

April 2023

**FINDING OF NO SIGNIFICANT IMPACT
FIRSTNET NETWORK AND COMMUNICATIONS TOWER AT
CAMP FRANK D. MERRILL
LUMPKIN COUNTY, GEORGIA**

1.0 INTRODUCTION

Fort Benning prepared an Environmental Assessment (EA) to identify and evaluate potential environmental effects associated with the proposed construction of a 308-ft FirstNet communication tower and supporting equipment on Camp Frank D. Merrill (hereinafter Camp Merrill) in Lumpkin County, Georgia. This EA was prepared in accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations at 40 Code of Federal Regulations (CFR) Parts 1500-1508, and the Army NEPA Regulation at 32 CFR Part 651 (Environmental Analysis of Army Actions).

The CEQ's Final Rule: Update to the Regulations Implementing the Procedural Provisions of the NEPA (87 FR 23453) for a Phase 1 rulemaking (hereinafter CEQ's 2020 NEPA Updates) went into effect September 14, 2020. Since that time, a Memorandum from the Assistant Secretary of the Army dated May 19, 2022, titled Implementation of Council on Environmental Quality Revisions (hereinafter Army's 2022 NEPA Updates) was released to implement the new requirements of the 2020 CEQ update for NEPA analysis conducted after May 2022. As such, the EA has been prepared in accordance with the CEQ's 2020 NEPA Updates and the Army's 2022 NEPA Updates. The Final EA includes analysis and findings concerning the proposed 308-ft FirstNet tower and supporting equipment potential construction and operational impacts, including mitigation measures to reduce any potential impacts to less than significant. The Final EA is incorporated by reference.

2.0 PURPOSE AND NEED

The purpose of the Proposed Action is to provide capable and reliable First Responder Network Authority (FirstNet) broadband wireless network. This would be accomplished by constructing a proposed communications tower and supporting equipment to increase the coverage area both on and off Camp Merrill.

FirstNet is not a commercial network; it's a public safety platform allowing first responders to share information more quickly and provide redundant communication systems in emergency, natural disasters, and times when the grid may be down. It will provide public safety coverage and capacity with preemption for first responders such as fire, police, and security. It would also enhance mutual aid interoperability with surrounding communities during critical incidents. Camp Merrill maintains contact with Fort Benning First Responders but also has a mutual aid agreement with the City of Dahlonega. Additionally, the Land Mobile Radio (LMR) antenna is proposed to be connected to the communications tower to improve the LMR two-way radio capabilities linking training areas both on and off Camp Merrill and within the Chattahoochee National Forest.

If the Proposed Action were not implemented, the communication tower would not be constructed thereby reducing the broadband coverage area that is needed for the mountainous region of the Chattahoochee National Forest. In addition, the LMR two-way radio system would not be attached to increase coverage in the Chattahoochee National Forest in which training is conducted several days at a time.

3.0 DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action is to construct, operate, and maintain a FirstNet Network and a communications tower on Camp Merrill that will integrate with the rest of the AT&T FirstNet system. The Proposed Action would include compliance with all applicable federal and state laws and regulations and Army requirements.

The tower is proposed to be a Self-supporting lattice tower with a full height of 308-ft. Tower height breakdown includes the tower at 300-ft, medium intensity strobe lights installed at 300-ft, antenna protrusion at 305-ft, and a lightning rod up to its highest point of 308-ft. The FirstNet tower is proposed to be contained in a 100-ft X 100-ft (10,000 SF or 0.23 acres) compound with security fencing around the perimeter. The components within the tower compound will consist of one 6'-8" X 6'-8" pre-fabricated walk-in cabinet and a 20kW Diesel powered emergency generator mounted on a prefabricated elevated helical foundation.

The lights will be medium intensity, dual obstruction strobe lights that will be red at night and white during the day. The Federal Aviation Administration sets the requirements for lighting (FAA Advisory Circular 70/7460-1 L Change 2, med-dual system – Chapters 4, 8, (M-Duel) and 12) and determines the type and location of tower lights based on aircraft safety and safe navigable airspace.

A contractor for AT&T will construct the proposed FirstNet tower; however, AT&T will provide the operations and maintenance and the FirstNet broadband services over a 25-year contract. Upon construction completion, the tower will be transferred to U.S. Army ownership by way of a DD Form DD 1354, Transfer and Acceptance of DoD Real Property. The Army will lease the land under the tower and related equipment to FirstNet broadband services and the Army will contract with FirstNet for operation and maintenance.

4.0 DESCRIPTION OF THE ALTERNATIVES

Army and NEPA regulations require the development and consideration of the Proposed Action and reasonable alternatives. Reasonable alternatives meet the Purpose and Need and provide options for implementing the Proposed Action, specifically the location on Camp Merrill. Screening criteria are used to narrow down alternatives for further analysis. Any alternatives that failed to meet the following criteria were not reasonable and were eliminated from further analysis. Alternatives to construct the Proposed FirstNet Network communications tower are required to:

- Be conducive with the Real Property Master Plan (RPMP) and Area Development Plan (ADP) addendum for Camp Merrill.
- Not interfere with mission-essential training and be compatible with necessary functions within the cantonment area;

- Have a stable land surface free of underground utilities and other infrastructure;
- Be located on high ground for optimum coverage in all areas in which the 5th RTB trains. Training is conducted on Camp Merrill, Mount Yonah, and in the mountains and the lower valleys of the Chattahoochee National Forest;
- Be accessible for tower and generator maintenance and generator refueling;
- Accommodate 100-ft X 100-ft compound (0.23 acres) with security fencing and/or barriers to prevent unauthorized access to the location;
- Be free from pedestrian traffic and vehicular traffic; and,
- Avoid excessive costs for construction, operations, and maintenance.

One Alternative was determined to be reasonable:

Alternative 1 is considered to be the best option and the Army's preferred alternative. This location is proposed to be on Camp Merrill's main cantonment area on 0.23 acres and will require minimal site improvements such as spreading gravel as needed and the removal of approximately 14 trees. A new, Army owned communications shelter was recently constructed as part of the ADP addendum to the Camp Merrill RPMP and is located adjacent to the Alternative 1. Two new parking spaces and an existing asphalt road (leads to Camp Wahsega Road) was repaved as part of a previous project and can be utilized to access the tower compound for construction and maintenance activities. Power service is available adjacent to the compound. This location is conducive with the RPMP and ADP, and it does not interfere with training or mission requirements. Alternative 1 would meet the Purpose and Need for the Proposed Action and is considered reasonable according to the screening criteria.

The No Action Alternative serves as a baseline for assessing the potential impacts of the Proposed Action Alternative even though it would not meet the purpose and need.

5.0 ANTICIPATED ENVIRONMENTAL EFFECTS

No significant adverse effects, or significant cumulative effects are anticipated to any Valued Environmental Component (VECs) analyzed in the EA for the Action Alternative. Alternative 1 analysis indicates potential *negligible and minor, adverse* effects may occur to VECs.

Overall, Alternative 1 would result in potential negligible adverse impacts to cultural resources, and "no adverse effect" to historic properties under the NHPA.

Direct, short-term, and long-term, negligible effects to migratory birds may potentially occur from possible collisions with the tower or antennae. Tower features incorporating a low-impact design (3-legs with lattice design) and no guy wires may preclude (or prevent) collision effects to migratory birds. The geography (mountain elevation differences) of the natural landscape coupled with dense forest trees within the Chattahoochee National Forest may reduce collisions due to the relative height in which birds would fly. That is, many migratory and other birds may fly above the tower as Camp Merrill and the tower will be lower in elevation than the nearby mountain ranges.

Potentially, there may be *negligible, short-term and negligible, long-term* effects to the Indiana Bat and the Gray Bat. Potential *short-term, negligible,* effects may occur to the Northern

Long-eared Bat. Alternative 1 is not likely to adversely effect these Bat Species. Finally, it is expected that the Proposed Action may have *indirect, short-term negligible* effects to the Etowah darter and the Etowah River with *no long-term* effects.

Lumpkin County Airport (also referred to as "Wimpy Airport" in some county maps and documents) is located approximately three miles northwest of Dahlonega, Georgia off Camp Wahsega Road. *No effects* are expected in the *short-term* or *long-term* to Airspace and Safety. Tower notification and licensing requirements are required before construction initiation. A "no hazardous" Air Analysis study may also be required as determined by the Federal Aviation Administration.

The Region of Influence on Camp Merrill Cantonment Area includes a cemetery with potential *short-term, minor adverse* effects to Aesthetic and Visual Resources due to a thinning vegetative screen north of the cemetery fence.

A Viewshed Analysis of effects to Aesthetics and Visual Resources was conducted to determine any potential adverse effects of FirstNet tower construction on the Appalachian National Scenic Trail (AT) viewshed and three Scenic Vistas. Given the results in the Viewshed Analysis along with the distance, and current topographic and forest (trees and shrubbery) features, it is expected the Proposed Action would have *indirect, negligible short-term and negligible long-term* effects. In the event the trees and shrubbery at the Sassafras Mountain Scenic Vistas were cleared (trees and shrubbery removed) to create a manicured look, the Proposed Action could potentially have *indirect, short-term, minor adverse effect* and *indirect, long-term, minor adverse effect* to the Aesthetic and Visual Resources.

- AT Treadway -Topographic features including dense forest trees, forest canopy, intermediate mountains, and distance from the AT to Camp Merrill are features that may likely camouflage the tower from the observer while walking along the AT treadway. During fall and winter leaf-off seasons, the dense tree stands and crisscrossing of the tree branches will break-up the lattice tower even more and camouflage it from the observer view while on the AT treadway.
- The AT Campsite Shelter locations constructed along the opposite side of the AT from Camp Merrill would not see the proposed FirstNet tower. This is primarily due to the elevation differences and dense forest trees between the AT treadway, Campsite Shelters, and Camp Merrill. It is also expected the tower lights would not be seen at the Shelter locations at night.
- One AT Shelter in Fannin County and a Scenic Vista on Gilmer County border are nearly 5 miles west of the tower compound. The observer may see the tower during the leaf-off season; however, there are several conditions making viewing unlikely. The distance, elevation differences over 1,600 feet, dense forest trees, and Bell Mountain (located east of the AT Shelter and Scenic Vista) will likely block the observer's view of the tower and lights.
- Two AT Scenic Vistas on Sassafras Mountain approximately 1.85 miles north of the proposed tower. Trees and vegetation will significantly obscure if not entirely block the observers view of the tower and lights during leaf-on seasons. During the winter leaf-off seasons, it is expected that the tree stands and crisscrossing of the tree branches will

substantively break up and camouflage the tower from the observers view. The tower lights may still be visible to an observer on the two Scenic Vistas during the winter leaf-off season; however, it is not expected to have a significant adverse effect on the Aesthetic or Visual Resources. If the trees and vegetation, in the direction of Camp Merrill, were cleared on the Sassafras Mountain Scenic Vista 1 or Scenic Vista 2 to create a manicured look, the FirstNet tower and lights will potentially be viewable to observers from these two Scenic Vistas. The tower would not be seen on the horizon as the observer will be looking “down to” a tower in a forested viewshed and not “up to” a tower silhouetted against the sky. The low-impact design with small lattice pieces may further break-up and soften the towers presence to observers in the event trees and vegetation were removed to create a more manicured look at the Scenic Vistas.

6.0 MITIGATION

For the Proposed Alternative 1, adhering to applicable Federal and State environmental laws, regulations, and permitting processes would minimize potential adverse environmental impacts. No other mitigation is proposed.

7.0 PUBLIC AVAILABILITY

The Final EA and the Draft FNSI were made available to the public for a 30-day public comment period from **February 23 through March 24, 2023**. An announcement that these documents was available was published via a Notice of Availability (NOA) in The Columbus Ledger-Enquirer, The Dahlonega Nugget, North Georgia News, The News Observer, and Times Courier in accordance with the Army NEPA Regulation. These documents were also made available at several libraries and the Camp Merrill Museum and were posted on the Fort Benning iSportsman website at <https://ftbenning.isportsman.net/news.aspx>. The NOA of the Final EA has been mailed to all agencies/individuals/organizations on the Camp Merrill NEPA distribution (mailing) list for the Proposed Action, as identified in **Appendix C** of the Final EA. As part of Fort Benning’s ongoing, established process and dialogue with the Federally recognized Native American Tribes affiliated with Fort Benning and Camp Merrill area respectively, the Army has notified each Tribe of the project and document links for their review and comment.

Fort Benning received two (2) comments during the 30-day public comment period. These comments are summarized below:

1. The Chickasaw Nation provided comments in a letter to the Fort Benning NEPA Program Manager on 20 March 2023. These comments included:

The proposed project is outside of our area; therefore, we do not request government-to-government consultation with the Department of the Army. While The Chickasaw Nation has no objection to the undertaking, we respectfully defer to the federally recognized First American tribe(s) who have identified a connection to the project area.

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2. The Georgia Department of Community Affairs Historic Preservation Division (HPD) provided written comments on 24 of March 2023 (project number HP-230223-008). These comments included:

Based on the information provided and desktop research, HPD concurs archaeological site 9LU63 is not eligible for listing in the National Register of Historic Places (NRHP). Additionally, HPD finds Camp Wahsega 4-H Center, located within the proposed project's area of potential effect (APE), is eligible for listing in the NRHP. Furthermore, HPD finds multiple other historic resources within the APE, some of which may be eligible for listing in the NRHP, including but not limited to GNAHRGIS resources 202868/Mt Zion Baptist Church and Cemetery, 43078/109 Hunters Road, and 202820/Hickory Flats Cemetery. However, it is HPDs' opinion that the tower, as proposed, will have no adverse effect to historic resources that are listed in the NRHP, as defined in 36 CFR Part 800.5(d)(1), due to topography, intervening vegetation, distance, and existing modern intrusions.

Although Fort Benning received comments, there were no issues or concerns raised that affected the EA's analysis or decision of a FNSI for the Proposed Action.

8.0 CONCLUSION

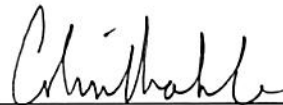
In consideration of the analysis in the EA, I have decided to implement Alternative 1. It is concluded that the Army's preferred Alternative 1 would meet the purpose and need of a FirstNet Network and communication tower for providing priority and pre-emption during routine and emergency situations and enhance interoperability with other local, State, and Federal first responders.

Pursuant to NEPA, CEQ, and Army NEPA regulations, the implementation of Alternative 1 would not generate significant controversy or have a significant impact on the quality of the human or natural environment. As such, a "Finding of No Significant Impact" is warranted for this Proposed Action and will not require the preparation on an Environmental Impact Statement.

FINDING OF NO SIGNIFICANT IMPACT
REVIEWED AND APPROVED BY:

APR 28 2023

Date



Colin P. Mahle
Colonel, U.S. Army
Garrison Commander