Supplemental Environmental Assessment II and Draft Finding of No Significant Impact

for the

Infrastructure Footprint Reduction Program

Fort Benning, Georgia and Alabama

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1.0 PURPOSE AND NEED

The Commanding General of the US Army Training and Doctrine Command (TRADOC), General William W. Hartzog, in a memorandum dated 1 November 1996, directed Installations to support the "Winning the Infrastructure War" initiative via implementation of the Infrastructure Footprint Reduction Program (IFRP). The intent of the initiative was the achievement of affordability in mission accomplishment by way of infrastructure cost-avoidance, while continuing to maintain high standards. Rather than incur the expense of maintaining unused or under-utilized buildings deemed unaffordable due to age or design, these structures would be demolished and their various functions relocated. The IFRP was implemented on Fort Benning through the development of the Facility Reduction Program. The Facility Reduction Program is a dynamic initiative, with buildings being added to or deleted from the list in accordance with mission demands.

An Environmental Assessment (EA) and Finding of No Significant Impact (FNSI) for the IFRP on Fort Benning were completed in 1997, based on the best available information attainable at the time. The EA analyzed the "No Action/Status Quo" alternative plus two action alternatives; one (Alternative II) involving the construction and utilization of an on-Post facility for the disposal of demolition wastes and one (Alternative III) involving the transport of demolition wastes to an off-Post commercial facility. Additionally, the document presented a thorough and comprehensive analysis of the environmental consequences of both actions and their potential impacts to natural and human environments. No comments on this EA and FNSI were received from the public and it was determined that, with proper mitigation and monitoring efforts, neither of the proposed alternatives would result in potentially significant environmental impacts. Alternative III was selected as the preferred action because it offered the most flexibility in disposal methods for wastes generated by demolition.

A Supplemental Environmental Assessment (SEA) was prepared in 2002 to address two amendments to the original EA and FNSI. In the interim, some buildings originally identified as proposed for demolition had been deleted from the program list and other buildings not previously identified for demolition had been added to the list; the list was revised to reflect these changes, as appropriate. In addition to an updated Facility Reduction Program list, Alternative III was amended under the 2002 SEA by addition of the modification, "Utilization of Vacated Buildings for Firefighter Training;" however, the modification is rarely implemented as the requirements for preparing a structure for a firefighting exercise are onerous and, having been thusly prepared, the structure may no longer exhibit the attributes needed for realistic training (Gustafson, 2007). Descriptions of structure preparation and the permits required are available in Appendix A and Appendix B, respectively, of the 2002 SEA. The 2002 SEA determined that demolition of buildings on the Facility Reduction Program list or their reutilization for firefighter training would result in minor adverse effects to soils and air quality due to soil disturbance, fugitive dust, and fine particulate matter ($PM_{2.5}$) that were temporary in nature or readily mitigated.

In September 2007, DPW Master Planning Division again revised the Fort Benning Facility Reduction Program list (Fig. 1) to reflect further additions and deletions of buildings proposed

for demolition. The spirit of the original initiative (affordability) is retained by removing from inventory outdated structures or structures where rehabilitation would not be cost effective. Sites made available by demolition would be available for possible new construction using the latest energy efficiency technology; structures contracted after 2007 are required to meet or exceed Leadership in Energy and Environmental Design (LEED) "Silver" standards. Affordability would also be enhanced by avoidance of costs associated with potential mitigation for adverse effects resulting from possible future development of unimproved sites.

Fort Benning has prepared this Supplemental Environmental Assessment II (SEA II) to identify and evaluate the potential environmental effects of the newly revised list of buildings (Fig. 1) proposed for demolition. For the purposes of this document, the proposed action will be referred to as "Revised Alternative III," since it consists of a similar off-Post demolition waste disposal strategy, but with a different Facility Reduction Program list than the one analyzed in the 2002 EA and FNSI. Also, the previous SEA referred to the Facility Reduction Program as the "Master Demolition Program;" this SEA II refers to the Facility Reduction Program, as it is known in the Master Planning Office (Holloway, pers. com. 2007). The utilization of a condemned structure for firefighter training, as evaluated in the 2002 SEA, is still considered an environmentally valid option to demolition; however the regulatory requirements associated with this option make it unlikely that this option will be implemented. The cost of preparing a structure such that it meets regulatory requirements for burning is generally considered to render this option nonviable. This SEA II was prepared in accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations, and the Army NEPA Regulation (32 Code of Federal Regulations, Part 651). This document consists of an objective appraisal of the potential effects, both negative and positive, of the proposed action and its alternatives on the natural and human environment, as well as an appraisal of the cumulative effects of those actions in a specifically defined region of influence. It also contains discussions of mitigation, monitoring, permit requirements, and findings and conclusions in accordance with NEPA guidelines. The SEA II evaluates potential effects associated with the proposed action only if the potential effects were not adequately described in the previous 1997 EA and 2002 SEA or if there have been changes in the characteristics of the affected environment categories, now known as Valued Environmental Components (VECs): soils, vegetation, water quality, wildlife, socioeconomics, land use, environmental justice, cultural resources, utilities, noise, air quality, solid waste/pollution prevention, hazardous waste/materials containment/disposal, public health and safety, protection of children, aesthetics, and sustainable design and development.

2.0 DESCRIPTION OF THE PROPOSED ACTION

2.1 LOCATION OF THE PROPOSED ACTION

The location of the proposed action is as described in the previous 1997 EA and 2002 SEA.

2.2 PROPOSED ACTION

Revised Alternative III: "Implement the 2007 Facility Reduction Program."

This alternative would entail the identification of unused or under-utilized buildings deemed unaffordable due to age or design, relocation of currently occupying activities, if any, demolition of identified structures, and disposal of generated waste at an appropriately licensed off-Post commercial facility, as discussed previously in the 1997 EA and 2002 SEA. Under this alternative however, the updated Facility Reduction Program list (Fig. 1) would determine the affected structures. Private firms would be contracted to perform the demolition, debris transport, and disposal work. Contractors would be required to adhere to all applicable Federal, State, and local laws and regulations and Army regulations regarding waste transport and disposal and provide documentation of such to Fort Benning. Identified structures would be removed from inventory via submission of Form 1354 to Real Property by the proponent upon completion of demolition activities.

The selection of buildings for placement on the Facility Reduction Program list is validated in accordance with Army Regulation (AR) 405-70 "Utilization of Real Property," AR 405-80 "Management of Title and Granting of Use of Real Property," AR 405-90 "Disposal of Real Estate," AR 415-15 "Army Military Construction Program Development and Execution," and AR 420-70 "Buildings and Structures."

3.0 AFFECTED ENVIRONMENT

The majority of the affected environment, both natural and cultural, has not changed since the completion of the 2002 SEA and FNSI and may be reviewed in the "Supplemental Environmental Assessment for the Infrastructure Footprint Reduction Program, US Army Infantry Center, Fort Benning, Muscogee and Chattahoochee Counties, Georgia," which is on file at EMD and the Fort Benning and Columbus libraries. In the interim, however, some changes have occurred in the following VECs, which are presented in their updated status below.

3.1 BIOLOGICAL RESOURCES

3.1.1 Species of Conservation Concern

3.1.1.1 Red-cockaded woodpecker

The Red-cockaded woodpecker (RCW) was placed on the Federal list of endangered species in 1970. Fort Benning has one of the largest RCW populations in the southeastern United States, with birds widely dispersed over much of the Post except that portion of the Installation lying in Alabama. In 2002, USFWS approved Fort Benning's Endangered Species Management Plan (ESMP) for the RCW, issued a Biological Opinion (BO) that included specific management activities, and approved implementation on Fort Benning of the "1996 Management Guidelines for the RCW on Army Installations." As of August 2007, Fort Benning had a total of 305 manageable RCW clusters supporting 261 Potential Breeding Groups (Witter, 2007).

The EIS for BRAC 2005 and Transformation identifies operations and maintenance activities associated with Transformation that would be likely to have adverse impacts on the RCW. A total of 108 RCW clusters on Fort Benning would be directly impacted by BRAC/ Transformation; 102 of those are active RCW clusters containing primary breeding groups. Army data indicate that 32 out of 99 analyzed active RCW clusters would be directly "taken" as a result of BRAC/ Transformation (Barron, 2007). The US Fish and Wildlife Service, in July 2007, issued a Biological Opinion of no jeopardy based on proposed avoidance, minimization, and compensation measures that would minimize adverse effects on the RCW; these measures include continuing consultation between Fort Benning and USFWS as BRAC/ Transformation progresses. The aforementioned documents are available by contacting Fort Benning EMD.

3.1.1.2 Bats

Eight species of bats, known to occur within the boundaries of the Installation, are listed in the Fort Benning Integrated Natural Resources Management Plan (INRMP):

- Big brown bat (*Eptesicus fuscus*)
- Eastern pipistrelle (*Pipistrellus subflavus*)
- Eastern red bat (*Lasiurus borealis*)
- Evening bat (*Nycteceius humeralis*)
- Little brown myotis (*Myotis lucifugus*)
- Mexican free-tailed bat (*Tadarida braziliensis*)
- Seminole bat (*Lasiurus seminolus*)
- Southeastern myotis (*Myotis austroriparius*)

The Southeastern myotis is a species of Special Concern in the State of Georgia; in the State of Alabama it is a species of High Conservation Concern, along with the Little brown myotis and Mexican free-tailed bat. All three species have been known to inhabit man-made structures for roosting and breeding. Furthermore, the Eastern pipistrelle, Big brown, and Evening bats are also known to make use of man-made structures. Due to their habitat preferences and the current state of disuse of many of the structures proposed for demolition, these bat species may occur within the proposed project areas. The primary focus of bat management on Fort Benning is the resolution of nuisance complaints. The INRMP describes techniques for capture and exclusion that were developed by Conservation Branch to minimize the possibility of sealing in hibernating bats or flightless juveniles when conducting bat exclusion efforts.

3.1.1.3 Migratory Birds

In accordance with the terms of international conventions and the Migratory Bird Treaty Act (MBTA) (16 United States Code Section 703), it is unlawful to harm migratory birds and their specified ecosystems. Conservation of migratory birds by Federal agencies and their consideration in the NEPA process is also mandated by Executive Order 13186. On July 31, 2006, a Memorandum of Understanding (MOU) was finalized between the Department of Defense and USFWS identifying measures to enhance migratory bird conservation on U.S. military Installations. Consistent with this MOU, Fort Benning manages and conserves migratory bird species through its INRMP and considers effects to migratory birds in any proposed action via the NEPA process. Fort Benning will continue to follow the applicable MOU provisions, which may involve permitting for some activities and further consideration of

migratory bird management in the INRMP. As of February 2007, the Migratory Bird Permit section of 50 CFR Part 21.15 allows for the incidental "take" of migratory birds during military readiness activities, except those ongoing or proposed activities that may result in a significant adverse effect on a population of a migratory bird species. Military readiness activity includes all training and operations of the Armed Forces that relate to combat, and the adequate and realistic testing of military equipment, vehicles, weapons, and sensors for proper operation and suitability for combat use. If a significant adverse effect on a population may result, then the Armed Forces must confer and cooperate with the USFWS to develop and implement appropriate conservation measures to minimize or mitigate such significant adverse activities. This proposed action is not expected to result in significant adverse effects to migratory bird populations.

An inventory of bird species known to occur on the Installation is available in the Fort Benning INRMP. During their respective nesting seasons, migratory birds require adequate protection of their habitats in accordance with the MBTA. The following species covered by the MBTA have been known to inhabit man-made structures and may be present within the proposed project areas:

- Barn swallow (*Hirundo rustica*)
- Barn owl (*Tyto alba*) (not listed in INRMP)
- Carolina wren (*Thryothorus ludovicianus*)
- Chimney swift (*Chaetura pelagica*)
- House finch (*Carpodacus mexicanus*)
- House wren (*Troglodytes aedon*)
- Northern rough-winged swallow (*Stelgidopteryx serripennis*)
- Purple martin (*Progne subis*)

A significant change to the MBTA, the 2005 Migratory Bird Treaty Reform Act (MBTRA), now excludes from protection those species considered to be non-native to the United States. The law provides that the U.S. Fish & Wildlife Service must promulgate a list of the now-excluded species. The following species, affected by the MBTRA, are known to inhabit man-made structures and may be present within the proposed project areas; however, they are no longer afforded legal protection by the MBTA:

- European starling (*Sturnus vulgaris*)
- Eurasian collared dove (*Streptopelia decaocto*) (not listed in INRMP)
- House sparrow (*Passer domesticus*)
- Rock dove (*Columba livia*)

3.2 HUMAN ENVIRONMENT

3.2.1 Cultural Resources

Management of cultural resources on Fort Benning is an ongoing effort accomplished via compliance with applicable cultural resource laws and regulations and the Installation's

Integrated Cultural Resources Management Plan (ICRMP). Fort Benning's ICRMP addresses compliance with legal requirements such as the Native American Graves Protection and Repatriation Act (NAGPRA), Archeological Resources Protection Act (ARPA), National Historic Preservation Act (NHPA) Section 110, and other mandates. To further improve efficiency in the Installation's Cultural Resources Management program, Fort Benning has adopted the Army Alternative Procedures (AAP) for implementing Section 106 of the NHPA. The intent of the AAP is to expedite the review of actions that might affect historic properties and use periodic meetings and NEPA documentation to accomplish most consultation efforts, providing substantial decision-making authority to the Installation based on the presence of professional staff. At Fort Benning, NEPA project review begins with the proponent submitting a Fort Benning Form 144R. All projects are reviewed by the various environmental program managers, including the Cultural Resources Manager (CRM).

All structures and archaeological sites on Fort Benning that meet the criteria for listing on the National Register (36 CFR Section 60.4) are considered eligible for listing on the NRHP until determined otherwise through established processes. Any buildings meeting the criteria for listing with the National Register, which are determined to be affected by the implementation of Revised Alternative III, will be addressed by following the Historic Properties Component (HPC) of the ICRMP. The HPC provides the Standard Operating Procedures (SOP) followed by Fort Benning and replaces procedures found in 36 CFR 800 for assessing proposed actions and their potential effects on Fort Benning's historic properties. Certification of Fort Benning's HPC by the Advisory Council on Historic Preservation was received in April 2006. Under the HPC, a finding of no adverse effect will require no further review of the project prior to the notice to proceed, although a record of the project is kept for a yearly review by the relevant state SHPO and Tribes in consultation with Fort Benning. An initial finding of an adverse effect for a project can be changed to no effect or no adverse effect if redesign or other avoidance measures are taken. Should mitigation be required, consultation with the appropriate State Historic Preservation Office (SHPO) and Tribes, as needed, will be conducted through the NEPA process.

There is a potential for identified structures considered otherwise ineligible for listing to be located within a historic district or within the viewshed of a historic district; these structures are also subject to the consultation process. If an adverse effect is predicted by the Fort Benning Cultural Resources Manager, appropriate action, such as consultation or mitigation, would be initiated in order to remedy the adverse effect. Consultation would be initiated in accordance with the HPC, using the Fort Benning NEPA process. Fort Benning would be responsible for subsequent coordination with Georgia SHPO, Federally recognized American Indians affiliated with the Fort Benning region (Tribes), and others, to identify and implement the appropriate action. Additionally, any buildings constructed between 1941 and 1943, but not listed in the 1986 Programmatic Memorandum of Agreement pertaining to World War II build-up efforts, would be subject to HPC processes, as would those buildings associated with the lives of persons of historical significance. Memoranda of Agreement (MOA) between Fort Benning and other stakeholders are no longer used to document consultation and mitigation.

3.2.2 Air Quality

In 2003, the 40% opacity limit for all outdoor burning was changed to exempt emissions attributable to Fort Benning's prescribed burning program from compliance with the opacity

rule. Fort Benning is currently working with Georgia Department of Natural Resources (GADNR) to establish a smoke management plan (SMP), per the EPA guideline, "US EPA Interim Air Quality Policy on Wildland and Prescribed Fires"(23 April 1998), because some of the fine particulate matter ($PM_{2.5}$) in the area appears to originate from wildfire and fire utilized for land management purposes. If the SMP is certified by the State, then, according to the Policy, $PM_{2.5}$ emissions from prescribed burning may be excluded in the $PM_{2.5}$ emissions total used to designate non-attainment. The Muscogee County area hosts four $PM_{2.5}$ monitors; two for real-time measurement of $PM_{2.5}$ levels and two that utilize collection filters to verify the real-time results. Recent monitoring indicates a trend in the MSA that would possibly lead to a designation of non-attainment for $PM_{2.5}$ in the near future (Gustafson, 2007).

Fort Benning keeps an inventory of stationary air emissions sources and uses this information to update its Title V Permit. The Title V Permit application was issued by GADNR-EPD Air Permitting Section on 16 July 2003 and is to be renewed five years from the issue date.

3.2.3 Solid Waste

Since 1 June 1997, all Fort Benning construction and demolition (C&D) waste has been transported off-post to a State-permitted facility. According to a policy issued 6 February 2006 by LG David Barno, Assistant Army Chief of Staff for Installation Management Command (IMCOM), Installations must apply the principles of sustainability as they build, renovate, or demolish their facilities. The policy requires that all new construction, renovation, and demolition projects or contracts awarded at Installations must include the diversion of at least fifty percent of C&D waste from landfills. In a procedure known as "deconstruction," structures are disassembled in a planned and controlled manner and the building materials are recovered and processed for re-use or recycling, thereby avoiding the energy expenditure required to mine, harvest, and transport raw materials; savings are also realized in landfill space, disposal fees, and the expense of waste transport. The policy also requires the inclusion of C&D waste management performance requirements in solicitation documents, following Unified Facilities Guide Specifications. Sustainable management of C&D waste demonstrates Federal leadership in programs that promote the responsible stewardship of natural resources.

3.2.4 Hazardous/Toxic Materials/Waste

Fort Benning submitted a Closure Certification Report to GADNR-EPD on 26 August 2005 for its Hazardous Waste Storage Facility, satisfying the requirements of the Hazardous Waste Facility Permit, Number HW-021(S)-2, regarding closure of the permitted unit. The facility was then inspected by GADNR Hazardous Waste Management Branch on 14 September 2005 to verify the closure certification and closure was deemed successfully completed. Corrective Action Permit Number HW-021(CA) was issued to Fort Benning on 24 September 2005 to cover all current and future corrective action activities on the Installation. These actions terminated permitted hazardous waste storage on the Installation but continue to require the investigation and remediation, if necessary, of hazardous constituent contamination. Neither the change in permitting nor this proposed action would affect hazardous or toxic materials or waste; therefore, this VEC will not be discussed further.

3.2.5 Utilities

Defense Reform Initiative Directive (DRID) #49 directed all Military Departments to privatize their utility systems except those needed for unique security reasons or when privatization is not cost effective. Privatization is defined as the transfer of ownership, responsibilities, investments, upgrades, plant replacement, and continued operation and maintenance to the non-Federal sector. Fort Benning has privatized its electrical and natural gas distribution systems, its potable water treatment and distribution system, and its wastewater collection and treatment system, therefore complying with the requirements of DRID #49.

3.2.5.1 Energy Sources

Fort Benning's electrical distribution system was privatized in June 1999; Flint Electric Membership Corporation (FEMC) is the new owner of the system. Electrical power is supplied by Georgia Power Company via two 115 kilovolt feeders into its substation on Marne Road. Voltage is transformed, metered, and fed to the adjacent FEMC-owned substation. There is no emergency electric power generation system for the entire Installation, but emergency power generators are in place at critical locations, such as the airfield, control tower, hospital, communications center, stockade, transmitter sites, radio beacon sites, and steam plants.

Fort Benning's natural gas distribution system was privatized in February 2002; Atmos Energy is the new owner of the system. Mission and loads at the Installation determine the volume of natural gas supplied by Atmos. Natural gas supplies the majority of non-mobile fuel requirements at the Installation. Fuel oil is used as a backup fuel in cases where boilers are greater than five million British thermal units, as well as the programmed primary fuel for newly constructed boilers.

3.2.5.2 Potable water supply

Fort Benning's water system is owned and managed by Columbus Water Works (CWW) to provide potable water to the cantonment areas. Fort Benning retains ownership of the underlying lands; however, the ownership, operation, and maintenance of the buildings, systems, and associated water facilities are the responsibility of CWW. Potable water supply to more remote areas of the Installation (including several ranges) is drawn from seven on-Post, non-essential wells with existing withdrawal permits. However, the majority of potable water is drawn from the existing CWW system, pumped into water transport trailers, and driven out to the training compartments/sites.

3.2.5.3 Wastewater treatment

There are two sanitary wastewater treatment plants that serve the entire Installation with a combined capacity of 8.4 mgd; current use is 3 mgd. Fort Benning's wastewater systems are also owned and managed by CWW. The sanitary sewage collection system consists of approximately 126 miles of 6-inch to 24-inch vitrified clay, cast iron, and concrete lines. Twenty-nine lift stations are required to move sewage across the rolling terrain of Fort Benning.

4.0 ENVIRONMENTAL CONSEQUENCES

The analysis in this section is for implementation of Revised Alternative III, as discussed in Section 2.2. If a structure other than those on the Facility Reduction Program list (Fig. 1) in this SEA II is selected for demolition, or if any other significant changes in scope of work occur, additional NEPA analysis would be required. Each identified structure would be subject to environmental review prior to demolition, with results and concurrence for the action made available in the Record of Environmental Consideration (REC) generated by the Fort Benning NEPA process, utilizing a Form-144R.

During preliminary analysis it was determined that the implementation of Revised Alternative III would have no potential effect, either adverse or beneficial, on the following VECs: wetlands, environmental justice, pesticides and herbicides, land use, unexploded ordnance (UXO), radiological substances, aesthetics, protection of children, transportation, and public health/safety. Therefore, these areas and issues will not be examined further in this SEA II.

4.1 NATURAL ENVIRONMENT

4.1.1 Soils

The threshold level of significance for soils is any ground disturbance or other activity that would result in illegal discharges and violate applicable Federal or State laws and regulations, such as the Georgia Erosion and Sedimentation Control Act (ESCA), and the potential for Notices of Violation (NOV) for failure to implement applicable State permits, such as a National Pollutant Discharge Elimination System (NPDES) construction permit under the ESCA, prior to initiating a proposed action.

As a result of the implementation of Revised Alternative III, soil disturbance would be confined to the footprint of identified structures and the immediate vicinity, where activities take place to demolish the structures and transport the debris off the Installation. The demolition contractor would be required to prepare and implement a Spill Prevention, Control and Countermeasures (SPCC) Plan for demolition activities. There is a possibility for release onto soils of petroleum/oil/lubricant (POL) products and/or hazardous materials from vehicles and equipment involved in the demolition process, resulting in potential contamination of soils, groundwater, or adjacent surface water bodies. The SPCC describes procedures and practices to prevent or minimize spills and releases onto ground surfaces in order to ensure the protection of soil resources. For actions with soil disturbance in excess of one acre, the contractor would be responsible for the preparation of a NPDES permit required by GADNR-EPD and an Erosion, Sedimentation, and Pollution Control Plan (ESPCP), which is part of the NPDES permit. A copy of the ESPCP must be coordinated through Fort Benning EMD prior to submittal to EPD. Overall, this action would be anticipated to result in temporary minor adverse effects to soils.

Adherence to the ESPCP, NPDES permit, and SPCC is required and would include measures to minimize impacts to soils and vegetation. During the demolition process, sites requiring a NPDES permit would require daily, weekly, and monthly inspections and reports, as well as the

monitoring of turbidity (sediments) in adjacent surface water bodies. Additional mitigation would include rehabilitation of the site.

4.1.2 Vegetation

The threshold level of significance for vegetation is the loss of vegetation at a level that would substantially reduce the occurrence of a native plant species or degrade the habitat of a dependent animal species at the population level on the Installation. Vegetation discussed below refers both to under-story shrubbery and over-story such as mature pines or hardwoods, and ground cover such as grasses.

Currently, the ground where the structures are sited is kept free of vegetation by the presence of the structures. The implementation of Revised Alternative III would result in temporary minor adverse effects to vegetation due to access by vehicles and equipment required to demolish structures and transport the debris off the Installation for treatment; any tree removal necessary for access by the demolition contractor would require prior approval from an EMD forester. Trees on the demolition site would be protected from inadvertent damage by placement of a physical barrier outside the drip-line, preventing vehicle access, debris accumulation, or equipment storage. Vegetation loss would be limited to the cantonment area where the identified structure is located. Minimization of the temporary minor adverse effects on vegetation would be as discussed previously in Soils, above, and in accordance with the ESPCP and NPDES Permit.

Indirect minor positive effects on vegetation would be realized when the site of a demolished structure is rehabilitated; exposed soils resulting from the demolition of identified structures (and possible removal or capping of buried utility lines) would be rehabilitated via revegetation management strategies described in the INRMP and would be reincorporated into the Installation's greenspace. No additional mitigation is proposed.

4.1.3 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 Georgia Water Quality Control Act, and the potential for NOV for failure to implement applicable Federal and State permits, such as a NPDES permit, prior to initiating a proposed action. This also includes non-compliance with management practices for Total Maximum Daily Loads (TMDLs) for streams defined as impaired under Georgia's 303(d) List.

The implementation of Revised Alternative III would not be expected to result in any direct adverse effects on water quality; however, there is the potential for dust, particulate matter, or displaced sediments resulting from demolition activities to enter surface waters via storm-water runoff. Contractors would be responsible for obtaining a NPDES construction permit for demolition activities resulting in ground disturbance in excess of one acre, which would include the preparation of an ESPCP and SPCC Plan as discussed previously in the Soils section of this document. As part of the NPDES permit Best Management Practices (BMPs) and Fort Benning requirements, contractors would also implement measures to prevent spills or releases of hazardous materials into waterways (including storm-water drainage pathways along access

roads and/or near project areas). Overall, this action would have the potential to result in indirect minor adverse effects on water quality.

BMPs and other regulatory requirements, such as placement of silt fencing and/or straw-bale barriers between the demolition site and the path of storm-water drainage, would prevent migration of contaminants into surface waters of the Installation, ensuring the protection of surface water resources. Waterways potentially impacted by the proposed action include Upatoi Creek, the Chattahoochee River, and their respective tributaries. No additional mitigation is proposed.

4.1.4 Species of Conservation Concern

The threshold level of significance for species of conservation concern occurs if an alternative disrupts normal behavioral patterns or disturbs habitat at a level that substantially impedes the Installation's ability to avoid jeopardy or conserve, manage, or recover a protected species. Each identified structure would be surveyed for species of conservation concern prior to demolition, with results made available in NEPA documentation generated by the Fort Benning Form 144R process. There are no Federally threatened or endangered species known to occur on or in the identified structures, and no adverse effects would be expected to Federally listed species due to implementation of Revised Alternative III.

4.1.4.1 Red-cockaded woodpecker (Federally listed as Endangered)

There are no identified structures within the boundaries of known RCW clusters; however, identified structures may exist within the boundaries of RCW foraging habitat. If tree removal is necessary for access to a structure, demolition contractors would be required to continue ongoing coordination of demolition plans with Fort Benning EMD Conservation Branch personnel, by submitting a Fort Benning Form 144R to EMD, in order to avoid impacting suitable foraging habitat in the immediate vicinity of the proposed action. Any demolition activities that fall outside of the structure footprint would require prior approval by the Installation and coordination with Conservation Branch. No adverse effects to the RCW or its habitat are expected due to implementation of Revised Alternative III and no further mitigation is proposed at this time.

4.1.4.2 Bats

The implementation of Revised Alternative III has the potential to adversely affect bats utilizing an identified structure for roosting or propagation of young. In order to avoid adverse effects, each structure would be inspected by Conservation Branch personnel for the presence of bats prior to demolition. The INRMP describes, in detail, the protocol for dealing with bats found in structures. If bats are detected, demolition would be delayed until the reproductive season has lapsed. Outside of the reproductive season, bats would be removed from the building using exclusion techniques, enabling the bats to relocate themselves, and no adverse effects would be expected. No additional mitigation is proposed.

4.1.4.3 Migratory Birds

The implementation of Revised Alternative III has the potential to adversely affect migratory birds utilizing a structure for roosting or propagation of young. In order to avoid adverse effects, each structure would be inspected by Conservation Branch personnel for the presence of nesting

migratory birds prior to any demolition scheduled during the reproductive season. In accordance with procedures described in the INRMP, if nesting birds are detected, demolition would be delayed until the reproductive season has lapsed, unless it is a species exempted by the MBTRA. Outside of the reproductive season, no adverse effects to migratory birds would be expected, as demolition would take place during daylight hours and any birds using the building to roost overnight would relocate themselves due to the disturbance. No additional mitigation is proposed.

4.1.5 Air Quality

The threshold level of significance for air quality is the emission of pollutants sufficient to result in a violation of applicable Federal or State laws and regulations such as the Clean Air Act, the potential for Notices of Violation (NOV) for failure to possess applicable State permits prior to initiating a proposed action, or failure to follow permit requirements.

The implementation of Revised Alternative III would have the potential to result in temporary minor adverse effects to air quality due to fugitive dust emissions during demolition. The demolition contractor would be responsible for the use of any needed mitigation, such as tarp covers on trucks transporting debris off-Post to the appropriate regulated landfills and the wetting or seeding of soils to prevent displacement. The contractor would also be required to inspect and abate ACM and LBP per Federal and State laws and regulations and as prescribed in NEPA documentation generated by the Fort Benning Form-144R process. Structures that are properly prepared and permitted for firefighter training would be exempt from $PM_{2.5}$ emissions requirements. No further mitigation is proposed.

4.1.6 Noise

The threshold level of significance for noise is any expansion of Zone III (incompatible) contours, due to operations, into areas where sensitive noise receptors (residences, hospitals, libraries, etc.) exist.

The implementation of Revised Alternative III would result in temporary minor adverse effects to noise levels on the Installation due to demolition activities and transport of debris; however, these effects would be of a local nature and would therefore result in no permanent adverse effect. No mitigation is proposed.

4.2 HUMAN ENVIRONMENT

4.2.1 Cultural Resources

The threshold level of significance for cultural resources includes the unmitigated disturbance of properties listed or eligible for listing on the *National Register of Historic Places* (NRHP) or the violation of applicable Federal laws and regulations such as the National Historic Preservation Act (NHPA), Archaeological Resources Protection Act, and others.

The following buildings are historic and would require mitigation prior to the implementation of Revised Alternative III and demolition: 4, 239, 245, 249, 296, 322, 1792, 1836, 2452, 2459, 2763, 2962, and 3716. Buildings 4, 245, 296, and 2763, and 3716 (Sand Hill) are individually eligible for the NRHP. Buildings 239, 249, 322, 1792, 1836, and 2962 are eligible for the NRHP as contributing properties to the Main Post Cantonment Historic District. Buildings 2452 and 2459 are eligible for the NRHP as contributing properties to the Lawson Army Airfield Historic District. The proposed demolition of aforementioned structures does not meet the Secretary of the Interior's Standards for the Treatment of Historic Properties and would be an Adverse Effect. The following steps must be completed in consultation with the Fort Benning Cultural Resources Manager and documentation provided through the NEPA process before the buildings can be demolished:

- Adaptive Reuse Consideration
- Economic Analysis (comparing the economic costs associated with alternatives including rehabilitation and reuse, demolition and new construction, and mothballing for reuse)
- Real Estate Transfer Consideration
- Relocation Consideration

If an alternative can not be found to eliminate the Adverse Effect, each individual building must be documented in the form of the Historic American Building Survey (HABS) or the Historic American Engineering Record (HAER).

1. Bldg 4 and Bldg 2962 are already included under contract with Panamerican Consultants (PCI) for HABS to commence in CY 08.
2. Bldg 245 was included in a HAER report on the Water Treatment Plant completed by PCI in 2006.
3. Bldg 296 is under contract with Brockington & Associates for HABS which began FY07 – the report is currently being drafted.
4. Bldg 2763 was recorded in a HABS by PCI in 2006 – a draft is being prepared for submittal to the National Park Service for review.

Buildings 5961, 5962, 5963, 5964, 5965, 5966, 5967, 5968, 5969, 5970, 5971, 5972, 5974, 5975, 5976, 5977, 5978, 5981, 5984, 5985, 5986, 5987, 5988, 5989, and 5990 are eligible for the NRHP as contributing properties to the Ammunition Storage Area Historic District. They were covered nationwide by the Advisory Council on Historic Preservation in May of 2007 under the *Program Comments for Cold War Era (1946-1974) Unaccompanied Personnel Housing, World War II and Cold War Era (1939-1974) Ammunition Storage Facilities, and World War II and Cold War Era (1939-1974) Army Ammunition Production Facilities and Plants*. No further mitigation is required in regards to any Adverse Effects to these properties.

Overall, this action would result in minor adverse effects to historic cultural resources. Salvage is recommended for all reusable building materials, in particular roofing materials, brick, doors, windows, etc. for future reuse in other historic properties on post. No additional mitigation is proposed.

No adverse effects to archaeological sites are expected from this action due to the lack of ground disturbance outside the structure footprint and the use of existing archaeological surveys to avoid such sites.

4.2.2 Socioeconomics

The threshold level of significance for socioeconomics consists of a combination of several factors, including unusual population growth or reduction, unusual increase/decrease in housing demand, substantial increase/decrease in demand for public services, or a substantial increase/decrease in employment opportunities.

The implementation of Revised Alternative III would result in temporary minor positive effects on the local economy due to jobs related to the demolition of identified structures. These jobs may or may not be granted to the local workforce, however, and due to the temporary nature of the action, would not result in any significant effect on the local economy. Temporary minor positive effects to the local economy are also expected due to fees required for disposal of demolition debris at licensed off-Post facilities. No mitigation is proposed.

4.2.3 Utilities

The threshold level of significance for utilities is any additional demand for service on the Installation, or discharge from a given utility or energy system, that cannot be accommodated.

The implementation of Revised Alternative III would result in the possible removal, capping, or abandonment of utility lines servicing the identified structures. Indirect minor positive effects to utilities would be expected due to discontinuation of utilities usage in structures of outdated design or lacking in modern energy efficiency measures. No mitigation is proposed.

4.2.4 Solid Waste

The threshold level of significance for solid waste is any change in demand for disposal capacity that would adversely affect the ability of a disposal facility to service existing customers or effectively accommodate additional demands. The threshold level of significance, as it pertains to demolition activities, is the diversion of less than fifty percent, by weight, of construction or demolition waste from Installation or off-post landfills.

The implementation of Revised Alternative III would generate demolition debris from the identified structures; however, no adverse effects to Fort Benning are expected because Installation policies and guidelines require that all construction and demolition debris must be transported to a non-Federal facility for treatment. An exception is made for clean concrete rubble and asphalt, which may be processed through the Installation Material Recycling Facility (MRF) and re-used for erosion control projects and road construction on the Installation. Clean steel is also processed at the MRF. The debris that is transported off-Post would be taken to a facility specifically suited for disposal of construction type debris; potential impacts from solid waste would be further mitigated by diversion of at least fifty percent of C&D waste from landfills. Minor adverse effects from solid waste are expected to off-Post facilities due to capacity occupied by Fort Benning demolition debris, but these would be mitigated by payment of a disposal fee. No additional mitigation is proposed.

IMCOM policy requires that fifty percent of construction and demolition debris must be diverted from landfill disposal and processed for reuse or recycling as per Unified Facilities Guide

Specifications. This policy was implemented to extend landfill life in the vicinity of Federal facilities and reduce the costs associated with manufacturing 'new' building materials. Demolition contractors would be required to divert fifty percent or more of demolition debris and provide supporting documentation; this requirement would be written into solicitation documents.

4.2.5 Hazardous/Toxic Materials/Waste

The threshold level of significance for hazardous/toxic materials/waste is surpassed if the storage, use, transport, or disposal of these substances: substantially increases human health risk or environmental exposure; is a violation of applicable Federal, State, or Army regulations; or results in noncompliance with Fort Benning's Hazardous Waste Management Plan.

The term, hazardous materials, pertains to any material, including waste, which may pose an unreasonable risk to health, safety, property, or the environment, when existing in specific quantities and forms. The term also includes chemicals that have been determined by the Secretary of Transportation to present risks to health, safety, property, or the environment during transport.

Hazardous materials, such as asbestos-containing materials (ACM) and lead-based paints (LBP), and toxic materials such as polychlorinated biphenyls (PCBs), would be removed from identified structures prior to demolition, per the guidelines for these actions in the Hazardous Waste Management Plan. The resulting hazardous waste would enter the appropriate waste stream and be transported off-Post to a facility specifically suited for disposal of such materials.

Several structures identified for demolition have been previously identified as Solid Waste Management Units (SWMU) due to past activities on the site and are therefore listed with GADNR-EPD in the Installation's Corrective Action Permit Number HW-021(CA). Demolition of such structures is limited to the superstructure (i.e. above-ground components) only; no surface or subsurface disturbance of soil surrounding a SWMU or removal of subsurface foundations, including removal of buried utility lines, would be allowed prior to the completion of appropriate site remediation and approval by the State. Furthermore, no tampering or removal of groundwater monitoring wells adjacent to or in the vicinity of a SWMU-related structure slated for demolition would be allowed.

Two of the structures identified for demolition have been previously identified as vehicle maintenance shops with an oil-water separator. Removal of the oil-water separator would be subject to prior coordination with EMD to identify potential safety hazards and ensure appropriate permits, monitoring, and personal protection equipment are incorporated into the demolition process. All components of the oil-water separator would be cleaned and disposed of in accordance with State of Georgia hazardous waste and solid waste regulations, including the cleaning residuals; a site closure report would be submitted after removal of the separator. Other structures previously associated with vehicle repair, maintenance, or operation would also be inspected for release of hazardous wastes and, if found, would require remediation in accordance with the SPCC Plan and EMD guidelines. There are no known underground or above-ground storage tanks associated with any of the identified structures on the Facility Reduction Program list (Fig. 1) (Menefee pers. com. 2007).

Appropriate guidance regarding the demolition of structures and debris disposal was provided in the EA and SEA that this document supplements; the same guidance applies to identified structures on the updated Facility Reduction Program list (Fig. 1). No adverse effects from hazardous/toxic materials/waste are expected to Fort Benning as a result of implementation of Revised Alternative III. Minor adverse effects are anticipated to off-Post facilities due to capacity occupied by Fort Benning demolition debris, but these would be mitigated by payment of a disposal fee. No additional mitigation is proposed.

Summary of Potential Environmental Consequences

RESOURCE	EFFECT	MITIGATION
Soils	Temporary minor adverse effects	Adherence to ESPCP, NPDES Permit, and SPCC Plan required; rehabilitation of site
Vegetation	Temporary minor adverse effects	Adherence to ESPCP and NPDES Permit required; rehabilitation of site
Water Quality	No direct adverse effects Temporary indirect minor adverse effects	Adherence to ESPCP, NPDES Permit, and SPCC Plan required; silt fence and straw-bale barrier installation
Species of Conservation Concern	No adverse effects	Schedule action to avoid reproductive season; Follow procedures in INRMP
Air Quality	Temporary minor adverse effects	Wetting/seeding of soils and covered debris transport required
Noise	Temporary minor adverse effects	None proposed
Cultural Resources	Minor adverse effects	HABS/HAER documentation required; Possible reuse of materials or relocation of structures
Socioeconomics	Temporary minor positive effects	None proposed
Utilities	Indirect minor positive effects	None proposed
Solid Waste Pollution Prevention	No adverse effects (on-Post) Minor adverse effects (off-Post)	50% diversion from landfills required; Disposal fee
Hazardous/Toxic Materials/Waste	No adverse effects (on-Post) Minor adverse effects (off-Post)	Compliance with Haz Waste Mgmt Plan, SPCC Plan required; Disposal fee

5.0 CUMULATIVE EFFECTS ANALYSIS

The Council on Environmental Quality (CEQ) defines cumulative effect as the "Impact on the environment which results from the incremental effects of the action(s) when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions" (CEQ, 1978). The actions proposed in this SEA II, in addition to proposed projects in the Columbus-Phenix City area, have the potential to result in negative or positive effects in a cumulative manner. These projects all occur within a well-defined and specific geographical (spatial) region of influence (ROI), which is defined in the following subsections; in addition, the projects are also limited on a temporal basis as well, since they all have the potential to be implemented within a 7-year period, as indicated by the planning documents obtained for the individual cities, and therefore may increase the potential for cumulative effects. These projects have not been listed in detail in this SEA II; however, they may be reviewed in the previous IFRP SEA (2002) and the BRAC/Transformation FEIS (2007). Each media (such as air, water, etc.) may have a more specifically defined ROI with the potential to be affected by the proposed projects and is individually addressed in the following subsections.

The cumulative effects predicted for specified VECs due to implementation of Revised Alternative III are described below. It was determined that the proposed action would result in no potential cumulative effects to vegetation, wildlife, socioeconomics, environmental justice, land use, sustainable design and development, radiological materials, UXO, public health and safety, or utilities. This determination was the result of a preliminary analysis of the proposed action and its individual and cumulative potential to affect the natural and human environment, in either a direct or indirect manner, as well as consideration of other projects in the ROI; therefore, these media will not be discussed in further detail. The threshold level of impact for each VEC below is the same as in Section 4.0, Environmental Consequences, and is not restated below.

5.1 SOILS

The ROI for soils consists of the five county area (Chattahoochee, Marion, Muscogee, Russell, and Talbot) containing Fort Benning, Columbus, and Buena Vista, Georgia, and Phenix City, Alabama. Past, present, and future actions in the ROI, such as construction and road/trail maintenance, have the potential to contribute to soil disturbance, erosion, and a loss of vegetative cover; however, adherence to applicable Federal, State, and local laws and regulations, such as erosion control BMPs and NPDES permits, would help minimize soil erosion. These actions also have the potential to result in minor soil contamination due to spills or accidents during construction and maintenance activities; however, legally required mitigation measures, such as secondary containment and equipment inspections, would help minimize the threat of incidents and subsequent soil contamination. Adverse effects to soils due to implementation of Revised Alternative III are expected to be minor and temporary in nature; additionally, the re-use or rehabilitation of the site after structure demolition is expected to result in minor positive effects due to the erosion control and soil stabilization measures it would entail. Overall, implementation of this alternative would result in no cumulative impacts when considered with the other actions in the ROI.

5.2 VEGETATION

The ROI for vegetation consists of the five county area (Chattahoochee, Marion, Muscogee, Russell, and Talbot) containing Fort Benning, Columbus, and Buena Vista, Georgia, and Phenix City, Alabama. Past, present, and future actions in the ROI have the potential to contribute to a loss of vegetative cover; however, adherence to applicable Federal, State, and local laws and regulations, such as erosion control BMPs and NPDES permits, would help minimize impacts to vegetation. Adverse effects to vegetation due to implementation of Revised Alternative III are expected to be minor and temporary in nature; additionally, the rehabilitation of the site after structure demolition is expected to result in minor positive effects due to the erosion control and soil stabilization measures it would entail. Indirect minor positive effects on vegetation would also be realized if the site of a demolished structure is utilized for construction of a new structure, providing the opportunity to avoid impacts to vegetation on sites that have not yet been cleared. Overall, implementation of this alternative would result in no cumulative impacts when considered with the other actions in the ROI.

5.3 WATER QUALITY

The ROI for water quality consists of the streams and other surface water bodies within the local watershed. Past, present, and reasonably foreseeable future actions in the ROI include construction and road/trail maintenance and have the potential to contribute to soil disturbance, erosion, and loss of vegetative cover. In particular, the construction and operation of the ISBC, IPBC, DMPRC, and MPTR have the potential for adverse effects on water quality in the Fort Benning portion of the ROI; likewise, construction of the Oxbow Meadows Marina and development related to the Muscogee Technology Park in Columbus would have the potential for adverse effects within the ROI. The rehabilitation of the Maneuver Corridors on Fort Benning has the potential for long-term positive effects on water quality in the ROI due to the proposed erosion control and soil stabilization measures it would entail, reducing the potential for future sedimentation of adjacent streams. Adherence to mitigation required in the Federal and State permits for these projects would further minimize potential effects. Adverse effects to water quality due to implementation of Revised Alternative III are expected to be minor and temporary in nature; additionally, the re-use or rehabilitation of the site after structure demolition is expected to result in minor positive effects due to the erosion control and soil stabilization measures it would entail. Overall, implementation of this alternative would result in no cumulative impacts when considered with other actions in the ROI.

5.4 CULTURAL RESOURCES

The ROI for cultural resources consists of all lands within the boundaries of Fort Benning. Past, present, and reasonably foreseeable future actions in the ROI include several construction projects that have the potential to contribute to soil disturbance and inadvertent disturbance of cultural resources. In particular, construction related to the ISBC, IPBC, DMPRC, MPTR, and Army BRAC/Transformation has the potential for adverse effects to cultural resources in the Fort Benning area. Demolition of *National Register of Historic Places*-eligible or potentially eligible buildings associated with the construction of new barracks on the Main Post, Sand Hill, and Kelley Hill cantonment areas also has the potential for adverse effects to cultural resources.

Adherence to applicable Federal, State, and local laws and regulations and to avoidance, minimization, and mitigation measures identified for these projects during the AAP process would minimize potential adverse effects.

Initially, an evaluation of all potentially eligible historic structures would be required to confirm or reject their suitability for the NRHP prior to implementation of Revised Alternative III. Identified structures determined to be eligible require mitigation, such as avoidance of impact through relocation of the structure or minimization/mitigation of adverse effects by Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) documentation prepared by Fort Benning and submitted to SHPO prior to the demolition of identified structures by the contractor. Concurrent with other ongoing projects in the ROI, the implementation of Revised Alternative III would result in minor adverse effects to historic structures due to demolition activities; these minor adverse effects would be minimized through adherence to all required mitigation. No cumulative impacts are expected to cultural resources when considered with other actions in the ROI.

5.5 Utilities

The ROI for utilities consists of the five county area (Chattahoochee, Marion, Muscogee, Russell, and Talbot) containing Fort Benning, Columbus, and Buena Vista, Georgia, and Phenix City, Alabama, served by the same utility providers used by the Installation. Indirect minor positive effects on utilities would be realized if the site of the demolished structure is suitable for construction of a new structure that is able to utilize existing utility connections; any new structures that can be located on previously occupied sites would offer the opportunity to avoid future impacts to utilities resulting from the emplacement of new infrastructure. The implementation of Revised Alternative III would not result in any incremental increase in demand for service on the Installation that cannot be accommodated, when considered cumulatively with the other actions in the ROI.

5.6 Solid Waste

The ROI for solid waste consists of the five county area (Chattahoochee, Marion, Muscogee, Russell, and Talbot) containing Fort Benning, Columbus, and Buena Vista, Georgia, and Phenix City, Alabama, served by the same landfills used by Installation contractors to dispose of C&D waste. When considered with other actions predicted for the remainder of the ROI, which have the potential to generate C&D waste and reduce available C&D landfill capacity, it has been determined that this alternative would result in minor incremental adverse effects from solid waste and minor cumulative adverse impacts when considered with the other actions in the ROI.

5.7 Hazardous/Toxic Waste/Materials

The ROI for hazardous/toxic waste/materials consists of the five county area (Chattahoochee, Marion, Muscogee, Russell, and Talbot) containing Fort Benning, Columbus, and Buena Vista, Georgia, and Phenix City, Alabama, served by the same disposal facilities used by Installation contractors to process hazardous waste. When considered with other actions predicted for the remainder of the ROI, which have the potential to generate hazardous waste and reduce available

disposal facility capacity, it has been determined that this alternative would result in minor incremental adverse effects from hazardous waste and minor cumulative adverse impacts when considered with the other actions in the ROI.

6.0 CONCLUSIONS and RECOMMENDATION

6.1 CONCLUSION

Revised Alternative III, "Implement the 2007 Facility Reduction Program," was the only option considered as the preferred alternative because it closely resembled the preferred alternative of the previous SEA, differing only in use of an updated Facility Reduction Program list (Fig. 1) and abandonment of the option to use identified structures for firefighter training. Implementation of Revised Alternative III, entailing the demolition of outdated structures deemed unaffordable and identified on an updated Facility Reduction Program list (Fig. 1), would allow Fort Benning to comply with the intent of the IFRP while adding to Installation greenspace or providing potential construction sites for future structures. Although potential minor adverse effects exist for soils, vegetation, noise, solid waste, water quality, air quality, and cultural resources, these effects would be minimized through adherence to all permit requirements and all applicable Federal, State, and local laws and regulations. Potential adverse effects predicted for wildlife species of conservation concern would be avoided. Minor beneficial effects are predicted for utilities, due to cost avoidance resulting from discontinuation of utilities usage in structures of outdated design or lacking in modern energy efficiency measures. Minor adverse cumulative impacts are predicted for solid waste and hazardous waste as a result of space occupied in disposal facilities due to this action, but no significant cumulative impacts from this action are predicted.

6.2 RECOMMENDATION

When considered with the information in the previous EA and SEA, the recommended course of action is to proceed with Revised Alternative III via identification and demolition of outdated structures under the IFRP, as indicated on Figure 2 of this document, because it would meet the purpose and need for this action (support the "Winning the Infrastructure War" initiative via implementation of the IFRP) while minimizing environmental effects associated with its implementation through avoidance, mitigation, and/or adherence to all permit requirements and all applicable Federal, State, and local laws and regulations.

6.3 PERSONS AND AGENCIES CONSULTED

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