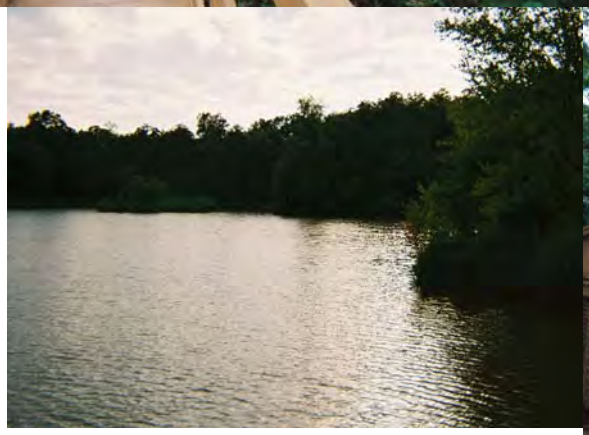
Environmental Assessment for Uchee Creek Campground Expansion, Fort Benning, Russell County, Alabama

Environmental Management Division
Fort Benning, Georgia



February 2007

ACRONYMS AND ABBREVIATIONS

ADEM	Alabama Department of Environmental Management
ASP	Ammunition Supply Point
BMP	Best Management Practice
BRAC	Base Realignment and Closure
CBMPP	Construction Best Management Practices Plan
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act
DCNR	Department of Conservation and Natural Resources
DMPTR	Digital Multi-Purpose Training Range
DMPRC	Digital Multi-Purpose Range Complex
EA	Environmental Assessment
EPA	Environmental Protection Agency
ESMP	Endangered Species Management Plan
FNSI	Finding of No Significant Impact
FOD	Field Operations Division
FY	Fiscal Year
INRMP	Integrated Natural Resources Management Plan
IPBC	Infantry Platoon Battle Course
ISBC	Infantry Squad Battle Course
MBTA	Migratory Bird Treaty Act
NEPA	National Environmental Policy Act
NOR	Notice of Registration
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
POL	Petroleum, Oil, and Lubricants
RCI	Residential Communities Initiative
RCW	Red-cockaded Woodpecker
ROI	Region of Influence
RV	Recreational Vehicle
SPCC	Spill Prevention Control and Countermeasure
SWP3	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
WPCA	Water Pollution Control Act

DRAFT

FINDING OF NO SIGNIFICANT IMPACT

1.0 INTRODUCTION

The United States Army has prepared an Environmental Assessment (EA) to identify and evaluate potential environmental effects from construction and operation of additional recreational facilities at Uchee Creek Campground, Fort Benning, Russell County, Alabama. In May 1995, the Army completed an EA and Finding of No Significant Impact (FNSI) for the Expansion and Upgrade of the Uchee Creek Campground and Marina at Fort Benning, Russell County, Alabama (USACE 1995). In it, the 1995 EA proposed construction of additional cabins, primitive camping and picnic areas, an equine facility and trail system, a covered picnic pavilion, covered boat slips at the marina, a riverboat dock, an interpretive archaeological display, and a sand beach along the creek proper. Since the 1995 EA was completed 11 years ago, and the population and mission of this dynamic Post has changed significantly, Fort Benning is preparing another EA to address expanded needs at the existing campground. This EA was prepared in accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality Regulations at 40 Code of Federal Regulations (CFR) Parts 1500-1508 and the Army NEPA Regulation at 32 CFR Part 651 (*Environmental Analysis of Army Actions*).

2.0 DESCRIPTION OF THE PROPOSED ACTION

Currently, there is a high demand for overnight accommodations at Fort Benning, including camping sites and associated facilities. This demand arises from the growing needs of the Installation, retired and visiting military and their families. The main focus of the Uchee Creek Campground project is to develop more recreational vehicle (RV) sites to accommodate the larger, ever more popular RVs, and chalets to help satisfy this demand. The proposed action would provide the facilities and campground areas to support recreational needs of Soldiers, civilians, and their families at Fort Benning and complement existing overnight options at Fort Benning. To ease the pressure for recreational facilities, the proposed action would construct 10 new chalets, 29 pull-through RV sites, a new playground, and renovate existing playgrounds, as funding allows.

3.0 DESCRIPTION OF THE ALTERNATIVES

Fort Benning developed two alternatives for the proposed action as part of the planning process:

Alternative A (Preferred Alternative): Under Alternative A, Fort Benning would:

- Construct ten chalets, two of which would be completed with additional luxury amenities and are referred to as “honeymoon” chalets;
- Construct 29 RV pull-through sites, completed in two phases;

- Construct one new playground and refurbish others; and
- Operate and maintain RV sites and chalets in a manner consistent with current operating and maintenance procedures at existing campground.

Alternative B

Under this alternative, the Uchee Creek Campground expansion would be identical to Alternative A with the exception of an added amenity: a catfish pond would be created from the conversion of an existing 1-acre pond that was used for dredge spoils disposal from Uchee Creek, when funding becomes available.

Alternative C (No Action)

In accordance with NEPA, the no-action alternative was also considered. For the no-action alternative, no additional recreational facilities would be constructed at Uchee Creek Recreational Area and no renovations would occur. The existing, insufficient recreational facilities at Uchee Creek would continue to fail to meet the needs of Army personnel, particularly at Fort Benning. This alternative has no potential impacts.

4.0 ANTICIPATED ENVIRONMENTAL EFFECTS

The analysis contained in this EA indicates that Alternative A would have temporary minor adverse effects on soils, water quality, and biological resources at Fort Benning because of construction. The EA demonstrated that with adherence management plans, applicable Federal and state laws and regulation, no significant adverse environmental impacts would result from the proposed action as implemented by either Alternative A or B. This determination is based on the following findings:

- Erosion control best management practices (e.g., silt fencing and soil covering) would minimize the potential adverse effects to soils and water quality that may result from ground disturbance. However, under Alternative B, soil samples from the pond would be required to be disposed of at an approved disposal site (depending on soil sample makeup) prior to any construction.
- No impaired streams are found at or near the proposed site, soil erosion would be kept to a minimum, and potential contamination during construction would be minimized by following existing Fort Benning plans, Federal and State permitting regulations, and existing management procedures. Nearby impaired Chattahoochee River would not be impacted due to distance, soil erosion control measures, and Uchee Creek (nearest outlet to the river) is impounded.
- The proposed action would not affect any Federally- or state-listed threatened or endangered species potentially occurring in the project area. One inactive Red-cockaded woodpecker

cluster would be effected; however, this would not be adverse or significant since it is inactive.

- The proposed action under either of the alternatives would not adversely affect wetlands, vegetation, cultural resources, or air quality.
- No cumulative impacts would result from implementing the proposed action through Alternatives A or B.

In accordance with Army NEPA Regulations , the Army must indicate if any mitigation measures would be needed to implement the proposed action or any alternative selected as the preferred alternative under this environmental assessment. For purposes of this EA, it was determined that no mitigation measures, except for wetlands fencing and avoidance, would be needed to arrive at a finding of no significant impact for the preferred alternative. If Alternative B were chosen, appropriate soil sampling would be required to determine the proper means of disposal.

5.0 CONCLUSION

Based on review of the information contained in this EA, it has been determined that implementation of Alternative A is the best course of action. While Alternative B provides additional recreational facilities and amenities, this alternative would require extensive funding for the required soil sampling and construction, which is not available at this time. I have determined that the construction of chalets and RV sites at Uchee Creek Campground at Fort Benning is not a major Federal action within the meaning of Section 102(2)(c) of NEPA and the proposed expansion would not result in significant potential environmental impacts. Accordingly, the preparation of an Environmental Impact Statement is not required.

6.0 PUBLIC AVAILABILITY

a. The EA and draft Finding of No Significant Impact (FNSI) for the proposed action were available for a public review period of 30 days starting from the first day of publication in *The Columbus Ledger-Enquirer* (February 12 to March 14, 2007), in accordance with 40 CFR Part 1501.4 (e)(1) and Army Regulation 200-2 (as promulgated in 32 CFR 651.36). These documents are available at the W.C. Bradley Memorial Library, South Lumpkin Library, Fort Benning Main Post Library, and at the Installation website: http://www.benning.army.mil/EMd/_program_mgt/legal/index.htm. A notice of availability (NOA) of the EA and Draft FNSI was mailed to all agencies/individuals/ organizations on the distribution (mailing) list for the proposed action. The NOA will also be posted at the Uchee Creek Recreation Area.

b. Summary of Public Comments: Reserved until completion of the public comment and review period.

7.0 REQUESTS

Requests for additional information or submittal of written comments may be made within 30 days after first publication date. Direct requests and comments to Mr. John E. Brown, NEPA Program Manager, Fort Benning Directorate of Public Works, Environmental Management Division, Attention: IMSE-BEN-PWE-P, Meloy Hall, Building #6, Fort Benning, Georgia 31905-5122.

FINDING OF NO SIGNIFICANT IMPACT
REVIEWED AND APPROVED BY:

_____
Date

_____
Keith Lovejoy
Colonel, IN
Garrison Commander

Environmental Assessment

of the

Uchee Creek Campground Expansion
Russell County, Alabama

Fort Benning, Georgia

APPROVED BY: _____ DATE:_____

CRAIG TAYLOR
Director of Public Works
Fort Benning

Environmental Assessment
Uchee Creek Campground Expansion
Fort Benning, Russell County, Alabama

Prepared for
Environmental Management Division
Fort Benning, Georgia

February 2007

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

This Environmental Assessment (EA) provides an analysis of the effects on the natural and human environment that would result from the construction and operation of additional recreational facilities at Uchee Creek Campground, Fort Benning, Russell County, Alabama.

The Army intends to construct 10 chalets, 29 recreational vehicle (RV) pull-through sites, one playground, and refurbish existing playgrounds as funding is identified at the existing facilities at Uchee Creek Campground to support the increased demand for such services at Fort Benning. These facilities would be constructed within the confines of the current Uchee Creek Recreational Area.

Three alternatives and their respective primary environmental effects are considered in this document, as described below. Table ES-1 presents a summary comparison of potential impacts among the alternatives. As this table demonstrates, in general, minor temporary impacts would result.

Table ES-1 Comparative Summary of Impacts

Resource	***Level of Impacts by Alternative***		
	Alternative A	*Alternative B*	*No Action*
Natural Environment			
Soils	Temporary Minor Adverse	Temporary Minor Adverse	None
Water Quality	Temporary Minor Adverse	Temporary Minor Adverse and Beneficial	None
Biological Resources	Temporary Minor Adverse	Temporary Minor Adverse	None
Human Environment			
Land Use and Visual Resources	None	None	None
Solid Waste	None	None	None
Cultural Resources	None	None	None
Socioeconomics and Environmental Justice	None	None	None
Hazardous Materials and Waste	None	None	None
Air Quality	None	None	None
Transportation	None	None	None
Public Health and Safety	None	None	None
Noise	None	None	None
Protection of Children	None	None	None

Alternative A (Preferred Alternative)

Under the preferred alternative, the Army would:

- Construct 10 chalets, two of which would be completed with additional luxury amenities and are referred to as “honeymoon” chalets;
- Construct 29 RV pull-through sites, completed in two phases;

- Construct one new playground and renovate or refurbishment of others; and
- Operate and maintain RV sites and chalets in a manner consistent with current operating and maintenance procedures at existing campground.

Alternative B

Under this alternative, the Uchee Creek expansion would be identical to Alternative A with the exception of an added amenity: a catfish pond would be created from the conversion of an existing 1-acre pond that was used for dredge spoils disposal from Uchee Creek.

Alternative C (No Action)

For the no-action alternative, no additional recreational facilities would be constructed at Uchee Creek Recreational Area. The existing recreational facilities at Uchee Creek would continue to fail to meet the needs of Fort Benning personnel due to insufficient overnight accommodations. This alternative has no potential impacts.

ANTICIPATED ENVIRONMENTAL EFFECTS

The analysis contained in this EA indicates that Alternative A would have temporary minor adverse effects to soils at Fort Benning because of construction. The EA demonstrated that with adherence to Best Management Practices (BMPs), no significant adverse environmental impacts would result from the proposed action as implemented by either Alternative A or B. This determination is based on the following findings:

- Erosion control best management practices (e.g., silt fencing and soil covering) would minimize the potential adverse effects to soils and water quality that may result from ground disturbance. However, under Alternative B, soil samples from the pond would be required to be disposed of at an approved disposal site (depending on soil sample makeup) prior to any construction.
- No impaired streams are found at the proposed site, soil erosion would be kept to a minimum, and potential contamination during construction would be minimized by following existing Fort Benning plans, Federal and State permitting regulations, and existing management procedures. Nearby impaired Chattahoochee River would not be impacted due to distance, soil erosion control measures, and Uchee Creek (nearest outlet to the river) is impounded.
- The proposed action would not affect any Federally- or state-listed threatened or endangered species potentially occurring in the project area. One inactive Red-cockaded woodpecker cluster would be effected; however, this would not be adverse or significant since it is inactive.

- The proposed action under either of the alternatives would not adversely affect wetlands, vegetation, cultural resources, or air quality.
- No cumulative impacts would result from implementing the proposed action through Alternatives A or B.

In accordance with Army NEPA Regulations, the Army must indicate if any mitigation measures would be needed to implement the proposed action or any alternative selected as the preferred alternative under this environmental assessment. For purposes of this EA, it was determined that no mitigation measures, except for wetlands fencing and avoidance, would be needed to arrive at a finding of no significant impact for the preferred alternative. If Alternative B were chosen, appropriate soil sampling would be required to determine the proper means of disposal.

CONCLUSION

Based on review of the information contained in this EA, it is concluded that Alternative A is the best course of action. While Alternative B provides additional recreational facilities and amenities, this alternative would require extensive funding for the required soil sampling and construction, which is not available at this time.

TABLE OF CONTENTS

TABLE OF CONTENTS

List of Figures

List of Tables

CHAPTER 1

PURPOSE OF AND NEED FOR THE PROPOSED ACTION

1.0 PURPOSE OF AND NEED FOR THE PROPOSED ACTION

1.1 INTRODUCTION

Currently, the Uchee Creek Campground has a 3- to 9-month waiting list for chalet and cabin reservations. There is also a demand for more recreational vehicle (RV) sites to accommodate the larger RVs for both long-and short-term users. To alleviate this backlog, and in anticipation of more incoming personnel, Fort Benning proposes to expand the campground facilities at Uchee Creek once again An expansion and upgrade was completed 11 years ago in the same general area and analyzed in an EA completed in 1995 (USACE 1995 and available for review on the Fort Benning Environmental Management Divisions web site at https://www.infantry.army.mil/EMD/ program/legal/index.htm); however, the population and mission of this dynamic Post has changed significantly since that time so Fort Benning is preparing this EA to include further upgrades and expansion. In this EA, the analysis focuses on providing the facilities and campground areas to support the recreational needs of personnel and families at Fort Benning. In accordance with National Environmental Policy Act (NEPA) and Council on Environmental Quality (CEQ) regulations implementing NEPA, the Uchee Creek Campground Expansion EA also evaluated the no-action alternative (Alternative C).

1.2 PURPOSE OF AND NEED FOR THE PROPOSED ACTION

Currently, there is a high demand for overnight accommodations at the Fort Benning campground, with a waiting list for cabins and chalets of 3 to 9 months. The main focus of the Uchee Creek Campground proposal is to develop more RV sites and chalets to help satisfy this demand for more overnight accommodations. Therefore, the purpose of the proposed action is to provide the facilities and campground areas to support recreational needs of Soldiers, civilians, and their families at Fort Benning (Figure 1-1). The proposed action would construct 10 chalets, 29 RV sites, a new playground, and renovate existing playgrounds to add to the amount of recreational facilities available. The need for the proposed action is to ensure the morale and welfare of personnel at Fort Benning is addressed, but also to meet the increased population and their associated desire for recreational facilities at the nearby campground.

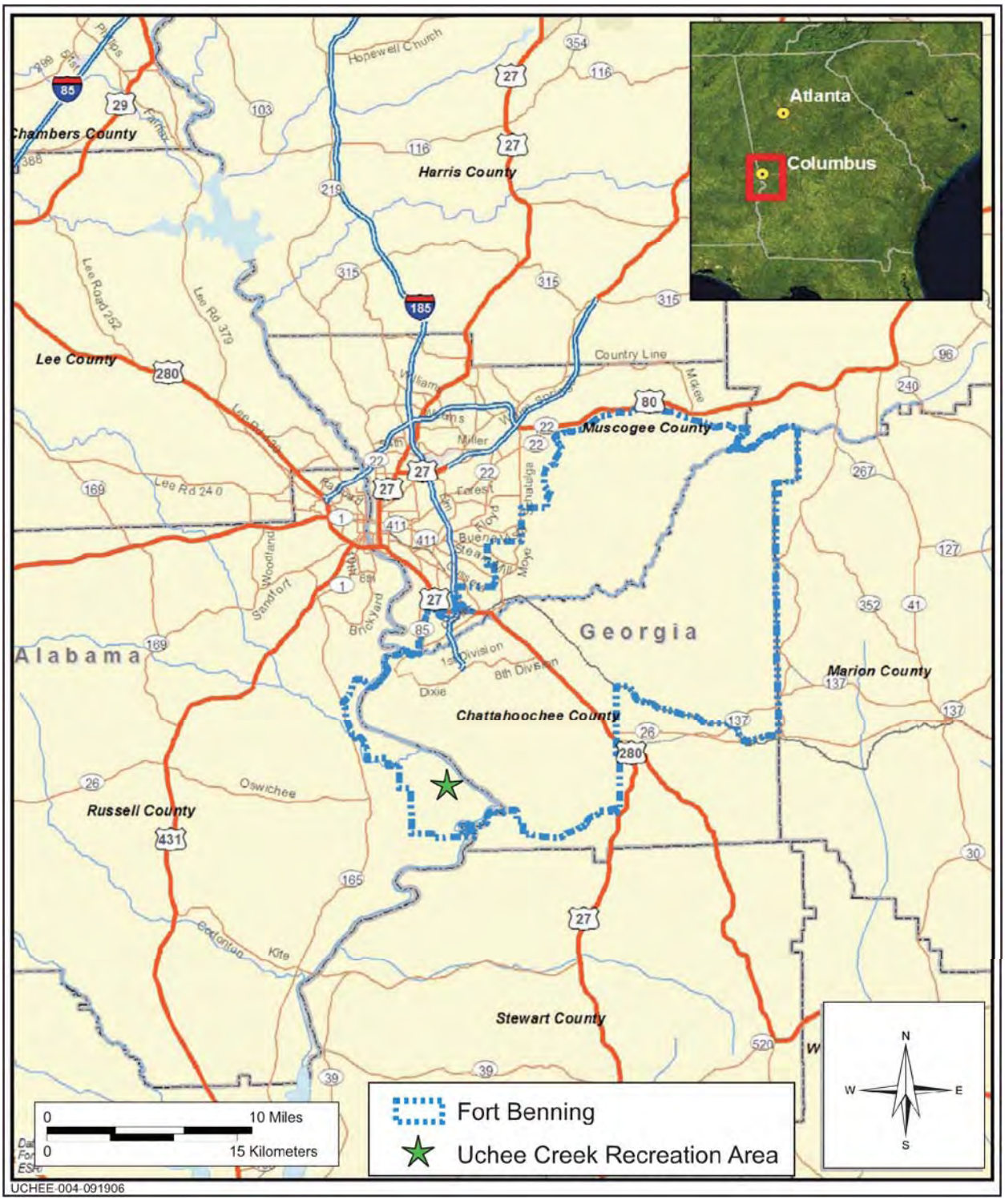


Figure 1-1 Project Vicinity

The overall goal of recreational facilities is intended to contribute to the Soldier's quality of life and maintain *esprit de corps*, thereby enhancing job proficiency and reinforcing the military mission effectiveness (Fort Benning 2006). It also forms an integral part of the non-pay compensation system, allowing an inexpensive and nearby leisure activity for Army families. Additionally, it promotes physical, mental, and social well-being, and provides a sense of community and community support. The challenge is to accommodate all users who desire to partake of recreational facilities at Fort Benning. To achieve this requires construction of new sites and chalets for quality recreational opportunities.

Proposed construction and maintenance activities as well as use will be addressed in this EA. All proposed construction sites would occur within the Uchee Creek Recreational Area boundaries and are proposed in areas set aside for recreational activities.

1.3 ENVIRONMENTAL COMPLIANCE AND DECISION TO BE MADE

Fort Benning is preparing this EA to identify, evaluate, and compare the potential environmental effects of constructing new chalets and RV sites at Fort Benning's existing Uchee Creek Campground and any related mitigation requirements. This EA is prepared in accordance with NEPA; the CEQ regulations that implement NEPA; and Army Regulation at 32 Code of Federal Regulations (CFR) Part 651 (Army Regulation 200-2, *Environmental Effects of Army Action*s). NEPA is implemented by CEQ regulations contained in Title 40, CFR Parts 1500 to 1508. In general, the CEQ regulations require that prior to implementing any major action, the Federal agency must evaluate the proposal's potential environmental effect as well as notify and involve the public in the agency's decision-making process (Appendix A is the Alabama State Historic Preservation Office Letter, Appendix B provides the distribution list of the EA, and Appendix C provides a copy of the public involvement plan associated with this proposal).

This EA identifies the potential environmental effects of the alternatives, and contains discussions of any mitigation and permit requirements, findings and conclusions in accordance with NEPA. Such information provides the basis for the agency to determine whether to prepare an Environmental Impact Statement or a FNSI.

The use of the term "significant" (and derivations thereof) in this EA is consistent with the definition and guidelines provided in the CEQ regulations (40 CFR 1508.27), which require consideration of both the context and intensity of impacts.

CHAPTER 2

DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

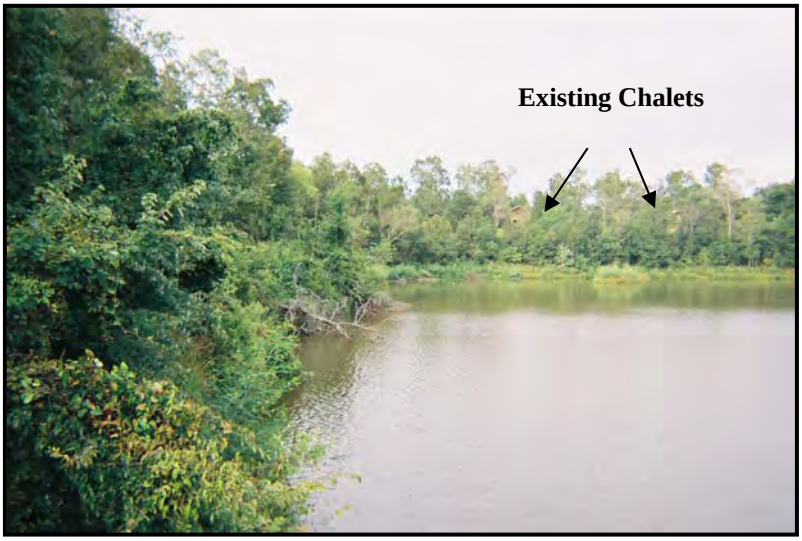
2.1 PROPOSED ACTION

The proposed action is to provide new construction of overnight accommodations at Fort Benning in support of recreational pursuits at Uchee Creek Campground (Figure 2-1) and complement other overnight camping options at Fort Benning. The proposed action would involve construction of new RV sites, new chalets along Uchee Lake, a new playground, and renovation of existing playgrounds (as funding becomes available).

Two action alternatives are analyzed to meet the proposed action: Alternative A would construct 29 RV sites, 10 chalets, build one new playground, and renovate existing playgrounds as funding becomes available; Alternative B would construct the same facilities and add one amenity, a catfish pond. Under both alternatives, the RV sites, chalets, and playgrounds would be operated and maintained using the same procedures now applied at existing RV sites, chalets, and playgrounds. Alternative C is the no-action alternative, wherein no new recreational facilities would be constructed at Uchee Creek Campground.

Figure 2-2 shows the overall concept (some details may change slightly, but within the same footprint) of the expansion with proposed components highlighted. This proposal would increase the recreational capacity at Fort Benning and help alleviate the demand for such facilities—a demand that has been steadily growing.

Chalets



There are 10 existing chalets along the north shore of Uchee Lake with panoramic views. The proposed action would construct 10 new chalets that are similar in size and construction and would roughly follow the topography and avoid any ecological constraints (e.g., lake shorelines) in the same manner as the existing chalets (Fort Benning 2006). At approximately 1,400 to 1,600 square feet, the chalets would each accommodate 8 to 10 people.

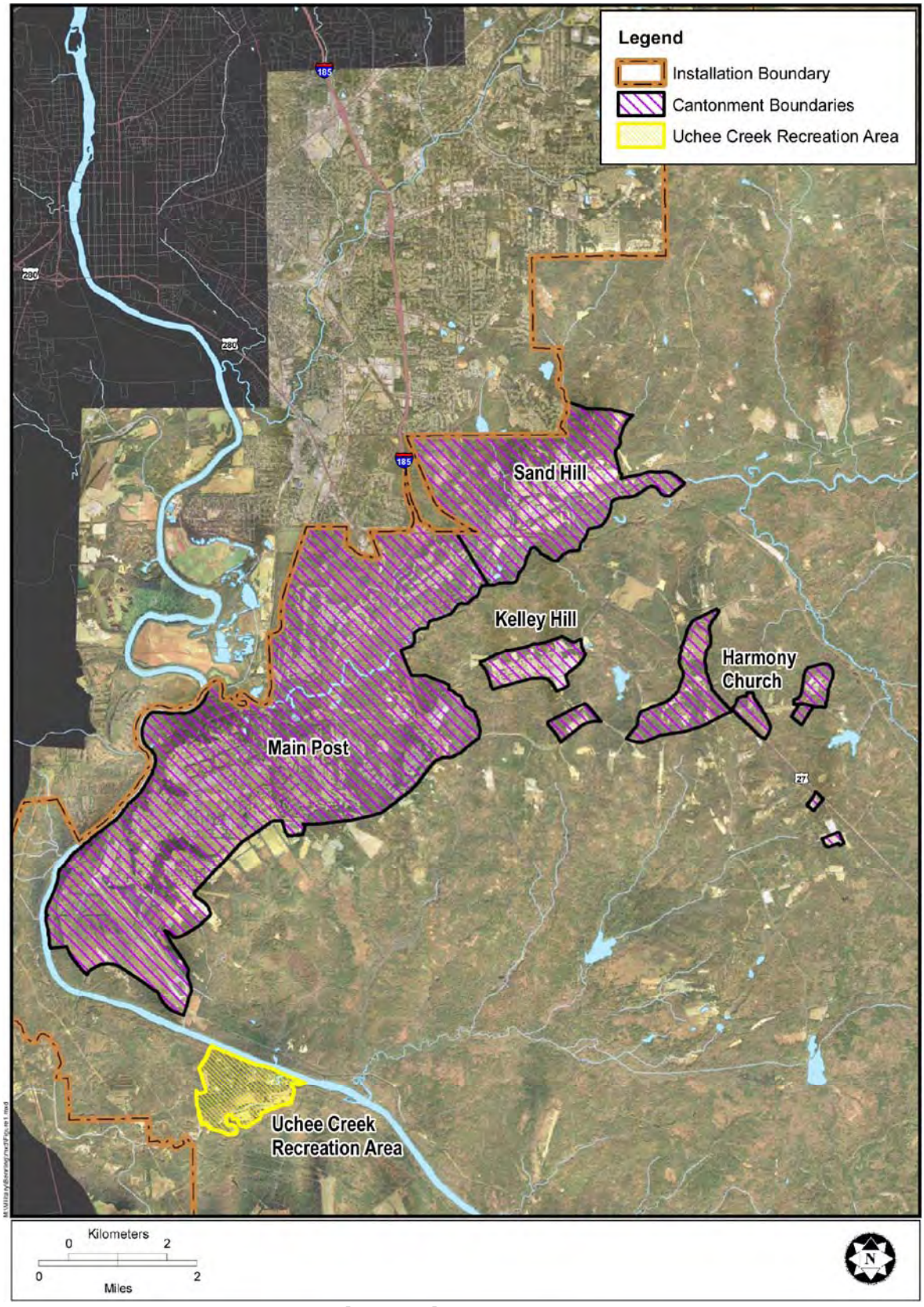


Figure 2-1 Uchee Creek Recreation Area Location

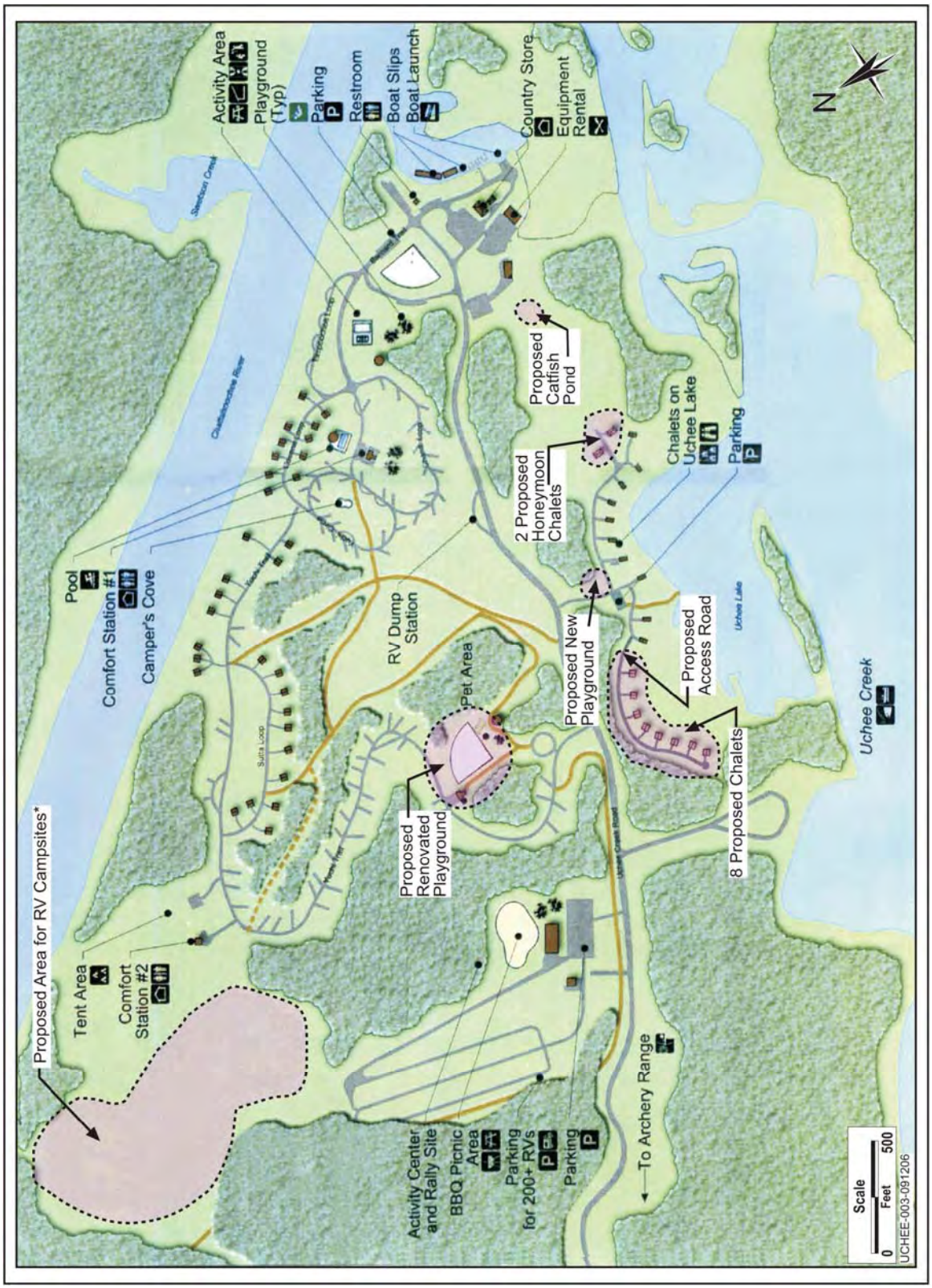


**Figure 2-2 Conceptual Uchee Creek Campground Expansion Proposal*

**Figure 2-2 Conceptual Uchee Creek Campground Expansion Proposal*

Two of these new chalets would include luxury features, and are referred to as "honeymoon" chalets (Fort Benning 2006). These two honeymoon chalets are at the northeast edge of Uchee Lake, near the existing chalets that line the lake to the east of the pier. The eight other chalets would be built in a line out to the west from the existing pier. Parking for three vehicles would be provided at each of the new chalets. The total area of the chalet portion of the project is approximately 5 acres. A proposed new access road adjoining the existing chalet road would add approximately 1,065 linear feet of paved area to the west. A short (165 linear feet) entrance road would be joined to the existing chalet road on the northeast to gain access to the honeymoon chalets to be built. New utility lines (electricity, water, and sewage) would be built as well and linked to the existing infrastructure within the campground. Operational and maintenance procedures used at existing chalets would be applied to the new facilities.

Chalet (Front View)

Chalet (Back View)

RV sites

The 29 RV sites are proposed north of the existing facilities about 300 feet from the Chattahoochee River and would be constructed in two phases. Phase 1 would begin after March 1, 2007, with 16 sites in two loops designed for paved pull-through spaces. Phase 2 would add a third loop with 13 pull-through spaces (Figure 2-3) and would be completed as funding allows. Single RV sites would measure 63 by 200 feet, while the double-sided sites would measure 126 by 200 feet. An access road is included in this upgrade. All utility hook-ups (i.e., water, sewer, electricity) would be provided; therefore, utility lines for electricity, lift stations for drinking water, and disposal sites for solid waste like garbage and sewage would also be built.. Total area for the new RV site is 22.5 acres, with approximately 14 acres to be disturbed; two isolated, seasonally-inundated wetlands have been avoided through access road design (USACE 1995). A graded walking trail would connect the loops to the existing walking trail and link them to other amenities in the campground. An activity center (or picnic pavilion) in the middle of the RV park would also be built as money allows (see Figure 2-3). Operational and maintenance procedures currently used for existing RV sites will be applied for this new expansion.

Existing RV Site

Picnic Pavilion in Existing Playground

Playgrounds

Up to two playgrounds are part of the proposal for the campground area: a new playground in the vicinity of Uchee Lake and the chalets to prevent children from crossing Uchee Creek Road to the existing playground, and the other is an existing playground in the recreational area that would be updated with new equipment (refer to Figure 2-2).

Playground Equipment to be Updated

Typical Equipment that would Serve the New and/or Renovated Playgrounds

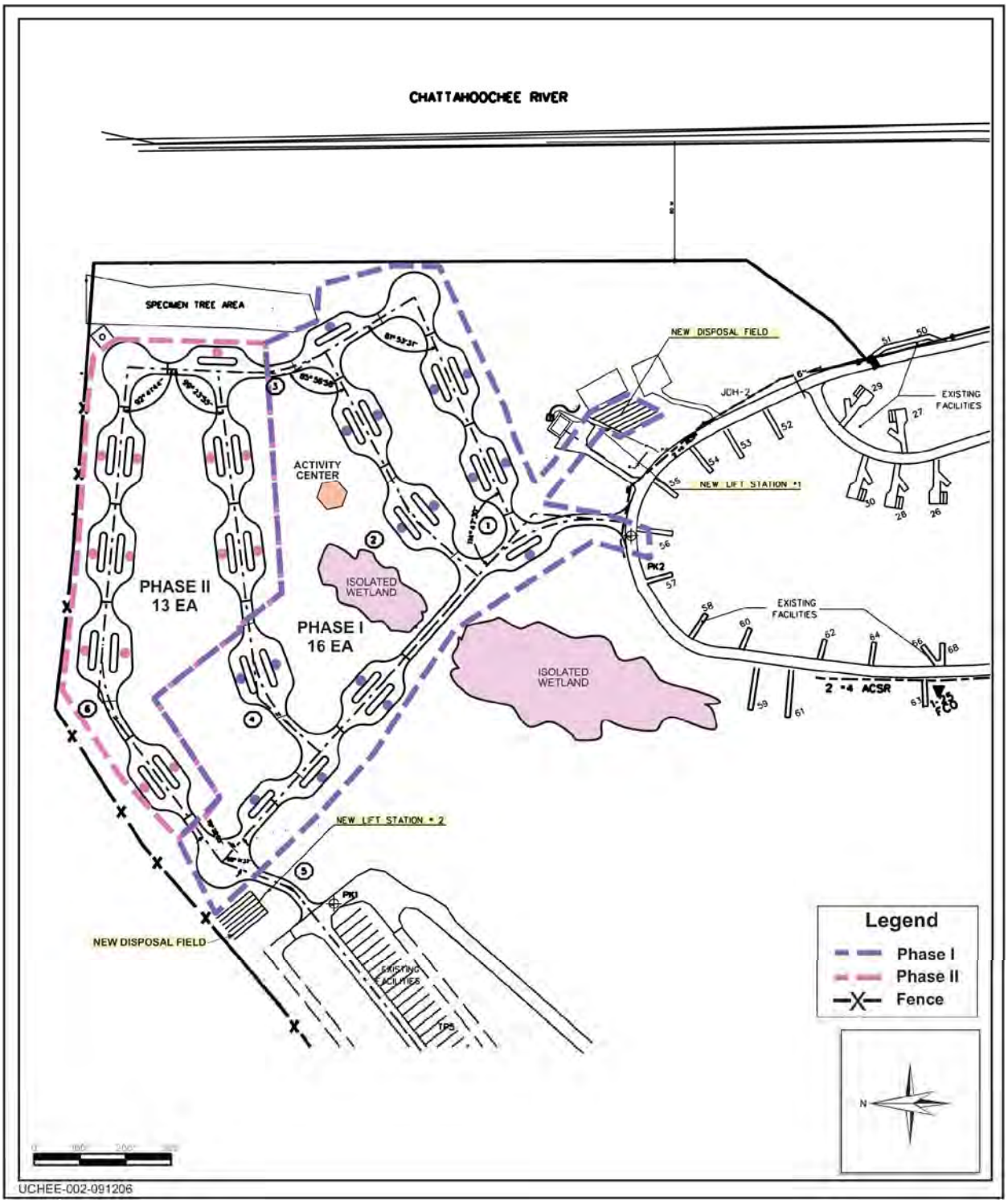


Figure 2-3 RV Campsite Location Detail

**Note: The isolated wetlands were avoided through road design taking advantage of the natural break and the wetlands fenced during construction to prohibit soil movement and vehicle intrusion.*

2.2 ALTERNATIVES CONSIDERED

2.2.1 Alternative A (Preferred Alternative)

Under the preferred alternative, Fort Benning would construct 10 new chalets, 29 pull-through RV sites, utilities and road access associated with this new construction, and one new playground. Existing playgrounds would also be updated with new equipment as funding is available. Operational and maintenance procedures (e.g., RV parking, solid waste disposal [garbage and sewage], electrical hookups, and chalet cleaning) applied at existing RV sites, chalets, and playgrounds would be used at the expanded sites. These new facilities would help alleviate the strain on existing recreational facilities at Uchee Creek Campground. A total of 19 acres would be cleared or disturbed under this proposal.

2.2.2 Alternative B

Alternative B is identical to Alternative A with an additional amenity: conversion of an existing 1-acre pond, used for permitted dredge material disposal from Uchee Creek in the early 1990s (personal communication, Osbourne 2007), to a catfish pond. Prior to any construction, these materials will need to be tested, characterized, and the appropriate measures conducted to close this site and dispose of the materials. No additional ground would be disturbed by this alternative.

2.2.3 Alternative C (No Action)

For the no-action alternative, Fort Benning would not construct new facilities at Uchee Creek Campground. Existing facilities would continue to be inadequate to accommodate the recreational needs of Army personnel, and the backlog of those wishing reservations at the campground could be anticipated to increase as the Post adds new missions and Soldiers.

2.3 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD

An alternative considering other locations for recreational expansion was eliminated from detailed study in this analysis. New recreation areas could be constructed on lands now used for training. Conversely, one or more of the other existing recreational areas designed for day-use only might be expanded to accommodate the increased visitor use (both day-use and overnight use). However, because of the extensive training mission, there is little room for expansion without impacting either training areas or foraging/nesting habitat for the red-cockaded woodpecker (RCW), a federal listed endangered species found on Fort Benning. Construction of new recreational areas, conversion of existing training land to recreational use, or expansion of any existing recreation area except Uchee Creek Campground probably would result in a conflict with either the Installation's training missions or its recovery efforts for the RCW. Because of these conflicts, these alternatives were eliminated from detailed study.

2.4 MITIGATION MEASURES

In accordance with 32 CFR 651.11(d), the Army must indicate if any mitigation measures would be needed to implement the proposed action and/or alternatives. For purposes of this EA, no mitigation measures would be required. The isolated wetlands will be avoided, no cultural resources are found at the proposed construction sites, installation of silt fencing during construction will minimize sedimentation and soil movement to the Chattahoochee River more than 300 feet away, and exposed soils during construction would be watered or covered to minimize fugitive dust. In summary, since no mitigation measures would be required, a finding of no significant impact would be applicable to implement the proposed action and/or alternatives.

CHAPTER 3

AFFECTED ENVIRONMENT

3.0 AFFECTED ENVIRONMENT

This chapter provides a description of the existing conditions of the area potentially affected by the proposed action and alternatives. The proposed Uchee Creek Campground expansion construction activities could directly affect areas at Fort Benning under the proposed action or the alternatives. These impacts, primarily associated with ground disturbance from construction of chalets, RV sites, or playgrounds are focused in the southwest region of the Installation along the Alabama side of the Chattahoochee River (refer to Figure 2-1).

Resources Analyzed

This assessment evaluates the following resources under the natural environment section: soils, water quality (including wetlands), and biological resources, including information on wildlife, vegetation, and protected species. The human environment section addresses land use and visual resources. These resources are analyzed because they have the potential to be affected by Alternative A or Alternative B.

Resources Eliminated from Further Analysis

The Army evaluated 14 resources for their potential to be affected by the proposed action (Alternatives A and B) and the no-action alternative (C). In accordance with CEQ regulations, this evaluation determined ten resources did not warrant further examination in the EA. The following provides the rationale for eliminating these resources from further analysis.

Solid Waste. No major solid waste issues are anticipated with this proposal. The construction contractor is responsible for disposal of all construction and demolition waste from the site to a landfill permitted to accept these types of materials. Waste generated at RV sites and chalets would continue to be collected at central trash locations throughout the campground and sewage would go to newly constructed septic systems; any recyclables would be disposed of at the Fort Benning recycling facility. Solid waste disposal from any alternative implementation should result in no potential impacts; therefore, this resource will not be evaluated further in this EA.

Cultural Resources. No known cultural resources have been identified within the limits of the already disturbed project site. Based on conclusions reached in consultation with the Alabama State Historic Preservation Office (Appendix A) for the 1995 expansion and associated EA (where the area now being proposed for expansion was evaluated in 1995), there are no known or suspected cultural or historical resources of significance in the proposed construction area. The letter states that there are potentially eligible sites within the campground, but these are not found at or near the proposed construction sites and would not be impacted by this action. Therefore, an analysis of cultural resources has been eliminated from further discussion.

Socioeconomics/Environmental Justice. Socioeconomics focus on the general features of the local economy that could be affected by the proposed action or alternatives. Socioeconomics comprise the basic attributes of population and economic activity within Fort Benning and surrounding communities in Georgia and Alabama, and typically encompasses population, employment, income, housing, and taxes. During construction of the proposed campground expansion there would be a minor beneficial economic impact to local businesses from materials purchased or services rendered. Expanded campground operations would also add a small financial benefit to concessionaires at the facility. Impacts to socioeconomics are negligible and thus, were not analyzed further. The potential impacts associated with the proposed action and alternatives would not have a disproportional impact on low-income and minority populations. No low-income and/or minority populations are found in or near the campground that could be impacted directly from construction activities and would be unlikely to be impacted indirectly by operations and maintenance functions because there is no real change to the existing operations; therefore, environmental justice has been eliminated from further discussion.

Hazardous Materials and Waste. Handling, disposal, use, and storage of hazardous materials will be addressed in the Construction Best Management Plan that will be required of the construction contractor. In addition, the Spill Prevention Control and Countermeasure Plan required under the National Pollutant Discharge Elimination System permit will also proscribe measures to address potential spills. All hazardous materials would be confined to the temporary construction period; no hazardous materials or waste would be associated with campground operations. Further evaluation of this resource is not warranted in this EA.

Air Quality. Russell County, Alabama and the areas around Fort Benning, Georgia enjoy relatively good air quality, with levels of all criteria pollutant emissions currently in attainment. However, there is the possibility that within the next few years, the Environmental Protection Agency may find Russell County and the region to be in non attainment for one of the criteria pollutants (particulate matter 2.5 [$PM_{2.5}$]) (personal communication, Gustafson 2006). These fine particulates are generally produced through fuel combustion from motor vehicles, power generation, industrial facilities, residential fire places, wood stoves, camp fires, and agricultural burning. If the region were found to be in non attainment for $PM_{2.5}$, the introduction of these particulates from the proposed action would not be regionally significant. This conclusion is justified because: 1) only about 19 acres of land would be disturbed for a few months over the next year and this activity would temporarily produce large-particulate matter (PM_{10}) in the form of dust; 2) the existing ban burn in Russell County from 1 May through 31 October would be followed and no open burning (such as camp fires) would be allowed; and 3) the RV and personal vehicles that would be associated with the increased visitors to the campground would most likely come from the area as well or would only be staying temporarily at the campground and not significantly contribute to the overall regional $PM_{2.5}$ emissions. Therefore, impacts to air quality would be minimal. The construction of 10 chalets, 29 RV sites, and a playground would not add measurably to the area pollutant levels. Campground operations would not impair the air quality found in the general Fort Benning area because

no significant increases would be generated. Further evaluation of this resource, therefore, is not warranted in this EA.

Transportation. The total contribution of personally-owned and/or recreational vehicle traffic as a result of the proposed expansion of an existing campground by 29 RV sites and 10 chalets would be minor. Construction vehicle traffic would also be minimal, but could temporarily cause delays of traffic flow within the campground near the construction sites. However, the impacts would be minor, short-term and limited to small areas of the campground. Vehicular transportation, therefore, requires no further analysis in this EA.

Public Health and Safety. The proposed small campground expansion project would not represent an adverse or significant impact to fire and police protection or health services of the region; therefore, this resource will not be evaluated further in this EA.

Utilities. While utility installation is anticipated for chalet and RV site construction (e.g., street lights, water and sewer improvements) the modifications would be localized, utilize existing campground infrastructure, and be too minor to influence utility services and support infrastructure within Russell County. Prior to construction, the contractor will be required to identify the existing and planned utility line layout, provide for a design of the appropriate upgrades in the construction plans, and describe how the utilities will be installed in the contractor's Construction Best Management Plan. An increase of 10 chalets and 29 sites would place minimal additional demand on the local electrical service provided, maintenance contracts of the disposal sites found within the campground, or drinking water supplied through campground wells. Therefore, utilities were eliminated from further analysis.

Noise. Noise from construction equipment would be buffered by vegetation, localized, and temporary. Construction is projected to occur over 9 months, with much of it taking place in the winter when fewer visitors would be utilizing the campground, and during normal daylight hours. This would minimize camp residents' annoyance due to the noise. Once construction is complete, noise from the campground expansion operations would not be significantly different than that occurring presently. Thus, noise impacts are not analyzed further in this EA.

Protection of Children. Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks* requires each Federal agency to identify and assess environmental health and safety risks that may disproportionately affect children and pose a disproportionate environmental health or safety risk to children. The proposed action would not affect children because the construction areas would be cordoned off to limit access, no lead-based paint or other contaminants are found at the proposed expansion sites nor would be used, and the facilities that would be improved and/or built are found at existing campground facilities locations and would occur in an area of the Installation where no schools or residential homes are located. In addition, the construction of a playground at the Uchee Lake

chalet area would minimize the potential of children crossing the campground entry road to access the existing play area. Therefore, protection of children was not evaluated further in this EA.

3.1 NATURAL ENVIRONMENT

3.1.1 Soils

The principal factor influencing stability of structures is soil properties. Soil, in general, refers to unconsolidated earthen materials overlying bedrock or other parent material. Soil structure, elasticity, strength, shrink-swell potential, and erodibility all determine the ability for the ground to support structures and facilities. Relative to development, soils typically are described in terms of their type, slope, physical characteristics, and relative compatibility or limitations with regard to particular construction activities and types of land use.

Most of the southwestern third of Fort Benning is covered by the Upper Loam Hills soil province which contains soils which are heavier textured and more mesic than the drier Sand Hills soils to the northeast (U.S. Army 2001). These soils also generally have higher organic matter content and higher water holding capacity. Soils along the Chattahoochee are occasionally flooded sandy loams (USDA 1997 and 2003). The topography is generally smooth to gently rolling with low relief (USDA 1997). 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 (U.S. Army 2001); however, the soils found within the proposed project area are not highly erodible (personal communication, Hollon 2006).

To prevent erosion, consequent damage to endangered species habitat, or sedimentation of streams and wetland areas, the Army employs Best Management Practices (BMPs) as defined by the Alabama Department of Environmental Management (ADEM), and Alabama Soil and Water Conservation Committee, Georgia Department Natural Resources, and Georgia Soil and Water Conservation Commission for all required projects and activities. In Alabama, regardless of size, require an approved Construction Best Management Practices Plan (CBMPP), fees, and Notice of Registration (NOR) to meet the federal National Pollutant Discharge Elimination System (NPDES) and Alabama Water Pollution Control Act (WPCA) requirements. The Installation also considers and complies with soil conservation measures in their planning and execution for all construction, operation, and maintenance activities involving land disturbance. The CBMPP 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 ADEM Field Operations Division (FOD).

Construction contractors are required to install sedimentation and erosion control measures and practices that are sufficient to retain the sediment generated by the land-disturbing activity within the boundaries of the construction site and plant or otherwise provide a permanent ground cover sufficient to restrain erosion after completion of construction. Contractors are also responsible for developing the CBMPP and obtaining approval, coordinating with Fort Benning Environmental Management Division for submittal of fees, and NOR to the ADEM FOD, depending upon project location, prior to initiating any project.

3.1.2 Water Quality

Water quality focuses on surface and ground water quality within the sites proposed for construction of RV sites, chalets, and playgrounds that would be utilized under Alternatives A or B. The Clean Water Act (CWA) of 1972 is the primary Federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The primary objective of the CWA is to restore and maintain the integrity of the nation's waters. Jurisdictional waters of the U.S. are regulated resources and are subject to Federal authority under Section 404 of the CWA. This term is broadly defined to include at least navigable waters (including intermittent streams), impoundments, tributary streams, and wetlands.

Surface Water Quality

The primary watercourse at Fort Benning, and boundary line between Georgia and Alabama, is the Chattahoochee River. The Chattahoochee River flows in a southerly direction and contains numerous oxbows, abandoned meander channels, and wetland areas. On the Georgia side, most streams drain into the Chattahoochee River through the eastward flowing Upatoi Creek, which enters north of the Main Post area and serves as the main drainage basin for other streams and tributaries at Fort Benning. On the Alabama side, the Uchee Creek flows east through the campground into the Chattahoochee River. As for total maximum daily load, the Uchee Creek is not an impaired stream as classified by the Environmental Protection Agency (EPA 2006). While the Chattahoochee River (classified as an impaired stream) is nearby, the campground waters drain into the Uchee Creek and the waters from the creek are impounded within the campground and do not flow into the Chattahoochee (USACE 1995).

Wetlands

The National Wetlands Inventory conducted by the U. S. Fish and Wildlife Service (USFWS 1982) shows that Fort Benning contains about 16,926 acres of wetlands. The inventory described lacustrine, riverine, and palustrine systems. On Fort Benning, wetlands include impounded water, flowing water, river floodplains, stream floodplains, small stream swamps, wooded seepage bogs, herbaceous and shrub seepage bogs, and gum/oak ponds. According to this broad inventory, Uchee Creek Campground had no *permanently* flooded wetlands or impoundments, and no permanent streams apart from Uchee Creek itself. However, following the delineation that was conducted in association with the 1995 expansion

(USACE 1995), which included examination of the current proposed area, the site of the proposed campground expansion does contain two areas comprising jurisdictional wetlands, all of which are seasonally inundated, depressional systems. In 1995, these wetlands were termed jurisdictional by USACE (1995), ensuing case law has determined that these types of systems are no longer jurisdictional. While the design for this proposed project specifically avoids encroaching upon these wetlands and fencing would be erected during construction to preclude disturbance, the Section 404 process would be followed if unintentional intrusion occurs.

Ground Water Quality

Fort Benning is in the Coastal Plain hydrologic province of Georgia and Alabama, whose principal ground water source is the Cretaceous aquifer system. The aquifer systems are directly related to the various geologic formations. Ten drinking-water supply wells are found on Fort Benning, including three wells within the Uchee Creek Campground area (personal communication, Wilkins 2006).

Stormwater

Fort Benning at Uchee Creek Campground operates industrial activities subject to the requirements of the U.S. Environmental Protection Agency (EPA) and Alabama state industrial NPDES regulations under the CWA. These regulations involve regulating stormwater discharges from industrial activities that have the greatest potential to contaminate runoff. The applicable installation industrial sectors include, but are not limited to roads; wastewater treatment facilities; and hazardous waste storage, treatment, or disposal activities.

Installation sources of industrial stormwater pollution have been identified in order to prevent contamination from runoff created by rain events to protect the water quality. Storage of petroleum, oil, and lubricants (POLs) is managed properly; and a Storm Water Pollution Prevention Plan (SWP3) has been developed and implemented at Fort Benning. The SWP3 outlines BMPs that have been implemented to reduce the potential for stormwater pollution.

The CWA's Construction NPDES Program and Alabama WPCA (specifically ADEM Administrative Code Chapter 335-6-12) require that erosion and sedimentation controls be implemented for any ground-disturbing projects. Thus, depending upon the location of the project, the Army consistently obtains a General Permit for Storm Water Discharges via submittal of an NOR to the ADEM and development of a CBMPP prior to implementation of actions, as described previously in the soils section.

Stormwater at Fort Benning is also regulated under the Installation's general stormwater NPDES permit. Stormwater discharges within the Main Post drain directly into the Chattahoochee River through a storm drain system. Installation stormwater within the proposed campground expansion area drains via shallow

ditches towards Uchee Creek near its confluence with the Chattahoochee River as well as into Uchee Lake where the chalets are found. No areas on the proposed sites have a potential for serious erosion problems.

3.1.3 Biological Resources

Biological resources include native or naturalized plants and animals and the habitats in which they occur. The Fort Benning Integrated Natural Resources Management Plan (INRMP) (U.S. Army 2001) provides a comprehensive overview of the status of biological resources throughout the Installation—the INRMP is in the process of being updated.. For purposes of this EA, discussions of resources present in areas that would be affected by implementation of the proposed action at the Uchee Creek Campground construction sites are provided below for: 1) vegetation and wildlife, including migratory birds, and 2) protected species, including threatened and endangered species. No unique ecological areas (described in U.S. Army 2001) are present in the vicinity of the Uchee Creek Campground facility construction sites.

Vegetation and Wildlife

Vegetation. On Fort Benning, plant and animal communities in both terrestrial and aquatic habitats have been classified into 13 ecological groups (U.S. Army 2001). Ecological groups provide a framework for managing species and habitats of concern on the Installation. Ecological groups are the top level of a hierarchy that includes, at finer scales of differentiation, vegetation alliances, and associations that are structurally and functionally similar.

Ecological groups in and around the proposed campground expansion sites are provided in Table 3-1, the presence of each group is also included. Following are summary descriptions of each ecological group. More detailed accounts of these ecological groups and others that occur elsewhere on the Installation (e.g., training areas and ranges) are provided in the INRMP (U.S. Army 2001).

Table 3-1 Ecological Groups at the Proposed Uchee Creek Campground Expansion Sites	
Ecological Group	***Present at Uchee Creek Campground***
Bottomland hardwood and mixed hardwood/ pine forests	Yes
Loblolly/slash pine plantation	Yes
Seasonally wet depressions	Yes
Shoreline	Yes
Longleaf pine plantations	No
Longleaf pine sandhills	No
Herbaceous and shrub seepage bogs	No
Small stream swamps and wooded seepage bogs	No

Source: Fort Benning GIS 2005a

Hardwood and mixed hardwood/pine forest communities occur at Uchee Creek Campground. Similar to these communities but occurring on previously disturbed sites are loblolly and slash pine plantations. These forests are quite variable on the Installation and occur in the ecotone between the dry ridge tops and the mesic bottoms. Common tree species found in these areas include loblolly and shortleaf pine (*Pinus echinata*), various oaks (*Quercus* spp.) and other hardwoods, along with a diverse shrub understory (U.S. Army 2001). Diverse shrubs and herbaceous species occur in these communities, which support abundant wildlife, including red-cockaded woodpecker.

Wildlife. Fort Benning supports at least 350 invertebrate, fish, and wildlife species (U.S. Army 2001). From the standpoint of the proposed action, common wildlife expected to occur include white-tailed deer (*Odocoileus virginianus*), foxes (*Felis* spp.), river otters (*Lutra canadensis*), beavers (*Castor canadensis*), rabbits (*Sylvilagus* spp.), squirrels (*Sciurus* spp.), and a variety of smaller mammals. In addition to a diverse assemblage of forest songbirds, wild turkey (*Meleagris gallopavo*), bobwhite quail (*Colinus virginianus*), and several other species are important game birds on the Installation (see U.S. Army 2001 for more details).

There are approximately 150 species of birds protected under the Migratory Bird Treaty Act (MBTA) that occur on the Installation, either seasonally or year round. Fort Benning is complying with the MBTA by

implementing Army Policy Guidance of 17 August 2001 and Executive Order 13186 (*Responsibilities of Federal Agencies to Migratory Bird Treaty Act*, 11 January 2001). Fort Benning manages and conserves migratory bird species through its INRMP and considers effects to migratory birds in any proposed action through the NEPA process (see U.S. Army 2001 for details).

The river and creek bordering the campground contain a wide variety of nongame and game fish (bass, sunfish, and catfish), several species of aquatic turtles, and numerous aquatic invertebrates. Some of the seasonally flooded wetlands on the site serve as breeding ponds for invertebrates, frogs, toads, and salamanders.

Protected Species

Protected species include those that are listed or proposed for listing as threatened or endangered by the U.S. Fish and Wildlife Service (USFWS); and state-protected species listed as rare, threatened, and endangered by the Alabama Department of Conservation and Natural Resources (DCNR). A complete listing of threatened and endangered species that occur on Fort Benning and its training ranges is provided in the INRMP (U.S. Army 2001). A total of 96 such species occur on the Installation.

A review of the Installation database revealed that no Federal or state protected threatened or endangered species are known to occur in the southwest portion of the Installation containing the Uchee Creek Campground construction sites (Fort Benning 2005). However, habitat for the Federally-protected RCW is found in Alabama, near the proposed campground expansion. Although some of the more mature planted pine stands onsite could provide potential foraging habitat for the Federally-endangered RCW, no impact is anticipated since the nearest RCW colony site, located ½ mile to the west, is abandoned. This protected species is discussed in more detail below.

Red-cockaded Woodpecker (Picoides borealis). Red-cockade woodpeckers have a social structure that involve a breeding pair and helpers that assist with cavity excavation and maintenance, egg incubation, feeding young, and defending the group's territory. Nesting generally occurs from April through June. Groups of RCWs nest in an aggregation of cavity trees called a cluster that is surrounded by contiguous foraging habitat. Discrete cluster sites are typically located where mature pine trees are more than 60 years old. Foraging habitat, however, is more variable with timber taking on increasing value as the stands age past 30 years. Both nesting and foraging habitat can be characterized as open stands of pine with a scarce to moderate midstory. As the midstory becomes dense or reaches the height of cavities, cluster abandonment and decreased foraging value results.

Fort Benning supports one of the largest RCW populations in the southeastern United States. The RCWs are well dispersed over the entire Installation, except that no active clusters are located on the Alabama portion. Intense efforts have been implemented to increase the endangered species staff at Fort Benning and to greatly enhance management activities for RCWs and their habitat on Fort Benning. On 27 September 2002, the USFWS approved Fort Benning's Endangered Species Management Plan (ESMP) for the RCW and issued a Biological Opinion that included specific management activities. This allowed the implementation of the "1996 Management Guidelines for the RCW on Army Installations." Fort Benning is also one of 13 primary core locations selected by the USFWS to manage for a RCW recovery population (451 clusters at Fort Benning). Presently, Fort Benning has a total of 295 manageable RCW clusters (249 active and 46 inactive, as of 2004) (Fort Benning 2004).

Management of the RCW and its habitat on Fort Benning is described in the INRMP (U.S. Army 2001). This includes the protection and maintenance of existing habitat areas, and the expansion of nesting opportunities for the species in new areas on the Installation. As was mentioned before, there are no active RCW clusters in Alabama (Fort Benning 2004).

3.2 HUMAN ENVIRONMENT

3.2.1 Land Use and Visual Resources

Land use generally refers to human modification of land, often for residential or economic purposes. It also refers to the use of land for preservation or protection of natural resources such as wildlife habitat, vegetation, or unique features. Human land uses include residential, commercial, industrial, agricultural, and recreation. Unique natural features are often designated as national or state parts, forests, wilderness areas, or wildlife refuges.

Attributes of land use include general land use and ownership, land management plans, and special use areas. Land uses are frequently subject to management plans, policies, ordinances, and regulations that determine the types of activities that are allowed or that protect specially designated or environmentally sensitive uses. Special Use Management Areas are identified by federal and state agencies as being worthy of more rigorous management.

Visual resources are defined as the natural and manufactured features that comprise the aesthetic qualities of an area. These features form the overall impression that an observer receives of an area or its landscape character. Landforms, water surfaces, vegetation, and manufactured features are considered characteristics of an area if they are inherent to the structure and function of the landscape. The significance of a change in visual character is influenced by social considerations, including public value placed on the resource, public awareness of the area, and general community concern for visual resources in the area. Recreational resources include evaluation of the potential effects to activities such as swimming, boating, hiking, and fishing and the lands that support these activities. For this EA, these social considerations are addressed as visual and recreational sensitivity, and are defined as the degree of public interest in a visual or recreational resource and concern over adverse changes in the quality of that resource.

The Uchee Creek Campground includes developed and undeveloped lands; developed areas consisting of recreation sites and undeveloped areas composed of vegetation and forested areas. Approximately one-fourth of the 380-acre Uchee Creek Campground was cleared and developed in the initial phase of construction. The proposed project would expand and upgrade the campground in a similar manner, resulting in clearing and development of another 19 acres. All construction would occur within the established boundaries of the recreation area. New structures (chalets, RV sites, playgrounds) would be sited to minimize clearing of trees and undergrowth.

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

4.0 ENVIRONMENTAL CONSEQUENCES

The approach used for this impact analysis is to compare what would occur if the proposed action preferred alternative, Alternative B, or the no-action alternative (Alternative C) were implemented at Fort Benning. The environmental impact analysis is designed to focus on those environmental resources that potentially could be affected by the expansion of the Uchee Creek Campground; thresholds used throughout the EA have been developed through progressive environmental analyses conducted by Fort Benning such as the 1995 EA (USACE 1995) and the Digital Multipurpose Range Complex Final Environmental Impact Statement (Fort Benning 2004). Potential effects may result primarily from construction aspects of Alternatives A or B. Preferred Alternative A entails construction of 29 new RV sites, 10 chalets, a new playground, and renovation of existing playgrounds. Alternative B is identical to Alternative A, but also adds the conversion of a former 1-acre permitted dredge spoils pond to a catfish pond.

Chapter 4 presents the potential environmental consequences of the proposed campground expansion construction and operations for each resource discussed in Chapter 3. Cumulative effects of the campground expansion when considering past, present, and foreseeable future actions are presented in Chapter 5. A comprehensive matrix comparing the no-action alternative and the proposed action alternatives by resource and potential impacts is provided in Table 6-1.

4.1 NATURAL ENVIRONMENT

4.1.1 Soils

Impacts to soils are considered significant if any ground disturbance or other activities would violate applicable Federal or state laws and regulations, or Alabama WPCA (administered by the ADEM), and the potential for Notices of Violation (NOV) for the failure to receive applicable state permits, such as an NPDES construction permit, prior to initiating a proposed action. Potential adverse effects to soils could result from ground disturbance leading to soil erosion, fugitive dust propagation, sedimentation, and pollutants such as hazardous materials and/or waste. Effects to soils are most likely to occur from construction activities; operations (in the form of RV camping, recreation at the playgrounds, or activities centered around the chalets) are unlikely to disturb soils after facility construction.

For the alternatives, tributary stream areas would be avoided; however, if disturbance is deemed unavoidable during construction and chalet design phases, the appropriate consultation and permits (e.g., stream buffer variance) would be obtained. Soil erosion and sedimentation controls would be put in place, per WPCA requirements, and NPDES permits obtained in advance.

Alternative A (Preferred Alternative)

The Alternative A proposed construction would result in the displacement of soil as a part of clearing and grubbing, and earthmoving cut-and-fill operations for both the construction of the facilities and the trenching for the underground utility lines to support the expansion. Clearing and building construction/expansion would be contracted to a private contractor, through a Fort Benning procurement process.

Approximately 0.29 acres for each single RV site (total of 5), 0.58 acres for each double-sided RV pull-through campsite (total of 24), and one-third to one-half acre for each chalet site would be cleared of vegetation and stump and root matter grubbed out. Any merchantable timber to be removed within these areas during this process would be sold via a timber sale contract controlled by Fort Benning's Land Management Branch. All timber removal contracts would be conducted in accordance with Alabama Forestry Commissions' BMPs for timber harvests. Any remaining non-commercial vegetative debris would be removed from the Installation under separate Fort Benning contracts. All slash removal contracts would be conducted in accordance standard BMPs to control potential erosion and sedimentation. Soil excavation for RV parking and trenching for utilities would be compacted in a trench, or spoiled on or adjacent to the site and re-vegetated to prevent erosion. Temporary construction activities may result in the migration of airborne or waterborne soil particles and POLs (from construction equipment) onto adjacent lands and streams, which could contribute to sedimentation of off-site areas. For POLs, Fort Benning would require use of fueling and maintenance practices as well as spill counter measures to prevent contamination of soil. During the construction process vehicles would use existing access roadways, which would result in less earth moving and vegetative removal.

Adherence to the CBMPP under the construction NPDES permit is required and would include measures to minimize impacts to soils. The construction contractor is required to prepare, certify, and submit a CBMPP to the Alabama Department of Environmental Management as part of the NPDES construction permit process. Some of the components of the CBMPP include a project description, soil information, changes to existing contours, existing drainage patterns, BMP locations, detailed drawings, and a timeline or construction schedule. As part of the CBMPP, Spill Prevention Control and Countermeasures (SPCC) Plan measures are required during construction activities to prevent and/or minimize spill/release from hazardous materials into ground surfaces. During construction, the NPDES permit would require daily, weekly, and monthly inspections and reports. This standard set of measures would help minimize the effects of this alternative from construction activities.

All practices for erosion and sedimentation control would be designed and implemented in accordance with the Alabama Handbook for Erosion Control, Sediment Control and Stormwater Management on Construction Sites and Urban Areas in Alabama. Practices specified in the CBMPP could include erosion control matting, silt fencing, brush barriers, storm drain outlet protection, rock filter dams, berm

construction, temporary and permanent seeding, and the application of mulch. The application of any or all of these measures would depend upon precise, specific ground conditions in the areas disturbed by construction. Erosion control matting, if needed, would be used on slopes greater than 2.5:1. Silt fencing, rock filter dams, and berm construction represent the types of measures used to trap sediment on the site. Gravel exits, or similar measures, could be used at construction exits to reduce transport—or drag-out—of mud from construction vehicles traveling from the site to existing paved roads. Potentially, the disturbed areas could be seeded with temporary and permanent grasses to stabilize them.

Other management practices potentially applicable during the construction phase to address soil and sedimentation effects could include: buffer zones, dust control on disturbed areas, construction road stabilization, and storm drain outlet protection. The selected construction contractor would be responsible for continuously maintaining all erosion and sediment control measures during the construction of the sites.

Facilities involving the use and storage of hazardous materials would be designed to meet SPCC requirements under Army Regulation 200-1, as well as state and Federal requirements as applicable. These facilities include, but are not limited to, loading/unloading operations areas, hazardous material and POL storage areas (above/underground facilities), and generators. Design requirements of these facilities would include: secondary containment and/or diversion structures; and spill supplies and equipment to mitigate spills and/or releases. These measures would prevent and/or minimize soil contamination from possible discharge of pollutants into the environment.

Post-construction campground operations soil disturbances are expected to be minor, and would be managed as part of the Installation's on-going environmental management program.

Overall, this alternative would result in a potential for temporary, minor adverse effects to soils. Implementation of appropriate BMPs would likely reduce effects of construction operations on soil resources.

Alternative B

Alternative B is identical to the Alternative A proposal, with one minor enhancement —conversion of a former 1-acre permitted dredge spoils pond to a catfish pond. Impacts to soils would be the same as under Alternative A with the addition of a small amount of permitted dredge materials from Uchee Creek (personal communication, Osbourne 2007) that would need to be disposed. The exact amount of material to be disposed has not been quantified at this time. However, if this alternative were chosen, the construction contractor would be required to sample the materials, determine the characteristics of the material, handle the materials in the appropriate manner, dispose of it at a landfill approved for the type of

material identified, and close the site. Post-construction operations would have no additional adverse effect on soils other than those mentioned in Alternative A.

Alternative C (No Action)

The no-action alternative would have no impact on current soil conservation measures because no new construction would occur.

4.1.2 Water Quality

The threshold level of significance for water quality is the violation of applicable Federal or state laws and regulations, such as the Clean Water Act and the Alabama WPCA requirements, and the potential for an NOV for the failure to receive applicable Federal and state permits, such as a NPDES permit (required for all projects 1 acre or more in size), prior to initiating site development activities. This also includes not following management practices for "impaired streams," as defined under Alabama's 303(d) List, for Total Maximum Daily Loads (TMDL). While the nearby Chattahoochee River is designated an impaired stream, no Alabama TMDL-designated streams would be affected by the proposed action. The threshold for streambanks is failure to obtain the necessary permits from ADEM or the violation of applicable Federal and state laws and regulations.

Waterways that could be affected by this proposal include Uchee Creek and Uchee Lake. Seasonal, wetlands do occur within Alternative A or B but are avoided by design and will be protected (identified and fenced off) during the construction process.

Adverse effects to water resources could result from erosion, runoff, and surface contamination from pollutants such as hazardous materials and/or waste. Effects to water are most likely to occur from construction activities.

The construction and alteration would occur for the most part in areas that have already been disturbed and used for similar activities. In addition to the examples listed in Chapter 3, additional management practices include:

- Other than outlined in construction plans, no additional disturbance or construction-related activities would occur within a minimum of 25-foot vegetative buffer from perennial streams, and buffer zones would be marked. Logging decks and defined skid trails for tree cover removal would be located outside the buffer zones.
- In areas adjacent to waterways, tree clearing would be accomplished using low impact methods in accordance with the Alabama Forestry BMPs for Water Quality and Timber Harvesting (Alabama Forestry Commission 2006).

- Pollution of nearby storm drainages and waterways would be minimized by SPCC BMPs such as secondary containment and minimum material exposure.

Alternative A (Preferred Alternative)

Construction of the expanded campground facilities at the Alternative A sites could create potential temporary minor adverse effects on water quality, primarily due to potential sedimentation of adjacent streams from tree clearing and grading construction activities. Uchee Lake has the potential to be affected by Alternative A because the chalet construction occurs nearby. If this alternative were chosen, Fort Benning would require the construction contractor to implement erosion control measures to minimize adverse impacts to water quality such as silt fencing and soil covering. Jurisdictional wetlands in the immediate area of RV sites are identified and would be fenced to prevent construction equipment trespassing into this area (refer to Figure 2-3).

Adherence to applicable Federal and state laws and regulations as well as Installation policies and guidelines is required and would minimize impacts to surface and ground water quality. All tree clearing and construction activities greater than 1 acre in size and/or as part of a common development area, such as Alternatives A, require an NPDES General Permit for Storm Water Discharges. A Notice of Intent for construction-related stormwater discharge would be submitted to the ADEM to meet these requirements. As a standard practice, Fort Benning would ensure the construction contractor prepare and implement an SPCC Plan and its requirements during construction activities to prevent and/or minimize spill/release from hazardous materials into waterways. Erosion control, as discussed previously, would be applied as necessary and practicable to minimize the deposition of sediments into adjacent surface waters at the site of disturbance. As part of the NPDES permit, water samples would be collected during construction to document any changes in turbidity. If turbidity increases, additional erosion controls may be required. While stream banks (Uchee Lake) and an impaired stream (Chattahoochee River) are adjacent to the proposed action areas, it is not anticipated that these resources would be adversely impacted both in the short term under construction or long-term for operation and maintenance activities. During construction best management practices (e.g., stream bank buffers and erosion controls) would be followed and minimize impacts.

Under the proposed action, construction would also entail the extension, replacement, or addition of stormwater drainage infrastructure through digging of trenches, either from existing lines along the nearest road or other primary locations. Trenches could also run from new buildings (i.e., chalets) and roads to discharge points in existing systems or additional locations in local drainages. Although these areas would be avoided during the design process, any work involving construction or excavation in, over, or under streams would need authorization from the USACE, under the CWA and other requirements. Sustainable design measures—retention and detention structures which support improved water quality as well as reduced water quantity—also would be implemented to minimize impacts from

additional stormwater discharges. Such measures for utility systems would reduce the potential for adverse impacts from the stormwater system.

Any new water supply lines would have a backflow preventer and water meter installed, and would be disinfected following American Water Works Association methods as required. During construction and subsequent facility use, all waste water discharges would be connected to the sanitary sewer system.

Post-construction campground activities would not result in adverse effect to water quality as campground operations are routine actions and covered by Installation environmental management plans and practices. Overall, potential short-term minor adverse effects to water quality may result from this alternative. Use of silt fencing, soil watering, and mulching during construction would minimize effects to water quality.

Alternative B

Alternative B is identical to the components of Alternative A (i.e., no impacts to stream banks, impaired streams, or wetlands) with the addition of a catfish pond, converted from a pond with underlying dredge spoils taken from Uchee Creek. Conversion of the 1-acre pond to a catfish pond would require testing to determine contamination level, dredging of contaminated material, disposal at appropriate landfill by the contractor, and refilling with water. Adherence to erosion control measures during dredging and disposal would also be incorporated. Minor positive impacts to water quality are expected from establishment of a catfish pond.

Alternative C (No Action)

Under the no-action alternative, no additional RV sites or chalets would be constructed at Fort Benning and, therefore, no site construction would be required. No effects to water quality would result from this alternative.

4.1.3 Biological Resources

The threshold level of significance for vegetation is loss at a level that would substantially reduce the occurrence of a plant species or degrade the habitat of a dependent animal species at a population level on the Installation. The threshold level of significance for migratory species is the obstruction or reduction of the ability of the species to migrate; this would occur through road construction and/or overflights. Impacts to Federally- and state- protected species occur if an alternative disrupts normal behavior patterns or disturbs habitat at a level that substantially affects the Installation's ability to either avoid jeopardy or conserve and recover the species.

At the action alternative sites (A and B), construction activities would entail ground disturbance and some vegetation removal. Noise and activity during construction would result in temporary disturbance to wildlife primarily within these construction footprints. Subsequent occupation and use of these sites would result in the continuation of disturbed/altered conditions throughout much of the area.

Alternative A (Preferred Alternative)

The footprint of Alternative A disturbs approximately 19 acres, of which approximately 10 acres are mixed hardwoods and successional pine and undergrowth vegetation. The loss of vegetation and wildlife habitat within the nearly 10 acres would be minor compared to the overall acreage within the Installation and, therefore, not be significant nor adverse to vegetation. Impacts to wildlife would emanate from construction noise and would be minor and temporary in nature; therefore, no significant or adverse impacts. No migratory routes would be obstructed or reduced through temporary construction activities and no overflights are associated with this proposed action; therefore, no impacts to migratory species would occur. No state-listed species were found in 1995; however, if they were found there would be only temporary adverse impacts due to construction activities.

Because there are no active clusters at or near the proposed expansion sites, there would be no significant impacts to the RCW or foraging habitat. Only about 10 acres of potential RCW habitat would be removed from the inactive cluster. If the inactive cluster were to become active, consultation would take place between Fort Benning and the USFWS. Federally listed birds such as the bald eagle, wood stork, and other protected species, would be negligibly impacted on a temporary basis during the construction period. This would not introduce an adverse impact because no nests of these species occur at the site and the construction would only introduce a temporary disturbance.

Overall, implementation of Alternative A would result in temporary minor adverse impacts to biological resources during construction, but no other impacts. Use of BMPs for timber removal and soil erosion prevention to protect vegetation, water quality, and habitat, together with ongoing implementation of the policies, and management plans developed for RCWs would help reduce any impacts.

Alternative B

The components of Alternative B are identical to Alternative A with the addition of a catfish pond. As with A, vegetation removal would not change species population levels within the Installation or greatly change the total number acres of available habitat; no migratory routes would be obstructed to preclude migratory species movement through the area, no state-listed species would be adversely impacted, and no active clusters of RCW are found. The existing footprint of the pond would be used and no further impacts to the area would be anticipated. The Federally-protected bald eagle and wood stork could be negligibly impacted on a temporary basis during the construction period; however, because no nests of

these species occur at the site and the construction would only introduce a temporary disturbance no adverse impacts are anticipated to Federal- and state-listed species. In summary, no long-term adverse impacts would occur if Alternative B were selected.

Alternative C (No Action)

If no action were taken, there would be no change to biological resources from current conditions and, therefore, no impacts to biological resources. Existing uses of the land as well as existing conservation measures to sustain biological resources on the Installation would continue.

4.2 HUMAN ENVIRONMENT

4.2.1 Land Use and Visual Resources

The threshold level of significance for land use is exceeded when the proposed action would adversely impact and/or change existing land uses and management. For visual resources, the threshold level of significance is when the proposed action would be detrimental to the beauty of and detract from the visual appeal of an area. This section analyzes potential effects of the action alternative on land use and characteristics of the visual impacts.

Existing land use of the proposed sites is wooded, with some brush vegetation. The expansion of the campground would not change the overall recreational land use already designated for this area. Whenever feasible, vegetation would be retained, protected, and supplemented to ensure the maximum natural visual environment remained. The entire area to be disturbed for this proposal is 19 acres and only represents a tiny fraction of the 184,000 acres of Fort Benning property.

Alternative A (Preferred Alternative)

No impacts to land use are expected as a result of Alternative A. Construction of the 29 RV sites and 10 chalets at Uchee Creek Campground would be consistent with current land use of recreation. Clearing of scrubby underbrush would also actually improve the visual aesthetics of the campground. Visual aesthetics of the undeveloped, previously disturbed woodlands in the area are generally not outstanding. Chalet sites are proposed so that the hardwood forest is left undisturbed. Paved areas would be kept to a minimum necessary and confined to the vicinity of the existing campground area. Smaller paved areas would be located at recreational vehicle sites and chalets. No degradation of aesthetic values is anticipated under Alternative A. Chalets would be finished in natural wood color and blend in with the natural surroundings. Clearing of vegetation for additional RV sites or chalets would slightly change the visual appeal, but with the small acreage involved and the remaining large tracts of surrounding woodlands left intact, this would result in negligible impacts to visual resources.

Alternative B

Impacts to land use and visual resources under Alternative B would be similar to impacts described under Alternative A, with one positive addition—the conversion of a former permitted dredge spoils pond to a catfish pond would beneficially impact both resources. Any residue remaining in the former permitted dredge soils pond would be removed appropriately, ensuring a cleaner and healthier ecosystem. The completed catfish pond would add a unique and visually appealing waterscape to the Uchee Creek Campground environment, for a minor positive impact.

Alternative C (No Action)

Under Alternative C, no impacts to land use or visual resources would occur.

CHAPTER 5

CUMULATIVE EFFECTS

5.0 CUMULATIVE EFFECTS

A cumulative effects analysis within an EA should consider the potential environmental consequences resulting from "the incremental impacts of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions" (40 CFR 1508.7). Assessing cumulative effects involves defining the scope of the other actions and their interrelationship with the proposed action if they overlap in space and time. Cumulative effects can result from individually minor, but collectively significant actions taking place over a period of time. Cumulative effects are most likely to arise when a proposed action is related to other actions that could occur in the same location or at a similar time. Actions geographically overlapping or close to the proposed action would likely have more potential for a relationship than those farther away.

5.1 Scope of Cumulative Effects Analysis

Cumulative analysis must determine if the action proposed under the alternatives in this EA have the possibility to result in either adverse or positive incremental impacts when considering other past, present, and future projects in a defined area near the proposed action location. For purposes of this EA, projects occurring within the last year and this year are considered since they could potentially interact with activities associated with the proposed action. Information about these projects has been obtained from the Final Environmental Impact Statement, Digital Multi-Purpose Range Complex (DMPRC), Fort Benning, Georgia (U.S. Army 2004), the Multi-Role Bridge Company Establishment Environmental Assessment, (U.S. Army 2005), planning documents of surrounding communities, and Fort Benning personnel.

The overall Region of Influence or ROI for the purposes of this EA is the area adjacent to the Uchee Creek Campground that could potentially interact with the proposed action. This would comprise those projects within 2 miles of the campground construction sites. Figure 5-1 presents locations of projects across the Installation and the surrounding community that are past, present, and reasonably foreseeable within the mile radius. Following evaluation of the numerous projects and their location across the installation and region, only number 16—a force protection measure where the security perimeter barrier has been upgraded—represents a past action that could present cumulative impacts to the Uchee Creek Campground proposal (Number 43) due to its proximity to the Chattahoochee River, other on-going activities that represent cumulative impacts are the continued maintenance and operation of the ranges adjacent to the campground and the campground itself. While there are the transformation actions at Fort Benning, related to the Base Realignment and Closure Committee decision to relocate the Armor School (and other actions) to the Installation, no projects are planned to occur within the Alabama portion of the Installation. An Environmental Impact Statement addressing Fort Benning Transformation actions is planned for public release in early spring 2007 and includes a cumulative impact analysis. However for

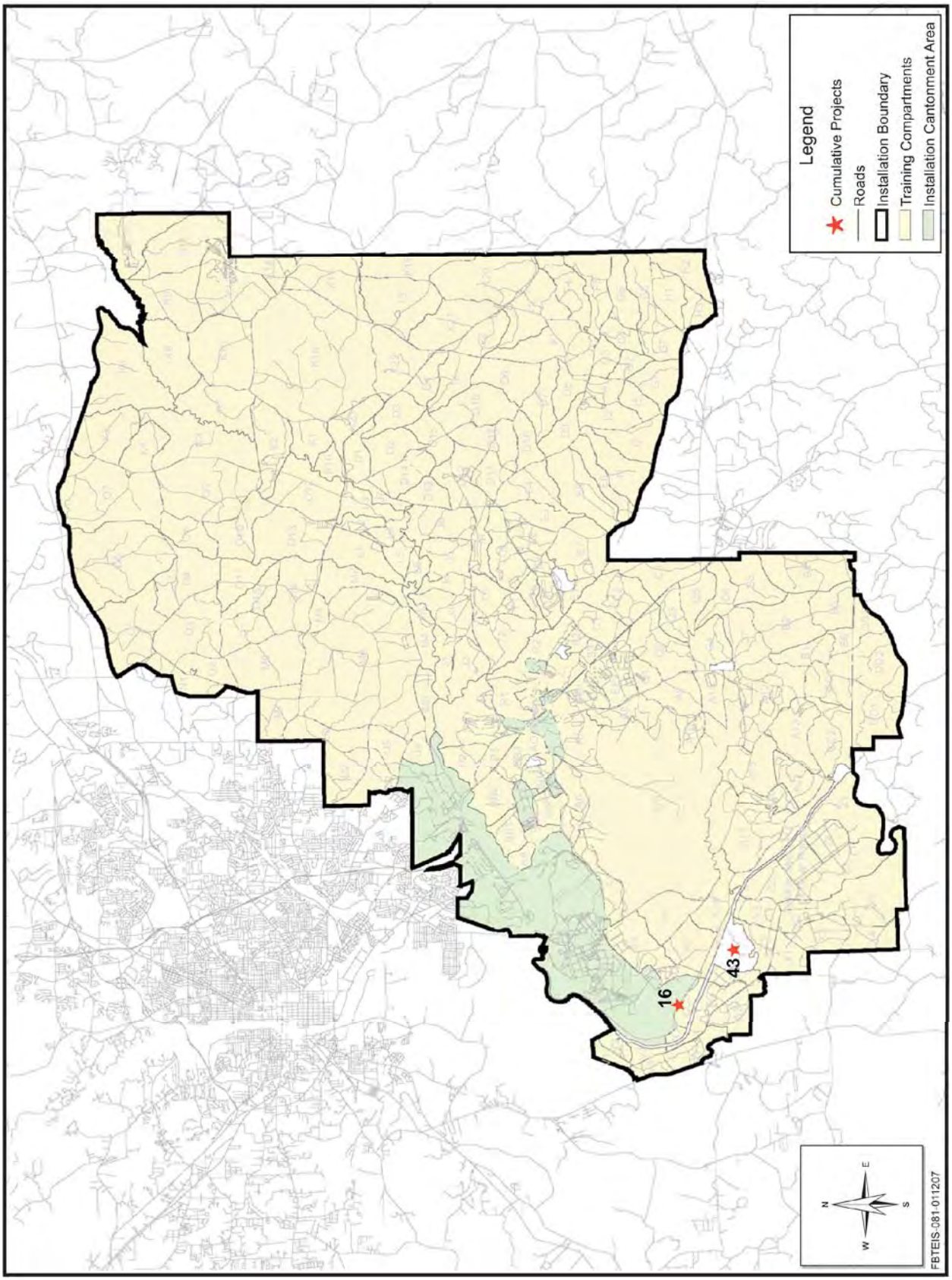


Figure 5-1 Projects Considered for Cumulative Effects

the purposes of this EA and the limited scope of this ROI, only the force protection measure and would present any potential cumulative impacts when combined with this proposed campground expansion.

5.2 Assessment of Cumulative Effects

Analysis of the Uchee Creek Campground Expansion action alternatives resulted in a finding of minor, temporary, potential direct or indirect effects on soils water quality, and biological resources so these will be further analyzed in this section of the EA. Visual resources, under Alternative B, would have a long term beneficial effect directly within the campground but would not have any interaction with the security barrier; therefore, it is not analyzed further within this section.

Soils. The ROI for soils and vegetation consists of a very localized area within the Uchee Creek Campground in Russell County, Alabama. The only action in the ROI (for both alternatives) would be the already established security barrier and existing range and campground operations and maintenance. The security barrier has been constructed and erosion control measures undertaken in its design; therefore, no adverse cumulative impacts to soil erosion are anticipated. While range activities (such as training and road/trail maintenance) may contribute cumulatively to soil erosion when combined with this proposal, the campground expansion construction would be negligible and adherence to applicable Federal, state, and local laws and regulations, such as erosion control measures and NPDES permits, would help minimize soil erosion. Therefore, no cumulative impacts are anticipated to soils.

Water Quality. Like soils the security barrier is already established and potential sedimentation due to this action would not occur when considered incrementally with the short-term impacts of campground construction. Therefore, no cumulative impacts to water quality are anticipated.

Biological Resources. Vegetation removal, when considered for both projects and either alternative, would not represent any long-term cumulative impacts. The security barrier has been built and the 10 acres of vegetation removed, under the proposed action and/or alternatives, would not present a regional influence on overall vegetation availability for wildlife. In addition, wildlife would only be temporarily disturbed from noise during construction, and migratory routes would not be impacted by this proposed action, therefore, no cumulative impacts from the two projects when combined are anticipated. Federally- and state- listed species would also not be cumulatively impacted. The only potential RCW habitat that would be removed does not currently support an active cluster. In summary, no cumulative impacts to biological resources would occur.

CHAPTER 6

CONCLUSIONS AND RECOMMENDATIONS

6.0 CONCLUSIONS AND RECOMMENDATIONS

The no-action alternative (Alternative C), as described under baseline conditions, would not meet the purpose and need for providing adequate recreational facilities and opportunities for Fort Benning and other Army personnel. The additional chalets, RV sites, and playgrounds considered under the proposed action, Alternative A, would meet this need. Alternative B would also meet this need with an additional amenity for recreational users by supplying a catfish pond.

The predicted environmental consequences of Alternatives A, B, and C on the relevant environmental resource categories are presented in Table 6-1, along with a summary of mitigation measures. Neither of the action alternatives (A and B) is expected to result in significant adverse impacts in any resource category. Potential minor, temporary adverse effects would occur under the action alternatives to soils, water quality, and biological resources. No cumulative impacts are expected

Both Alternatives A and B would be suitable to implement and environmental effects would be similar. Because Alternative A provides for increased recreational accommodations at Uchee Creek Campground, does not present any significant adverse impacts, and has adequate funding, it is the recommended alternative for implementation under this proposal. Alternative B would require examination of the pond's underlying soils to determine the most suitable form of disposable prior to any construction.

Table 6-1 Comparison of Potential Impacts by Alternative			
Resource	***Proposed Action***		***No Action***
	Alternative A	*Alternative B*	*Alternative C*
Biological Resources	• Temporary minor adverse impacts from construction activities could temporarily disturb wildlife • Construction and operation of additional recreational facilities would not impact the RCW because there are no active clusters at the proposed construction sites • No impacts to other Federal and state protected species **Mitigation Measures**: Adherence to species management plans and applicable laws and regulations	• Same as Alternative A **Mitigation Measures**: Adherence to species management plans and applicable laws and regulations	• No changes to current biological resources, therefore, no impacts • Current conservation measures would continue
Human Environment			
Land Use and Visual Resources	• No impacts **Mitigation Measures**: None proposed	• Tranquility and visual attributes to catfish pond are beneficial impacts **Mitigation Measures**: None proposed	• No impacts

CHAPTER 7

REFERENCES CITED

7.0 REFERENCES CITED

Alabama Forestry Commission. 2006. Alabama's Best Management Practices for Forestry. Website: Http://www.forestry.state.al.us/bmps.htm. November.

Base Closure and Realignment Commission (BRAC Commission). 2005. *2005 Defense Base Closure and Realignment Commission Report.* 8 September.

Environmental Protection Agency (EPA). 2006. Total Maximum Daily Loads, List of Impaired Waters in Alabama. Website: http://iaspub.epa.gov/tmdl/waters_list.control?state=AL&huc=. November.

Fort Benning. 2006. Outdoor Recreation Plan. Army Installation Management Agency, Southeast Region Office. Fort Benning. July.

_____. 2005a. Geographic Information Database (GIS), Fort Benning, Georgia.

_____. 2005b. Residential Communities Initiative, Final Environmental Assessment. Fort Benning, Georgia. June.

_____. 2004. Final Environmental Impact Statement for the Digital Multipurpose Range Complex. Fort Benning, Georgia. April.

_____. 2003. Installation Master Plan. Fort Benning, Georgia.

_____. 1999. Environmental Impact Statement (Final) for Land Exchange Between the U.S. Army (Fort Benning, GA) and Consolidated Government of Columbus/Muscogee County, Georgia. January.

Jackson, Charlotte. 2006 and 2007. Fort Benning Directorate of Community Activities. Fort Benning, Georgia. Personal communication.

Osbourne, Bob. 2006 and 2007. Fort Benning Directorate of Community Activities. Fort Benning, Georgia. Personal communication.

United States Army (U.S. Army). 2005. Multi- Role Bridge Company Establishment Environmental Assessment, Fort Benning, Georgia.

_____. 2003. Environmental Assessment for the Installation of Anti-Terrorism/Force Protection Measures at the U.S. Army Infantry Center, Fort Benning, Georgia. July.

_____. 2001. Fort Benning Final Integrated Natural Resources Management Plan (INRMP). September.

United States Army Corps of Engineers (USACE). 2002. Mobile District. Final Programmatic Environmental Impact Statement for Army Transformation. February.

_____. 1995. Savannah District. Environmental Assessment and Finding of No Significant Impact for Expansion of Uchee Creek Campground and Marina, Fort Benning, Russell County, Alabama. May.

United States Department of Agriculture (USDA). 1997. Natural Resources Conservation Service, Soil Survey of Chattahoochee and Marion Counties, Georgia.

_____. 2003. Natural Resources Conservation Service, Soil Survey of Russell County, Alabama.

United States Fish and Wildlife Service (USFWS). 1982. National Wetlands Inventory. U.S. Department of the Interior. Washington, DC.

Wilkins, Joe. 2006. CWA/Waste Water Programs Manager. Fort Benning, Georgia. Personal Communication. September.

CHAPTER 8

LIST OF PREPARERS AND CONTRIBUTORS

8.0 LIST OF PREPARERS AND CONTRIBUTORS

Christina Cummings, *Production*
A.A.S., Administrative Office Technology, Boise State University, 1999
Years of Experience: 8

Cathy Doan, *Environmental Analyst*
B.S., English, Central Michigan University, 1980
M.A., Human Resources Development, Webster University, 1985
Years of Experience: 9

Edie Mertz, *Graphics*
A.A. General Education, Cerro Coso College, CA, 1994
Years of Experience: 13

Kathy L. Rose, *Project Manager/Environmental Analyst*
B.A., Political Science/German, University of Massachusetts/Amherst, 1980
M.A., International Relations, George Washington University, 1983
M.S., Forest Resource Management, University of Idaho, 1996
Years of Experience: 12

APPENDIX A

ALABAMA SHPO LETTER

STATE OF ALABAMA
ALABAMA HISTORICAL COMMISSION
468 South Perry Street
MONTGOMERY, ALABAMA 36130-0900

F. LAWERENCE OAKS
EXECUTIVE DIRECTOR

TELEPHONE NUM8ER
242-3184

April 13, 1995

Mr. M.J. Yuschishin
Planning Division
Department of the Army
Savannah District, COE
P.O. 889
Savannah, GA 31402-0889

Re: AHC# 95-0645, Two Archaeological Surveys, Ft. Benning
Russell County, AL

Dear Mr. Yuschishin:

Based upon the cultural resource assessment conducted by Brockington and Associates, Inc., in 1992, the State Historic Preservation Officer has determined the following. Our office agrees with the provided evaluation that archaeological site 1RU135 is eligible for nomination to the National Register of Historic Places under criterion D, for potential to contribute scientific data to the prehistoric database. It must be avoided by all ground disturbing activities, present and those planned in the future. Should disturbance ever be necessary at any of these locations, additional (Phase II) testing should be done to determine exact eligibility status. Future consultation with this office would be necessary under those conditions. Therefore, except for the above given stipulation, our office concurs with the proposed project. If within the last several years 1RU135 has been subjected to ground disturbance we request the opportunity to review all correspondance pertaining to the activities.

For the archaeological survey conducted by Panamerican Consultants, Inc., for Compartment W-4 on Ft. Benning in 1994, we have determined the following. We can concur with the survey conclusions that of the twelve recorded archaeological sites, one (1RU58) is definitely and seven are potentially eligible for the National Register of Historic Places. The seven sites are 1RU45, 90, 91, 222, 224, 227, and 230. They must be avoided by all ground disturbing activities, present and those planned in the future. Should disturbance ever be necessary at any of these locations, additional (Phase II) testing should be done to determine exact eligibility status. Future consultation with this office would be necessary under those conditions. The other four sites are cleared for project activities, from a cultural resource perspective. Therefore, except for the above given stipulation, our office concurs with the proposed project.

It is our opinion that, as is suggested in at least one of the submitted cultural resource survey documents, the significant archaeological sites identified in both surveys should be monitored on an annual basis. In fact all known sites of any import should be inspected at least on a yearly schedule. Our office would be happy to accompany Ft. Benning staff on any of these trips.

We appreciate your consideration in the protection of Alabama's nonrenewable cultural resources. If this office can be of further assistance, please do not hesitate to write or call Ms. Lee Luis of our staff.

Sincerely,

F. Lawerence Oaks
State Historic Preservation Officer

FLO/LAL/gtj

APPENDIX B

DISTRIBUTION LIST

APPENDIX B
DISTRIBUTION LIST
FOR PUBLIC NOTICE AND ENVIRONMENTAL ASSESSMENT

All individuals on this list were mailed a copy of the Notice of Availability for the EA. Persons who received both the Notice of Availability and the EA are annoted with a double asterisk.

I. MUNICIPAL AND COUNTY ELECTED AND APPOINTED OFFICIALS

** Mr. Victor W. Cross
Phenix City-Russell County Chamber of Commerce
1107 Broad Street
Phenix City, AL 36867

Mayor Jeff Hardin
601 12th Street
Phenix City, AL 36867

II. TRIBAL, STATE, COUNTY, AND LOCAL GOVERNMENT OFFICIALS

Honorable Tarpie Yargee
Chief
Alabama/Quassarte Tribal Town
P.O. Box 187
117 North Main Street
Wetumka, OK 74880

Honorable Lovelin Poncho
Chairman
Coushatta Tribe of Louisiana
1940 Bell Road
P.O. Box 818
Elton, LA 70532

Honorable Joanne Battiste
Principal Chief
Alabama-Coushatta Tribe of Texas
571 State Park Road 56
Livingston, TX 77351

Honorable Gary Bucktrot
Mekko
Kialegee Tribal Town
108 N. Main Street
P.O. Box 332
Wetumka, OK 74883

Honorable Bill Anoatubby
Governor
Chickasaw Nation
124 South Broadway
American Building, 3rd Floor
P.O. Box 1548
Ada, OK 74821

Honorable George Wickliffe
Chief
United Keetoowah Band
of the Cherokee Indians of Oklahoma
P.O. Box 189
Park Hill, Oklahoma 74451

Honorable A.D. Ellis
Principal Chief
Muscogee (Creek) Nation of Oklahoma
P.O. Box 580
HWY 75 & Loop 56
Okmulgee, OK 74447

Honorable Mitchell Cypress
Chairman
Seminole Tribe of Florida
AH-THA-THI-KI Museum
HC-61, Box 21A
Clewiston, Florida 33440

Honorable, Bufford Rolin, Chairman
Poarch Band of Creek Indians
HCR 69A, Box 85B
Tribal Offices
5811 Jack Springs Road
Atmore, AL 36502

Honorable George Scott
Town King
Thlopthlocco Tribal Town
P.O. Box 188
Okemah, OK 74859

Honorable Kelly Haney
Principal Chief
Seminole Nation of Oklahoma
P.O. Box 1498
Wewoka, OK 74884

Honorable Lisa Stopp
Assistant Chief
United Keetoowah Band of the
Cherokee Indians of Oklahoma
P.O. Box 189
Park Hill, OK 74451

Honorable Phillip Martin, Chief
Mississippi Band of the Choctow Indians
P.O. Box 6010
Choctaw Branch
Philadelphia, Mississippi 39350

Honorable Kevin Sickey, Chairman
Coushatta Tribe of Louisiana
P.O. Box 99
Elton, LA 70532

Richard Shelby
Alabama, U.S. Senator
110 Hart Senate Office Building
Washington DC 20510

Lesley Vance
80th House District, Room 630-E
11 S. Union Street
Montgomery, AL 36130

Jeff Sessions
Alabama U.S. Senator
335 Russell Senate Office Building
Washington, DC 20510

Myron C. Penn
Alabama, 28th Senate District, Room 731
11 S. Union Street
Montgomery, AL 36130

Mike Rogers
Alabama, 3rd District
514 Cannon HOB
Washington, D.C. 20515

III. LOCAL AND REGIONAL ADMINISTRATORS, FEDERAL AGENCIES, OR COMMISSIONS WITH REGULATORY INTEREST

** U.S. Fish & Wildlife Service
Georgia Office
247 South Milledge Avenue
Athens, GA 30605

** U.S. EPA
Attn: Dr. Gerald Miller
Atlanta Federal Building
61 Forsyth Street
Atlanta, GA 30303-3104

U.S. EPA
Attn: Waste Management Division
Atlanta Federal Building
61 Forsyth Street
Atlanta, GA 30303-3104

** Commander, Savannah District COE
Attn: CESAS-PD-EC (Mr. Coleman)
Post Office Box 889
Savannah, GA 31402-0889

Alabama State Historic Preservation Officer
Alabama Historic Commission
468 South Perry Street
Montgomery, AL 36130

Alabama Department of Conservation
and Natural Resources
64 N. Union Street
Montgomery, Alabama 36130

Tom Fisher, Regulatory Branch
Albany Field District
U.S. Army Corps of Engineers
1104 North Westover Rd., Unit 9
Albany, GA 31707

IV. CITIZEN ADVISORY GROUPS AND LOCAL INTEREST GROUPS OR PERSONS

Chattahoochee Nature Center
9135 Willeo Road
Roswell, GA 30075

Sierra Club, Georgia Chapter
1447 Peachtree Street N.E.
Suite 305
Atlanta, GA 30309

National Wildlife Society
1401 Peachtree Street N.E.
Suite 240
Atlanta, GA 30309

National Wildlife Society
1401 peachtree St., N.E.
Suite 240
Atlanta, GA 30309

The Nature Conservancy
Post Office Box 2452, Ft. Benning Branch
Columbus, GA 31905-2452

Audobon Society of Columbus
P.O. Box 442
Hamilton, GA 31811

Chattahoochee Riverkeeper, Inc.
30 W. 10th Street
P.O. Box 1492
Columbus, GA 31909

.

V. LOCAL NEWS AND MEDIA

WRBL TV 3 (CBS)
Attn: Legals
1350 13th Avenue
Columbus, GA

WTVM TV 9 (ABC)
Attn: Legals
1909 Wynnton Road
Columbus, GA 31994

WXTX TV 54 (FOX)
Attn: Legals
6524 Buena Vista Road
Columbus, GA 31994

Columbus Times
2230 Buena Vista Road
Columbus, GA 31906

WKCN (99.3 FM)
Attn: Legals
1353 13th Avenue
Columbus, GA 31901

WGSY (100 FM)
Attn: Legals
1501 13th Avenue
Columbus, GA 31901

WOKS (1340 AM) and WXFE (105 FM)
Attn: Legals
P.O. Box 1998
Columbus, GA 31902

VI. FORT BENNING OFFICIALS

Walter Wojdakowski
Major General, U.S. Army
Commanding General
Infantry Hall (Bldg 4)
Fort Benning, GA 31905

Deputy CG/Assistant Commandant
Infantry Hall (Bldg 4)
Fort Benning, GA 31905

Commander, U.S. Army Infantry Center
Attn: ATZB-OT
Fort Benning, GA 31905

APPENDIX C

PUBLIC AND STAKEHOLDER INVOLVEMENT PLAN

Environmental Assessment for Uchee Creek Campground Expansion
Fort Benning, Georgia and Alabama
Public and Stakeholder Involvement Plan (PIP)
February 2007

1. PURPOSE

1.1 Need for Project. Currently, there is a high demand for overnight accommodations at Uchee Creek Campground, Fort Benning, with a waiting list for cabins and chalets of 3 to 9 months. The main focus of the Uchee Creek Campground project is to develop more RV campsites and chalets to help satisfy this demand for more overnight accommodations. The purpose of the proposed action is to provide the facilities and campground areas to support recreational needs of Soldiers, civilians, and their families at Fort Benning. The need for the proposed action is to ensure the morale and welfare of personnel at Fort Benning is addressed, thus enabling them to be physically and mentally fit in combat situations.

1.2 Need for Public and Stakeholder Involvement Plan. This Public Involvement Plan (PIP) presents a comprehensive means of satisfying legal requirements while enhancing community knowledge and participation in the planning for the proposed expansion of the Uchee Creek Recreation Area at Fort Benning. Throughout this PIP, "public" is used to broadly describe individuals who are in communities near the proposed project site or that may be interested or affected by the proposed action or alternatives. "Stakeholder" is used to identify those entities that have an additional relationship to Fort Benning environmental resources or regulatory or governmental duties. Stakeholders include the federally-recognized American Indian Tribes associated with the Fort Benning area (Tribes); federal, state and local governmental agencies with regulatory authority over Fort Benning (e.g., United States Fish and Wildlife Service [USFWS] and Georgia and Alabama State Historic Preservation Offices); and interested public agencies.

1.2.1 Public involvement required by National Environmental Policy Act (NEPA). The primary law that drives public involvement is the National Environmental Policy Act (NEPA). NEPA requires federal agencies, such as the Army at Fort Benning, to prepare an environmental analysis of the proposed action and alternatives. Potential environmental impacts, both direct and indirect, are identified for the proposal and each alternative, and possible mitigation for any negative impacts is presented. Also, cumulative impacts (i.e., incremental impacts when considering other projects or actions in a region of affect) are identified as well as any resultant mitigation.

An EA is the appropriate level of NEPA documentation for the Expansion of the Uchee Creek Campground at Fort Benning. The Council on Environmental Quality (CEQ) has NEPA oversight for the federal government and has published regulations and guidance for preparation of an EA. The Army

supplements NEPA and the CEQ directions with Army Regulation 200-2, *Environmental Effects of Army Actions* (AR 200-2), current version effective 29 March 2002. AR 200-2 provides guidelines for the contents of an EA and the processes required for full environmental analysis with participation by public, stakeholders, and regulators. This PIP will not restate the provisions of AR 200-2, so attention to the specific requirements provided therein is required to fully comply with AR 200-2 and the Army's requirement for public and stakeholder participation and scoping. NEPA requires opportunities for public review and comment of an EA. Public interaction is based on two-way communication that reflects the needs of the community, and may utilize such methods as notices, brochures, news releases, web page information, summaries, draft documents, public meetings, comments, and/or other methods. This PIP will address the means of meeting the NEPA and AR 200-2 public involvement requirements.

1.2.2. Other Laws and Regulations. There are several other laws and regulations that require public notices and participation during the planning phases of a federal project and some *may be* relevant to the implementation of the proposed campground expansion. Although NEPA may address some of the topics and issues in the EA, Fort Benning needs to satisfy the requirements of these other laws and regulations.

1.2.3 Goals of Plan. Fort Benning is committed to meeting the legal requirements and also takes measures for communication and involvement of the public and stakeholders in the planning of the Uchee Creek Campground Expansion proposal at Fort Benning. Limitations in resources, personnel, and time impose constraints that necessitate an efficient and realistic plan. This PIP must assist the Army planners and be realistic for implementation. Goals for this PIP include:

- Promote an understanding of public and stakeholder involvement requirements and opportunities for better resourcing and scheduling;
- Specify steps needed to meet legal responsibilities for comment opportunities of public members and stakeholders;
- List realistic time frames and responsible persons or offices for each step;
- Coordinate activities to maximize the quality of the information, ensure the information relates to planning actions in process, and incorporate any resultant feedback into future participation or planning processes;
- Incorporate opportunities to present information to better partner with the community; and
- Keep the Fort Benning Public Affairs Officer (PAO) informed.

2. PUBLIC INVOLVMENT PLAN STRUCTURE

This PIP is presented chronologically, providing the anticipated steps, time frames, and actions. Although this plan is meant to serve as a foundation for public and stakeholder involvement, it may have to be adjusted to accommodate changes. Items in this PIP should be evaluated for suitability before engaging in the recommended actions. AR 200-2 divides the scoping process into three phases for simplification: the Preliminary Phase, the Public Interaction Phase, and the Final Phase. Although the

majority of public and stakeholder involvement is conducted in the Public Interaction Phase, the other two stages encompass important steps to prepare for and respond to public and stakeholder involvement. This PIP will use the three phases to organize this Plan, although the phases often overlap.

3. PRELIMINARY PHASE

3.1. Initial Internal Scoping. This is an internal Fort Benning action that is normally very informal and may result in limited amounts of documentation. Often proponents of the action start this internal scoping as a part of management planning for the proposal, rather than as a conscious effort to conduct internal scoping. Internal scoping is a process of identifying project requirements, initial environmental concerns, and possibly explore options to address those concerns. In this case, much of the internal scoping occurred in August 2006 by the Division of Morale, Welfare and Recreation and Directorate of Community Activities (DCA). Internal scoping is important because it commences the environmental analysis; however, internal scoping is only a precursor to public and stakeholder involvement. It is important for the proponent (i.e., the Army at Fort Benning) and all those working with the proponent to keep in mind that the decisions regarding the project are not final and are just proposals. Until the process of environmental analysis and documenting a decision is complete, the proponent may modify the project, especially to reduce potential environmental impacts, incorporate internal concerns, or address potential mitigation measures.

3.1.1. Identify Proponent. Initially, the proponent(s) of the proposal is identified. Usually, the proponent is the person or activity that has initiated the action, has initiated a funding request, and makes the important decisions or recommendations regarding the project. For the expansion of the Uchee Creek Recreation Area proposal, the proponent has been identified as the DCA, Fort Benning, and the Fort Benning Garrison Commander for this action.

3.1.2. Coordinate with Environmental Planners. For actions that could have, and/or the potential to have, a negative affect or a substantial positive affect on the environment, the proponent is required to coordinate with EMD. Early coordination is required for large or complex projects. Failure to coordinate early can lead to several problems, including failure to maintain a proper NEPA record, delay in project execution, extra expense from redesigns and incorporation of mitigation, plus other problems. Normally the proponent initiates coordination by submitting a completed Fort Benning Form 144-R to EMD to determine what level of NEPA analysis is required; however the NEPA documentation for some proposals obviously requires more complex NEPA analysis and the internal scoping can begin with a kick-off meeting or other ways. For purposes of this NEPA process, DCA personnel coordinated NEPA compliance with EMD to initiate this EA.

3.1.3. Document internal scoping efforts. NEPA compliance involves maintaining records of alternatives explored, issues identified, personnel involved, and other aspects of necessary for internal

scoping. Preparing meeting minutes or notes or other evidence of internal scoping is helpful not only for maintaining a project file, but also to later recall information for environmental document preparation. Alternatives or options that may have been considered informally in the internal scoping process may be a basis for alternatives evaluated formally in the EA. This internal scoping does not substitute for public scoping, but it is a necessary precursor. The NEPA Administrative File for this action is kept at EMD.

3.1.4. Coordinate with Public Affairs Officers. The EMD NEPA Program Manager and Directorate of Public Works (DPW) will keep the Fort Benning PAO informed regarding environmental planning and scoping for the Uchee Creek proposal.

3.1.5. Tentative List of Affected and Interested Parties (Mailing List). EMD maintains a NEPA mailing list consisting of individuals or entities that have shown interest in Fort Benning's environmental studies or past projects. The mailing list also includes federal, state, and local government offices, Tribes, and other interested citizens and organizations requesting to be on the mailing list. This list will be reviewed and adjusted for each NEPA action. Moving toward an electronic mailing database would be more efficient for many on the mailing list, and EMD would need to acquire email addresses for those who indicate a preference to receive email rather than traditional mail. However, email will not totally replace mailings that are required for notices associated with the EA process and for those citizens not having email accessibility. For the Uchee Creek Campground proposal, Fort Benning has taken the basic Mailing List and adjusted it according to the potential of those individuals to be affected by the proposed action and alternatives and to update addresses. Part of the scoping process includes continued maintenance of the Mailing List—it will be updated routinely to correct, add, and/or remove individuals, organizations, entities, and government agencies.

4. PREPARATION OF THE EA AND FINDING OF NO SIGNIFICANT IMPACT (FNSI)

4.1. Involvement in the EA Development. The EA is the environmental analysis document that is available for public review and comment in the NEPA process for this proposed action. While several partial drafts of the NEPA document may be routed for review at the Installation (internal) level, the first NEPA document to leave the Installation for public review is the EA and draft FNSI. The Installation will make every attempt to inform the public of the proposal and address any relevant comments during the Public Interaction Phase into the EA analysis.

4.2. EA Preparation.

4.2.1. Drafting the NEPA Document. The EA will follow the general format in AR 200-2 although variations can be made as long as all required information and analysis are included. Reliable data and information are used in the development of the draft Uchee Creek EA. It is suggested that the EA be simultaneously developed with other environmental planning requirements to be efficient and credible.

4.2.2. Gathering Information. Much information and data will be obtained from existing sources. Coordination with the proponent, Fort Benning stakeholders, and external participants will be conducted early to ensure the information and data are correctly presented in the EA.

4.2.3. Coordinating with Other Environmental Requirements. Several other environmental requirements involve data collection, potential project impact analysis, and consideration of mitigation measures (if needed). Information obtained to satisfy other requirements will be incorporated into the EA, when available. Often only a summary of the related information is presented, with either a reference to the full document, placing the full document in an appendix, or incorporating by reference. If either referencing or incorporating another document, the full text of the document will be available for public review when the EA is made publicly available. If possible, the public involvement activities will be integrated to meet the requirements of NEPA and other requirements to present a complete picture to the public of the proposal and potential environmental impacts.

4.2.4. Coordinating with Others: The EA internal Army review includes DCA, DPW (Master Planning, EMD Program Managers), and the Office of the Staff Judge Advocate (OSJA Environmental Attorney) personnel. See AR 200-2 651.45(d)(2) for more information.

4.2.5. Cooperating Agencies. At this time, there are no cooperating agencies involved in the NEPA for the proposed expansion of the Uchee Creek Campground at Fort Benning.

5. PUBLIC INTERACTION PHASE

Publishing the EA for Public and Stakeholder Review and Comment: The Notice of Availability (NOA) of the EA and draft FNSI will be published in *The Bayonet*, the *Columbus Ledger-Enquirer*, and any other suitable media. The Fort Benning website will also include the NOA, as well as the full text of the EA, draft FNSI, and, when possible, the appendices to the EA.

In addition to the announcement of the NOA in the newspaper and website, the NOA will also be mailed to all persons/agencies on the project Mailing List. Fort Benning is required to make hard copies of the EA and draft FNSI available for review to anyone on this list (or in the general public) upon request. At a minimum, hard copies of the EA and draft FNSI will be provided to key Installation personnel, regulatory agencies, and local libraries (both on and off post). Additionally, the NOA will be posted at the Uchee Creek Recreation Area. The review and comment period for the draft EA and FNSI is 30 days after the first publication of the NOA in the local media.

6. THE FINAL PHASE

After the close of the time frame for public comment on the EA and draft FNSI, the Final Phase for public involvement begins. Comments are considered and any revisions must be incorporated, either by errata sheets for minor revisions or complete revision and production of a revised EA for more comprehensive changes.

6.1. Draft Finding of No Significant Impact (FNSI). No decision will be made until 30 days after the EA and draft FNSI have been made available for public review and comment. The draft FNSI includes the decision (which alternative is selected), a description of alternatives considered, explanation of all factors used in making the decision, and an account of avoidance and mitigation requirements (if applicable). See AR 200-2, Section 651.35(c) for more information.

6.2. Mitigation and Monitoring. If mitigation measures are identified, then monitoring requirements will be identified in the EA and FNSI. A monitoring plan and enforcement programs for any required mitigation will be included in the EA and FNSI and carried out by the proponent. Fort Benning will provide the status of the mitigation and monitoring results upon request. Point of contact for requesting this information is the Fort Benning Public Affairs Office.

Reference:

Army Regulation 200-2, *Environmental Effects of Army Actions*, Headquarters, Department of the Army, 2002.

Fort Benning. 2005. Environmental Assessment for Temporary Brigade Combat Team Support Facility and Brigade Combat Team Training at Fort Benning, Georgia; Appendix B, Public and Stakeholder Involvement Plan. January.