



NAVY OPERATIONAL SUPPORT CENTER RELOCATION



Supplemental Environmental Assessment

December 2016

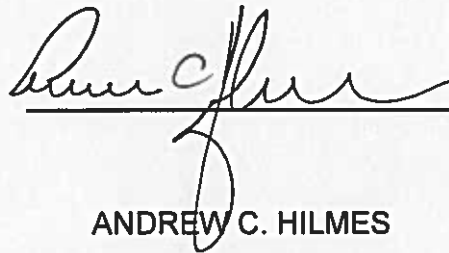
Directorate of Public Works
Environmental Management Division
Fort Benning, Georgia

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**SUPPLEMENTAL
ENVIRONMENTAL ASSESSMENT
NAVY OPERATIONAL SUPPORT CENTER RELOCATION
FORT BENNING, GEORGIA**

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

8 DEC 2016

A handwritten signature in black ink, appearing to read "Andrew C. Hilmes", is written over a horizontal line. The signature is fluid and cursive.

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

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SUMMARY

Introduction

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

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.

Previously proposed site locations for the NOSC were initially proposed and analyzed in the NOSC Relocation EA of August 2015. On September 29, 2015, Fort Benning's Garrison Commander signed a FNSI selecting the Soldiers' Plaza site for relocation, operation, and maintenance of the NOSC. Since that time, demolition of the World War II era buildings under the Army's Infrastructure Footprint Reduction Program (Section 3.1.3) has been completed and coordination of NOSC's relocation has continued. Fort Benning, however, concluded a Department of the Army mandated Area Development Planning (ADP) charrette in October of 2016 to initiate site planning and long-term direction for family housing within the Main Post Cantonment Area. Through the ADP charrette, it was determined that a parcel on the margin of the housing area, previously zoned for community, would be best utilized for general operations and support and designated for such use and development. As well, this parcel met the screening criteria (Chapter 2.0) for the NOSC's relocation. Therefore, the preparation of this supplemental EA incorporates the 2015 NOSC Relocation EA and offers the addition of this parcel as the new Preferred Alternative.

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 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 proposes to provide a minimum of 21,000 square feet of building space and 36,000 square feet of paved parking in accordance with the NOSC's requirements under the 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 possible means of meeting the purpose and need for the Proposed Action. Fort Benning developed the screening criteria in an effort to narrow down the field of potential Alternatives for further analysis. Potential Alternatives that failed to meet the following criteria were eliminated from further analysis. The proposed Action Alternatives to construct a new NOSC are required to:

- Be within Fort Benning's boundary and in close proximity to essential services and facilities to support their mission and avoid excessive personnel commuting distances;
- Be available for development (little to no ground preparation or demolition required);
- Have the capability for compliance with AT/FP requirements of UFC 4-010-01.
- Accommodate at a minimum a 21,000 square foot building and 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

Alternative 1 would result in the relocation of the NOSC to Fort Benning's Main Post at Soldiers' Plaza (Figure 2-1), and associated construction maintenance and operation. Soldiers' Plaza is located south off Dixie Road and is a 15 acre parcel available for immediate development and currently designated for administrative and support facilities. Over more recent years, this location has primarily functioned as "in processing" 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.

Demolished earlier this year, the parcel recently contained approximately 35 World War II era wooden buildings that were originally built as temporary facilities. These structures were historic properties per the NHPA, however, the adverse impacts of demolition were 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). Future facilities planned to coexist with the NOSC include the 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 provides excellent accessibility for commuters during peak hours of traffic flow. Other improvements include approximately 50 paved parking spaces on the western and southern margin of the property. Alternative 1 would meet the purpose and need for the Proposed Action and is considered reasonable according to the screening criteria.

Alternative 2: Bradshaw Road Site

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

Alternative 3: Custer Road Site (Preferred Alternative)

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

Similar to Alternative 1, the proposed location provides excellent accessibility for commuters and is approximately 0.5 mile from the Interstate-185/Lindsey Creek Parkway access control point. The Preferred Alternative would 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 hinder 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 this 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. 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

VEC	No Action Alternative	Alternative 1: Soldiers Plaza Alternative 2: Bradshaw Road Site Alternative 3: Custer Road Site (Preferred Alternative)
Air Quality	Negligible effects from the utilization of older and less efficient buildings and HVAC systems.	Minor, short-term adverse impacts to air quality during construction, operation will have long-term beneficial effects.
Biological Resources	No Impacts.	No Impacts.

Cultural Resources	<i>No Impacts.</i>	<i>No Impacts.</i>
Facilities (Utilities)	<i>No Impacts.</i>	<i>Negligible effects to as a result of new facility construction and operation.</i>
Hazardous and Toxic Materials and Waste	<i>No Impacts.</i>	<i>Negligible effects as a result of hazardous material storage and handling during construction and operation.</i>
Land Use	<i>No Impacts.</i>	<i>No Impacts.</i>
Safety and Security	<i>Minor, long-term, adverse impacts.</i>	Negligible effects as a result of increased traffic counts, operation will have long-term beneficial effects.
Water Resources	<i>No Impacts.</i>	<i>No Impacts.</i>
Soils	<i>No Impacts.</i>	<i>Minor, short-term adverse impacts to soils from construction.</i>
Traffic and Transportation	<i>No Impacts.</i>	<i>Negligible effects from increased traffic counts.</i>

The analysis contained in this EA indicates that for the most part, implementation of the Proposed Action for the Action Alternatives would have only short-term, minor adverse effects to Air Quality, Water Resources, and Soils 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 Action Alternatives.

Conclusion

The No Action Alternative would not meet the purpose and need for relocating, constructing, and operating the NOSC to Fort Benning. Although the Action Alternatives met the purpose and need for the Proposed Action, the location proposed for Alternative 3 was considered to be the best option due to its location and accessibility (0.5 mile) from an access control point (Interstate-185/Lindsey Creek Parkway). 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 Alternative 3. Therefore, preparation of and EIS is not warranted for this action.

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1 PURPOSE AND NEED

1.1 Introduction

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

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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.

There are four cantonment areas on Fort Benning: Main Post, Kelley Hill, Sand Hill, and Harmony Church. Within these cantonment areas, Fort Benning has its own offices, schools, shopping malls, medical facilities, housing, and churches (Figure 1-1). Fort Benning also has multiple training facilities, firing ranges, and maneuver training areas on the Installation. The cantonment areas on-Post provide a centralized location for community facilities and support services for Soldiers and their Families.

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 a minimum of 21,000 square feet of building space and 36,000 square feet of paved parking in accordance with the NOSC's requirements under the 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).

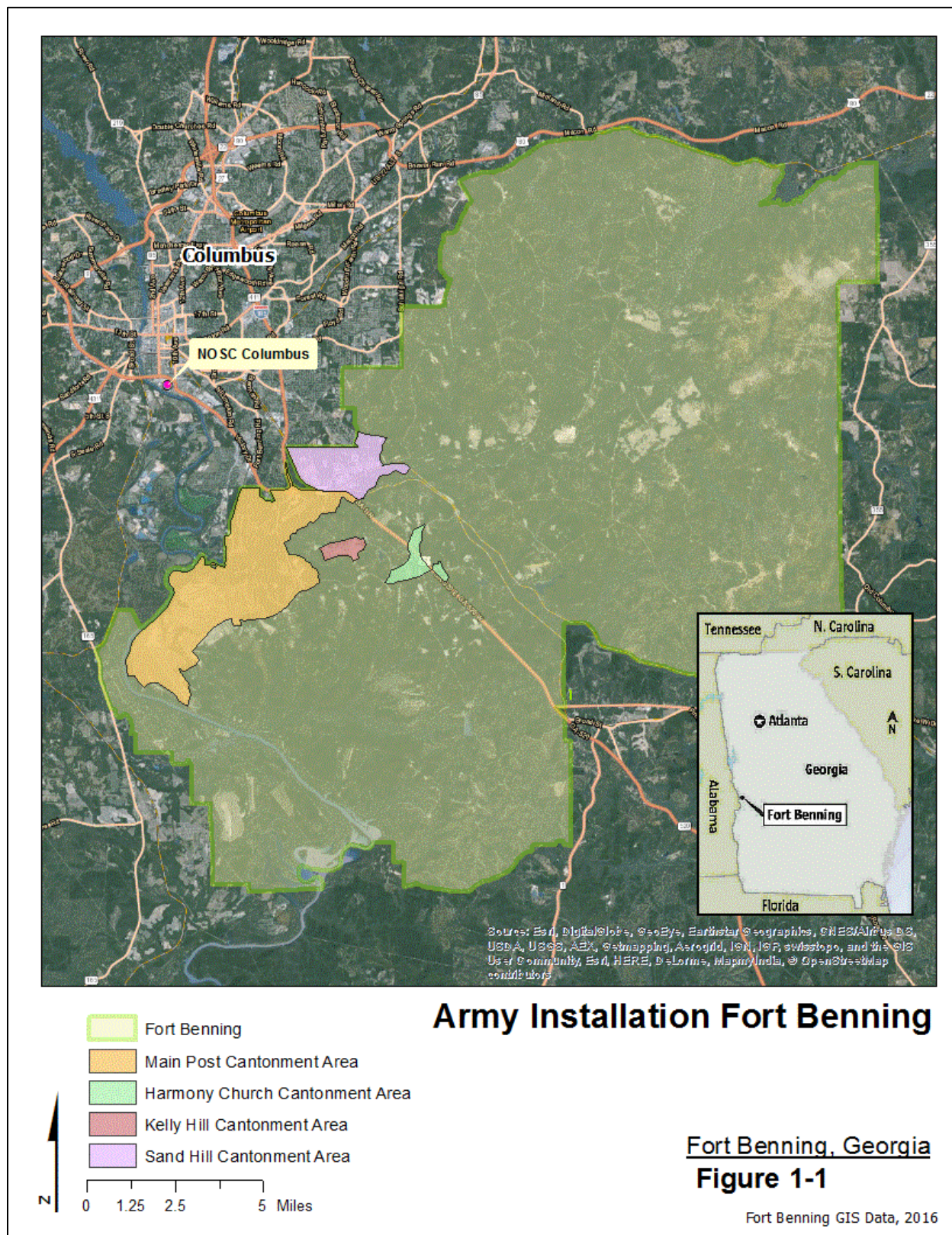
All replacement facilities must comply with AT/FP, UFC requirements and other DoD Directives. A support service and utilities agreement will be required between the NOSC and the U.S. Army once facilities are occupied.

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 three proposed site 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 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 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 in an effort to narrow down the field of potential Alternatives for further analysis. Potential Alternatives that failed to meet the following criteria were eliminated from further analysis. The proposed Action Alternatives to construct a new NOSC are required to:

- Be within Fort Benning's 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 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

Alternative 1 would result in the relocation of the NOSC to Fort Benning's Main Post at Soldiers' Plaza (Figure 2-1), and associated construction maintenance and operation. Soldiers' Plaza is located south off Dixie Road and is a 15 acre parcel available for immediate development and currently designated for administrative and support facilities. Over more recent years, this location has primarily functioned as "in processing" 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.

Demolished earlier this year, the parcel recently contained approximately 35 World War II era wooden buildings that were originally built as temporary facilities. These structures were historic properties per the NHPA, however, the adverse impacts of demolition were 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). Future facilities planned to coexist with the NOSC include the 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 (ROI).

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

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 a sparsely forested six acre parcel available for immediate development. Necessary utilities are available, but no other improvements exist. Alternative 2 would meet the purpose and need for the Proposed Action and is considered reasonable according to the screening criteria.

2.5 Alternative 3: Custer Road Site (Preferred Alternative)

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

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

2.6 Alternatives Considered but Eliminated from Further Study

Alternative means of meeting the purpose and need of the Proposed Action were considered but eliminated from further analysis based on their inability to meet one or more of the screening criteria (Section 2.1). The Alternatives eliminated from further study are the same as presented in the 2015 NOSC Relocation EA. To prevent reiterating what was previously discussed in length, the Alternatives eliminated are as listed below and include:

- Rebuilding/renovation of current NOSC Columbus;
- Acquiring new real estate within Columbus, GA;
- Acquiring existing facilities within Fort Benning, GA.



Alternative 1: Soldiers' Plaza

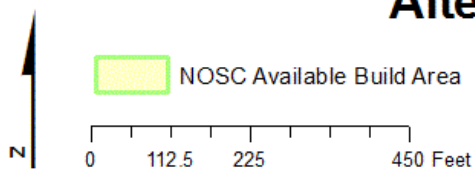
Fort Benning, GA
Figure 2-1

Fort Benning GIS Data, 2016



Alternative 2: Bradshaw Road Site

Fort Benning, GA
Figure 2-2



Fort Benning GIS Data, 2016



3 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:

- *Bridge 27 Replacement (FY15-18)*: Approximately four acres of disturbance connecting the Sand Hill Cantonment Area to First Division Road, including demolition of the existing bridge.
- *Soldier Family Support Center (FY15-17)*: Demolition of 35 World War II temporary wooden buildings known as Soldiers' Plaza at Dixie Road and Lumpkin Road. The 15 acre parcel currently exists as open green space and future development is undetermined at this time.
- *Infrastructure Footprint Reduction Program (FY14-16)*: 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 FY14-16 include Soldier's Plaza, Airborne Barracks, and Martin Army Community Hospital on Main Post, and vehicle maintenance facilities in Kelley Hill (Fort Benning, 2008).

- *DoDEA "21st Century Schools" Initiatives (FY12-FY19):* Including FMS, White Elementary School and McBride Elementary School were identified for replacement due to inadequate space, extensive maintenance and/or repairs requirements, and energy inefficiency. New construction locations will be in close proximity to military housing areas to accommodate school aged children. Re-use or demolition of outdated facilities was considered based on cost effectiveness and Installation needs.
- *Benning Technology Park and Custer Road Interchange Improvements (FY15-18):* The Georgia 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.
- *DoDEA Restructuring for Student Achievement (FY16-18):* Programs focused on the restructuring of DoDEA to better serve students. The new developing DoDEA configuration would involve district consolidation, centralization of administrative resources, and construction of a new District Superintendent Office on Fort Benning's Main Post.
- *Custer Road Repair (FY17-19):* Fort Benning will perform road repairs and upgrades that consist of intersection redesign, widening and adding of lanes, and road realignment.
- *14th Amendment Highway/Interstate 14 (FY?):* A proposed Interstate Highway from Texas to Georgia that was signed into law as a part of the 2005 Safe, Accountable, Flexible, Efficient Transportation Equity Act. The Interstate would primarily use existing highways and provide a strategic corridor to numerous

military installations and major Gulf Coast and Atlantic ports. At this time, no Federal funding for the route has been identified. Beyond the initial studies and 2011 report to Congress to meet the legislation's Congressional mandate, little Federal action has occurred to fund or advance this project.

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.

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 O₃, based on the 2008 primary and secondary standards. Motor vehicles (mobile sources) are a primary contributor to ground-level O₃ 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

On August 1, 2016, the CEQ issued guidance on incorporating greenhouse gas (GHG) considerations into NEPA review of Federal actions. This guidance recommends where agencies are unable to quantify a proposed action's projected GHG emissions that they include a qualitative analysis (CEQ, 2016). Under the Proposed Action, GHG emissions—which include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride—would result from the on-site manufacture of construction materials (i.e., pavement, concrete, etc.), the use of transportation, demolition, and construction equipment, and maintenance of the infrastructure over its expected life cycle. Given the global nature of climate change and the current state of the science, it is not possible at this time to link the emissions resulting from the Proposed Action to any specific climatological change or resulting environmental impact. It is estimated, however, that the GHG emissions as a result of the Proposed Action would represent a negligible impact and a miniscule percentage of the total Fort Benning and regional GHG emissions.

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. 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

Necessary site preparation and construction activities would include grading, trenching, paving, and facility construction. 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, would reduce fugitive dust and PM emissions. Construction may 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. Vehicle traffic emissions and greenhouse gas emissions resulting from the implementation of Alternative 2 would be considered de minimis.

Alternative 3: Custer Road Site (Preferred Alternative)

Potential impacts to air quality resulting from the implementation of Alternative 3 would be similar in both nature and to the level described under Alternatives 1 and 2. Adherence to existing requirements and GA Air Quality Rules to minimize effects to air quality would reduce fugitive dust and PM emissions. Construction may require permits, stipulating air BMPs and other mitigation measures essential for the project to minimize potential impacts. Overall, Alternative 3 would generate negligible effects 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. Any vehicle traffic emissions and greenhouse gas emissions resulting from the implementation of Alternative 3 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 air quality 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. The ROI for biological resources is Fort Benning's Main Post Cantonment Area.

Vegetation in the undeveloped areas of Fort Benning consists of hardwood and pine trees, and is heavily wooded. The developed areas consists more of hardwood tree species, decorative shrubs around buildings, and open grassed areas for green space and training facilities.

The developed or cantonment areas generally do not provide exclusive or quality habitat for wildlife. Development and human activity have forced native animal populations to less disturbed and less active areas of the Installation, such as training areas. Wildlife species common within the Cantonment Areas include white-tailed deer, gray squirrel, eastern cottontail rabbit, raccoon, striped skunk, groundhog, and mourning dove. Additionally, all of Fort Benning's Unique Ecological Areas, exist outside of the cantonment areas. Since the Proposed Action will not have any adverse effects to aforementioned wildlife, and/or migratory birds, it is not discussed in further detail.

The removal of pine or other trees as a result of any of the Action Alternatives will not impact any habitat known to contain State and Federally Listed Threatened or Endangered Species. This includes designated Red-cockaded woodpecker (RCW) habitat (current or potential), which doesn't exist within the Main Post Cantonment Area. Since, there would be no impacts expected to State and Federally Listed Species, this is not discussed further.

3.3.2 Environmental Consequences

Potential impacts on biological resources would be considered significant if there was a substantial loss or degradation of habitat or ecosystem functions (natural features and processes) essential to the persistence of native plant and animal populations, including migratory birds, as a result of the Proposed Action.

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

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

Alternative 3: Custer Road Site (Preferred Alternative)

Alternative 3 is located within the Main Post Cantonment Area in a forested undisturbed parcel. Vegetation removal and land disturbances due to construction 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. 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.

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 the Proposed Action in conjunction with other projects within the ROI.

Proposed Mitigation

Since there are no impacts associated with biological resources for any of the alternatives, no additional mitigation measures for biological resources would be required other than compliance with existing regulations, permits, and plans. However, the project designers should consider:

- Limiting disturbed areas to the maximum extent possible through design;

- Using native trees and other vegetation in open spaces and around storm water management structures;
- Employing tree protection devices at the sites of construction and demolition.

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

Cultural resources found within the boundaries of Fort Benning include: archaeological sites, buildings, historic districts, and Native American resources. There are no known cultural resources within the boundaries of the proposed Alternatives. There are also no known cultural resources nearby the alternative sites that would be impacted by the Proposed Action. 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.

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

Under the Preferred Alternative, the Proposed Action would not be expected to impact any cultural resources. 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.

Alternative 3: Custer Road Site (Preferred Alternative)

The potential impacts to cultural resources resulting from the implementation of Alternative 3 would be similar to those described under Alternatives 1 and 2. As well, there are no known cultural resources at this location. 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, no impacts as a result of the Proposed Action are expected to occur involving implementation of Alternative 3.

Cumulative Impacts

The Proposed Action would not impact any known cultural resources; therefore there would be no cumulative impacts to 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 applicable 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. The ROI for utilities includes Fort Benning's Main Post Cantonment Area.

Fort Benning's utilities have all been privatized. Columbus Water Works, ATMOS Gas, and Flint Energies own and manage the water and sewer, gas, and electric utilities, respectively, on Fort Benning. The sanitary sewage collection system connects to the Columbus Water Works treatment plant. Flint Energies supplies electricity to Fort Benning through overhead and/or buried transmission lines, and ATMOS Gas provides gas through underground pipelines.

Under the privatization of utilities agreements, each respective entity 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.

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

Under the Proposed Action, utility systems (power, electric, sewer, and potable/waste water) would need to be connected to the NOSC. Detailed electrical engineering designs have not been performed, nor have specific demands been determined; however, the increase in the building footprint could slightly increase the demand for electricity, gas, and water and sewer services. The new facilities would be required to adhere to the Army mandate to follow the guidelines for energy efficiency per the U.S. Green Building Council's Leadership in Energy and Environmental Design or LEED standards. Therefore, the Proposed Action Alternatives would result in negligible effects to utilities.

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.

Alternative 3: Custer Road Site (Preferred Alternative)

The potential impacts to utilities resulting from the implementation of Alternative 3 would be equivalent to those described under Alternatives 1 and 2. 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

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

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 (Figures 2-1, 2-2, 2-3) or analyzed under the Action Alternatives.

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

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 adverse impacts. It is anticipated that if Alternative 1 is implemented, there would be both negligible effects during construction and on-going operation activities 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 effects during construction and operation activities 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 preclude any adverse impacts.

Alternative 3: Custer Road Site (Preferred Alternative)

The potential impacts to HTMW resulting from the implementation of Alternative 3 would correspond to those described under Alternatives 1 and 2. Both negligible effects during construction activities and on-going operation as a result of hazardous material storage and handling would occur. Adherence to existing material and waste management plan and procedures for handling, storage, and disposal of these substances would preclude any adverse impacts. Therefore, only negligible effects would be expected to occur.

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. 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.

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.

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

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 would 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.

Alternative 3: Custer Road Site (Preferred Alternative)

Under Alternative 3, site preparation, construction, and operation of the NOSC facilities on Fort Benning would occur at the Custer Road Site (Figure 2-3). The Custer Road Site's current land use is undeveloped and forested. Fort Benning's Real Property Master Planning previously designated the site location for community development in support of the nearby housing. In October of 2016, Fort Benning held an ADP charrette in an effort to initiate site planning and long-term direction for family housing within the Main Post Cantonment Area. Through the ADP, this parcel was determined to be available and be utilized for general operations and support use. As a result, the NOSC facilities would be constructed and operate in an area that 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 as a result of implementation of the Preferred Alternative.

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 ongoing 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

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 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 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 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.

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

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

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 Alternative 1.

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.

Alternative 3: Custer Road Site (Preferred Alternative)

Impacts to safety would be the same as those described under Alternative 1 and 2. Increased traffic counts from NOSC personnel commuting would result in negligible effects. 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. Any potential impacts to safety and security would be mitigated by adherence to existing safety practices. As a result, long-term, beneficial effects to safety and security conditions or procedures are expected under the Preferred Alternative.

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 Water Resources

3.9.1 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. 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 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.

3.9.2 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

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.

Alternative 3: Custer Road Site (Preferred Alternative)

Under the Preferred Alternative, the potential exists for short-term, minor adverse effects to surface water resources during the construction phase. Nevertheless, long-term effects to water resources would be precluded by re-vegetation and stabilization of the construction site. 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 under the Preferred Alternative.

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 must comply 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.

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.

3.10 Soils

3.10.1 Affected Environment

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

3.10.2 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

Under Alternative 1, 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 prior to any construction activities. As a result, potential adverse effects to soils would be considered short-term and minor.

Alternative 3: Custer Road Site (Preferred Alternative)

The potential impacts to soils resulting from the implementation of the Preferred Alternative would be similar to those described under Alternative 1 and 2. No tributary streams exist within the proposed construction or buildable area and the Upatoi Creek is more than 1,100 feet south of the site. To preclude any potential impacts to soils prior to construction activities, soil erosion and sedimentation controls will be implemented in accordance with the Clean Water Act, the Georgia Erosion and Sedimentation Control Act, and appropriate NPDES permits. As a result, potential adverse effects to soils would be 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, minor 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 activities. No construction equipment or construction would occur within this buffer, in accordance with the Georgia Erosion and Sediment Control Act, with the exception of perpendicular utility crossings (if required). If wetlands are found within the chosen Alternative, adherence to the mitigation provision in the CWA Section 404 permit would reduce impacts. Therefore, no additional mitigation measures are warranted.

3.11 Traffic and Transportation

3.11.1 Affected Environment

Traffic and transportation includes the roadway system and traffic conditions for the roadway network serving Fort Benning. The ROI for traffic and transportation encompasses the public roadways within 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.

3.11.2 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

Under Alternative 1, 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. 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.

Alternative 3: Custer Road Site (Preferred Alternative)

The potential impacts to traffic and transportation resulting from the implementation of the Preferred Alternative would be similar to the level described under Alternative 1 and 2. Additional traffic from Reservists would represent a negligible increase in traffic counts and would be primarily along routes that are sufficient to facilitate additional traffic. Additionally, the Preferred Alternative's location is the most proximate Alternative, 0.5 mile, to an access control point (Interstate-185/Lindsey Creek Parkway). Therefore, 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.

4 CONCLUSION

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. This Alternative would not meet the Purpose and Need stated in Section 1.4 for relocating, constructing, and operating the NOSC to Fort Benning.

This EA indicates that implementation of any of the Action Alternatives 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.

After evaluation of impacts it is concluded that the Supplemental EA's Preferred Alternative (Alternative 3: Custer Road Site), would meet the purpose and need of relocating, constructing, and operating the NOSC on Fort Benning. Although all of the Action Alternatives met the screening criteria provided in Section 2.1, the location proposed for Alternative 3 was considered to be the best option due to its location and accessibility (0.5 mile) from an access control point (Interstate-185/Lindsey Creek Parkway). 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 any of the Action Alternatives. Therefore, preparation of and EIS is not warranted for this action.

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6 ACRONYMS AND ABBREVIATIONS

ACUB	Army Compatible Use Buffer
ADEM	Alabama Department of Environmental Management
ADP	Area Development Plan
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

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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 th St NW Washington, DC 20036	Georgia Wildlife Federation 11600 Hazelbrand Rd, NE Covington, GA 30014
Columbus Chamber of Commerce 1200 6th Ave Columbus, GA 31902	Chamber of Commerce Phenix City-Russell County 1107 Broad St Phenix City, AL 36867	

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