Data, 2015





## Alternative 2: Bradshaw Road Site

**Fort Benning, GA**  
**Figure 2-2**



Fort Benning GIS Data, 2015

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## **3.0 AFFECTED ENVIRONMENT AND CONSEQUENCES**

### **3.1 Introduction**

Chapter 3 describes the affected environment and potential direct, indirect, and cumulative environmental consequences from the implementation of each reasonable alternative. The affected environment describes the current environmental setting and provides a baseline reference for understanding the intensity of any potential impacts or environmental consequences resulting from the Proposed Action. Both the affected environment and environmental consequences are described for comparison within broad resource areas known as Valued Environmental Components (VECs). The 14 VECs recommended for consideration by the 2007 Army NEPA Analysis Guidance Manual are listed below (U.S. Army Environmental Command, 2007).

- Air Quality
- Airspace
- Biological Resources
- Cultural Resources
- Energy
- Facilities (Utilities)
- Hazardous and Toxic Materials and Waste
- Land Use
- Noise
- Safety and Security
- Soils
- Socioeconomics and Environmental Justice
- Traffic and Transportation
- Water Resources

In accordance with Army NEPA Regulation, any resource or VEC that by its nature cannot be potentially affected with the Proposed Action does not need to be evaluated. Of the 14 VECs considered, four were dismissed from full analysis due to effects that are negligible or non-existent, as summarized below. These include Airspace, Energy, Noise, and Socioeconomics and Environmental Justice.

#### *VECs Not Fully Analyzed*

Potential impacts to Airspace and Energy would be considered non-existent as management and existing conditions of those resources would remain unaffected and unchanged by the Proposed Action. Potential adverse effects to Noise would be short-term and localized in nature to the extent of being considered negligible (i.e., below background levels of nearby ranges). Concerning Socioeconomics and Environmental Justice, the effects from dollars spent within the community as a result of construction and property maintenance would have a negligible impact and would not change the economics in the region. Conversely, any financial losses (e.g., rental fees, etc.) by the city of Columbus could be replaced by new tenants. Likewise, there would be no effects

to the health and safety of children as the project will conform to required construction safety protocols. There are not Environmental Justice issues as there are no minority or low-income populations on Fort Benning. As a result, additional discussion of these VECs has not been carried further within this EA.

### **3.1.1 Analyzing Potential Impacts and Region of Influence**

The potential direct and indirect impacts resulting from the implementation of the Proposed Action are discussed in each of the following sections. The impacts discussion contains a level of analysis that provides the intensity and type of impacts that are expected to occur as a result of the NOSC's relocation to Fort Benning.

A Region of Influence (ROI) was also determined for each resource area and was based on the type and extent of potential impacts to the affected VEC. The ROI may be limited to the specific location of an alternative, such as the construction limits, or may include larger areas, such as an entire region. For this EA, the ROI of the proposed alternatives are primarily limited within Fort Benning's Main Post. VECs with ROIs that exceed beyond the boundaries of Fort Benning include Air Quality, Traffic and Transportation, and Water Resources. Such differences in the ROI are identified within those sections.

### **3.1.2 Cumulative Effects Analysis Methodology**

Cumulative impacts are defined as environmental impacts that result from the incremental impacts of the Proposed Action when added to other past, present, and reasonably foreseeable actions regardless of what agency or person is responsible for the action. Therefore, the Army considered a wide range of past, present, and reasonably foreseeable future actions to identify other projects in the ROI that could contribute to cumulative environmental effects. Cumulative effects are addressed within each resource section following the discussion of direct and indirect environmental consequences for each alternative.

### **3.1.3 Past, Present, and Reasonably Foreseeable Actions**

Past, present, and reasonably foreseeable actions that were reviewed in conducting the cumulative effects analysis are as follows:

- *Implementation of a 30-Megawatt Photovoltaic Solar Facility (FY15):* Construction, operation, maintenance of a 30-Megawatt Photovoltaic Solar Facility on approximately 250 acres of land on Fort Benning located at the Dove Field near the western boundary of Fort Benning within Russell County, Alabama.
- *Fort Benning Training Enhancements (2015-2016):* Fort Benning is preparing an installation-specific Environmental Assessment and Biological



Assessment to study three training proposals: installation level impacts of realignment to an Infantry Brigade Combat Team in 2015, relocation of the heavy maneuver portion of the Army Reconnaissance Course in 2016 to the Good Hope Maneuver Training Area, and enhancement of off-road maneuver areas in the Good Hope Maneuver Training Area as funding becomes available.

The Training Enhancement proposal would result in reduced training impacts to red-cockaded woodpeckers (RCWs) in and around the Southern Maneuver Training Area and the potential for increased soil erosion in the Good Hope Maneuver Training Area. The proposals are expected to have overall beneficial impacts to Biological Resources. Minor adverse impacts would remain to Soils as potential ground disturbances from training would continue.

- *Artillery Firing Points (FY16-17)*: Expansion and maintenance of up to 7 existing firing points with 20-acre footprints in various training area locations south of the K15 Impact Area. One additional 20-acre location will be constructed to support the Artillery Fires Brigade of the Third Infantry Division.
- *Army Reconnaissance Course (ARC) Training Locations* (: Expansion of ARC training areas within the Southern Maneuver Training Area region (training would not include tracked vehicles or off-road maneuver).
- *Bridge 27 Replacement (FY15)*: Approximately 4 acres of disturbance connecting the Sand Hill Cantonment Area to 1st Division Road, including demolition of the existing bridge.
- *Soldier Family Support Center (FY15)*: Demolition of 35 World War II temporary wooden buildings known as Soldiers' Plaza at Dixie Road and Lumpkin Road, and renovation of eight existing buildings to establish the Resiliency Campus in the Main Post Cantonment Area.
- *Training Lands Expansion Program (FY12-13)*: Potential acquisition of up to 82,000 acres additional heavy maneuver training land adjacent to or near Fort Benning. This program is on hold pending Army force structure and budgetary decisions.
- *Infrastructure Footprint Reduction Program (FY14 – FY18)*: An Army mandated program to eliminate underutilized and outdated facilities while achieving affordability in base operations U.S. Army Construction Engineering Research Laboratory Technical Report, 1993. Each fiscal year, Fort Benning Master Planning Division identifies structures to be demolished to meet program goals related to consolidating facility functions and personnel into fewer buildings with more effective space utilization. The number and types of facilities and/or

buildings to be demolished vary from year to year based on Installation needs and military mission. Notable demolition activities for FY14-15 include Soldier's Plaza, Airborne Barracks, and Martin Army Community Hospital on Main Post, and vehicle maintenance facilities in Kelley Hill (Fort Benning, 2008).

- *Fielding of the Enhanced Performance Round (EPR) (FY15 and beyond):* A DoD initiative to improve munitions performance and lethality on the battlefield, as well as satisfy a component of the Army's "Green Ammunition" program to create environmentally friendly small arms ammunition to reduce lead accumulation at training ranges. The current lead-core 5.56mm ball ammunition will be replaced with a copper-core enhanced performance round, which has less adverse environmental impacts, and concurrently provides better shooting accuracy, consistency, and increased penetrating capability on hard and soft targets.
- *Tactical Unmanned Aerial Vehicle Hanger (FY17):* To support the 75<sup>th</sup> Ranger Regiment's Tactical Unmanned Aerial Vehicle Hanger Platoon, this 10,340 square foot facility will consist of maintenance bays, classrooms, storage, and administrative areas. Other ancillary support facilities will include hazardous materials storage, a Tactical Unmanned Aerial Vehicle Hanger runway, and personnel parking. This facility is to be constructed alongside other support facilities currently used for operations at Lawson Army Airfield.
- *Development of Muscogee Technology Park (ongoing):* A 2,124 acre tract of land adjacent to the northwestern corner of the Installation acquired by the City of Columbus from the Army in exchange for 2,156 acres which now comprises most of the southern portion of the Good Hope Maneuver Training Area. The Muscogee Technology Park is currently home to a FedEx distribution center, Pratt and Whitney aerospace manufacturing, and other warehouse distribution centers. Currently, Blue Cross and Blue Shield of Georgia is constructing a new 235,000 square-foot office space to house approximately 1,500 employees that will serve nearly three million members in Georgia.
- *Chattahoochee Fall Line Wildlife Management Area (2014):* A 10,800-acre tract spanning north central Marion County and southern Talbot County was created by a partnership between the GA Department of Natural Resources, The Nature Conservancy, and the U.S. Army at Fort Benning through the Army Compatible Use Buffer Program (ACUB). This new Wildlife Management Area provides opportunities for outdoor recreational activities such as hunting, hiking, camping and bird-watching, and will serve as a demonstration site for longleaf pine ecosystem restoration which provides important habitat for wildlife, including both game and non-game species like the federally endangered red-cockaded woodpecker and the state's official reptile, the gopher tortoise. The entire property is jointly managed by the Georgia Department of Natural Resources and The Nature Conservancy.

- *Benning Technology Park and Custer Road Interchange Improvements (2015 – 2018)*: The GA Department of Transportation will be implementing a road improvements project that consists of interchange improvements at the intersection of U.S. 27 (Victory Drive) and Custer Road in Muscogee County. The proposed project would improve the existing security checkpoint interchange system in the Sand Hill Cantonment Area by providing civilians access to a proposed commercial development off-Post without having to pass through the Fort Benning security checkpoint. The commercial development, to be known as Benning Technology Park, borders Fort Benning directly west of the Patton Place military housing area. Benning Technology Park is a private/public joint venture between Columbus State University, Flournoy Development Company, and the Development Authority of Columbus, which will include offices, retail services, and educational facilities.

*Additional project on Fort Benning or within the ROI have been proposed; however, details are not available for consideration in the cumulative impacts analysis. These projects include:*

- *Department of Defense Education Activity (DoDEA) “21<sup>st</sup> Century Schools” Initiatives (FY12-FY18)*: A program focused on facility improvements to meet current DoDEA learning objectives that include the use of technology, and mandated requirements for sustainability and energy conservation. Four schools have been identified for replacement due to inadequate space, extensive maintenance and/or repairs requirements, and are energy inefficient. New construction locations will be in close proximity to military housing areas across the Installation to accommodate school aged children. Re-use or demolition of outdated facilities will be considered based on cost effectiveness and Installation needs.
- *Tri-State Water Wars*: Legal challenge by the states of Florida and Alabama against GA and the U.S. Army Corps of Engineers that contests the reallocation of water supply from the Chattahoochee River to support population growth in Atlanta, GA and surrounding suburban areas. This lawsuit filed in 1990 argues that the Corps’ dam construction favors the interests of GA over environmental impacts to endangered aquatic species downstream due to decreased water levels and flow rates, as well as impacting freshwater input to the eastern Gulf of Mexico which increases salinity levels that impact marine life. In 2013, the case was elevated to the Supreme Court of the United States and a decision is currently pending.

## **3.2 Air Quality**

### **3.2.1 Affected Environment**

Air quality in a given location is generally described by the concentrations of various pollutants in the atmosphere. A pollutant concentration is compared with National Ambient Air Quality Standards (NAAQS) that establish limits on the maximum allowable concentrations of pollutants to protect public health and welfare. According to the Environmental Protection Agency (EPA) regulations, an area with air quality better than the NAAQS is designated as being in attainment; areas with substandard air quality are classified as nonattainment areas. A nonattainment designation is given to a region if the primary NAAQS for any criteria pollutant are exceeded at any point in the region for more than three days during a three year period.

#### *Region of Influence*

The air emission's ROI at Fort Benning is the multi-county airshed to include Muscogee, Chattahoochee, Russell, Lee, Harris, Talbot, and Marion counties. The EPA has designated these counties as in attainment for all required standards for criteria pollutants (except lead in a limited area off the Installation in Muscogee County around a battery plant [U.S. Environmental Protection Agency, 2014]). The region is considered to be in attainment for O<sub>3</sub>, based on the 2008 primary and secondary standards. Motor vehicles (mobile sources) are a primary contributor to ground-level O<sub>3</sub> levels in GA.

#### *Fort Benning's Air Quality*

Fort Benning is designated as a major stationary source of air pollutants and operates under a Title V Operating Permit (No. 9711-215-0021-V-03-0). The Title V permit was issued in March 2014 and is in effect for five years. The permit includes a list of emission sources, applicable regulations, emissions limits, and monitoring and record-keeping requirements. The permit is modified on a routine basis to account for the addition or removal of stationary sources.

Fort Benning has stationary sources including boilers, generators, storage tanks, and paint booths, as well as fugitive sources such as prescribed burning and range training. Prescribed burning is a primary area source criteria pollutant emission on the Installation (U.S. Army, 2011). Prescribed fires reduce the potential for destructive wildfires and contribute to the maintenance of long-term air quality as acknowledged in the EPA's Interim Air Quality Policy on Wildlands and Prescribed Fires. This policy also recognizes that prescribed fires are an irreplaceable ecological management tool, critical to the process of maintaining bio-diversity and balance within fire-dependent natural communities.

#### *Greenhouse Gases*

In 2014, the CEA released revised draft guidance for public comment that describes how Federal departments and agencies should consider the effects of greenhouse gas emissions and climate change in their NEPA reviews. This guidance explains that agencies should consider both the potential effects of a proposed action on climate

change, as indicated by its estimated greenhouse gas emissions, and the implications of climate change for the environmental effects of a proposed action. The guidance also emphasizes that agency analyses should be commensurate with projected greenhouse gas emissions and climate impacts, and should employ appropriate quantitative or qualitative analytical methods to ensure useful information is available to inform the public and the decision-making process in distinguishing between alternatives and mitigations. It recommends that agencies consider 25,000 metric tons of carbon dioxide equivalent emissions on an annual basis as a reference point below which a quantitative analysis of greenhouse gas is not recommended unless it is easily accomplished based on available tools and data. Unlike the previous guidance, the revised draft guidance applies to all proposed Federal agency actions, including land and resource management actions. It reflects CEQ's consideration of comments received on the 2010 draft guidance in addition to other Federal agency and affected stakeholder input. It does not create new or additional regulatory requirements and instructs agencies on how to address the greenhouse gas emissions from and the effects of climate change on their proposed actions within the existing NEPA regulatory framework. (Council on Environmental Quality, 2014)

### **3.2.2 Environmental Consequences**

Potential environmental impacts to air quality that could result from the alternatives are discussed in the following section. A significant adverse impact to air quality would occur if an alternative threatened the attainment status of the region or led to a violation of any federal, state, or local air regulation or would result in nonattainment.

#### *No Action Alternative*

The implementation of the No Action Alternative would continue to make use of the current NOSC facilities located in downtown Columbus, GA. The older and less efficient buildings and heating, ventilation, and air conditioning or HVAC systems would require more energy usage and result in additional emissions; when compared with newer more efficient amenities. Nevertheless, the potential effects to Air Quality would be considered negligible. As well, the continued use of the facilities would avoid potential adverse air emission impacts as a result of construction and equipment usage associated with the other action alternatives. Overall, existing air quality conditions within the ROI would remain unchanged under the No Action Alternative.

#### *Alternative 1: Soldiers' Plaza (Preferred Alternative)*

Necessary site preparation and construction activities would include grading, trenching, paving, and facility construction. Per se, vehicle and other construction equipment have the potential to generate temporary engine, dust and/or particulate matter (PM) emissions during the project's construction. "Operation associated emissions would include emissions from commuting vehicle traffic and the use of the NOSC's building systems, such as climate control/HVAC and electrical/lighting systems. DoD construction guidance requires that new construction be designed and built to Leadership in Energy and Environmental Design (LEED) Silver standards. As a result,

operation of a newly constructed facility would produce fewer emissions, due to building envelope and system improvements.

Adherence to existing requirements and GA Air Quality Rules to minimize effects to air quality, such as immediately dampening disturbed soils with water and covering truck beds transporting dust generating materials, will reduce fugitive dust and PM emissions. Construction would require permits, stipulating air best management practices (BMPs) and other mitigation measures essential for the project to minimize potential impacts. Therefore, implementation of Alternative 1 will result in negligible changes to existing air quality conditions. Although the potential exists for minor, short-term adverse effects to air quality during construction, operation would have long-term beneficial effects on air quality through the utilization of more energy efficient building systems. Furthermore, vehicle traffic emissions and greenhouse gas emissions resulting from the implementation of Alternative 1 would be considered de minimis.

#### *Alternative 2: Bradshaw Road Site*

Overall, potential impacts to air quality resulting from the implementation of Alternative 2 would be similar in both nature and to the level described under Alternative 1 and result in negligible changes to existing air quality conditions. While the potential exists for minor, short-term adverse effects to air quality during construction, operation will have long-term beneficial effects on air quality through the utilization of more energy efficient building systems. As well, vehicle traffic emissions and greenhouse gas emissions resulting from the implementation of Alternative 2 would be considered de minimis.

#### *Cumulative Impacts*

This Proposed Action could have negligible cumulative effects when considering other projects in the ROI. Short-term cumulative impacts on air quality could occur if numerous construction projects are conducted simultaneously on Fort Benning. Such projects could include the Bridge 27 Replacement, Soldier Family Support Center, Infrastructure Footprint Reduction Program, and/or the Tactical Unmanned Aerial Vehicle Hanger. However, this would be unlikely as all construction is closely coordinated between various Fort Benning entities to minimize the potential for adverse cumulative impacts. Therefore, no cumulative impacts are expected.

#### *Proposed Mitigation*

No additional mitigation measures for air quality would be required. Compliance with applicable Federal and State regulations and permits would be required to reduce the level of potential effects.

### **3.3 Biological Resources**

#### **3.3.1 Affected Environment**

Biological resources include native or naturalized plants and animals and the habitats in which they occur. Biological resources discussed in this EA include Vegetation, Wildlife,



Migratory Birds, and Threatened and Endangered Species, which could potentially be affected by construction and operational activities associated with the Proposed Action.

### *Region of Influence*

The ROI for biological resources includes Fort Benning with a focus on the Main Post Cantonment Area that could be directly and/or indirectly impacted by the Proposed Action.

### *Vegetation and Wildlife*

There are more than 1,275 species of plants on Fort Benning located within approximately 29,000 acres of unforested areas and 150,000 acres of woodland. Loblolly and longleaf pine are the predominant conifers within the Installation, comprising approximately 80,000 acres of the woodland; the remaining 70,000 acres of woodland consist of approximately 15,000 acres of forested restricted access areas and 54,000 acres of hardwood forest (Fort Benning, 2013).

Fort Benning is located within the Longleaf Pine Ecosystem with vegetative cover distributed along broadly defined ecological units or subsections. The northern portion of the Installation is part of the Sand Hills subsection characterized primarily by well-drained sandy surface soils and loamy subsoils. The Longleaf pine (*Pinus palustris*) is the prevailing plant species whose dominance is sustained by frequent fires.

Fort Benning is inhabited by more than 350 species of fish and wildlife, including 154 species of birds, 47 species of mammals, 48 species of reptiles, 25 species of amphibians, 67 species of fish, and 9 species of mussels, as well as numerous insect and other invertebrate species. The most commonly encountered species found within the Installation include: American alligators, turtles, snakes, American beaver, white-tailed deer, feral swine (pigs), eastern wild turkey, eastern gray squirrel, raccoon, rabbits, and other small mammals.

There are approximately 150 species of birds protected under the Migratory Bird Treaty Act on Fort Benning either seasonally or year round. Most of these species are breeding residents or neotropical migrants for which the typical breeding season is spring through summer. Fort Benning manages and conserves migratory bird species through its Integrated Natural Resource Management Plan (INRMP) and considers effects to migratory birds in any proposed action via the NEPA process.

### *Invasive Species*

Executive Order 13112 requires federal agencies, to the extent practicable and permitted by law, to prevent the introduction of invasive species; to provide for their control; and to minimize the economic, ecological, and human health impacts that invasive species cause. Fort Benning utilizes an integrated pest management approach to control invasive plant species. Integrated pest management involves using targeted, sustainable control methods that can include a variety of measures, such as habitat modification, biological control, mechanical control, physical control and the judicious

use of pesticides. Specific procedures related to the control of invasive plant species are outlined in Fort Benning's Integrated Pest Management Plan (Fort Benning, 2013).

Common invasive plant species identified on Fort Benning include the tree species of Chinese Tallowtree (*Triadica sebifera*) and Mimosa (*Albizia julibrissin*), and shrubs such as Chinese Privet (*Ligustrum sinense*) and Multiflora Rose (*Rosa multiflora*). Invasive vine species include Kudzu (*Pueraria montana var. lobata*) and English Ivy (*Hedera helix*). Invasive grasses include Cogongrass (*Imperata cylindrical*) and Japanese Knotweed (*Fallopia japonica*).

Feral swine are widespread across the Installation and considered a pest species for many reasons. The primary concern is the extensive damage to vegetation and soil surfaces that occurs due to their characteristic "rooting" habits, which jeopardizes the establishment of ground cover and native vegetation. Other impacts of feral swine include direct mortality of pine and hardwood trees, competition with native wildlife species, habitat disturbance, and direct mortality of threatened and endangered species. Additionally, feral swine can also uproot and damage cables, wiring, targetry, bivouac sites, and other military assets. Fort Benning's management of this species focuses on controlling the population by establishing liberal hunting regulations such as no bag limits and expanded season lengths. In addition, trapping is conducted at specific locations to minimize damage to military assets and sensitive plants (U.S. Army Corps of Engineers, 2009). Specific procedures related to the control of feral swine are outlined in Fort Benning's Integrated Pest Management Plan (Fort Benning, 2014).

#### *Endangered, Threatened, and Rare Species*

There are 96 species (four amphibians, eight birds, seven fishes, four mammals, four mussels, nine reptiles, and 60 plants) of conservation concern found on Fort Benning. Plant and animal species listed as threatened, endangered, or proposed as such by the USFWS, the state of Georgia or the state of Alabama are recognized as special-status species. The Endangered Species Act (ESA) protects only federally listed species. State listed species are protected in the state of Georgia by the Georgia Wildflower Preservation Act or Georgia's Endangered Wildlife Act. The state of Alabama likewise protects a number of species through the Nongame Species Regulation (Alabama Administrative Code 220-2-.92). Although state listed species are not protected by the ESA, they may be considered for federal listing in the future and afforded special management attention through Fort Benning's INRMP.

AR 200-1 (Environmental Protection and Enhancement) guides Army compliance with the ESA. Federally listed or candidate species occurring on Fort Benning include the Red-cockaded Woodpecker (*Picoides borealis*) (Endangered), American Alligator (*Alligator mississippiensis*) (Threatened for similarity in appearance), Wood Stork (*Mycteria Americana*) (Endangered), Relict Trillium (*Trillium reliquum*) (Endangered), Georgia Rockcress (*Arabis Georgiana*) (Candidate), and Gopher Tortoise (*Gopherus polyphemus*) (Threatened). The Bald Eagle (*Haliaeetus leucocephalus*) has been delisted but is protected under the Bald and Golden Eagle Protection Act. Although the species is not known to occur on Fort Benning, critical habitat has been designated on



Fort Benning for the Shiny-rayed Pocketbook (*Lampsilis subangulata*) (Endangered) along Uchee Creek in Russell County, Alabama; (Fort Benning, 2014).

### *Unique Ecological Areas*

Fort Benning has identified several areas that have unique or rare ecological characteristics or that represent the best example of a particular habitat or plant community type. Unique ecological areas (UEA) were chosen based on characteristics of their soil type, topography, slope, aspect, elevation, hydrology, flora, fauna, and other biotic and abiotic features. Many areas apparently contain remnant native plant communities that have experienced minimal disturbance relative to other similar communities. To conserve the ecological integrity of these areas, Fort Benning will use their designation as UEAs to ensure that current and future land-use planning and training activities take into consideration their presence and their preservation. For more information on UEAs, see the Fort Benning INRMP.

### *Habitat Conservation and Enhancement Outside of Fort Benning*

Fort Benning has made substantial efforts towards habitat conservation outside its boundaries, primarily through efforts to buffer potential encroachment. The Sikes Act authorizes the Department of Defense to partner with non-federal governments or private organizations to establish buffers around military installations. The Army implements this authority through the ACUB program, which provides funding for the Army to work with state and local governments, non-governmental organizations, and willing land owners to help prevent encroachment of training areas and promote regional conservation efforts.

Through Fort Benning's partnership with The Nature Conservancy, off-Post conservation measures both buffer the Installation boundary from land uses incompatible with military training and promotes land management to protect and restore habitat for listed, imperiled, or at-risk species that impact Fort Benning's mission. Restoration includes removal of invasive species, herbicide application, ecological tree harvesting, and planting of long leaf pine. Properties enlisted in the ACUB program are either placed into permanent conservation easements, or purchased fee simple by The Nature Conservancy or other Army partners and may be later sold to conservation buyers encumbered with permanent conservation easements. ACUB lands are not federally owned; the Army holds only a contingency right to ensure that training buffer and conservation purposes are met.

Fort Benning's ACUB Plan, RCW Off-Post Conservation Plan and stakeholder partnerships continue to leverage resources to protect and ecologically connect habitat beyond the boundary of Fort Benning. Currently, the ACUB program at Fort Benning encompasses over 20,000 acres around Fort Benning with a goal of protecting up to 40,000 acres by 2020 (Fort Benning, 2014).

### **3.3.2 Environmental Consequences**

Potential impacts on biological resources would be considered significant if one of more of the following conditions would result:

- Substantial loss or degradation of habitat or ecosystem functions (natural features and processes) essential to the persistence of native plant and animal populations;
- Substantial loss or degradation of a sensitive habitat, including surface waters and UEAs that support high concentrations of special status species or migratory birds;
- Disruption of a federally listed species, its normal behavior patterns, or its habitat that substantially impedes the Installation's ability to either avoid jeopardy or conserve and recover the species; or
- Substantial loss of population or habitat for a state-protected species increasing the likelihood of federal listing action to protect the species in the future.

#### *No Action Alternative*

The No Action Alternative would entail the NOSC's continued use of its present facilities located in downtown Columbus, GA. Under this alternative, neither new construction nor operation of the NOSC on Fort Benning would occur. Therefore, no impacts to biological resources would occur on Fort Benning as a result of the No Action Alternative.

#### *Alternative 1: Soldiers' Plaza (Preferred Alternative)*

Soldiers' Plaza is located within the Main Post Cantonment Area in a previously disturbed parcel. Any vegetation removal due to construction would be miniscule and land disturbances would adhere to applicable Federal and State laws, regulations and permit requirements. As well, GA NPDES and Air Quality Rules for construction would preclude potential impacts to biological resources. Additionally, there is no Federally listed and/or candidate species habitat within the Main Post Cantonment Area. Therefore, under the Preferred Alternative no impacts to biological resources are expected to occur during construction or operation activities of the NOSC.

#### *Alternative 2: Bradshaw Road Site*

The potential impacts to biological resources resulting from the implementation of Alternative 2 would be equivalent to those described under Alternative 1. Likewise, all Federal and State laws, regulations, permit requirements, and BMPs for construction would be followed and preclude any potential impacts to biological resources. Furthermore, no impacts to biological resources are expected to occur

#### *Cumulative Impacts*

Past, present, and future activities that have caused adverse impacts to biological resources in the ROI have primarily been associated with construction and/or training activities. Although such activities have the potential to cause vegetation loss, habitat loss, and habitat degradation on Post, Fort Benning continues to successfully maintain diverse ecological communities through environmental resource management and site-

specific NEPA analysis. No cumulative impacts to biological resources are expected when considering other projects within the ROI.

#### *Proposed Mitigation*

No additional mitigation measures for biological resources would be required since there are no impacts associated with biological resources for any of the alternatives. Therefore, no mitigation other than compliance with existing regulations, permits, and plans would be required.

### **3.4 Cultural Resources**

#### **3.4.1 Affected Environment**

Cultural resources consist of historic districts, sites, structures, artifacts, objects, or any other physical evidence of human activity considered important to a culture, subculture, or community for scientific, traditional, religious, or other reasons.

Cultural resources found within the boundaries of Fort Benning include: archaeological sites, buildings, historic districts, and Native American resources. As mentioned in section 2.3, Soldiers' Plaza currently contains approximately 35 World War II era wooden buildings originally built as temporary facilities. These historic structures are scheduled for demolition later this year. Such structures were determined to meet the criteria of the National Register of Historic Places under a Programmatic Memorandum of Agreement between the DoD, Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers (1986) and mitigated under an Army Memorandum of Agreement for the demolition of temporary World War II wood structures (see Appendix A) (U.S. Army Construction Engineering Research Laboratory Technical Report, 1993). There are no known cultural resources within the Bradshaw Road Site parcel. Concerning the NOSC Columbus, there are no plans for its future utilization and the city of Columbus would be responsible for determining its eligibility as a historic property to manage accordingly.

#### *Region of Influence*

The ROI includes the proposed project locations and adjacent Main Post Cantonment Area.

Management of cultural resources on Fort Benning is accomplished through the Installation's Integrated Cultural Resources Management Plan (ICRMP). Fort Benning has 13 federally recognized Tribes affiliated with the Installation and local area and ten participate in consultation on a bi-annual basis. Also, Fort Benning has adopted the Army Alternate Procedures for implementing Section 106 of the National Historic Preservation Act (NHPA) in an effort to improve efficiency in the Installation's cultural resources management. The Historic Properties component of the ICRMP procedures establishes protocols for evaluating the potential effect on historic properties and combining Section 106 consultation with the NEPA process.

### **3.4.2 Environmental Consequences**

Impacts to cultural resources would be considered significant if they meet one or more of the following criteria:

- The activity would cause an adverse effect to a historic property or other cultural resource that is listed on or eligible/potentially eligible for inclusion in the NRHP, and measures mitigating the adverse effect of the resource are not available and cannot be implemented.
- The activity would restrict access to a cultural resource of significance to the Tribes associated with the Fort Benning area without resolution through consultation.

Direct effects generally involve physical damage or destruction to all or part of a resource through ground-disturbing activities or deterioration or destruction of a resource brought about through neglect. Indirect effects generally result from alterations to the characteristics of the surrounding environment or setting that contribute to a resource's significance.

The Proposed Action in these alternatives would continue the preservation, protection, avoidance and sometimes excavation of discovered or known sites. Additionally, all regulatory requirements associated with soil disturbing or other land use activities would be followed.

#### *No Action Alternative*

Under the No Action Alternative, the Proposed Action described would not be implemented. This would include potential soil disturbing activities for site preparations, construction, or operations of the NOSC facility on Fort Benning. Therefore, no impacts to cultural resources would occur.

#### *Alternative 1: Soldiers' Plaza (Preferred Alternative)*

Under the Preferred Alternative, the Proposed Action would not be expected to impact any cultural resources. Historic resources currently within the Soldier's Plaza footprint include Fort Benning Buildings 2602, 2604, 2606-2622, and 2624-2638. As mention in section 3.4.1, these resources have been previously mitigated under an Army Memorandum of Agreement for the demolition of temporary World War II wood structures (U.S. Army Construction Engineering Research Laboratory Technical Report, 1993). It is planned that an archeological survey of the area will occur following the demolition of the wooden buildings associate with the Soldier Family Support Center project (section 3.1). All land disturbance activities would adhere to applicable Federal and State laws, regulations and permit requirements. In the unlikely event unknown cultural resources are discovered during construction, work would immediately cease until those resources are properly evaluated by Fort Benning's Cultural Resource Management. Therefore, under the Preferred Alternative no impacts to cultural resources are expected to occur during construction or operation activities.

### *Alternative 2: Bradshaw Road Site*

The potential impacts to cultural resources resulting from the implementation of Alternative 2 would be similar to those described under Alternative 1. Likewise, all land disturbance activities would adhere to applicable Federal and State laws, regulations and permit requirements. In the unlikely event unknown cultural resources are discovered during construction, work would immediately cease until those resources are properly evaluated by Fort Benning's Cultural Resource Management. Therefore, under Alternative 2 no impacts to cultural resources are expected to occur during construction or operation activities of the NOSC.

### *Cumulative Impacts*

The Proposed Action would not impact any known cultural resources.

### *Proposed Mitigation*

There would be no effects associated with cultural resources for any of the alternatives. Therefore, no mitigation other than compliance with existing regulations, permits, and plans would be required.

## **3.5 Facilities (Utilities)**

### **3.5.1 Affected Environment**

Facilities (utilities) are the basic services required by the Proposed Action and include potable water, wastewater, and energy/electricity. Fort Benning's utilities have all been privatized. Under the privatization of utilities agreements, each respective entity—Columbus Water Works (portable water and wastewater), Flint Energy (electricity), and ATMOS Energy (gas)—would continue to own and manage each systems on behalf of Fort Benning for the NOSC's needs. The ownership and management of any new utility lines that would be constructed for the NOSC facilities would be transferred to the private utility owners. Utility infrastructure would be upgraded as required.

Executive Order (EO) 13693; *Federal Leadership in Environmental, Energy, and Economic Performance*; was signed on March 19, 2015. It expanded upon the energy reduction and environmental performance requirements of EO 13514. It sets numerous Federal energy requirements in several areas, including: greenhouse gas management, sustainable buildings and communities, water efficiency, pollution prevention, and waste reduction.

Reducing energy consumption is one of the challenges to Army management. In January of 2008, the Department of the Army issued the LEED Implementation Guide for use by all Army installations. All vertical construction projects with climate controlled facilities must achieve the Silver level of LEED for New Construction (LEED-NC v 3.0). As a result, the most energy efficient lighting, water conservation measures, HVAC controls, and building envelope materials would be considered for use in the design/engineering of the Proposed Action.

### *Region of Influence*

The ROI for utilities includes Fort Benning's Main Post Cantonment Area.

## **3.5.2 Environmental Consequences**

Impacts to utilities would be considered significant if the Proposed Action exceeded the carrying capacity of any utility system (e.g., water and energy) on the Installation. The assessment of impacts to utilities is based on current capacity, utility infrastructure, and the capability to expand capacity.

### *No Action Alternative*

Under the No Action Alternative, the Proposed Action would not occur and the NOSC would continue using its present facilities located in downtown Columbus, GA. Consequently, there would be no impacts to utilities from the No Action Alternative.

### *Alternative 1: Soldiers' Plaza (Preferred Alternative)*

The Proposed Action would not substantially increase the use and/or demand for utilities or utility infrastructure on the Installation. All new facility construction would be required to achieve all Federal energy requirements and specified LEED standards. As a result, negligible effects to utilities would be expected from implementing the Preferred Action.

### *Alternative 2: Bradshaw Road Site*

The potential impacts to utilities resulting from the implementation of Alternative 2 would be equivalent to those described under Alternative 1. New facility construction would be required to achieve all Federal energy requirements and specified LEED standards. Only negligible effects to utilities would be expected as a result.

### *Cumulative Impacts*

The Proposed Action, along with past, present, and future actions (i.e., Implementation of a 30-Megawatt Photovoltaic Solar Facility, Soldier Family Support Center, and the Infrastructure Footprint Reduction Program), would negligibly increase the estimated utility use and not result in adverse impacts to Fort Benning's utility systems. New facility construction required by the NOSC would achieve all Federal energy requirements and specified LEED standards to maximize the efficient use of utilities. Any incremental effects when considered with other projects would be negligible since it is anticipated that each utility system would readily meet any increased demands on capacity.

### *Proposed Mitigation*

There would be negligible impacts associated with utilities or utility infrastructure for the Action Alternatives. Therefore, no mitigation other than compliance with existing Federal energy requirements and LEED standards as related to new construction would be required.



### **3.6 Hazardous and Toxic Materials and Waste**

#### **3.6.1 Affected Environment**

Hazardous and Toxic Materials and Waste (HTMW) are identified and regulated primarily by the Comprehensive Environmental Response, Compensation, and Liability Act; the Occupational Safety and Health Act; the Resource Conservation and Recovery Act (RCRA); the Federal Insecticide, Fungicide, and Rodenticide Act; and the Emergency Planning and Community Right-to-Know Act. Various state laws regulate the management and disposal of hazardous materials and waste.

Hazardous waste is defined in the RCRA as any “solid, liquid, contained gaseous or semisolid waste, or any combination of wastes that could or do pose a substantial hazard to human health or the environment.” Waste may be classified as hazardous because of its toxicity, reactivity, ignitibility, or corrosivity. In addition, certain types of waste are “listed” or identified as hazardous in 40 CFR 263.

Past resource and waste management practices at Fort Benning have resulted in the presence of toxic and hazardous waste contamination at some locations. HTMW on Main Post consist of, but are not limited to, asbestos and lead-based paint in older buildings, petroleum products, and Solid Waste Management Areas/Units (SWMUs). SWMUs are identified sites or locations where solid wastes have been routinely stored and/or disposed and involve the potential or actual release into the environment. Common examples include waste tanks, septic tanks, burn pits, or landfills (material disposal areas), wastewater outfall areas, and areas that were contaminated from leaking product storage tanks (including petroleum). Fort Benning actively manages programs for addressing contaminated sites in compliance with RCRA and the National Oil and Hazardous Substances Pollution Contingency Plan. Currently, there are seven active SWMUs on Fort Benning’s Main Post Cantonment Area, but none exists on or adjacent to available build areas identified in Figure 2-1 and Figure 2-2 and analyzed under the Action Alternatives.

#### *Region of Influence*

The ROI for HTMW encompasses Fort Benning’s Main Post Cantonment Area and any associated underlying groundwater aquifers.

#### **3.6.2 Environmental Consequences**

Impacts would be considered significant if the Proposed Action created considerable risk to human health or safety, including direct or indirect human exposure, substantial increase in environmental contamination, or resulted in violations of applicable Federal, state, DoD, and local regulations.

#### *No Action Alternative*

Under the No Action Alternative, the NOSC facilities nor its operation would occur on Fort Benning. Therefore, no impacts related to HTMW would occur as a result of the No Action Alternative.

*Alternative 1: Soldiers' Plaza (Preferred Alternative)*

In the short-term, the quantity of hazardous materials such as petroleum, oil, and lubricants would increase in support of the Proposed Action. Such a demand would primarily be related to and required by heavy equipment use and ended with the completion of the construction phase. In the long-term, facility and operational needs would involve the storage and use of hazardous materials such as cleaning agents, paints, adhesives, and other products for household and facility maintenance.

Conversely, this will be offset by facility reductions at the current location.

The risk of uncontrolled release of hazardous substances during construction and long-term operation would be minimized by following applicable Federal and State laws and regulations and Army policy for storage of hazardous materials.

Under Alternative 1, adherence to existing material and waste management plans and procedures for handling, storage, and disposal of these substances would preclude any long-term, adverse impacts. It is anticipated that if the Preferred Alternative is implemented, there would be both negligible, short-term effects during construction activities, and negligible long-term effects, during operation, as a result of hazardous material storage and handling.

*Alternative 2: Bradshaw Road Site*

The potential impacts to HTMW resulting from the implementation of Alternative 2 would correspond to those described under Alternative 1. Although there would be both negligible, short-term effects, during construction activities, and negligible long-term effects, during operation, as a result of hazardous material storage and handling, adherence to existing material and waste management plan and procedures for handling, storage, and disposal of these substances would result in negligible long-term, effects.

*Cumulative Impacts*

The Proposed Action, along with actions in the past, present, and future, would negligibly increase the use of HTMW and would not result in any cumulative impacts.

*Proposed Mitigation*

Adherence to applicable Federal and State laws and regulations would minimize impacts due to construction and operational maintenance activities in the long-term. Therefore, no additional mitigation measures are warranted.



## **3.7 Land Use**

### **3.7.1 Affected Environment**

Land use involves the utilization or modification of land for agricultural, industrial, training, residential, recreational, or other purposes. Land uses are frequently regulated by management plans, policies, ordinances, and regulations that determine the types of uses that are allowable or to protect specially designated or environmentally sensitive uses.

#### *Physical Setting*

Fort Benning encompasses approximately 182,000 acres of Muscogee, Chattahoochee and Russell counties. The region is characterized by small unincorporated communities, rural residences, agricultural and undeveloped land used for farming and forestry. The largest population center closest to Fort Benning is the City of Columbus, Georgia, located adjacent north and west of the Installation.

Fort Benning's land use is for operational training or support of cantonment functions. The land use and management within the cantonment areas (i.e., Main Post, Harmony Church, Kelly Hill, and Sand Hill) are planned in accordance with the Real Property Master Plan and provide orderly development of the Installation. Impacts to the land use and environment are minimized by using proper management plans to guide land use planning decisions.

#### *ROI*

The ROI for land use includes the land within Fort Benning's Main Post Cantonment Area and other adjacent cantonment or training lands that could potentially be affected by the Proposed Action.

### **3.7.2 Environmental Consequences**

Impacts on land use would be considered significant if the Proposed Action was incompatible with surrounding land use or results in incompatible land use changes that degraded mission-essential training or necessary functions within the cantonment areas.

#### *No Action Alternative*

The construction and operation of the NOSC facilities at Fort Benning would not occur under the No Action Alternative. Therefore, no changes to land use would occur and no impacts to land use are anticipated.

#### *Alternative 1: Soldiers' Plaza (Preferred Alternative)*

Under Alternative 1, site preparation, construction, and operation of the NOSC facilities on Fort Benning would not alter or adversely affect the overall land use and management of the Main Post Cantonment Area or any nearby lands. Since the 1940s,

Soldiers' Plaza has been utilized as housing and administrative and support facilities. Accordingly, the Preferred Alternative would remain consistent with the current Soldiers' Plaza land use. The NOSC facilities would be constructed and operate in an area already designated by Fort Benning's Real Property Master Planning for such administrative and support facilities. Therefore, no impacts are anticipated.

***Alternative 2: Bradshaw Road Site***

Under Alternative 2, site preparation, construction, and operation of the NOSC facilities on Fort Benning occur at the Bradshaw Road Site (Figure 2-2). The Bradshaw Road Site's current land use is green space designated by Fort Benning's Real Property Master Planning for general operations and support. Similar to Alternative 1, the NOSC facilities would be constructed and operate in an area of similar land use and would not alter or adversely affect the overall land use and management of the Main Post Cantonment Area or the nearby lands. Therefore, no impacts are anticipated.

***Cumulative Impacts***

The Action Alternatives will result in no cumulative impacts when considering other actions within the ROI. Fort Benning land use planning has avoided or minimized adjacent land use conflicts through siting projects according to the Real Property Master Plan and NEPA analysis. Such planning and analysis would continue to reduce the potential for adverse and significant cumulative effects to adjacent land uses.

***Proposed Mitigation***

The Proposed Action Alternatives would result in no adverse effects to Land Use; therefore, no mitigation would be necessary.

### **3.8 Safety and Security**

#### **3.8.1 Affected Environment**

***ROI***

The ROI for safety and security encompasses the Fort Benning Main Post Cantonment Area.

***Public and Installation Safety***

At Fort Benning, the Directorate of Public Safety commands the Military Police Units, the Fort Benning Fire Prevention and Protection Division, and the Post Safety Office. This Directorate enables a unity of effort among Fort Benning emergency services to help ensure a safer and secure environment. Existing Fort Benning security procedures include access controls points and barriers to ensure public safety and limit unauthorized access to the Installation.

***Construction Safety***

Construction activities are typically performed or contracted by the U.S. Army Corps of Engineers (USACE), following procedures set forth in the USACE Safety and Health

Manual 385-1-1 (U.S. Army Corps of Engineers, 2003). This manual outlines all of the requirements to comply with Occupational Safety and Health Administration (OSHA) standards during the construction and demolition process.

#### *Workplace Safety*

Workplace Safety applies to on-the-job safety and implements OSHA requirements. These requirements include appropriate and protective clothing and equipment, hazard materials communication, health and safety standards for the workplace, on-the-job reporting requirements, and myriad other requirements designed to protect the health and safety of workers.

#### *Transportation Safety*

Transportation Safety entails a large part of military functions because most troop movements and management activities are performed using ground-based vehicles. Fort Benning provides transportation safety briefings for on- and off-duty personnel and Families. On- the-job requirements describe safe handling, loading, and operation of government-owned vehicles including automobiles, trucks, troop carriers, and tanks. Off-the-job safety stresses training for vehicle operation for four-wheeled vehicles and motorcycles, seatbelt use, counseling, enforcement, and accident prevention programs.

### **3.8.2 Environmental Consequences**

A significant impact to safety and security would occur if military and civilian personnel are exposed to safety risks that do not comply with applicable regulations, policies, agreements, and action-specific safety reviews.

#### *No Action Alternative*

Under the No Action Alternative, there would be no change from current conditions as described under the affected environment sections. .. The implementation of the No Action Alternative would continue to make use of the current NOSC facilities that do not meet AT/FP requirements and continue to result in minor, long-term, adverse impacts to safety and security.

#### *Alternative 1: Soldiers' Plaza (Preferred Alternative)*

All previously implemented policies, procedures and applicable safety laws (e.g. OSHA) would remain under the Preferred Alternative. Although the construction of the NOSC facilities could have minor, short-term adverse impacts to safety, it would be mitigated by adherence to existing safety practices. Also, the increase in traffic counts from NOSC personnel commuting on-Post would be negligible. Operation of the NOSC on Fort Benning would provide beneficial effects to Navy personnel regarding Force Protection and Security. Therefore, long-term, beneficial effects to safety and security conditions or procedures are expected under the Preferred Alternative.

#### *Alternative 2: Bradshaw Road Site*

Overall impacts to safety would be similar to those described under Alternative 1.

With regard to safety, the implementation of Alternative 2 would result in negligible effects as a result of increased traffic counts from NOSC personnel commuting. Minor, short-term adverse impacts with the potential to result from the NOSC's facility construction would be mitigated by adherence to existing safety practices. Operation of the NOSC on Fort Benning would provide long-term, beneficial impacts to Navy personnel regarding Force Protection and Security. Nonetheless, all potential impacts to safety and security would be mitigated by adherence to existing safety practices. Therefore, long-term, beneficial effects to safety and security conditions or procedures are expected under the Alternative 2.

#### *Cumulative Impacts*

Since the Proposed Action would have beneficial impacts to safety and security, no cumulative impacts to safety and security are expected to occur.

#### *Proposed Mitigation*

Minor, short-term adverse impacts to safety would be mitigated by adherence to existing safety practices involving construction and related activities. No mitigation beyond compliance with existing policies, procedures and applicable safety laws would be necessary.

### **3.9 Soils**

#### **3.9.1 Affected Environment**

Soils typically are described in terms of their type, slope, physical characteristics, and relative compatibility or limitations with regard to particular activities.

#### *ROI*

The ROI for soils analysis includes the Main Post Cantonment Area, which could be directly and/or indirectly impacted by soil erosion and sedimentation from the Proposed Action.

Most of the southwestern third of Fort Benning is covered by the Upper Loam Hills soil province which contains soils that are heavier textured and more mesic than the drier Sand Hill soils to the northeast. These soils also generally have higher organic matter content and higher water holding capacity. Soils textures in the Main Post area of Fort Benning are predominantly urban (previously disturbed, covered by buildings and/or hardscapes) and loam-sand mix. Soils along the Chattahoochee are occasionally flooded sandy loams (Fort Benning, 2013).

The topography is generally smooth to gently rolling with low relief. The southwestern portion of the Installation has the lowest terrain at about 190 feet above sea level, with low terraces parallel to the Chattahoochee. Most of Fort Benning's soils are identified as highly erodible, the degree of which is determined by factors including texture, structure, percent slope, drainage, and permeability (Fort Benning, 2013).

Generally, soils on Fort Benning are highly susceptible to erosion if vegetation is removed by clearing or other disturbances. The potential for erosion also increases with the degree of slope.

To prevent soil erosion during construction, consequent damage to endangered species habitat, or sedimentation of streams and wetland areas, the Army employs National Pollutant Discharge Elimination System (NPDES) BMPs as defined by the GA Department Natural Resources (DNR), Georgia Soil & Water Conservation Commission for all construction projects. In GA, projects one acre or greater require a state approved Erosion Sedimentation Pollution Control Plan (ESPCP) for land disturbing activities, fee submittal for disturbed acreage, and Notice of Intent (NOI) to meet the requirements of the federal NPDES construction permit program and Georgia Erosion and Sedimentation Control Act. The ESPCP prescribes activities to limit erosion and sedimentation from the site and includes a site description, list of BMPs to be used, BMP inspection procedures to be performed by qualified personnel, procedures for timely BMP maintenance, requirements for sampling of discharges or receiving streams for turbidity, and reporting requirements to the GA DNR Environmental Protection Division (EPD) Field Operations Division.

### **3.9.2 Environmental Consequences**

A significant adverse impact would occur to soils if a substantial soil loss or compaction precluding the reestablishment of vegetation within two growing season or a violation of applicable federal or state law, regulation, or permit occurs.

#### *No Action Alternative*

The implementation of the No Action Alternative would continue to make use of the current NOSC facilities located in downtown Columbus, GA. As a result, there would be no ground disturbances as a result of construction or operation of the NOSC facilities at Fort Benning. Therefore, no potential impacts to soils would result.

#### *Alternative 1: Soldiers' Plaza (Preferred Alternative)*

Under the Preferred Alternative, no tributary streams exist within the proposed construction or buildable area. Additionally, soil erosion and sedimentation controls will be put in place, per the Clean Water Act, the GA Erosion and Sedimentation Control Act, and appropriate NPDES permits will be obtained in prior to any construction activities.

Minor, short-term adverse impacts to soils within the ROI may occur during the construction phase; however, no long-term effects to soils would be anticipated as all ground disturbances at the proposed sites, would be re-vegetated and stabilized.

#### *Alternative 2: Bradshaw Road Site*

The potential impacts to soils resulting from the implementation of Alternative 2 would be similar to those described under Alternative 1. No tributary streams exist within the

proposed construction or buildable area. As well, soil erosion and sedimentation controls will be put in place, per the Clean Water Act, the Georgia Erosion and Sedimentation Control Act, and appropriate NPDES permits will be obtained in prior to any construction activities. As a result, adverse effects to soils may occur but would only be considered short-term and minor.

#### *Cumulative Impacts*

Regional and local land soil resources would not be adversely affected by contributing activities and potentially foreseeable projects. All activities would be implemented on Fort Benning lands in which impacts to soil resources are managed through the existing Fort Benning Soil Conservation Program, which incorporates NPDES BMPs into the project design to prevent soil erosion. Therefore, no cumulative impacts to soils are anticipated from implementation of any of the Proposed Action Alternatives.

#### *Proposed Mitigation*

For any of the Proposed Action Alternatives, mitigation measures would be implemented as part of Federal and State permitting requirements to minimize the effects to soil resources during construction and operation activities. Application of Federal and State erosion control measures and NPDES permitting requirements to include preparation of an Erosion, Sedimentation and Pollution Control Plan (ESPCP) detailing erosion and sedimentation control BMPs, and a minimum 25-foot surface water setback to minimize soil impacts during construction are required prior to construction and demolition activities. Additionally, adherence to Federal and State laws and regulations would minimize impacts due to operations and maintenance activities in the long-term. Therefore, no additional mitigation measures are warranted.

### **3.10 Traffic and Transportation**

#### **3.10.1 Affected Environment**

Traffic and transportation includes the roadway system and traffic conditions for the roadway network serving Fort Benning.

#### *ROI*

The ROI for traffic and transportation encompasses the public roadways within and adjacent to the Main Post Cantonment Area.

Fort Benning's on-Post road network is comprised of primary, secondary, and tertiary roadways. There are three access control points providing access to the Main Post Cantonment Area; two are within GA and one in Alabama. Of all of Fort Benning's cantonment areas, Main Post is the largest cantonment area and has the highest potential of becoming congested but only during peak traffic periods.

Access to Main Post is provided by major traffic corridors, I-185/Lindsey Creek Parkway and Fort Benning Road (north-south) and First Division Road/Dixie Road (east-west).



North-south traffic is also served by Lumpkin and Sigerfoos roads, and Edwards and Anderson streets. East-west traffic is also served by Tenth Division Road, and Vibbert and Wold avenues.

### **3.10.2 Environmental Consequences**

A significant impact to traffic and transportation would result from the substantial reduction in roadway function or long-term closure of primary or secondary roadways. Impacts were assessed by reviewing existing traffic conditions of roadways.

#### *No Action Alternative*

Under the No Action Alternative, construction and operation of the NOSC facilities at Fort Benning would not occur. Therefore, no potential impacts to traffic and transportation resources would result, as there would be no change in traffic volumes on the roadways and no potential for temporary delays in traffic flow due to construction related activities within the ROI.

#### *Alternative 1: Soldiers' Plaza (Preferred Alternative)*

Under the Preferred Alternative, minor, short-term adverse impacts have the potential to occur from temporary delays in traffic flow as a result of actions related to construction activities. Construction design and coordination with Fort Benning's Directorate of Public Safety would assist in minimizing potential impacts. Additionally, effects would be temporary in nature and would end with the construction phase.

Only negligible effects would be expected from an increase in personnel commuting to Main Post associated with the Preferred Action. The overall level of Installation-wide traffic would still remain similar to current levels and would not impact wear and tear on roadways. Direct transportation routes to the proposed NOSC location are more than sufficient to facilitate additional traffic counts. Therefore, no impacts to traffic and transportation would be expected.

#### *Alternative 2: Bradshaw Road Site*

Overall, potential impacts to traffic and transportation resulting from the implementation of Alternative 2 would be similar in both nature and to the level described under Alternative 1 and would not impact traffic and transportation. While the potential exists for minor, short-term adverse impacts from construction, construction design and coordination with the Directorate of Public Safety would assist in minimizing potential impacts and effects would be temporary in nature ending with the construction phase.

Additional traffic from Reservist would represent a negligible increase in traffic counts and would be primarily along routes that are sufficient to facilitate additional traffic. Likewise, no impacts to traffic and transportation would be expected.

### *Cumulative Impacts*

Past, present, and future projects would have negligible effects on traffic and transportation within the ROI. Fort Benning's transportation network would remain adequate for minimal increases in traffic volume. The potential for delays, limiting access to the Installation, or long-term road closures would be minimized through proper coordination with Fort Benning Directorate of Public Safety and construction design. As a result, no cumulative adverse impacts are expected.

### *Proposed Mitigation*

No mitigation measures are warranted for temporary construction activities, additional traffic from support personnel, and wear and tear on roadways.

## **3.11 Water Resources**

### **3.11.1 Affected Environment**

Any activity that affects water quality, quantity, or rate of movement at one location within a watershed has the potential to affect the characteristics of water resources. Water resources include surface water and floodplains, groundwater and aquifer characteristics, and wetland resources. There are no known impacts to groundwater/aquifers and no wetlands exist on or near the proposed sites; therefore such features are not further discussed in this EA.

### *ROI*

The ROI for water resources and wetlands analysis includes the Main Post Cantonment Areas that could be directly and/or indirectly impacted by the Proposed Action.

### *Surface Waters*

Surface water systems are typically defined in terms of watersheds. Watersheds are delineated into hydrologic units by the U.S. Geological Survey using a nationwide system based on surface hydrologic features. Each hydrologic unit is identified by a unique hydrologic unit code or HUC.

The Chattahoochee River dominates the surface water regime at Fort Benning and within the ROI. The Chattahoochee River arises as a cold-water mountain stream in the Blue Ridge Province. All other surface waters in the ROI drain toward the Chattahoochee River.

Adherence to regulatory requirements by implementation of the Proposed Action would avoid or minimize adverse impacts to water resources. Implementation of the proposed alternatives could involve NPDES Permits. NPDES permitting protects state waters and water quality as required by the CWA. A state NPDES Construction Permit would be required prior to construction that involves more than one acre of land disturbing activity. Furthermore, Fort Benning requires vegetative and structural BMPs for all

construction associated land disturbances, and additionally an ESPCP for projects that disturb 0.1 acre or greater.

Surface water resources within Fort Benning could be adversely impacted from contamination from oil spills, pesticide residue, fired munitions residue, and untreated sewage bypass. These potential contamination sources are controlled and minimized by the implementation of Fort Benning Spill, Prevention, Control, and Countermeasure Plan, Fort Benning Installation Spill Contingency Plan, Storage Tank Management Plan, Stormwater Pollution Prevention Plan, and the NPDES permit requirements to prevent sewage bypasses. Nonpoint sources, more specifically sedimentation, however, are the primary pollutant sources of concern for surface water resources at Fort Benning. Consequently, much of the Installation's water resources management is closely related to minimizing and repairing erosion caused primarily by construction projects.

### **3.11.2 Environmental Consequences**

A significant adverse impact would occur to Water Resources if implementation of the Proposed Action resulted in a change in surface water impairment status, or resulted in unpermitted impacts to surface waters.

#### *No Action Alternative*

The construction and operation of the NOSC facilities at Fort Benning would not occur under the No Action Alternative. Therefore, no changes to water resources would have the potential to occur as a result and no impacts to water resources are anticipated.

#### *Alternative 1: Soldiers' Plaza (Preferred Alternative)*

Under Alternative 1, short-term, minor adverse effects to surface water resources could occur during the construction phase. No long-term effects to water resources would be anticipated as the sites would be re-vegetated and stabilized.

Other potential impacts to water resources could occur as a result of petroleum, oil and lubricant spills from vehicle and equipment failures. Compliance with applicable regulations minimizes the risks of minor spills occurring. In the unlikely event of an accidental fuel spill, Fort Benning personnel will follow spill response procedures and an accident response team would be available immediately to minimize any adverse effects. Overall, no impacts to water resources would be anticipated.

#### *Alternative 2: Bradshaw Road Site*

The potential impacts to water resources resulting from the implementation of Alternative 2 would be similar to those described under Alternative 1. Only short-term, minor adverse effects to surface water resources may occur during the construction phase. No long-term effects to water resources would be anticipated as the sites would be re-vegetated and stabilized.

Other potential impacts to water resources as a result of petroleum, oil and lubricant spills from vehicle and equipment failures would be minimized by personnel following

spill response procedures. An accident response team would be available immediately to minimize any adverse effects in the unlikely events described. Therefore, impacts to water resources are not anticipated.

#### ***Cumulative Impacts***

Past, present, and future projects have or may include major land disturbances, which had the potential to impact surface waters within the ROI. However, these projects require(d) compliance with NPDES construction permitting to minimize potential sedimentation impacts. Implementation of any of the Proposed Action Alternatives has the potential to temporarily increase localized erosion rates. However, all land disturbances would adhere to all Federal and State laws, regulations and permit requirements to protect water quality. Although there is a potential for cumulative impacts when considered with past, present, and future actions occurring near the Proposed Action sites, they are not expected to be significant since NPDES BMPs would be incorporated into the project to minimize impacts to water quality.

#### ***Proposed Mitigation***

Adherence to Federal and State requirements and NPDES permitting requirements to include preparation of an ESPCP detailing erosion and sedimentation control BMPs for implementation would minimize the effects to water resources. Therefore, no additional mitigation measures are warranted.

## **4.0 CONCLUSION**

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.

The No Action Alternative would not meet the purpose and need for relocating, constructing, and operating the NOSC to Fort Benning. Although both Action Alternatives met the purpose and need for the Proposed Action, the location proposed for Alternative 1 was considered to be the best option due to accessibility for commuters during peak hours of traffic flow and availability of approximately 50 paved parking spaces on the western and southern margin of the property. The EA analysis demonstrated that with adherence to applicable Federal and State environmental laws, regulations, and permitting processes, no significant adverse environmental impacts would result from the Proposed Action as implemented by the Action Alternatives. Therefore, preparation of and EIS is not warranted for this action.



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## **6.0 ACRONYMS AND ABBREVIATIONS**

ACUB	Army Compatible Use Buffer
ADEM	Alabama Department of Environmental Management
APE	Area of Potential Effect
ARC	Army Reconnaissance Course
AT/FP	Anti-Terrorism/Force Protection
BMPs	Best Management Practices
BRAC	Base Realignment and Closure
CAA	Clean Air Act
CBMPP	Construction Best Management Practices Plan
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act
DoD	Department of Defense
DoDEA	Department of Defense Education Activity
DPW	Directorate of Public Works
EA	Environmental Assessment
EIS	Environmental Impact Statement
EMD	Environmental Management Division
EPA	Environmental Protection Agency
EPD	Environmental Protection Division
EPR	Enhanced Performance Round
ESA	Endangered Species Act
ESPCP	Erosion Sedimentation Pollution Control Plan
FNSI	Finding of No Significant Impact
FY	Fiscal Year
GA	Georgia
DNR	Department Natural Resources
GHG	Greenhouse Gases
HTSW	Hazardous and Toxic Materials and Waste
HUC	Hydrologic Unit Code
HVAC	Heating Ventilation and Air Conditioning
ICRMP	Integrated Cultural Resources Management Plan
INRMP	Integrated Natural Resource Management Plan
LEED	Leadership in Energy and Environmental Design
MCoE	Maneuver Center of Excellence
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOI	Notice of Intent
NOSC	Navy Operational Support Center
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
PM	Particulate Matter
RCRA	Resource Conservation and Recovery Act

RCW	Red-cockaded Woodpecker
ROI	Region of Influence
SWMU	Solid Waste Management Areas/Unit
UEA	Unique Ecological Area
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
VEC	Valued Environmental Component

## **7.0 PREPARERS**

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## 8.0 DISTRIBUTION LIST

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Mayor's Office 100 10th St, 6th Floor Government Center Tower Columbus, GA 31901	Chattahoochee County County Manager P.O. Box 299 Cusseta, GA 31805	Mayor's Office City Hall 601 12th St Phenix City, AL 36867
Harris County County Manager P.O. Box 365 Hamilton, GA 31811	Talbot County Board of Commissioners P.O. Box 155 Talbotton, GA 31827	Webster County County Commissioner 6622 Cass St Preston, GA 31824
Stewart County County Commissioner P.O. Box 157 Lumpkin, GA 31815	Marion County County Commissioner P.O. Box 481 Buena Vista, GA 31803	Russell County Commission 1000 Broad St Phenix City, AL 36867
Senator Johnny Isakson 131 Russell Senate Office Bldg. Washington, DC 20510	Senator David Perdue B40D Dirksen Senate Office Bldg. Washington, DC 20510	Rep. Sanford Bishop, Jr. 2407 Rayburn HOB Washington, DC 20515
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### ***Local and Regional Administrators, Federal Agencies, or Commissions with Regulatory Interest in Fort Benning***

U.S. Fish & Wildlife Service West Georgia Office P.O. Box 52560 Fort Benning, GA 31905	USFWS, Regional RCW Recovery & Longleaf Pine Coordinator Mississippi Field Office 6578 Dogwood View Pkwy Jackson, MS 39213	GSWCC, Region 5 4344 Albany Hwy Dawson, GA 39842
GA DNR, EPD Director's Office 2 Martin Luther King Jr. Dr SE, Suite 1456, East Tower Atlanta, GA 30334	GA DNR Commissioner's Office 2 Martin Luther King Jr. Dr, SE, Suite 1252, East Tower Atlanta, GA 30334	USDA NRCS State Office Water Resources 355 East Hancock Ave, Suite 13 Athens, GA 30601
USEPA Region IV Regional Administrator 61 Forsyth St SW Atlanta, GA 30303	ADEM Office of the Director P.O. Box 301463 Montgomery, AL 36130	National Wildlife Federation Southeast Regional Center 730 Peachtree St NE, Suite 1000 Atlanta, GA 30308

The Nature Conservancy Chattahoochee Fall Line Office P.O. Box 52452 Columbus, GA 31905	The Georgia Conservancy 817 West Peachtree St, Suite 200 Atlanta, GA 30308	Southern Environmental Law Ctr. Director 127 Peachtree St, Suite 605 Atlanta, GA 30303
The Valley Partnership P.O. Box 1200 Columbus, GA 31902	Defenders of Wildlife National HQ 1130 17 <sup>th</sup> St NW Washington, DC 20036	Georgia Wildlife Federation 11600 Hazelbrand Rd, NE Covington, GA 30014
Columbus Chamber of Commerce 1200 6 <sup>th</sup> Ave Columbus, GA 31902	Chamber of Commerce Phenix City-Russell County 1107 Broad St Phenix City, AL 36867	

### ***Federally Recognized Tribes that Consult with Fort Benning***

Mr. Bryant J. Celestine Historic Preservation Officer Alabama-Coushatta Tribe of Texas 571 State Park Rd 56 Livingston, TX 77351	Ms. Amber Hood Historic Preservation Officer Chickasaw Nation P.O. Box 1548 Ada, OK 74820	Mr. Ace Buckner Representative Kialegee Tribal Town P.O. Box 332 Wetumka, OK 74883
Mr. Kenneth H. Carleton Tribal Historic Preservation Officer Mississippi Band of Choctaw Indians P.O. Box 6010 Choctaw, MS 39350	Mr. Emman Spain Manager, Cultural Preservation Officer Muscogee (Creek) Nation of Oklahoma P.O. Box 580 Okmulgee, OK 74447	Mr. Robert Thrower Tribal Historic Preservation Officer Poarch Band of Creek Indians 5811 Jack Springs Rd Atmore, AL 36502
Ms. Natalie Harjo Historic Preservation Officer Seminole Nation of Oklahoma P.O. Box 1498 Wewoka, OK 74884	Dr. Paul N. Backhouse Tribal Historic Preservation Officer Seminole Tribe of Florida 30290 Josie Billie Hwy, PMB 1004 Clewiston, FL 33440	Mr. Charles Coleman Representative Thlopthlocco Tribal town P.O. Box 188 Okemah, OK 74859
Ms. Molly Franks Tribal Historic Preservation Officer Quassarte Tribe of Oklahoma P.O. Box 187 Wetumka, OK 74883		

### **Fort Benning and Other Army Officials**

IMCOM Attn: Public Affairs Office 2405 Gun Shed Rd Ft Sam Houston, TX 78234	HQ US Army FORSCOM Attn: Public Affairs Building 8-1808 4700 Knox St Fort Bragg, NC 28310	HQ US Army TRADOC Attn: Ken Kimidy 661 Sheppard Pl Fort Eustis, VA 23604
Office of the Staff Judge Advocate 6450 Way St, Bldg 2839 Fort Benning, GA 31905	MCoE Commanding General 1 Karker St Building 4, Suite 6300 Fort Benning, GA 31905	Garrison Commander 1 Karker St Building 4, Suite 5900 Fort Benning, GA 31905
Infantry School Commandant 1 Karker St Building 4, Suite 6301 Fort Benning, GA 31905	Armor School Commandant 1 Karker St Building 4, Suite 6000 Fort Benning, GA 31905	

### **Local Media and Libraries**

Columbus Ledger-Enquirer 17 West 12 <sup>th</sup> St Columbus, GA 31901	Tri-County Journal 71 Bob Webb Rd Buena Vista, GA 31803	The Bayonet & Saber Public Affairs Office 35 Ridgeway Loop, Suite 381 Fort Benning, GA 31905
Columbus Public Library 3000 Macon Rd Columbus, GA 31906	Phenix City-Russell County Library 1501 17 <sup>th</sup> Ave Phenix City, AL 36867	Sayers Memorial Library 6870 Wold Ave, Building 93 Fort Benning, GA 31905
Cusseta-Chattahoochee Public Library 262 Broad St Cusseta, GA 31805		

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## **APPENDIX A**

### **Programmatic Memorandum of Agreements to Demolish World War II Temporary Buildings**



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PROGRAMMATIC MEMORANDUM OF AGREEMENT  
AMONG  
THE UNITED STATES DEPARTMENT OF DEFENSE  
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION  
AND THE  
NATIONAL CONFERENCE OF STATE HISTORIC PRESERVATION OFFICERS

WHEREAS, the Department of Defense (DoD) has been directed by United States Senate Armed Services Committee Report 97-440 to the Military Construction Authorization Bill for 1983 to demolish World War II (1939-1946) temporary buildings (buildings); and

WHEREAS, these buildings were not constructed to be permanent facilities and were intended to be demolished; and

WHEREAS, DoD has determined that these buildings may meet the criteria of the National Register of Historic Places; and

WHEREAS, DoD has determined that its program of demolition of these buildings (program) may have an effect on their qualities of significance and has requested the comments of the Advisory Council on Historic Preservation (Council) pursuant to Section 106 of the National Historic Preservation Act, as amended, (16 U.S.C. 470f) and its implementing regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800).

NOW, THEREFORE, DoD, the National Conference of State Historic Preservation Officers (NCSHPO), and the Council agree that the Program will be carried out in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

I. DoD will ensure that the following actions are carried out:

A. In consultation with the Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) (National Park Service, Washington, DC), DoD will develop documentation that includes:

1. A narrative overview of WW II military construction establishing the overall historical context and construction characteristics of each major type of building and including:

a. Explanation of the origins and derivations of the construction techniques and designs.

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b. Chronology that summarizes the political and military decisions that affected scheduling, locations, quantity, design, and construction techniques. Photocopies shall be made of all military manuals used to guide significant aspects of design or construction.

c. Summary statements of major installations' WW II development including site plans, lists of buildings, photocopies of appropriate photographs, and evaluations of the significance of the various building types and groups.

2. Documentation of one example of all major building types that includes: drawings (title sheet, floor plans, sections, elevations, and isometrics of framing systems and other pertinent construction details), photographs (perspective corrected, large format negative and contact print), and appropriate explanatory data. All documentation shall meet HABS/HAER Standards for format and archival stability.

3. Submission of the above documentation to HABS/HAER, for deposit in the Library of Congress, not later than three years from the date of this agreement.

4. Development of the above documentation will be undertaken with periodic reviews by HABS/HAER to ensure that completed documentation will meet HABS/HAER Standards.

B. In consultation with the Council and the NCSHPO, DoD will select some examples of building types or groups to treat in accordance with historic preservation plans (HPP), until such time as demolished or removed from DoD control. The HPPs will be submitted to the Council and the NCSHPO within three years from the date of this agreement. Work done in accordance with the HPPs will require no further review by a SHPO or the Council.

C. All buildings that are identified within sixty days of the Federal Register publication of this Agreement by organizations and individuals will be considered by DoD in its selection of examples to be documented and/or treated in accordance with Stipulations A and B above.

D. Until the documentation program is completed and HPPs have been developed for the representative sample of building types and groups, DoD will continue its current program of building demolition with caution, avoiding disposal of obviously unique and well-preserved, original buildings that are not documented.

## II. NCSHPO agrees to:

A. Assist the appropriate SHPO in informing DoD within sixty days of the Federal Register publication of this agreement of buildings that they wish to have considered in the selection of examples to be documented and/or treated in accordance with Stipulations I.A and I.B.

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B. Represent all SHPOs in the consultation on a selection of examples of buildings to be treated in accordance with Stipulation I.B.

III. If any of the signatories to this Agreement determines that the terms of the Agreement cannot be met or believes that a change is necessary, the signatory will immediately request an amendment or addendum to the Agreement. Such an amendment or addendum will be executed in the same manner as the original Agreement.

EXECUTION of this Agreement evidences that DoD has afforded the Council a reasonable opportunity to comment on its program of disposal of temporary WW II buildings and that DoD has taken into account the effects of this program on historic resources.

*John M. Burke* 7/2/86  
Executive Director, Advisory Council  
on Historic Preservation

*Robert G. Stur*  
Department of Defense

*John D. Baker* 7/7/86  
Chairman  
Advisory Council on Historic  
Preservation

Department of Army

Department of Navy

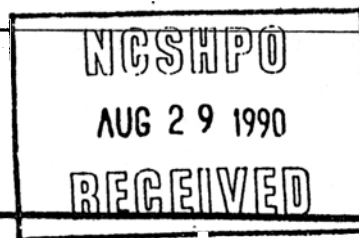
*Charles E. Lee* 6/6/86  
President  
National Conference of  
State Historic Preservation  
Officers

U. S. Marine Corps

Department of Air Force

*Robert A. Cooper* 5/13/86  
Historic American Buildings Survey/  
Historic American Engineering Record

**Advisory  
Council On  
Historic  
Preservation**



The Old Post Office Building  
1100 Pennsylvania Avenue, NW, #809  
Washington, DC 20004

**AMENDMENT to the  
PROGRAMMATIC MEMORANDUM OF AGREEMENT  
among  
THE UNITED STATES DEPARTMENT OF DEFENSE,  
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,  
NATIONAL CONFERENCE OF STATE HISTORIC PRESERVATION OFFICERS, and the  
HISTORIC AMERICAN BUILDINGS SURVEY/ HISTORIC AMERICAN ENGINEERING  
RECORD, regarding  
DEMOLITION OF WORLD WAR II TEMPORARY BUILDINGS**

WHEREAS, the Department of Defense (DOD), the Advisory Council on Historic Preservation (Council) and the National Conference of State Historic Preservation (NCSHPO), and the Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) entered into a Programmatic Memorandum of Agreement (PMOA) under Section 106 of the National Historic Preservation Act, which became effective on June 7, 1986, regarding the demolition of World War II temporary (buildings);

WHEREAS, DOD has determined that some stipulations of the PMOA cannot be met and require modification;

WHEREAS, the parties to the PMOA have consulted regarding such modifications;

NOW, THEREFORE, It is mutually agreed that the PMOA is amended as follows:

A new stipulation I.A 1.d is added, to read as follows:

d. Identification of topics for further research, and plans for the conduct of such research.

Stipulation I.A.3 is amended to read as follows:

3. Submission of the above documentation to the HABS/HAER Regional Coordinators, not later than December 31, 1992.

Stipulation I.B. is amended by changing its second sentence to read as follows:

The HPPs will be submitted to the Council and the NCSHPO no later than December 31, 1992.

A new stipulation IV is added, to read as follows:

A. The signatories to this Agreement will undertake to ensure that relevant research activities carried out under Memoranda of Agreement, Programmatic Agreements, and other Instruments executed pursuant to 36 CFR Part 800 are coordinated with Implementation of this Agreement, in order to allow their results to be integrated with the development of documentation under stipulation I.

B. The signatories to this Agreement will cooperate with the National Building Museum in its development, if feasible, of a major exhibition concerning architecture and engineering in World War II, and will make information produced by research activities pursuant to this and other Agreements available to the National Building Museum for use in preparing such an exhibition. DOD will provide materials from this study to the National Building Museum for development of the exhibit.

Advisory Council on Historic Preservation

Robert W. Bush 4/27/90  
Executive Director Date

National Conference of State Historic Preservation Officers

James Q. Smith 4/14/90  
President Date

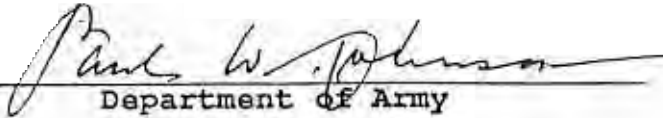
Historic American Buildings Survey/  
Historic American Engineering Record

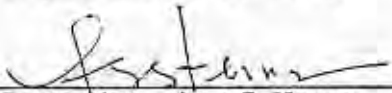
Robert A. Lytle 1.08.91  
Chief HABS/HAER Date

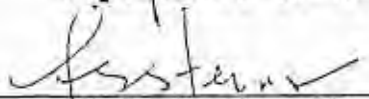
Department of Defense


Robert L. Smith 5/1/91  
Deputy Assistant Secretary of Defense Date  
(Environment)



  
Department of Army

  
Department of Navy F. S. STERNS  
Deputy, Office of the Assistant  
Secretary of the Navy (I&E)

  
U.S. Marine Corps F. S. STERNS  
Deputy, Office of the Assistant  
Secretary of the Navy (I&E)

  
Department of Air Force