DEXTER ELEMENTARY SCHOOL REPLACEMENT
FORT MOORE, GEORGIA

Unique ID: EAXX-007-21-001-1731682869

Environmental Assessment/ Finding of No Significant Impact

Eagle statue, “Herbie,” currently located at the existing Dexter Elementary School.

Maneuver Center of Excellence
Fort Moore, Georgia

23 October 2024

ENVIRONMENTAL ASSESSMENT

Dexter Elementary School
Replacement at Fort Moore, Georgia

Prepared by:
United States Army Corps of Engineers on behalf of Department of Defense Education Activity for the Directorate of Public Works, Environmental Management Division, Fort Moore, Georgia

Approved by:

J. D. Evans

Jerel D. Evans
Colonel, U.S. Army
Garrison Commander

7 November 2024

Date

DEXTER ELEMENTARY SCHOOL REPLACEMENT

ENVIRONMENTAL ASSESSMENT/ FONSI

Lead Agency	Department of the Army
Project Location	Fort Moore, Georgia
For Further Information Contact	Britt Horton Brittnea.i.horton.civ@army.mil
Mailed comments must be postmarked 21 December 2024. Emailed comments due midnight of 21 December 2024.	DEPARTMENT OF THE ARMY AMIM-MOP-EP Environmental Management Division C/O NEPA Program Manager 6650 Meloy Drive, Building 6, Room 309 Fort Moore, Georgia 31905-5122 Brittnea.I.Horton.civ@army.mil
Public Comment Period Ends	21 December 2024
Unique ID	EAXX-007-21-001-1731682869

Contents

List of Figures

1. Purpose, Need, and Scope

1.1. Introduction

Fort Moore has prepared this Environmental Assessment (EA) to examine the potential environmental consequences of constructing a new Dexter Elementary School to address student capacity needs and facility requirements at Fort Moore in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 US Code [USC] 4321 et seq.), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Part 1500-1508), and the Army NEPA Regulation (*Environmental Analysis of Army Actions*; 32 CFR Part 651).

As a public document, the EA is used to determine and evaluate the potential environmental effects of the Proposed Action, identify possible/potential mitigation measures to lessen or eliminate adverse effects, and examine reasonable alternatives for the Proposed Action. The effects analyses in this EA are based on a variety of sources and the best available information at the time of preparation. The information contained in this EA will be reviewed and considered by the Army prior to the final decision on how to implement the Proposed Action, if at all.

1.2. Project Background

Fort Moore was founded in 1918, first as Camp Benning and then Fort Benning, before being renamed to Fort Moore on May 11, 2023. Fort Moore changed the name to recognize LTG Hal Moore's life as a decorated and highly regarded commander of the Vietnam War and his wife, Julia Moore. Julia Moore was a leader of Army Family programs and changed how the military cares for the widows of fallen Soldiers. Throughout the EA, the installation will be referred to as Fort Moore; however, cited references may retain the name Fort Benning.

Fort Moore covers portions of Muscogee, Chattahoochee, and Marion counties in Georgia and Russell County, Alabama. Approximately 169,260 acres of Fort Moore are located in Muscogee, Marion and Chattahoochee Counties, Georgia, and approximately 12,740 acres are located in Russell County, Alabama (Fort Benning, 2020). Approximately 80 percent of Chattahoochee County is within the boundaries of Fort Moore.

Fort Moore is home to the Maneuver Center of Excellence (MCoE), which meets the Army’s mission by providing trained, agile, and adaptive Soldiers and leaders ready to operate across the range of military operations from peacekeeping and security operations to high intensity military conflicts. To support the Army’s mission, Fort Moore must possess the infrastructure and facilities necessary to support military training and the quality of life of the Soldiers and their families, which includes providing educational services to all children on the installation.

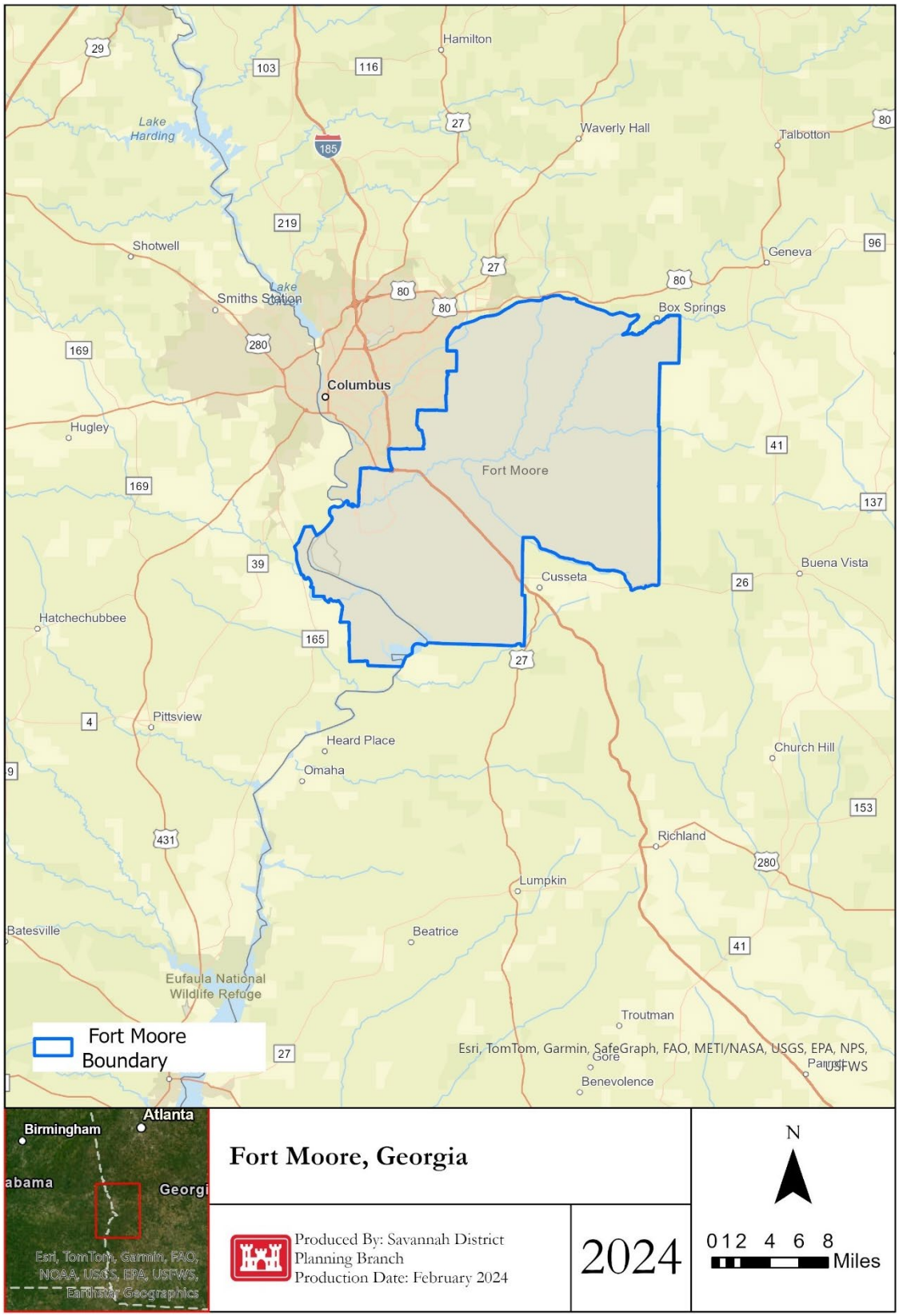


Figure 1. Location of Fort Moore, Georgia

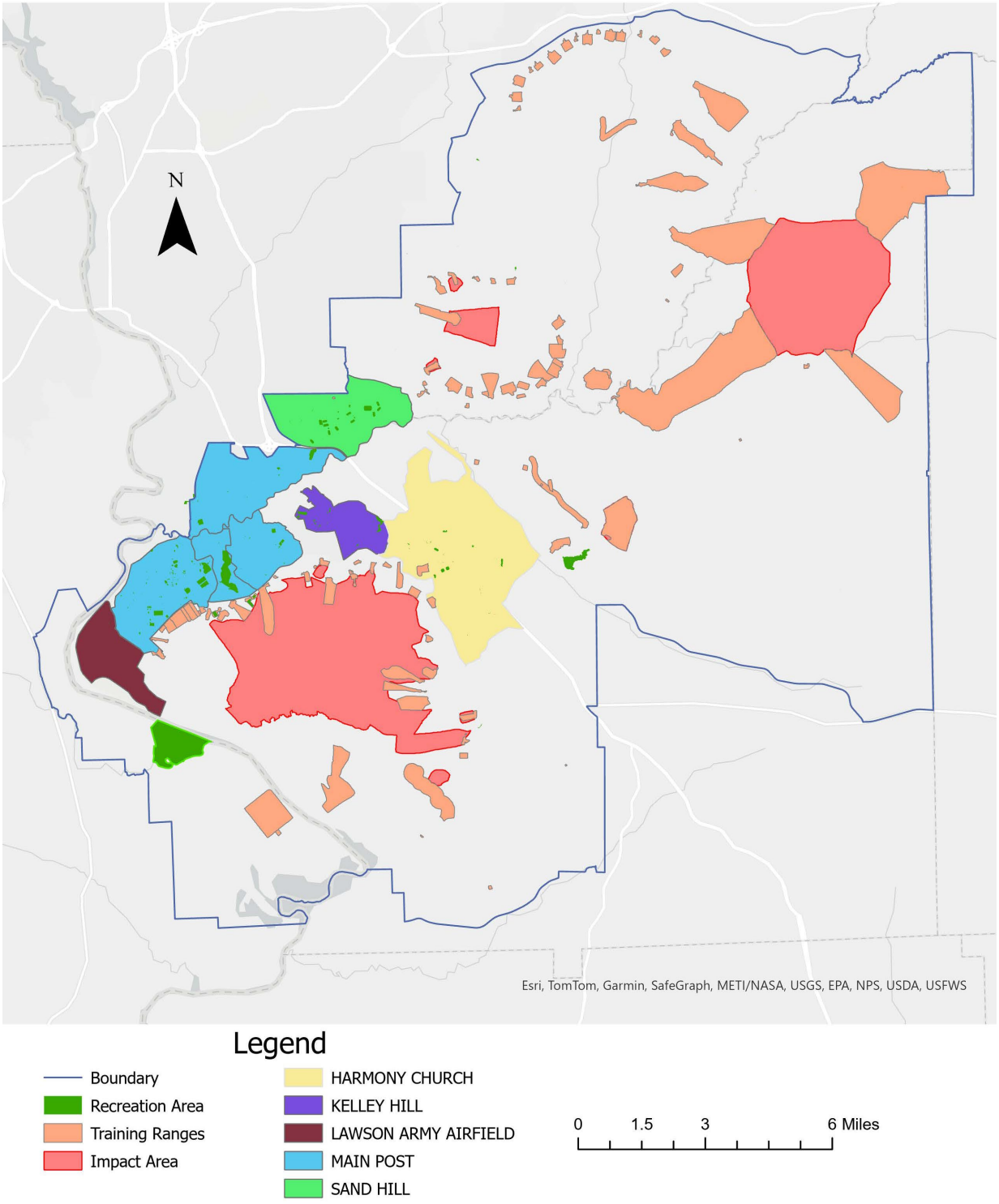


Figure 2: Fort Moore Installation Map

1.3. Purpose and Need for Proposed Action

Fort Moore is experiencing student capacity issues, and existing schools within the installation, such as at Dexter Elementary School, are aging and requiring more frequent maintenance and repair to expired and failing systems. The existing substandard environment would not be able to support curriculum requirements and would continue to impair the overall education program for students, thus not meeting the necessary learning objectives. Additionally, the required maintenance and repair of expired and failing systems will continue to strain maintenance capabilities and budgets.

The increased number of elementary school age children, including special education and full day or universal pre-kindergarten students residing on Fort Moore, has resulted in student capacity issues within Dexter Elementary School. As a result, there is a need to create a school environment that:

- Meets the 600-student capacity need
- Supports 21st century learning objectives including innovation in education, curriculum delivery, use of technology, and the requirements for sustainability and energy conservation
- Provides for overall consolidation
- Decreases Department of Defense Education Activity's (DoDEA) footprint within the Fort Moore installation

1.4. Decision to be Made

The EA evaluates whether the Proposed Action would result in significant impacts on the environment. If significant impacts are identified, the United States Army would undertake mitigation to reduce impacts to below the level of significance, undertake the preparation of an Environmental Impact Statement (EIS) addressing the Proposed Action, or abandon the Proposed Action. If no significant impacts are identified, the United States Army would utilize the EA to make an informed decision on whether to proceed with the Proposed Action. The EA is a planning and decision-making tool that will be used to guide the implementation of the Proposed Action in a manner that complies with all applicable federal, state, and local environmental laws and regulations and is consistent with Army standards for environmental stewardship. It is prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code 4331 et seq.), the regulations of the President's Council on Environmental Quality that implement NEPA procedures (40 Code of Federal Regulations [CFR] 1500-1508), and the Army's Regulation for implementing the National Environmental Policy Act of 1969 (32 CFR Part 651).

1.5. Scope of Environmental Analysis

This EA identifies, documents, and evaluates the potential environmental effects of the Proposed Action at Fort Moore in accordance with the Army's Environmental Analysis of Army Actions Regulation (32 CFR Part 651). The purpose of this EA is to inform decision-makers and the public of the potential environmental consequences of the Proposed Action. The EA qualitatively

and quantitatively evaluates the environmental and socioeconomic impacts of the Proposed Action and the alternatives considered. Under Army's Environmental Analysis of Army Action Regulation, the analysis of environmental and socioeconomic conditions addresses those areas and environmental resources with the potential to be affected by the Proposed Action.

1.6. Public Involvement

Agencies, federally recognized Native American Tribes, organizations, and members of the public having a potential interest in the Proposed Action are invited to provide comments on the EA.

The EA and draft Finding of No Significant Impact (FONSI) were distributed to individuals and organizations on the distribution list in Chapter 9 for a 30-day review and comment period. The EA and draft FONSI were made available for public review from 21 November 2024 to 21 December 2024. The FONSI is located in Appendix A.

A Notice of Availability (NOA) was circulated to individuals and organizations on the distribution list and posted in the following newspapers: Citizen of East Alabama, Columbus Ledger-Enquirer, and The Journal by 21 November 2024. Hard copies of the EA and Draft FONSI have been made available for public review at four libraries in the region: Phenix City-Russell County Library, Columbus Public Library, Cusseta-Chattahoochee Public Library, and Milton E. Long Library on Fort Moore.

Electronic versions of the EA and Draft FONSI were also posted on the Fort Moore website: https://www.moore.army.mil/Garrison/DPW/EMD/Legal.html

Public comments received are included in Appendix C. None of the public comments were substantive and required revision of the EA.

Based on the results of the EA analyses, and with consideration given to public and agency comments, the Army will decide as to whether implementation of the Proposed Action would have significant effects on the environment. If it is determined that the Proposed Action would have significant, adverse effects, the Army may proceed with preparation of an EIS. If it is determined that the Proposed Action would not have significant adverse effects, the Army may select the Proposed Action for implementation.

2. Description of the Proposed Action and Alternatives

2.1. Proposed Action

The Proposed Action is to replace Dexter Elementary School. The replacement school would be a 21st century school and meet the needs identified in the Section 1.3 Purpose and Need. 21st century equity in schools involves moving schools from a one-size-fits-all experience that leave young people disconnected, bored, or isolated, to learning that provides an equal opportunity to every student and is responsive to the demands and opportunities of the 21st century.

After the replacement of the elementary school, the original building will be used as administration offices for the DoDEA employees on Fort Moore.

2.2. Alternative Screening Process

The purpose and need (Section 1.3) were used to develop decision criteria. The decision criteria are objectives that provides a basis for comparison across alternatives (Table 1). This aids in the selection process of the alternative that most closely achieves the objectives and avoids defined constraints. Satisfaction of these decision criteria would provide an alternative suited to meet the purpose and need for the Proposed Action. From this comparison, alternatives were eliminated from further analysis and the Proposed Action was identified.

Table 1. Alternatives comparison against decision criteria.

	Alternatives Considered				
Decision Criteria	No Action Alternative (NAA)	Alternative 1- Replace Dexter Elementary School at the Zuckerman Ave. Site (Proposed Action)	Alternative 2-Replace Dexter Elementary School at the Existing Site	Renovation/Remodel/ Addition of the Existing Dexter Elementary School	Consolidate Dexter and Stowers Elementary School
Provide 21st century equity to students at Fort Moore.	Does not meet	Meets	Meets	Meets	Meets
Provide capacity for 600 students to accommodate the increasing number of special education students and pre-kindergarten students.	Does not meet	Meets	Meets	Meets	Meets
Allow for consolidation to decrease DoDEA's overall footprint within the Fort Moore installation.	Does not meet	Partially Meets	Meets	Meets	Meets
Financially feasible	Meets	Meets	Meets	Does not meet	Does not meet
Pedestrian walkability	NA	Meets	Partially Meets	Meets	Does not meet
Proximity to neighborhoods	Partially meets	Meets	Partially meets	Partially meets	Does not meet
Contains existing infrastructure	Meets	Does not meet	Partially meets	Partially meets	Partially meets
On or near Main post	Meets	Meets	Meets	Meets	Meets
Avoidance of potential learning disruption	Partially meets	Meets	Does not meet	Does not meet	Does not meet
Avoidance of potential housing impacts	Meets	Meets	Meets	Meets	Meets
Avoidance of traffic impacts	Partially Meets	Meets	Partially meets	Partially meets	Partially meets

Based on the comparison, Alternatives 1 and 2 were found to be the alternatives that best meet the purpose and need and therefore, were carried forward for additional analysis.

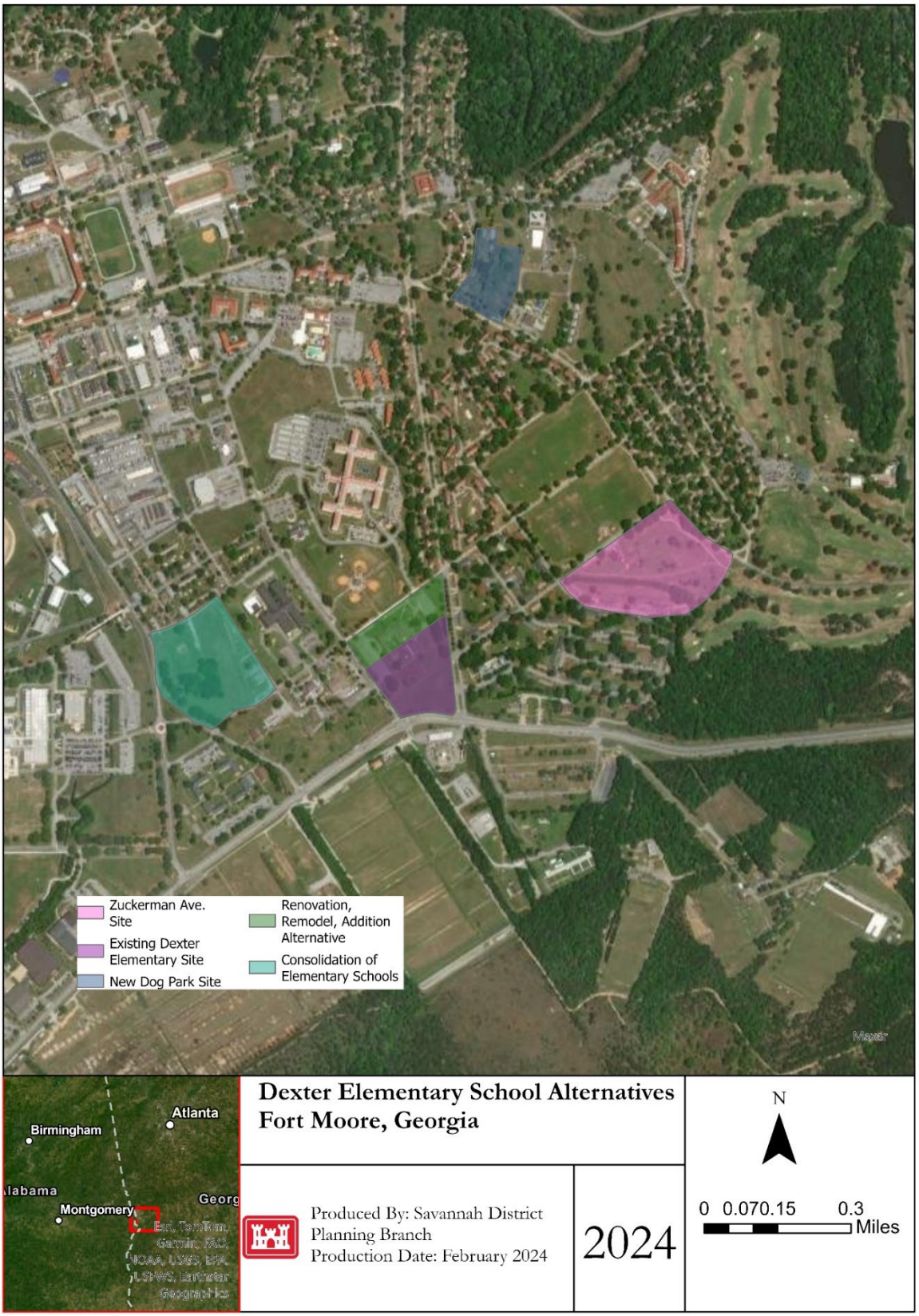


Figure 3. Map of the Dexter Elementary School Alternatives

2.2.1. Alternatives Dismissed from Analysis

The following alternatives were considered during alternative development but were eliminated from further consideration.

- Renovation/Remodel/Addition of Existing Dexter Elementary School (Figure 4)

This alternative involved the renovation, remodel, and addition of the existing elementary school complex. Under this alternative, the current school would not remain open during construction. This would require students and staff to utilize swing space during the renovation, such as: redistrict students from Dexter Elementary School to the other active schools on the installation or add a portable campus on Dexter Elementary School Site. The cost of the renovation/ remodel/addition alternative was not financially viable and therefore excluded from further analysis.

Figure 4. Renovation/Remodel/Addition of the Existing Dexter Elementary School

- Consolidate Dexter Elementary School and Stowers Elementary School (Figure 5)

This alternative involved building a new facility to consolidate Dexter Elementary School and Stowers Elementary School. The school complex would contain a two-story building designed for a capacity of 975 students. The size of the school would eliminate the connections between children in the same neighborhoods. Therefore, this alternative was excluded from further analysis.

Figure 5. Consolidation of Dexter Elementary School and Stowers Elementary School

2.3. Description of No Action and Action Alternatives

2.3.1. No Action Alternative

A No Action Alternative (NAA) is required under NEPA. The NAA is the most probable future condition if no action is taken. For the NAA, the original Dexter Elementary School would remain, and a new elementary school would not be constructed. The students and faculty would continue to use the existing facility. The undersized and functionally inadequate facility would continue to impact the learning environment for the students at Dexter Elementary School.

2.3.2. Alternative 1- Replace Dexter Elementary School at the Zuckerman Ave. Site (Proposed Action/Preferred Alternative)

The selection of Alternative 1 would result in building the new elementary school complex on the 14-acre Zuckerman Ave. site. The new school building would retain the Dexter Elementary School name at the new site. The project would construct a new two-story building that is a maximum of 117,000 square feet. The school would have a design population of 600 students for pre-K through 5th grade with a staffing authorization of 59. The project site improvements would include a maximum of 120 parking spaces and a new outdoor play area for the students. Additional site improvements would include signage, fencing, landscaping, exterior lighting, and utilities including updating the existing community pedestrian walkways that are currently at the site. Under this alternative, the project includes the demolition and replacement of an existing dog park that currently resides on a portion of the proposed school site. The school improvements would include three playgrounds, hardcourts for basketball, a bicycle trail, and open grassed field area.

The construction of the project is anticipated to start September 2026 and conclude in 2030. The site would require moderate grading and earth moving to prepare the site for the school. The grading of the site would maintain the current hydrologic patterns of sloping from the northeast corner of the property to the southwest corner of the site and would include primary stormwater storage areas. The site would have two primary stormwater pond areas located along the southwestern and southeastern portions of the site. These stormwater ponds would be a dry pond design that would not have standing water except for relatively brief periods after extreme weather events. The landscape of the site would require no substantial clearing. The construction of the school at this site would displace the existing dog park and a replacement dog park would be constructed.

Based on the scoring criteria that was discussed in Section 2.2, the Zuckerman Ave. site met all of the criteria and was deemed the most environmentally feasible and cost effective. Alternative 1 is the Proposed Action/Preferred Alternative for the project.

Figure 6. Alternative 1- Replace Dexter Elementary School at Zuckerman Ave. Site

2.3.3. Alternative 2- Replace Dexter Elementary School at the Existing School Site

The selection of Alternative 2 would result in building the new elementary school complex on the 18-acre, existing elementary school site. The new school building would be located south of the original school on the same property and retain the Dexter Elementary School name. The project would construct a new two-story building and parking lot for the replacement school. The replacement school would have a design population of 600 students for pre-K through 5th grade with a staffing authorization of 59. The project site improvements would include a maximum of 138 parking spaces. Under this alternative, the current school would remain in operation throughout the duration of construction.

The new school improvements would include outdoor activity areas including: two playgrounds, hardcourts for basketball, a bicycle trail, and open grassed field area. Although the existing Dexter Elementary School has existing playground facilities on the property, they would need to be reconstructed in order to allow enough room for the new building.

The construction of the project is anticipated to start September 2026 and conclude in 2030. The site would require minimal grading and earth moving to prepare the site for the construction of the new school. Full stormwater management conveyance and storage would be designed and implemented to serve the new improvements. The landscape of the site would require no substantial clearing.

Figure 7. Alternative 2- Replace Dexter Elementary School at the Existing Site

3. Affected Environment and Environmental Consequences

This section provides a discussion of the affected environment and potential environmental consequences of the Action Alternatives in comparison with the NAA. The study area for this analysis included the proposed project sites and vicinity.

3.1. Resources Dismissed from Detailed Analysis

Fort Moore does not anticipate any effects to air space, environmental justice, facilities and infrastructure, floodplains, safety, socioeconomics, or wetlands from the NAA or either Action Alternative. These resources have been dismissed from detailed analysis (Table 2). Relevant resources are considered in more detail below this section.

Table 2. Environmental Resources Dismissed from Detailed Analysis

Resource	Reason for Dismissal
Air Space	Construction activities would not affect the current airspace designations and all flights and associated activities would occur on other parts of the installation.
Environmental Justice	According to the Climate and Economic Justice Screening Tool (CEJST), no environmental justice or disadvantaged communities are located within or near the project area. Therefore, no benefits or disproportionate impacts are expected to Environmental Justice communities.
Facilities and Infrastructure	The action would have no impacts on facilities not described in the EA. There may be negligible, long-term impacts to existing dog park located at Zuckerman Ave. site. This dog park would be relocated to mitigate the loss due to the construction of the new school.
Floodplains	A local FEMA Floodplain map (13053C0127C) was reviewed. Based on the map review, the 100-year floodplain is outside of the project area. In addition, the majority of the surrounding areas were outside of the 100-year floodplain. As there are no 100-year floodplains in the area, there would be no effects to floodplains.
Socioeconomics	The Proposed Action would have negligible short-term effects on socioeconomics. The construction of the school may provide the potential for additional jobs and increased local spending by the workforce. Because the project is small in scale, the benefit of increased spending would be negligible.
Wetlands	Wetland information for the site was collected through previous installation wetland delineations, National Wetlands Inventory (NWI) mapping, and a site visit. After reviewing the NWI mapper, there were no wetlands present in either the existing Dexter Elementary School Site or the Zuckerman Ave. site. The absence of wetlands was confirmed at the site visit. The construction of the school would still require a no permit required letter from the USACE Regulatory Division.

3.2. Utilities

3.2.1. Affected Environment

Columbus Water Works, Liberty Utilities, Flint EMC and Georgia Power owns and manage the water and sewer, gas, and electric utilities, respectively, on Fort Moore. The sanitary sewage collection system connects to the Columbus Water Works treatment plant (USACE, 2009). Liberty Utilities provides gas through underground pipelines, and Georgia Power and Flint EMC supplies electricity to Fort Moore through overhead and/or buried transmission lines.

3.2.2. Environmental Consequences of No Action Alternative

The implementation of the NAA would mean that a new Dexter Elementary School would not be constructed, and the electrical and plumbing systems would not be updated. These systems were not designed to be energy or water efficient and are reaching their end of life. The NAA would result in long-term negative impacts to the school because the design life of the utilities are reaching expiration and are not energy efficient and don't employ water conservation measures.

3.2.3. Environmental Consequences of Alternative 1

The construction of a new Dexter Elementary School at the Zuckerman Ave. site would result in the connection of new utility systems at the site. The proposed school site has access to nearby water and wastewater facilities. The available water systems include an 8-inch water main at the intersection of Zuckerman Ave. and Bjornstadt Street, to the northwest of the site, and an 8-inch water main along the entire frontage of the school site adjacent to 1st Division Road, along the east side of the site. The potable water and the fire system water would then be provided to the school site either from the Zuckerman Ave. main, or from a connection to the 8-inch water main in the 1st Division Road.

The wastewater service for this school site would connect to an existing manhole located near the intersection of the Zuckerman Ave. and 1st Division Road. If gravity systems are not accessible due to the elevations, the new school site would include a lift station serving the school, with a force main connection to the northern manhole. The entire on-site system would be gravity, including manholes and piping.

The electrical power service for this site would connect to either the main power infrastructure located on Zuckerman Ave. or 1st Division Road. No fossil fuels would be utilized on this campus per the new Executive Order 14057: Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability.

Draft concepts of utilities for the new Dexter Elementary school being proposed at the Zuckerman Ave. site can be seen in Figures 8 thorough 11. As the footprint of the new school is larger than the existing, there would be an expected increase to the demand for electricity, water, and sewer services. However, the new Dexter Elementary School would comply with DoDEA Sustainability Guidance and Unified Facilities Criteria: High Performance and Sustainability Guidance (UFC 1-200-02). This guidance involves incorporating sustainability measures into the design of the school systems to optimize energy performance, protect and conserve water, enhance indoor environmental quality, reduce environmental impact of materials, and address

climate change risks. Overall, the construction of a new school at the Zuckerman Ave. site would result in negligible short-term effects to utilities during construction of the utility connections and would provide long-term net benefits through energy and water conservation measures incorporated into the design of the school. Existing utility systems have ample capacity to meet the requirements of the new school.

Figure 8: Site Water and Sewer Concept

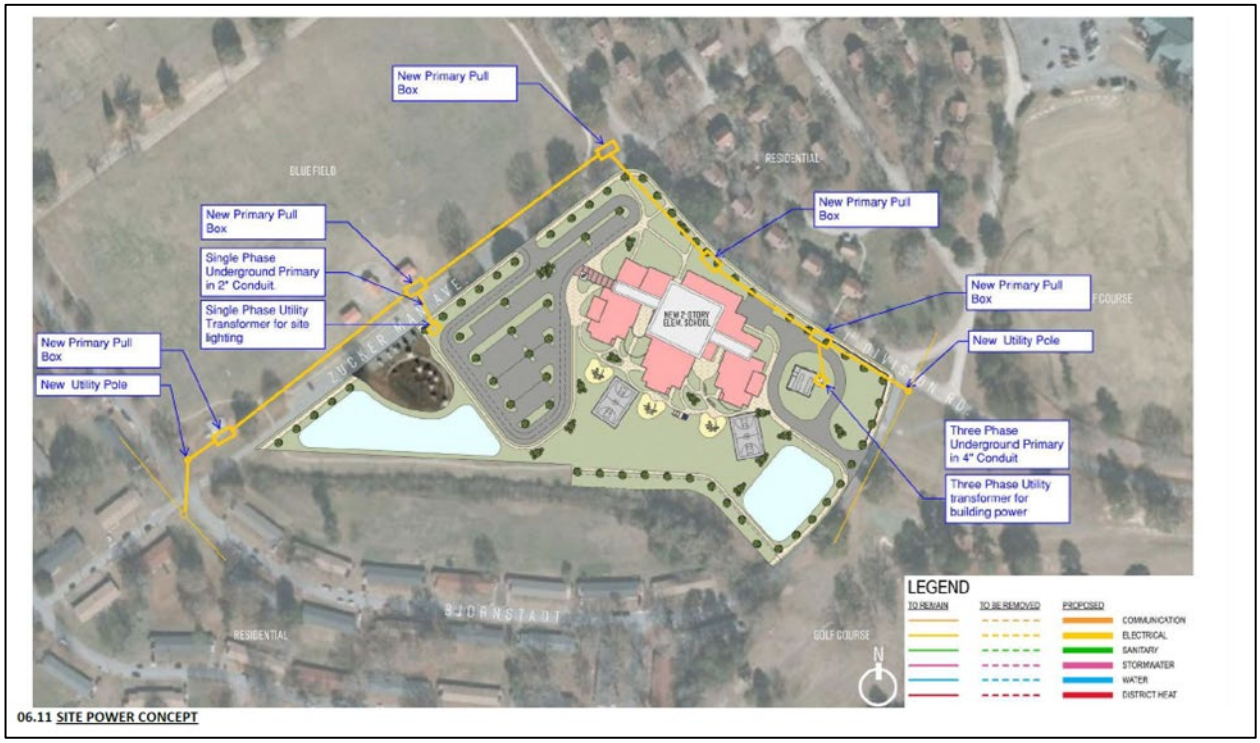


Figure 9: Site Power Concept

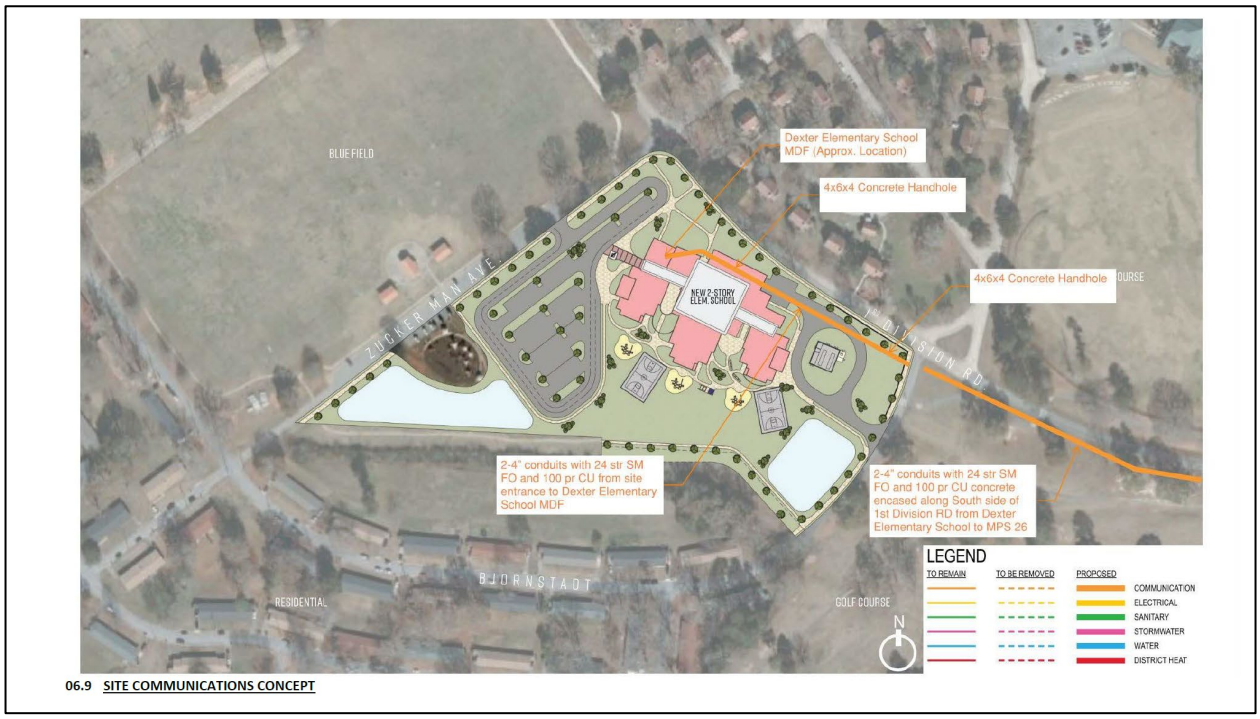


Figure 10: Site Communications Concept

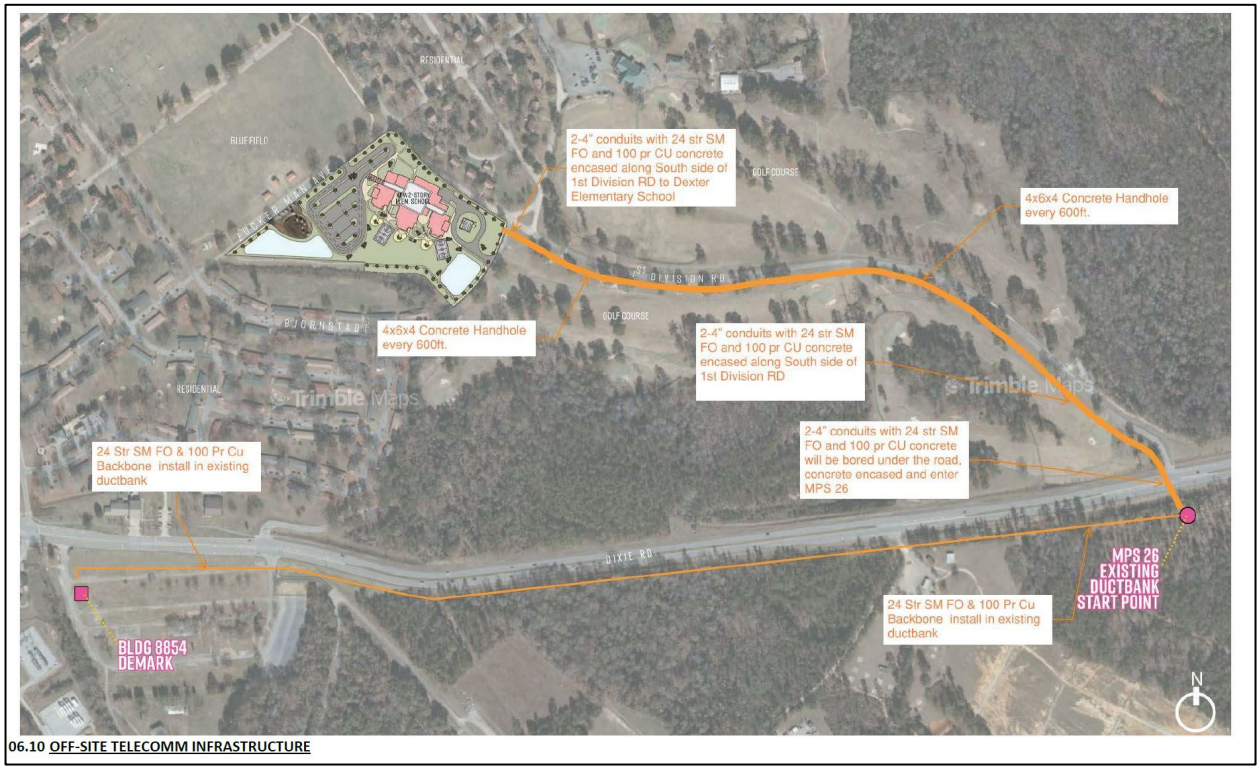


Figure 11: Off-Site Telecommunication Infrastructure

3.2.4. Environmental Consequences of Alternative 2

The construction of a new school at the existing Dexter Elementary School Site would allow for the school to utilize many of the existing systems. The proposed school site has access to the nearby water and wastewater facilities serving the existing school building. However, the water main would be relocated due to the new building placement. The potable water and the fire system water would then be provided to the new school site either from this new main, or from a connection to another water main.

The wastewater service for this school site would connect to an existing manhole located near the intersection of the Zuckerman Ave. and Lumpkin Road, on the east side of the new school facility. If this manhole is not accessible due to the elevations, the new school site could include a lift station serving the school, with a force main connection to the subject manhole. The entire on-site system would be gravity, including manholes and piping. Both water and wastewater facilities are readily available to this property.

The electrical power service for this existing site would connect to the existing power service entrance off Yeager Street.

The new Dexter Elementary School would comply with DoDEA Sustainability Guidance and Unified Facilities Criteria: High Performance and Sustainability Guidance (UFC 1-200-02). This guidance involves incorporating sustainability measures into the design of the school systems to optimize energy performance, protect and conserve water, enhance indoor environmental quality, reduce environmental impact of materials, and address climate change risks. Overall, the

construction of a new school would result in negligible short-term effects to utilities during construction and would provide long-term benefits through energy and water conservation measures incorporated into the design of the school.

3.3. Air Quality

3.3.1. Affected Environment

In compliance with the 1970 Clean Air Act (CAA) and the 1977 and 1990 CAA Amendments, the United States Environmental Protection Agency (USEPA) has promulgated National Ambient Air Quality Standards (NAAQS). The NAAQS were enacted for the protection of the public health and welfare, allowing for an adequate margin of safety. To date, the USEPA has issued the NAAQS for the following criteria pollutants: carbon monoxide (CO), sulfur dioxide (SO2), particulate matter (particles with a diameter less than or equal to a nominal 10 micrometers [PM10] and particles with a diameter less than or equal to nominal 2.5 micrometers [PM2.5]), ozone (O3), nitrogen dioxide (NO2), and lead (Pb).

The air quality region of influence consists of Fort Moore and the Columbus-Phenix City Interstate air quality control region (AQCR). Muscogee, Chattahoochee, Russell, Harris, Talbot, Marion, Webster, and Stewart counties are all within the Columbus-Phenix City AQCR. EPA Region 4, the Alabama Department of Environmental Management (ADEM), and the Georgia Department of Natural Resources' Environmental Protection Division (GAEPD) regulate air quality on Fort Moore. Fort Moore has been designated by the USEPA to be in attainment for all required standards for criteria pollutants, (except Pb in a limited area off the installation in Muscogee County around a battery plant [USEPA, 2014a]). Additionally, the region is considered to be in attainment for O3.

3.3.2. Environmental Consequences of No Action Alternative

Under the No Action Alternative, there would be no construction and so air quality impacts from construction activities would not occur.

Normal school operations, such as heating, cooling, and landscape maintenance may affect air quality. Additionally, vehicle emissions related to traffic associated with the school may also impact air quality, such as student drop off and school personnel commuting to the site. Air emissions associated with vehicles (cars and school busses) going to and from the existing school would remain but is not expected to affect Fort Moore's air quality attainment status. Under the no action alternative, heating and cooling systems would not be updated to current standards for energy efficiency, and outdated school heating and cooling systems would continue to impact air quality, therefore under the no action alternative there would be a minor impact to air quality from school operations.

Overall, the no action alternative would not affect the air quality attainment status on Fort Moore and negligible adverse impacts would occur.

More detailed analysis of greenhouse gas emissions related to the no action alternative is evaluated in Section 3.4 Climate Change and Greenhouse Gas Analysis.

3.3.3. Environmental Consequences of Alternative 1

During construction, the primary impacts to air quality would be localized impacts from fugitive dust and emissions from construction equipment. During construction, best management practices would be required to reduce the amount of fugitive dust from the site. Fort Moore's Air Quality Program reviews all construction and renovation projects to ensure that required reduction measures are in place for emissions from construction vehicles and for fugitive dust. Therefore, only negligible localized short-term adverse effects during construction are anticipated.

Post construction, normal school operations, such as heating, cooling, and landscape maintenance may affect air quality. Updated school electrical, heating, and cooling systems would reduce air quality impacts when compared to the no action alternative, and under Alternative 1, minor beneficial impacts to air quality are anticipated in comparison to the no action alternative.

Additionally, traffic associated with the school may also impact air quality, such as student drop off and school personnel commuting to the site. As the site is in close proximity to the existing site (no action alternative), there would not be an appreciable increase in vehicle emissions related to longer commute times. Additionally, the school design provides for more efficient student drop off and pick up, which would reduce vehicle idling times. Although, more students would result in more vehicles traveling to the school, the more efficient site layout for student drop off/pick up would offset these impacts. In addition, the new location of the school is more centrally located within the residential area which may incentivize more pedestrian and bike access to the school and cause less vehicle emissions. Therefore, in comparison the no action alternative, only negligible impacts to air quality are anticipated from vehicle emissions.

Greenhouse gas emissions related to construction and operation of the school are evaluated in more detail in Section 3.4 Climate Change and Greenhouse Gas Analysis.

Overall, Alternative 1 would have negligible short-term adverse impacts to air quality when compared to the no action alternative and may have a minor net positive long-term impact from more efficient heating and cooling systems. Overall, Alternative 1 would not affect the air quality attainment status of Fort Moore.

3.3.4. Environmental Consequences of Alternative 2

Impacts to air quality under Alternative 2 would be similar as those described for Alternative 1. However, as the new school would have an increased capacity and would result in more traffic in the area, localized impacts to air quality from vehicle emissions may be expected. The site design of the school would provide for more efficient student drop off and pick up and therefore may reduce some of the impacts. Overall, Alternative 2 would have a negligible short-term localized impact to air quality during construction and would have a negligible to minor long-term adverse impact to air quality when compared to the no action alternative. This alternative would not affect the air quality attainment status of Fort Moore.

3.4. Climate Change and Greenhouse Gas Analysis

3.4.1. Affected Environment

Georgia's climate is defined by hot, humid summers, and mild winters, with mostly abundant rainfall through the state. A measurable amount of rain falls on about 120 days each year, producing amounts averaging between 45 and 50 inches. Averaging over many years, the driest months are September and October, and the wettest month is March (NOAA, 2024). Future climate conditions predict increased severity in droughts and storms.

According to the Fourth National Climate Assessment for the Southeast United States, the number of rainfall events are increasing in western Georgia. The Southeast is experiencing more and longer summer heat waves, and that is expected to continue into the future. The number of days with high minimum temperatures (nighttime temperatures that stay above 75°F) has been increasing across the Southeast as well, and this trend is expected to intensify.

3.4.1. Environmental Consequences of No Action Alternative

Under the NAA, no construction of an elementary school on Fort Moore would occur. Therefore, no impacts to climate change would occur.

3.4.2. Environmental Consequences of Alternative 1

Consistent with section 102(2)(C) of NEPA, Federal agencies must disclose and consider the reasonably foreseeable effects of their Proposed Actions including the extent to which a Proposed Action and its reasonable alternatives (including the no action alternative) would result in reasonably foreseeable GHG emissions that contribute to climate change. Per the draft Council on Environmental Quality (CEQ) 2023 NEPA Guidance on Consideration of Greenhouse Gas Emissions and Climate Change, federal agencies should consider the potential effects of the Proposed Action on climate change through the assessment of greenhouse gas emissions (GHG).

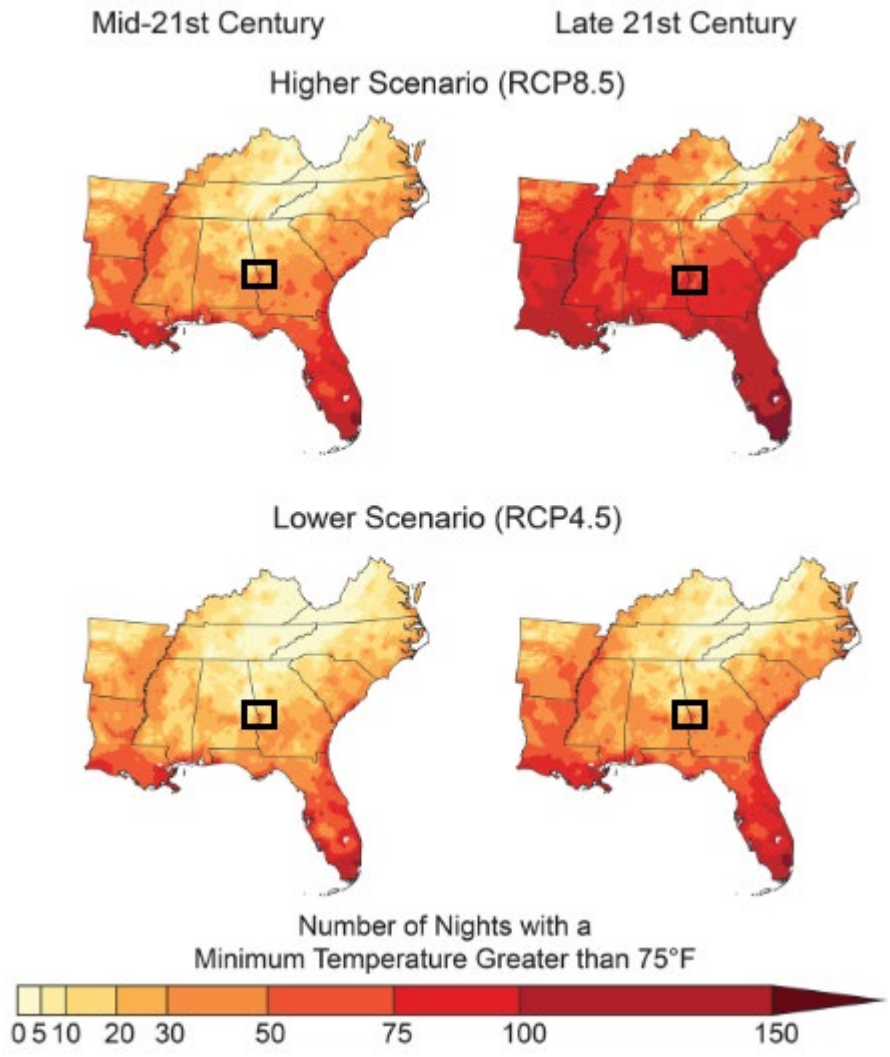


Figure 12. Fourth National Climate Assessment Number of Nights with a Minimum Temperature Greater than 75°F. The square block indicates the project area location. Under both high and low scenarios, an increase of 50 or more days of warmer nights is expected.

While the methodology and equipment used for the construction of the new elementary school located on Zuckerman Ave. has not been determined, assumptions can be made for the types and number of equipment used for excavation, land clearing, parking lot paving, and construction of the two-story school. Estimates were made on the type and quantity of equipment used for the construction duration of approximately four years. More detail can be found in Table 3 for the greenhouse gases (lbs) emitted as a result of construction of the new elementary school. Carbon dioxide equivalencies (CO_2e) is the total amount of emitted greenhouse gas emissions expressed in terms of the equivalent measurement of carbon dioxide. A total of 3,359,982 lbs, or 1,524 tons, of CO_2e is expected to be emitted as a result of four years of construction of the new elementary site located on Zuckerman Ave. This is equivalent to 1,679,633 lbs of coal burned, or 149,711 gallons of diesel consumed (EPA's Greenhouse Gas Equivalencies Calculator). The

social cost of carbon, or SC-GHG, was also quantified. SC-GHG estimates allow monetization of the climate change effects from GHG emissions. The SC-GHG translates metric tons of emissions into the familiar unit of dollars, allows for comparisons to other monetized values, and estimates the damages associated with GHG emissions over time and associated with different GHG pollutants (CEQ, 2023). The Cost of Climate Pollution tool was used to quantify the social cost of the carbon dioxide gas emissions as a result of using the bulldozer to create even grades. Using a 2% average discount rate and 2024 year of analysis and emissions, 1,524 metric tons of CO_2 is equivalent to $316,992.

Table 3. Greenhouse gas emissions as a result of four years of construction of the new elementary site located on Zuckerman Ave.

Emissions Source	CO2 (lbs)	CH4 (lbs)	NOX (lbs)	CO2eq (lbs)
Crawler Tractor (Dozer)	532	48	3,080	919,701
Dump Truck	266	24	1,540	459,850
Backhoe	355	32	2,054	613,134
Excavator	83	7	284	85,030
Rubber Tired Loaders	95	9	438	130,764
Crane	133	12	662	197,857
Paver	266	24	1,540	459,850
Concrete Mixer	266	24	1,540	459,850
Drilling Rig (Pile Driver)	47	4	113	33,945
Total (project duration)	**2,043**	**184**	**11,253**	**3,359,982**

Analysis was also conducted for continued operation of the new elementary school once construction is complete. According to the U.S. Energy Information Administration, an annual average of 10 kilowatt-hours (kWh) per square foot is used for public schools. The approximate square-footage of the proposed elementary school is 116,500. Therefore, the estimated annual kWh used for the school is approximately 1,165,000. This annual amount is equal to 486 metric tons of CO2e, or 535,271 pounds of coal burned.

The effects of climate change on the Proposed Action are expected to be minimal. Increased intensity of storms and drought are predicted but are not expected to affect the Proposed Action or be affected by the Proposed Action.

3.4.3. Environmental Consequences of Alternative 2

While design has not been evaluated for Alternative 2, assumptions can be made that the construction duration, type, and square footage would be similar to that of Alternative 1.

Therefore, greenhouse gas emissions are expected to be similar to the construction and continued operations of Alternative 1.

3.5. Wildlife and Migratory Bird Resources

3.5.1. Affected Environment

Wildlife species common within Fort Moore include white-tailed deer (*Odocoileus virginianus*), gray squirrel (*Sciurus carolinensus*), eastern cottontail rabbit (*Sylvilagus floridanus*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), and mourning dove (*Zenaidura macroura*) (USACE, 2005).

The project area does not, by nature, provide good habitat for wildlife. Development and human activity have forced native animal populations to less disturbed and active areas of the installation, such as training areas. Neither proposed site locations have wetlands or water features so there is no habitat for fish or mussel species.

The Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918;40 Stat. 755) prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the U.S. Fish and Wildlife Service (USFWS).

The Bald and Golden Eagle Protection Act (BGEPA) of 1940 (16 U.S.C. 668-668c) prohibits anyone from "taking" bald eagles, including their parts, nests, or eggs without a permit issued by the Secretary of the Interior. Any activity that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures. Bald and Golden Eagles are potentially located in the project area. However, no bald eagles or eagle nests were observed during the site visit.

Under the MBTA and the Bald and Golden Eagle Protection Act, 16 species of birds have been identified under the USFWS's Information, Planning, and Consultation System (IPaC) (USFWS, 2023a) that are protected within the project area, including the American bald eagle. The 16 species of birds are considered plentiful within the Bird Conservation Region where Fort Moore occurs (USACE, 2009).

3.5.2. Environmental Consequences of No Action Alternative

The implementation of the NAA would mean that a new Dexter Elementary School would not be constructed. Since construction would not occur, there would not be any short-term or long-term impacts to wildlife or migratory bird species.

3.5.3. Environmental Consequences of Alternative 1

Construction of the new Dexter Elementary School at the Zuckerman Ave. site could potentially effect wildlife and migratory birds during vegetation removal and construction activities. These actions could result in habitat loss, degradation, and fragmentation. However, the impacts would be minor as the acreage of lost habitat is small within the breeding ranges of these species.

Overall, there would be short-term, minor adverse effects to wildlife and migratory bird species within the Zuckerman Ave. site, but in the long-term, impacts would be negligible.

3.5.4. Environmental Consequences of Alternative 2

Construction of the new Dexter Elementary School at the existing site could potentially effect wildlife and migratory birds during vegetation removal and construction activities. These actions could result in habitat loss, degradation, and fragmentation. However, the impacts would be minor as the acreage of lost habitat is small within the breeding ranges of these species. Overall, there would be short-term, minor adverse effects to wildlife and migratory bird species in the area resulting from vegetation removal during construction activities.

3.6. Vegetation Resources

3.6.1. Affected Environment

Trees and other plants in the urbanized cantonment areas are important for many reasons including aesthetics, shade, erosion control, wildlife habitat, and wildlife food. Vegetation throughout the project area includes common trees (oak, maple, crepe myrtle, sweetgum, pine, and magnolia), ornamental shrubbery around existing buildings, and a variety of common grasses.

3.6.2. Environmental Consequences of No Action Alternative

The implementation of the NAA would mean that a new Dexter Elementary School would not be constructed. Since construction would not occur, there would not be any short-term or long-term impacts to vegetation resources.

3.6.3. Environmental Consequences of Alternative 1

The implementation of Alternative 1 would result in the removal of vegetation to accommodate the facility footprint and utility tie-ins. There would be minor, long-term adverse effects from the removal of several hardwood species and grassed areas for the construction of the new school. After the school is constructed, additional tree plantings would occur around the edge of the property. There would also be minor ornamental plantings to increase the visual appeal of the school. Overall, there would be minor, short-term adverse effects to vegetation from removal activities; then minor, long-term beneficial effects from the planting of additional tree species throughout the Zuckerman Ave. site.

3.6.4. Environmental Consequences of Alternative 2

The implementation of Alternative 2 would result in the removal of vegetation to accommodate the facility footprint and utility tie-ins. There would be minor, long-term adverse impacts to vegetation where the new school would be constructed. Minor ornamental planting may occur to increase the visual appeal of the school. Overall, there would be a minor, long-term adverse impact to vegetation.

3.7. Threatened and Endangered Species

3.7.1. Affected Environment

The Endangered Species Act (ESA) of 1973 (16 USC 1531-1543) regulates activities affecting plants and animals that are Federally listed as endangered or threatened, as well as the designated critical habitat of ESA-listed species. The USFWS's IPaC indicated several federally listed species potentially within the project areas. These included a total of five federally listed endangered species, one federally listed threatened species, one federally listed candidate species, and one federally listed non-essential, experimental population. Table 4 identifies USFWS ESA listed species potentially occurring within the Zuckerman Ave. site and the existing Dexter Elementary School Site. The species were the same in both sites except the fringed campion (indicated with an asterisk) was only listed for the Zuckerman Ave. site. While these species were listed as potentially occurring in the sites, it is not expected that these species would be present.

3.7.1. Environmental Consequences of No Action Alternative

The implementation of the NAA would mean that a new Dexter Elementary School would not be constructed. Since there are no preferred habitats within the study area, there would not be any short-term or long-term impacts to threatened and endangered species.

3.7.1. Environmental Consequences of Alternative 1

In review of habitat preferences for each listed species in Table 4, it was determined that suitable habitat does not exist in the project area for any of the species. Therefore, the proposed project would have no effect to ESA-listed species. Additionally, during the site visit these species were not observed.

3.7.1. Environmental Consequences of Alternative 2

In review of habitat preferences for each listed species in Table 4, it was determined that suitable habitat does not exist in the project area for any of the species. Therefore, the proposed project would not have any short-term or long-term impacts to these species. Additionally, none of these species were observed during the site visit. As there is no route of effect to ESA-listed species, a no effect determination has been made.

Table 4. USFWS Federally Listed Species Potentially Occurring within the Project Area (Project Code: 2024-0046419)

Category	Common Name	Scientific Name	Federal Status	Habitat
Mammals	Tricolored Bat	*Perimyotis subflavus*	Proposed endangered	Winter in caves & mines; All other seasons in trees among leaves of live or recently dead deciduous hardwoods
Birds	Red-cockaded Woodpecker	*Picoides borealis*	Endangered	Mature pine forests, most commonly in longleaf pine
	Whooping Crane	*Grus americana*	Experimental Population	Shallow marshes and adjacent, open grasslands
Reptiles	Alligator Snapping Turtle	*Macrochelys temminckii*	Proposed Threatened	freshwater systems and deeper beds of large rivers, canals and lakes
Insects	Monarch Butterfly	*Danaus plexippus*	Candidate	prairies, meadows, grasslands, and along roadsides with milkweed plants
Flowering Plants	Michaux's Sumac	*Rhus michauxii*	Endangered	sandy or rocky open woods in association with basic soils
	Relict Trillium	*Trillium reliquum*	Endangered	moist, rich soils in deciduous forested slopes, on bluffs and in stream flats, and moist hardwood forest with little or no disturbances
	Fringed Campion*	*Silene polypetala*	Endangered	hardwood bottoms and ravines in a very limited geographic range

***Species only listed for the Zuckerman Ave. site**
Note: List Developed from the USFW, Information for Planning and Consultation (IPaC) Website.

Following research and review of the species list, the habitat requirements for the identified species were evaluated. This evaluation included a review of the known ranges for the species as well as a comparison of the species habitat relative to the habitat conditions present within the project area. Based on the initial evaluation, it was determined that suitable habitat for the species were not present within the project area, as the project area is previously disturbed and only holds ornamental vegetation. There is also no federally designated critical habitat for any of the species listed.

3.8. Historical and Cultural Resources

3.8.1. Affected Environment

The area now known as Fort Moore served as the location of Camp Benning, which was in-use from 1918 until 1922, at which point it was renamed to Fort Benning before becoming Fort Moore in 2023. Prior to its use for military purposes, this area had a rich prehistoric and historic past. Fort Moore encompasses 3,613 documented archaeological sites within its boundaries, of which 737 sites are either eligible or potentially eligible for listing on the National Register of Historic Places (NRHP). A documented 994 historic structures and 68 cemeteries are present. One of the most important sites on the installation is the Yuchi Town Site, which is located on the Alabama side of the installation. It was declared a National Historic Landmark in 1996. There are seven historic districts comprising historic period Southeastern Indian archaeological sites and early U.S Army historic architecture. One of which, the Main Post Historic District, is pertinent to this undertaking.

The Main Post Cantonment Historic District was determined to have national and regional significance in the areas of community planning, architecture, landscape architecture, and military history. The proposed project area (Green Field) is located along Zuckerman Avenue and 1st Division Road, just inside the currently established boundary of the historic district, which is bounded by Bjornstad Street to the west.

3.8.2. Section 106 Consultation

On November 15, 2023, the Corps met with members of Fort Moore's Directorate of Public Works (DPW) and Georgia's State Historic Preservation Office (GA SHPO) to conduct a site visit at both proposed project areas. The meeting and site visit coincided with the meeting with consulting Tribes and GA SHPO that is held annually under the Army Alternate Procedures (AAP) as part of compliance with Section 106 of the National Historic Preservation Act (NHPA). Section 106 of the NHPA requires Federal agencies to consider the effects of undertakings on historic properties and provide the Advisory Council of Historic Preservation (ACHP) reasonable opportunity to comment with regard to such undertakings. The AAP allows Army installations to follow a streamlined set of parameters to meet their historic preservation responsibilities under the NHPA. The Historic Properties Component (HPC) of the Integrated Cultural Resource Management Plan outlines the Standard Operating Procedures (SOP) to meet its historic property Section 106 and stewardship responsibilities. The 2018 HPC is currently in effect, and the 2024 HPC is in the final stages of publication and can also be utilized to inform the process.

Under the AAP, GA SHPO serves as a technical reviewer, as outlined in HPC SOP 10 (GA SHPO Reference Number: TA-240321-001/Muscogee). The 35% Design was submitted to the GA SHPO on 22 March 2024 and comments were provided on 22 April 2024. Based on these comments, the building design went through a major revision to better incorporate the building into the surrounding historic district. The revised design was provided to GA SHPO on 29 August 2024. GA SHPO responded to the revised design on 6 September 2024 to state that they understand that the proposed height and footprint of the building remains the same, as well as the siting on the project site. They continued to acknowledge that the new construction will occur within the boundary of the NRHP-eligible Main Post Cantonment Historic District. Additionally, they expressed that the Spanish Revival style is compatible with the surrounding district. They recommended that the architectural design be as simple as possible and not a highly stylized version of the Spanish Revival style so that it will not detract from the more vernacular design of the surrounding historic architecture. GA SHPO technical reviews will continue to occur at the major design stages in accordance with the APPs and as outlined in the 2018 HPC, and the 2024 HPC upon Advisory Council on Historic Preservation certification.

3.8.3. Environmental Consequences of No Action Alternative

With implementation of the NAA, a new Dexter Elementary School would not be constructed, and therefore there would be no adverse effect on historic properties.

3.8.4. Environmental Consequences of Alternative 1

With implementation of Alternative 1, potential adverse effects to historic properties were initially identified as outlined in 36 CFR 800.5(a)(1)(v). *Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features.* With the proposed building location being within the Main Post Cantonment Historic District, implementation of the AAPs and the protocols outlined in the 2018 HPC were required to minimize effects. The initial design was revised to better incorporate the building into the surrounding historic district, and GA SHPO concurred that the Spanish Revival style is compatible with the surrounding district.

GA SHPO also recommended maintaining the old tree growth to break up the line-of-site onto the historic polo fields, especially Blue Field on the other side of Zuckerman Ave. The trees are contemporary with the period of significance of the historic district and would help act as a visual buffer between the proposed facility and the historic open spaces nearby to minimize visual impacts. The landscaping plan was provided to GA SHPO to indicate which trees would be maintained and the trees that need to be removed/replaced due to safety and construction concerns.

The Fort Moore Cultural Resource Management Program (CRMP) staff will carry out additional reviews at the major design stages (typically at 60-65% and 90-95%) in accordance with the HPC SOPs. With the addition of minimization measures and design mitigation features, the building design poses no adverse effects to the historic district, as it adheres to the HPC SOPs and incorporates feedback from the GA SHPO. Determination of Effects can be found in Appendix D.

3.8.5. Environmental Consequences of Alternative 2

With implementation of Alternative 2, no adverse effect on historic properties is anticipated. The current school is of modern construction, so there are no concerns with additions or building a new school on the existing site. There are several modern structures near the elementary school, including a large, multi-level hotel and gas station. There are no documented archaeological sites within the area, and the level of previous disturbance indicates that inadvertent discoveries would be unlikely. Additionally, the current school location is just outside of the Fort Moore Main Post Cantonment Historic District (primarily 1930s and 1940s period of significance). There are historic structures (base housing) adjacent to the existing elementary school that date to the 1960s and 1970s. A reassessment of the Main Post Cantonment Historic District now includes the base housing within its boundaries. Even with an expansion of the historic district, GA SHPO and DPW agreed that there would be a no adverse effect determination to making additions to the existing school due to the factors mentioned above.

3.9. Noise

3.9.1. Affected Environment

There are minor noise producing activities within the Zuckerman Ave. site. The Zuckerman Ave. site contains a dog park and playground, so the noise producing activities would be typical of

community green spaces (e.g., dogs barking, children playing, vehicular traffic, mowing grass, etc.). Naturally occurring noises (buzzing of insects, bird calls, etc.) are also common within the project area.

The Dexter Elementary School Site has minor noise producing activities. Most of the activities in the area are focused on classroom instruction and outdoor learning activities. The noise produced from this site is typical of any school setting (e.g., school bells, vehicular traffic, children playing, mowing grass, etc.).

3.9.2. Environmental Consequences of No Action Alternative

With implementation of the NAA, a new Dexter Elementary School would not be constructed; therefore, noise associated with construction activities would not occur. Noise associated with each site would continue without disruption.

3.9.3. Environmental Consequences of Alternative 1

With implementation of Alternative 1, noise resulting from the use of vehicles and equipment for the construction activities would be short-term and localized resulting in negligible noise effects. Construction activities would occur over four years and during normal business (i.e., daylight) hours. Although there are sensitive noise receptors (e.g., residential areas) adjacent to the sites of construction, no long-term noise effects would occur from these activities. Temporary increased levels of noise would terminate upon completion of construction, and the noise environment would return to pre-construction and pre-demolition conditions.

Constructing a new school at the Zuckerman Ave. site would be a long-term minor change in the sources of noise within the Main Post Cantonment Area. The noise producing activities in the area would be typical of community green spaces (e.g., dogs barking, children playing, vehicular traffic, mowing grass, etc.) and there would be noise associated with school operations (e.g., trucks for deliveries, bus traffic, and parent vehicle traffic). The noise level for indoor activities in residential areas and other indoor areas are ≤ 45 decibels. The noise levels for outdoor activities where people spend limited amounts of time, such as school yards and playgrounds is ≤ 55 decibels. The 45 decibels and 55 decibels noise levels were determined for residential areas where individuals spend varying amounts of time outside, such as a neighborhood (EPA, 1974). Therefore, the noise from the school would be compatible with the surrounding residential setting. During the development of the design for the new school, it would be important that it is coordinated with Family Housing for the potential noise impacts to the residents living in the area. It would be important that this coordination is completed before the construction of the new school begins.

3.9.4. Environmental Consequences of Alternative 2

With implementation of Alternative 2, noise resulting from the use of vehicles and equipment for the construction would be short-term but localized. Construction and demolition would occur over the course of four years during normal business (i.e., daylight) hours.

Short-term increases to noise could cause a negative effect to the students in the existing school. The students would remain in the existing school while the new facility is built. The adjacent construction noise could cause negative effects to the students' learning ability and school experience. The residential areas adjacent to the sites of construction would have no long-term noise effects from these activities. For both the school and residential areas, the temporary increased levels of noise would terminate upon completion of construction, and the noise environment would return to pre-construction and pre-demolition conditions.

Noise producing activities from the new Dexter Elementary School would not change or adversely affect the current noise environment within the nearby residential community.

3.10. Geology and Soils

3.10.1. Affected Environment

The Zukerman Ave. site ranges from elevation 375.00 to 350.00 and generally slopes from the northeast corner down to the southwest corner. Other than sporadic trees, pedestrian pathways, and a playground area, the project site is best described as an open sodded area.

The existing Dexter Elementary School is located in an urban environment, the area has been graded and filled and it is unlikely that any native soils remain at the site. The site is primarily flat and composed of either building, parking lots, or landscaping. Based on review of the U.S Department of Agriculture, Natural Resources Conservation Services (USDA NRCS) Soil Survey, the project site soils are designated OuB, Orangeburg-Urban land complex, 2 to 5 percent slopes. These soils would carry a soil group rating of B, which means they would have moderate infiltration rates when thoroughly wet. In general, these soils have a depth to the water table of greater than 6.5 feet from existing grade, and the depth to a potential soil restrictive layer is also greater than 6.5 feet. This soil type is identified as loamy fine sand, and would carry a Soil Classification of SP-SM.

3.10.2. Environmental Consequences of No Action Alternative

Under the No Action Alternative, there would be no impact to geology and soils as there would be no construction at the site.

3.10.3. Environmental Consequences of Alternative 1

Since the project site is primarily flat, minor to moderate grading and earthmoving is expected during construction. Use of best management practices as required by Georgia's construction permitting and National Pollutant Discharge Elimination System (NPDES) construction permitting requirements minimize impacts from erosion during construction. There would be some disturbance of soils, but as indicated by the USDA NRCS Soil Survey these soils are primarily designated as urban soils, meaning that native soils are not located on site. After construction, landscaping on site would stabilize any soils and erosion is unlikely to occur. Overall, under this alternative only minor short-term impacts are anticipated.

3.10.4. Environmental Consequences of Alternative 2

The proposed project site for the new school is an open park area and is essentially flat. Based on the topography minimal grading and earthmoving would be needed to prepare this site for school use. Use of best management practices as required by Georgia's General Construction Permit minimize impacts from erosion during construction. The site has been previously graded and native soils are not expected to still remain on site. After construction, soils would be stabilized by landscaping. For these reasons, adverse effects to soils and geology would be none to negligible.

3.11. Traffic and Transportation

3.11.1. Affected Environment

The existing Dexter Elementary School Site is located in the commercial district on the installation at the corner of Ingersoll Street and Colonel Ralph Puckett Pkwy., an area of moderate to high traffic. Colonel Ralph Puckett Pkwy is a primary community route for personnel on Fort Moore as it connects residential areas on the installation to places of work. Other adjacent roadways are Yeager Avenue to the north, Lumpkin Road to the east, Colonel Ralph Puckett Pkwy. to the south, and Ingersoll Street to the west. Pedestrian access to this site is available from nearly every road frontage, however, there is moderate to heavy vehicular traffic in the area. A new parking lot was constructed for the Dexter Elementary School and the old parking lot is currently used for student drop off and pick up. The new parking lot was constructed to alleviate traffic related to school drop off and pick up, the old parking lot now serves this function.

The Zuckerman Ave. site is located in a residential district on the installation, with light traffic typically associated with a residential area. The adjacent roadways are Zuckerman Ave. to the northwest, 1st Division Road to the northeast, and Bjornstadt Street to the southeast. The southwest frontage of the site is adjacent to an existing pedestrian pathway and a wooded intermittent stream. The Blue Field recreation area is located across Zuckerman Ave. to the northwest. Residential housing exists to the northeast and southwest and the Fort Moore golf course extends to the southeast limits across Bjornstadt Street.

3.11.2. Environmental Consequences of No Action Alternative

Under the No Action Alternative, student capacity would not change and therefore current traffic and transportation impacts would remain. Student drop off and pick up would continue in the old parking lot converted for this use. During periods of congestion, it is expected that there would continue to be minor impacts to traffic and transportation in the area from queuing of vehicles for student drop off and pick up. Furthermore, this site has limited pedestrian access and with the heavy traffic in the area would continue to have a moderate adverse effect to pedestrian traffic.

3.11.3. Environmental Consequences of Alternative 1

The access to the site during construction is proposed to be from Bjornstadt Street. The construction access will go down 1st Division Road and then turn down Bjornstadt briefly for

access. This is the least travelled portion of the adjacent road network and is the most remote to the adjacent residential communities. In addition, since this is a greenfield site, there is no complication between construction traffic and existing traffic attending an active school site.

The project site includes frontage on three (3) streets. To the north is 1st Division Road which is the most highly used road adjacent to the site and would be considered a collector road. To the east is Bjornstadt Street which is a residential road serving homes to the south of the proposed site. To the west is Zuckerman Ave., which would best be described as a residential collector. Due to the higher volumes of traffic on 1st Division Road, as well as the existing residential community to the north, it was determined that access from 1st Division Road was not desirable and therefore the project does not propose any direct vehicular access to this road. The main access to the project site is proposed to be from Zuckerman Ave. Since this is a residential collector, and currently serves park areas on both the east and west sides, it was determined that this road was the most appropriate to accommodate the traffic from the school and would have the least impact on the neighboring communities (refer to Figure 6 for site location information).

The service drive/bus loop typically is separated from the main entrance and for this reason, the access drive for these uses is from Bjornstadt Street, on the east side of the campus. This location provides the best separation of the two uses, which also assists in dispersing traffic within the community.

The main parking lot includes a portion along the south and east sides of the lot which includes adequate pavement to stack vehicles, three-lanes-wide, to address the concerns with the number of parent vehicles that drop-off and pick-up students at the school. The student drop-off queue begins at the entrance from Zuckerman Ave., and extends southwest, then southeast, and then back to the north. The drop-off zone is located on the west side of the new building. The total car stacking available is approximately 130 cars which is 21.6% of the student population. The main parking lot includes a total of 108 spaces and the service area contains an additional 11 spaces for a total site parking of 119 spaces.

Under Alternative 1, the elementary school would be located in closer proximity to residential areas and in less congested area providing for safer pedestrian and bike access. It is anticipated that under this alternative, more students may walk or bike to school.

Overall, with implementation of Alternative 1 there would be minor long-term adverse impacts to traffic and transportation patterns in and around the Zuckerman Ave. site associated with the construction and operation of the new school. This impact is a result of adding a new land use to the area in addition to residential and recreational uses already present in and around the site. It is anticipated however that by relocating the new Dexter Elementary School to the Zuckerman Ave. site there would be long-term net positive effects within this portion of the Main Post Cantonment Area as it would allow the possibility for students to walk or bike to school, which would further reduce impacts to traffic in the area.

3.11.4. Environmental Consequences of Alternative 2

The new school is proposed to be planned for up to 600 students. Based on this information, parking spaces for up to 138 vehicles would be required to meet the DoDEA Educational

Specifications. Although this alternative is located adjacent to the existing Dexter Elementary School Site, the existing parking lot would be too remote to the new facility and a new parking lot would be required. Access to the new lot would likely be from Lumpkin Road. The existing bus loop access would also be too remote and the access point for bus access would be from Ingersoll Street or potentially from Yeager Avenue.

The existing parent stacking area, which is located in the northwest portion of the school property, could potentially be reused for the new school facility. It is anticipated that building the new school would make the traffic and parking situation more constrained within an already busy and congested area. Significant improvements to pedestrian safety would need to be considered with this alternative including improved sidewalk access to the new building entrance and increased signage within the adjacent rights-of-way.

With an increase in the number of students and school staff at the new school, it is anticipated there would be an increase in traffic in an already congested area. Furthermore, given the site is in an area of heavy traffic, it is unlikely that students would walk or bike to school without major improvements to pedestrian safety.

Overall, with implementation with Alternative 2, there would be moderate long-term adverse impacts to traffic and transportation in and around the existing Dexter Elementary School Site from construction and operation of the new school. The construction and operation of the new school would increase what is already congested and busy area within the Main Post Cantonment Area.

3.12. Water Resources

3.12.1. Affected Environment

The proposed project is located within the Hydrological Unit Code 0313003 of the Middle Chattahoochee watershed. The project area contains one intermittent stream within the Zuckerman Ave. site. The stream was not assessed as one of the waterbodies listed on the Draft 2024 305(b)/303(d) List.

At the current Elementary School, there are a variety of grading and drainage issues throughout the campus. The issues at this facility include surface areas that have been obstructed and do not have adequate ability to drain to an inlet, existing roof drain downspouts that are either blocked or disconnected, or existing downspouts that have not been connected to a below grade system and contribute to minor flooding potential.

3.12.2. Environmental Consequences of No Action Alternative

With the implementation of the NAA, a new school would not be constructed; therefore, there would be no effects to water resources related to construction activities. The existing school site has minimal stormwater management measures and under the no action alternative they would not be updated to reduce stormwater from the site. Stormwater runoff from the existing site would have minor adverse impacts to water resources and would have minor impacts to water quality of nearby waterbodies.

3.12.3. Environmental Consequences of Alternative 1

With the implementation of Alternative 1, effects to water resources are most likely to occur during rain events on construction sites. The stormwater runoff would increase due to increased impervious surface associated with the new construction. However, the site would contain stormwater quantity controls to help maintain the runoff rate and volume.

As part of the construction design at the Zuckerman Ave. site, the design would avoid impacts to the existing intermittent stream by utilizing a 25-foot buffer. In order to determine the boundaries of the stream, a stream delineation assessment marked the boundaries of the aquatic resources using the ordinary high water mark assessment method. The 25-foot buffer was added to the edge of the boundary to ensure that no impacts to the stream or the buffer would occur during potential construction of the new school. Ordinary high-water mark stream assessment data forms and pictures from the assessment can be found in Appendix B.

After the construction period, there are several measures being implemented to manage for stormwater. To meet EISA Section 438 requirements, stormwater quality controls would be provided for the 95th percentile storm. Design features to accommodate this include two dry retention pond areas with infiltration, and the potential inclusion of bio or enhanced swales. These stormwater ponds would not have standing water except for relatively brief periods after extreme weather events. These features would be designed around grassed and landscaped areas and would utilize appropriate soil conditions and native vegetation. Stormwater quantity controls would also be provided to control runoff rate and volume. The conveyance of stormwater would also be accomplished through improvements to the stormwater management areas through a combination of inlets and piping. The stormwater quality and quantity controls would also meet sustainability requirements.

Short-term, minor adverse impacts on water resources are expected for this alternative due to potential stormwater runoff associated with construction activities. This effect is minimized through environmental protection measures and best management practices for water resources. The additional 25-foot buffer would increase absorption of storm water into the subsoil thereby reducing runoff and sedimentation. However, significant, long-term impacts are not expected with the increase in stormwater management for the area; it would reduce the risk of standing water, reduce the risk of flooding, mitigate structural damage to buildings, and maintain water quality.

Figure 13. Zuckerman Ave. Site Draft Stormwater Concept

3.12.4. Environmental Consequences of Alternative 2

With the implementation of Alternative 2, effects to water resources are most likely to occur during rain events on construction sites. The stormwater runoff would increase due to increased impervious surface associated with the new construction. There are existing drainage swales at the site that would be impacted from the increased stormwater.

With the development of the new school site, full stormwater management conveyance and storage would be designed and implemented to serve the new improvements. The stormwater management storage would be provided either in surface ponds, or below grade exfiltration, and would be recovered utilizing an underdrain system. Conveyance of stormwater from the improvements to the stormwater management areas would be using a combination of inlets and piping. The stormwater improvements would reduce the potential for temporary ponding on the surface during periods of heavy rainfall.

Short-term, minor adverse impacts on water resources are expected for this activity due to potential stormwater runoff associated with impervious surface. The effect is minimized by the addition of stormwater piping systems and other stormwater management measures.

3.13. Hazardous, Toxic, and Radioactive Waste

Hazardous materials and waste are identified and regulated primarily by the Comprehensive Environmental Response, Compensation, and Liability Act; the Occupational Safety and Health

Act; the Resource Conservation and Recovery Act (RCRA); the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA); and the Emergency Planning and Community Right-to-Know Act. Hazardous materials have been defined to include any substance with special characteristics that could harm people, plants, or animals when released. Various state laws also regulate the management and disposal of hazardous materials and waste. Hazardous waste is defined in the RCRA as any “solid, liquid, contained gaseous or semisolid waste, or any combination of wastes that could or do pose a substantial hazard to human health or the environment.” Waste may be classified as hazardous because of its toxicity, reactivity, ignitibility, or corrosivity. In addition, certain types of waste are “listed” or identified as hazardous in 40 CFR 263.

3.13.1. Affected Environment

The Fort Moore Environmental Division assists with the management of hazardous waste for the military units and activities that generate the waste. Centralized Accumulation Points and Satellite Accumulation Points are maintained in various locations across the Installation to facilitate the collection of hazardous wastes and to ensure that the wastes are transported off Post in accordance with applicable Federal, State, and Department of Defense (DoD) regulations. As a designated Large Quantity Generator of hazardous waste, such wastes generated by Fort Moore are collected and transferred to a central storage area, where they may be stored for no longer than 90 days before being transported off-site for treatment or disposal. Fort Moore arranges for the transport and disposal of its hazardous waste by appropriately licensed waste management and transportation companies through a Defenses Logistics Agency (DLA) contract.

The Zuckerman Ave. site is currently managed as green space with a dog park and playground, these activities do not produce hazardous waste, typical waste associated with landscaping such as fertilizers and pesticides may be used periodically. Historical aerial photos from 1935 suggest that the green space had a historic rail line and associated fill.

The Dexter Elementary School Site is located in an urban environment, the area has been graded and filled and it is unlikely that any native soils remain at the site. The site is primarily flat and composed of either building, parking lots, or landscaping. At this site there is hazardous materials such as Petroleum, Oil, and Lubricants (POLs) and other materials associated with parking lots, along with typical use of fertilizers and pesticides associated with the landscaping.

3.13.2. Environmental Consequences of No Action Alternative

With implementation of the NAA, a new Dexter Elementary School would not be constructed and therefore there would not be any impacts to HTRW resources within the study area associated with ground disturbance resulting from construction activities. Fort Moore would continue to manage hazardous waste in accordance to applicable laws and regulations. The use of pesticides and fertilizers in landscaping activities would follow applicable FIFRA regulations.

3.13.3. Environmental Consequences of Alternative 1

Under this alternative, the relocation of the dog park would result in minor demolition, due to the age of the dog park facilities, there is not expected to encounter hazardous materials related to

the relocation of the dog park facilities. Soil sampling would be conducted at the site of the historic rail line and associated fill. This sampling would be used to determine any required soil remediation prior to construction of the school. Remediation would adhere to all applicable Federal and state regulations for the handling and disposal of any encountered hazardous waste. There would be no need for additional municipal solid or hazardous waste disposal facilities, therefore there would be minor short-term effects resulting from demolition of the dog park and disposal activities of any soil remediation.

In the short-term, the quantity of hazardous materials such as POLs would increase in support of the construction activities. Quantities of various fuels in excess of current operating demand would be required for construction activities due to the use of heavy equipment. In the long-term, the effects to HTRW would be negligible for regular maintenance operations of the new school.

The risk of uncontrolled release of hazardous substances during construction and long-term operation would be minimized by following applicable Federal and State laws and regulations and Army policy for storage of hazardous materials. If this alternative is implemented, adherence to existing material and waste management plan and procedures for handling, storage, and disposal of these substances would preclude any long-term, adverse impacts. In summary, it is anticipated that there would be negligible to minor effects from hazardous material storage and handling during construction activities and operations.

3.13.4. Environmental Consequences of Alternative 2

In the short-term, the quantity of hazardous materials such as POLs would increase in support of the construction activities. Quantities of various fuels in excess of current operating demand would be required for construction activities due to the use of heavy equipment. In the long-term, the effects to HTRW would be negligible for regular maintenance operations of the new school.

The risk of uncontrolled release of hazardous substances during construction and long-term operation would be minimized by following applicable Federal and State laws and regulations and Army policy for storage of hazardous materials. If this alternative is implemented, adherence to existing material and waste management plan and procedures for handling, storage, and disposal of these substances would preclude any long-term, adverse impacts. In summary, it is anticipated that there would be negligible effects from hazardous material storage and handling during construction activities and operations.

3.14. Land Use

3.14.1. Affected Environment

The Zuckerman Ave. site contains a dog park and playground, so the land use of the area would be typical of a community green space. It is used for recreational purposes. There are also light posts along the parking lot area, which may give off ambient light at night.

The Dexter Elementary School Site contains the old Dexter Elementary School just north of the project area. The site is currently green space but does not hold recreational resources such as

playgrounds. The Dexter Elementary School Site is in an urban area that has many street lights and lights along the parking lot.

3.14.2. Environmental Consequences of No Action Alternative

The implementation of the NAA would mean that a new Dexter Elementary School would not be constructed. Since construction would not occur, there would not be any short-term or long-term impacts to land use.

3.14.3. Environmental Consequences of Alternative 1

Construction of a new Dexter Elementary School at the Zuckerman Ave. site could potentially have minimal long-term impacts to residents in the surrounding areas from light pollution. The building of the school would increase the number of lights that are on during the day and night. Because there is already street lighting and lamp posts in the dog park and playground area, the effect of school lights on the environment is minimal.

There would also be negligible short-term impacts to recreation; however, this would only occur during construction. During construction of the new school, recreational opportunities may be limited. There is a long-term negligible impact to recreation because the dog park is being relocated and a long-term positive impact because two playgrounds, basketball courts, and bicycle trails, are being constructed at the school. Some grassy areas and pedestrian walkways would remain.

3.14.4. Environmental Consequences of Alternative 2

The construction of a new Dexter Elementary School at the current Dexter Elementary School Site would not be expected to affect land use. As under this alternative, the school would be built near the existing school. The site is already near an urban area and there would be no land use change from a community area. Therefore, there would be no long-term or short-term impacts to land use under alternative 2.

3.15. Safety

3.15.1. Affected Environment

At Fort Moore, the Directorate of Public Safety commands the Fort Moore Fire Prevention and Protection Division and the Post Safety Office. This Directorate enables a unity of effort among Fort Moore emergency services to help ensure a safe and secure environment.

Construction activities are typically performed or contracted by the USACE, following procedures set forth in the USACE Safety and Health Manual 385-1-1 (USACE, 2003). This manual outlines all of the requirements to comply with Occupational Safety and Health Administration (OSHA) standards during construction projects.

The Zuckerman Ave. site and the Dexter Elementary School Site are both utilized by families and children, playgrounds and other family activities are also present around the sites.

3.15.2. Environmental Consequences of No Action Alternative

With the implementation of the NAA, a new school would not be constructed; therefore, there would be no effects to safety related to construction activities. There may be negative, long-term effects to safety from the NAA. The older legacy schools on the installation are not compliant with current life safety, energy, and accessibility codes or DoD Unified Facilities Criteria standards. The older facilities also do not meet the goals of the DoDEA 21st Century schools initiative. Without the construction of the new school, current safety issues would not be addressed.

3.15.3. Environmental Consequences of Alternatives

All previously implemented policies, procedures, and applicable safety laws (e.g., OSHA) would remain under the alternatives. Although construction of the building would have minor, short-term adverse impacts to safety, it would be mitigated by adherence to existing safety practices. In addition, appropriate safety measures, such as fencing, and signage would be utilized to protect children. Therefore, negligible, short-term impacts are expected for construction and no adverse impacts are expected to children. Because both alternatives would result in building a new school, there would be long-term benefits from the construction. Building the new school would result in newer utilities and current safety issues would be addressed, such as replacing expiring systems, increasing pedestrian safety, and improving overall safety. There would also be no long-term impacts expected from the creation of the stormwater ponds that are designed for the sites. The ponds are designed as dry retention ponds that would not hold water for extended periods of time. Therefore, positive, long-term impacts are expected for constructing the new school.

4. Cumulative Effects

Cumulative effects result from the Proposed Action when added to other past, present, and reasonably foreseeable projects or actions. Cumulative effects can result from individually minor, but collectively significant, actions taking place over a period of time. The study area for cumulative effects is the Main Post Cantonment area, as projects within this area are most likely to have a cumulative effect when considered with the Proposed Action.

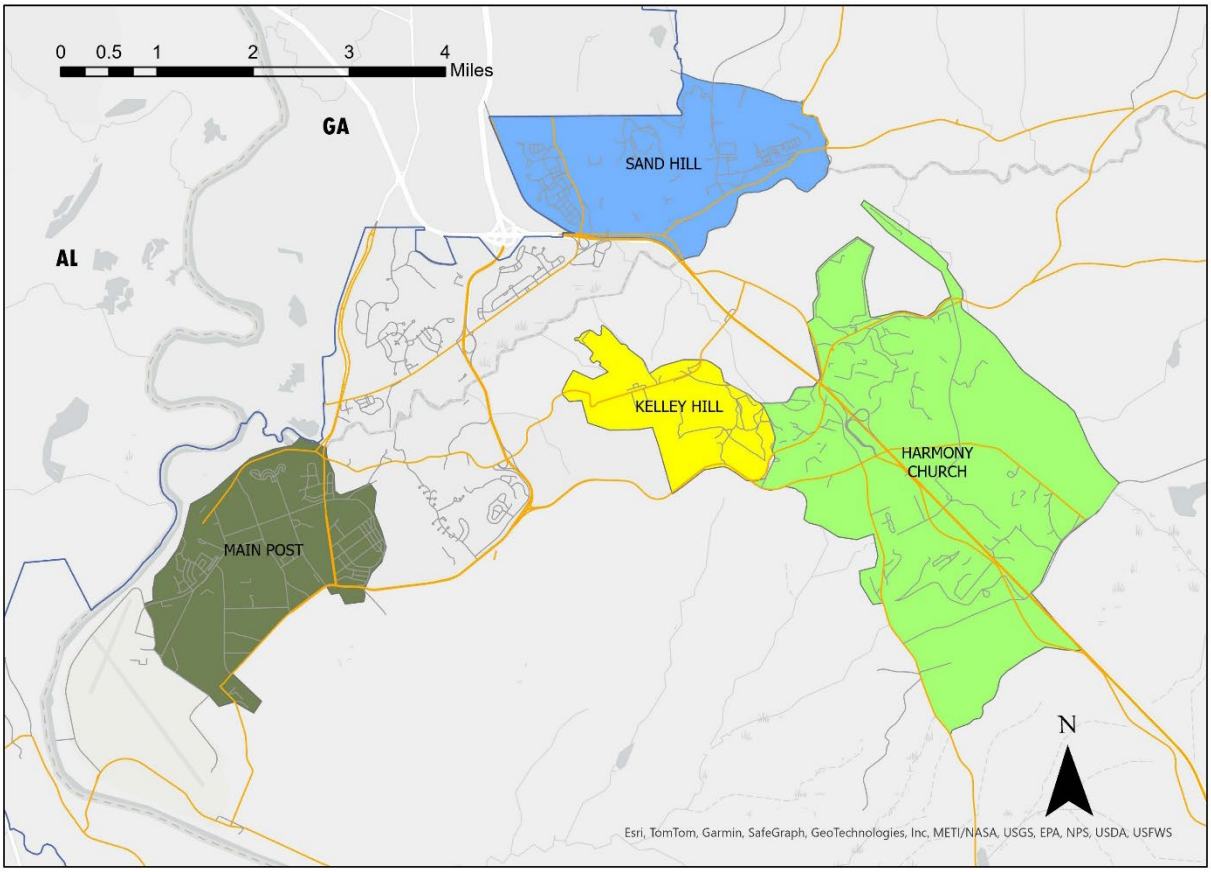


Figure 14. Fort Moore Map of Neighborhoods or Cantonment areas

4.1. Past, Present and Future Actions

This section identifies past, present, and reasonably foreseeable future actions considered. The analysis considers present and reasonably foreseeable future actions as those actions that are recently completed, currently under way, approved, and/or have identified funding. Actions beyond that become increasingly speculative and difficult to assess.

- **Infrastructure Footprint Reduction Program (FY 14 – 18) ---** An Army-mandated program to eliminate underutilized and outdated facilities and achieve affordability in base operations. Each fiscal year, Fort Moore Master Planning Division identifies structures to be demolished to meet the program goal and consolidates facility functions and personnel into fewer buildings with more effective space utilization. The number and types of facilities and/or buildings to be demolished vary from year to year based on Installation needs and military mission. An EA was prepared for this action that provides a full evaluation of the impacts (Fort Benning, 2018).

- **Building of a new dog park (Future project) ---** As a result of demolishing the dog park at the Zuckerman Ave. site, a new dog park would be constructed adjacent to the existing Child Development Center. The proposed site for the new dog park was the site of the

original E.A. White Elementary School which was previously demolished/relocated. A conceptual plan for the new dog park is provided in figure 13.

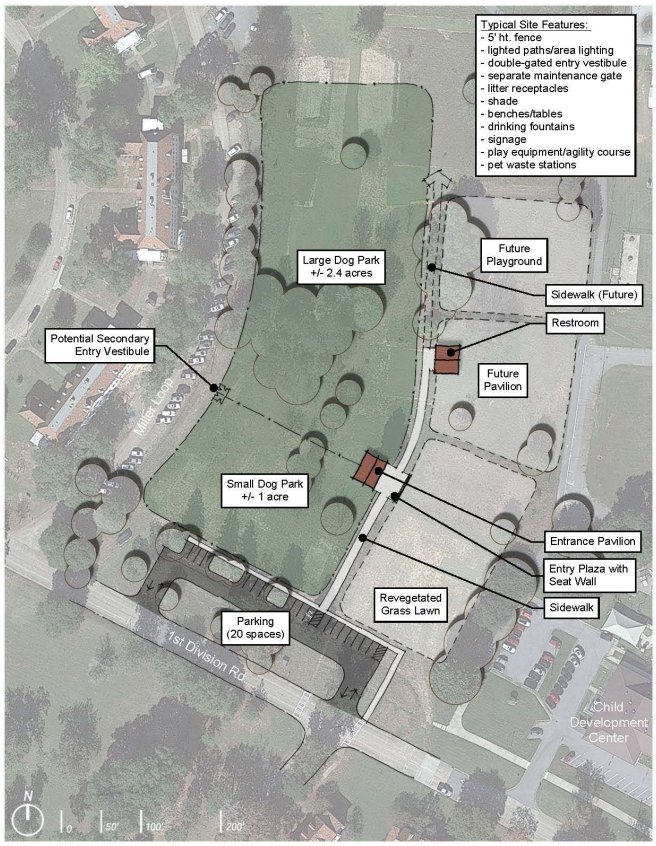


Figure 15. Concept drawing of new dog park to be created

4.2. Resource Areas Evaluated for Cumulative Effects

The remainder of this chapter describes the results of the cumulative effects analysis for resources considered in Chapter 3. The text below summarizes the past, present, and reasonably foreseeable actions within the project area that might impact each resource category identified to have an incremental cumulative effect. If a resource was not identified to have a cumulative effect, then this resource was not discussed in detail within the chapter.

4.2.1. Utilities

For cumulative projects listed in Section 4.1, no significant changes to utilities are expected. Under the NAA, long-term, minor adverse impacts could be expected with the failing infrastructure and the impact that can have on the system. Overall, the Action Alternatives' long-term potential net benefits from employing sustainable design when considered with other projects mentioned would not result in significant cumulative impacts to utility services.

4.2.2. Air Quality

For the Action Alternatives and cumulative projects listed in Section 4.1, short-term, minor adverse impacts to air quality from fugitive dust from construction activities and emissions from heavy construction equipment is expected. In the long-term, the impacts to air quality would be negligible to minor due to the potential for fugitive dust and emissions from heavy construction equipment used for maintenance activities at Fort Moore. However, there exists the potential for long-term beneficial effects to emissions from the Infrastructure Footprint Reduction Program (IFRP) and with the Actional alternatives with the elimination of outdated, sub-optimal chiller, boilers, and heating/cooling systems contributing to Fort Moore's Title V permit for stationary air emission sources.

Overall long-term impacts to air quality would be minor, and therefore no significant cumulative impacts would be anticipated.

4.2.3. Climate Change and Greenhouse Gas Analysis

For the Action Alternatives and cumulative projects listed in Section 4.1, minimal adverse impacts to greenhouse gases are expected from construction activities and school activities. There exists the potential for minor effects to greenhouse gases from the implementation of the IFRP and the building of the dog park. There would be long-term beneficial effects to the area from the IFRP because it would eliminate the outdated systems contributing to Fort Moore's Greenhouse Gas burden. There would be short-term, minimal adverse effects from the emissions from the heavy equipment used to construct the dog park.

4.2.4. Wildlife and Migratory Bird Resources

Cumulative projects that could affect wildlife and migratory bird resources would include projects that occur within or nearby the Main Post Cantonment Area. The green space that is designated for the dog park was the location of a recently demolished school. Because the Main Post Cantonment Area is highly urbanized and disturbed, the development and human activity have

forced native animal populations to less disturbed and active areas. There is abundant adjacent habitat for wildlife and birds to forage and nest. The action alternatives and cumulative projects listed would have long-term, negligible impacts to wildlife and migratory bird resources from construction and demolition activities.

4.2.5. Vegetation Resources

Cumulative projects that could affect vegetation resources would include projects that occur within or nearby the Main Post Cantonment Area. Due to the construction of the dog park, there would be minimal affects to vegetation. The creation of the dog park would affect vegetation through disturbance, creation of impervious surface, and removal during construction period. The action alternatives and cumulative projects listed would have long-term, negligible impacts to vegetation resources from construction and demolition activities.

4.2.6. Threatened and Endangered Species

For cumulative projects listed in Section 4.1, there would be no anticipated impacts to threatened and endangered species. No impacts to federally listed species would occur for either Action Alternative or as a result of cumulative projects, because suitable habitat for federal listed species identified in the USFWS IPaC database does not exist at either proposed school location.

4.2.7. Historical and Cultural Resources

Cumulative projects that could affect historical and cultural resources include the Alternative 1 new Dexter Elementary School construction within the Main Post Cantonment Historic District along Zuckerman Ave. within Green Field. Long-term adverse impacts would occur to the historical and cultural resources associated with the preferred alternative, primarily through the introduction of visual, atmospheric, and audible elements. The Proposed Action would have impacts to increases in traffic (school buses and cars in student pick-up/drop-off lanes) and subsequent noise associated with the school (vehicles, children, etc.). Such elements would diminish the integrity of the property's significant historical features.

4.2.8. Noise

For the Action Alternatives and cumulative projects listed in Section 4.1, it is anticipated that there would be long-term, negligible impacts to noise within the Main Post Cantonment Area. Noise producing activities created by the Action Alternatives would not change or adversely affect the current noise environment within the nearby residential community within the Main Post Cantonment Area. Short-term minor change in the sources of noise from construction and long-term change from the operations of new Dexter Elementary School within the Zuckerman Ave. portion of the Main Post Cantonment Area are expected but would not change the overall noise associated with the residential designation. Noise associated with cumulative projects list in Section 4.2 are not expected to alter existing land use for causing a change in surround land use causing noise levels to change from current conditions. Therefore, no significant cumulative impacts would be anticipated.

4.2.9. Geology and Soils

For the Action Alternatives and cumulative projects listed in Section 4.1, short-term, minor adverse impacts to geology and soils is expected from grading and construction activities. Use of best management practices as required by Georgia's construction permitting and National Pollutant Discharge Elimination System (NPDES) construction permitting requirements minimize impacts from erosion during construction activities. Long-term impacts are anticipated to be negligible as the sites have been or would be stabilized following demolition; the Dog Park and elementary school site would be landscaped upon completion of construction which would provide stabilization of soils on site. Overall, only minor cumulative impacts to geology and soils are expected.

4.2.10. Traffic and Transportation

Potential cumulative effects from the Action Alternatives, and the projects listed in 4.1 are primarily related to traffic impacts associated with construction activities. During active construction activities, access routes would be used to minimize impacts to residential areas. However, should construction activities coincide there could be moderate short- term impacts related to road closures to accommodate construction activities and increased vehicles on roadways. Once construction is complete, any long-term impacts would be negligible. Overall, no significant long-term cumulative impacts are expected.

4.2.11. Water Resources

Potential impacts water resources within the installation would be minimized through adherence to Clean Water Act regulations and NPDES construction permitting requirements. In Georgia, as streams on Fort Moore are protected under the Georgia Erosion and Sedimentation Act (Official Code of Georgia Annotated 12-7-1), any proposed land disturbing activity within the 25-foot buffer area of any stream would require a Georgia EPD stream buffer variance.

For the Action Alternatives and cumulative projects listed in Section 4.1, short-term, minor adverse impacts to water resources could occur during construction and demolition activities. Impacts to water resources are most likely to occur during rain events on active construction sites that may increase the potential for runoff, soil erosion, and surface contamination from pollutants such as hazardous materials and/or waste. Overall, no significant cumulative impacts to Water Resources would be anticipated.

4.2.12. Hazardous, Toxic, and Radioactive Waste

In the short-term, the quantity of hazardous materials such as POLs would increase in support of the construction activities. Quantities of various fuels in excess of current operating demand would be required for construction activities due to the use of heavy equipment. In the long-term, the effects to HTRW would be negligible for regular maintenance operations of the new school.

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

and Army policy for storage of hazardous materials. If this alternative is implemented, adherence to existing material and waste management plan and procedures for handling, storage, and disposal of these substances would preclude any long-term, adverse impacts. In summary, it is anticipated that there would be negligible effects from hazardous material storage and handling during construction activities and operations.

4.2.13. Land Use

Potential cumulative effects from the Action Alternatives and the projects listed in 4.1 are expected to be negligible. No impacts to land use would occur for either Action Alternative or as a result of cumulative projects, the designation of the area as residential would not be anticipated to change.

4.2.14. Safety

Potential cumulative effects from the Action Alternatives and the projects listed in 4.1 are expected to be negligible. No impacts to safety would occur for either Action Alternative or as a result of cumulative projects.

5. Conclusion

Twenty environmental resources were evaluated for potential impacts in relation to the implementation of the Action Alternatives. Of these environmental resources, it was determined that there would be no or negligible impacts to Air Space, Environmental Justice, Facilities and Infrastructure, Floodplains, Socioeconomics, and Wetlands. Therefore, these resources were not carried further in the analysis. Thirteen resources were carried forward for detailed analysis, including cumulative effects analysis.

Based on the analysis presented in this EA, implementation of either of the Action Alternatives would not have significant direct, indirect, or cumulative effects on the natural or human environment. As such, a FONSI is warranted for either of the Action Alternatives and does not require the preparation of an EIS. The No Action Alternative would not meet the purpose and need for providing an elementary school to support the current and anticipated student population of the Main Post Cantonment Area neighborhoods as well as providing 21st-centry learning opportunities.

Alternative 1 is the preferred alternative as it best meets the purpose and need for the Proposed Action. This alternative would address the needs of the current and future planned neighborhoods on Main Post and would provide 21st-century learning objectives to include innovation in education, curriculum delivery, use of technology, and the requirements for sustainability and energy conservation. The Zuckerman Ave. site, due to its proximity to the neighborhoods that it would serve, would provide better access to the community, including pedestrian access. No short or long-term significant adverse impacts are anticipated under this alternative. The requirement for sustainability measures in energy and water conservation are incorporated into the design which further reduces the impacts to resources. The site design has included a 25-foot buffer to avoid impacts to water resources on site. Additionally, impacts to historic and cultural resources are addressed.

6. Public Involvement and Coordination

This section summarizes public outreach that has occurred for this project, and record of correspondence are found in Appendix C.

6.1. Summary of Public Outreach

The EA and draft FONSI were issued for public review for a period of 30 days, beginning on 21 November 2024. Public review will be included in Appendix C in the EA. No substantive public comments were received.

6.2. List of Agencies and Persons Consulted

6.2.1. Tribes

On November 14, 2023, a meeting and site visit was held with Tribal representatives in accordance with the Army Alternate Procedures. Ongoing consultation is being conducted in alignment with the Army Alternate Procedures for compliance with Section 106.

6.2.2. State Agencies

On November 15, 2023, a meeting was held with the GA SHPO in accordance with the Army Alternate Procedures (GA SHPO Reference Number: TA-240321-001/Muscogee). A site visit was conducted at both proposed project areas. GA SHPO continues to serve as a technical reviewer under the Army Alternate Procedures for compliance with Section 106. The 35% design was submitted for review on 22 March 2024 and comments were received on 22 April 2024. Additional design reviews would be performed in accordance with the Army Alternate Procedures.

7. List of Preparers

Name	**Affiliate**	**Discipline/Role**
Andrea Farmer	USACE Planning	Archaeologist/Co-Author
Jonathan Brown	USACE Planning	Archaeologist/Co-Author
Kimberly Garvey	USACE Planning	Planning Chief/Reviewer
Suzanne Hill	USACE Planning	NEPA Lead/Reviewer
Benjamin Jones	USACE Project Management	Project Manager/Reviewer
Robin Armetta	USACE Planning	Biologist/Lead Author
Madison Monroe	USACE Planning	Biologist/Lead Author
Summer Wright	USACE Planning	Biologist/Co-Author

8. References

Barfield, Earl. " Summary of our Discussion” Received by Robin Armetta, December 7, 2023.

Directorate of Public Works Environmental Management Division. May 2022. Integrated Natural Resources Management Plan FY 2022-2027.

EPA. 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. March 1974.

EPA. "Greenhouse Gas Equivalencies Calculator." https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator. Accessed March 26, 2024.

Fort Benning. 2009. Final Environmental Assessment for White Elementary School Replacement at Fort Benning. October 2012.

Fort Benning. 2018. Infrastructure Footprint Reduction Program. Fort Benning. June 2018.

Fort Benning. 2018. Historic Properties Component of the Integrated Cultural Resource Management Plan. Final Execution November 2019.

Fort Benning. 2019. Final Environmental Assessment for Artillery Firing Point Expansions & Maintenance of the Open Field Training Environment. Fort Benning. March 2019.

Institute for Policy Integrity. "The Cost of Climate Pollution." New York University School of Law. https://costofcarbon.org/calculator. Accessed March 26, 2024.

NOAA. 2024. "What's Typical in North and Central Georgia?" https://www.weather.gov/ffc/clisumlst. Accessed 01 May 2024.

USACE. 2005. Final Environmental Assessment for the Residential Communities Initiative as Fort Benning, Georgia. June 2005.

USACE. 2009. Final Environmental Impact Statement Maneuver Center of Excellence, Fort Benning, Georgia. June 2009.

USACE. 2023. "USACE Climate Preparedness and Resilience." https://climate.sec.usace.army.mil/slat/. Accessed on: 03 November 2023.

U.S. Energy Information Administration. "Commercial Buildings Energy Consumption Survey (CBECS)." https://www.eia.gov/consumption/commercial/data/2012/c&e/cfm/pba4.php. Accessed March 26, 2024.

USFWS. Endangered and Threatened Species for the Fort Moore, Existing Dexter Elementary School and Proposed Zuckerman Ave. Site Project Area. Updated list obtained from USFWS on January 05, 2024. https://ecos.fws.gov/ipac/

U.S. Global Change Research Program. 2018. Fourth National Climate Assessment. https://nca2018.globalchange.gov/chapter/19/. Accessed 2 May 2024.

9. Distribution List

Selected and Appointed Government Officials

Skip Henderson III Mayor Mayor's Office 100 10th Street, 6th Floor Government Center Tower Columbus, GA 31901 skiphenderson@columbusga.org	Shareaka Booker Board of Commissions Office Assistant Cusseta-Chattahoochee County Government Manager P.O. Box 299 Cusseta, GA 31805-0299 Sbooker@ugoccc.com	City Clerk Mayor's Office City Hall 601 12th Street Phenix City, AL 36867 cityclerk@phenixcityal.us
Randall Dowling City Manager Harris County County Manager P.O. Box 365 Hamilton, GA 31811 rdowling@harriscountyga.gov	Larry Sparks Chairman Board of Commissioners Talbot County Board of Commissioners P.O. Box 155 Talbotton, GA 31827 lsparks@talbotcountyga.org	County Commissioners Webster County County Commissioner 6622 Cass Street Preston, GA 31824 websterco@windstream.net
Mac Moye County Manager Stewart County County Commissioner P.O. Box 157 Lumpkin, GA 31815-0157 mmoye@stewartcountyga.gov	Board of Commissioners Marion County County Commissioner P.O. Box 481 Buena Vista, GA 31803 marionga@windstream.net	Russell County Commission 1000 Broad Street Phenix City, AL 36867
Senator Jon Ossoff Russell Senate Office Building Washington, DC 20510	Senator Raphael Warnock Russell Senate Office Building Washington, DC 20510	Rep. Sanford Bishop, Jr. 2407 Rayburn HOB Washington, DC 20515
Rep. Mike Rogers 324 Cannon HOB Washington, DC 20515	Office of the Governor 206 Washington Street 111 State Capitol Atlanta, GA 30334 https://gov.georgia.gov/contact-us/open-records-request	Office of the Governor 600 Dexter Avenue Montgomery, AL 36130 openrecords@governor.alabama.gov

Local and Regional Administrators, Federal Agencies, or Commissions with Regulatory Interest in Fort Moore

U.S. Fish & Wildlife Service West Georgia Office P.O. Box 52560 Fort Moore, GA 31905 GAES_Assistance@FWS.gov	GA DNR Commissioner's Office 2 Martin Luther King Jr. Dr, SE, Suite 1252, East Tower Atlanta, GA 30334	GSWCC, Region 5 4310 Lexington Rd Athens, GA 30605
GA DNR, EPD Director's Office 2 Martin Luther King Jr. Dr SE, Suite 1456, East Tower Atlanta, GA 30334 askepd@gaepd.org	ADEM Office of the Director P.O. Box 301463 Montgomery, AL 36130 permitsmail@adem.alabama.gov	Terrance Rudolph State Conservationist USDA NRCS State Office Water Resources 355 East Hancock Ave, Suite 13 Athens, GA 30601 terrance.rudolph@usda.gov
Jeaneanne Gettle Administrator for Region 4 USEPA Region IV Regional Administrator 61 Forsyth St SW Atlanta, GA 30303 Gettle.Jeaneanne@epa.gov	The Georgia Conservancy 817 West Peachtree St, Suite 200 Atlanta, GA 30308 mail@gaconservancy.org	Georgia Wildlife Federation 11600 Hazelbrand Rd, NE Covington, GA 30014 info@gwf.org
The Nature Conservancy Chattahoochee Fall Line Office P.O. Box 52452 Columbus, GA 31905 bslay@tnc.org	Defenders of Wildlife National HQ 1130 17th St NW Washington, DC 20036 memberservices@defenders.org	The Valley Partnership P.O. Box 1200 Columbus, GA 31902 info@valleypartnership.org
Columbus Chamber of Commerce 1200 6th Ave Columbus, GA 31902 info@columbusgachamber.com	Cusseta-Chattahoochee County County Manager P.O. Box 229 Cusseta, Georgia 31805	Chamber of Commerce Phenix City-Russell County 1107 Broad St Phenix City, AL 36867 info@ealcc.com
Georgia Department of Community Affairs 60 Executive Park South, NE Atlanta, Georgia 30329		Columbus Planning Division 420 E 10th Street, Suite 2, Columbus, Georgia 31901
Ms. Linda Veenstra 1045 Satellite Circle Fortson, GA 31808		

Federally Recognized Tribes that Consult with Fort Moore

Mr. Delvin Johnson Tribal Historic Preservation Officer Alabama-Coushatta Tribe of Texas 571 State Park Rd 56 Livingston, TX 77351	Ms. Janice Lowe Tribal Historic Preservation Officer Alabama-Quassarte Tribal Town P.O. Box 187 Wetumka, OK 74883	Ms. Karen Brunso Tribal Historic Preservation Officer Chickasaw Nation P.O. Box 1548 Ada, OK 74820
Mr. David Cook Tribal Historic Preservation Officer Kialegee Tribal Town P.O. Box 332 Wetumka, OK 74883	Ms. Devon Frazier-Smith Tribal Historic Preservation Officer Absentee-Shawnee Tribe of Oklahoma 2025 S. Gordon Cooper Drive Shawnee, OK 74801	Mr. Turner Hunt Tribal Historic Preservation Officer Muscogee (Creek) Nation P.O. Box 580 Okmulgee, OK 74447
Mr. Larry Haikey Tribal Historic Preservation Officer Poarch Band of Creek Indians 5811 Jack Springs Rd Atmore, AL 36502	Mr. Ben Yahola Tribal Historic Preservation Officer Seminole Nation of Oklahoma P.O. Box 1499 Wewoka, OK 74884	Ms. Tina Osceola Tribal Historic Preservation Officer Seminole Tribe of Florida 30290 Josie Billie Hwy, PMB 1004 Clewiston, FL 33440
Mr. David Frank Tribal Historic Preservation Officer Thlopthlocco Tribal Town P.O. Box 188 Okemah, OK 74859	Ms. Elizabeth Toombs Tribal Historic Preservation Officer Cherokee Nation P.O. Box 948 Tahlequah, OK 74465	Ms. Lora Nuckolls Tribal Historic Preservation Officer Eastern Shawnee Tribe of Oklahoma 70500 E 128 Rd Wyandotte, OK 74370
Ms. Tonya Tipton Tribal Historic Preservation Officer Shawnee Tribe 29 S. Hwy 69A Miami, OK 74354		

Fort Moore and Other Army Officials

IMCOM Attn: Public Affairs Office 2405 Gun Shed Rd Ft Sam Houston, TX 78234 usarmy.jbsa.imcom-hq.mbx.public-affairs-office@mail.mil	HQ US Army FORSCOM Attn: Public Affairs Building 8-1808 4700 Knox St Fort Liberty, NC 28310	HQ US Army TRADOC Attn: Ken Kimidy 661 Sheppard Pl Fort Eustis, VA 23604
Office of the Staff Judge Advocate	MCoE Commanding General 1 Karker St	Garrison Commander 1 Karker St

6450 Way St, Building 2839 Fort Moore, GA 31905 usarmy.moore.mcoe.mbx.sja-legal-assistance@army.mil.	McGinnis-Wickam Hall, Suite 6300 Fort Moore, GA 31905	McGinnis-Wickam Hall, Suite 5900 Fort Moore, GA 31905
Infantry School Commandant 1 Karker St McGinnis-Wickam Hall, Suite 6301 Fort Moore, GA 31905	Armor School Commandant 1 Karker St McGinnis-Wickam Hall, Suite 6000 Fort Moore, GA 31905	

Local Media and Libraries

Columbus Ledger-Enquirer 945 Broadway, Suite 102 Columbus, GA 31901 fscandale@mcclatchy.com	The Journal 71 Webb Lane Buena Vista, GA 31803 tjournal@windstream.net	Fort Moore Public Affairs Office 1 Karker Street, McGinnis-Wickam Hall, Suite W-141 Fort Moore, GA 31905
Columbus Public Library 3000 Macon Rd Columbus, GA 31906	Phenix City-Russell County Library 1501 17th Ave Phenix City, AL 36867	Citizens of East Alabama Newspaper 2401 Sportsman Dr. Phenix City, AL 36867
Cusseta-Chattahoochee Public Library 262 Broad St Cusseta, GA 31805	Milton E. Long Library 6529 Eckel St Building 2783 Fort Moore, GA 31905	

Dexter Elementary School Replacement
Fort Moore, Georgia
Final Environmental Assessment and Finding of No Significant Impact

Appendix A - Finding of No Significant Impact

FINDING OF NO SIGNIFICANT IMPACT

DEXTER ELEMENTARY SCHOOL REPLACEMENT
FORT MOORE, GA
Unique ID: EAXX-007-21-001-1731682869

1 Introduction

Fort Moore has prepared this environmental assessment (EA) to examine the potential environmental and socioeconomic effects of building a new elementary school in the Main Post Cantonment Area at Fort Moore, Georgia. This EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA); the regulations of the President's Council on Environmental Quality (CEQ); United States (U.S.) Department of the Army (Army) Regulation 200-1, and Army NEPA Regulation (32 Code of Federal Regulations (CFR) Part 651).

This EA is a public document that will be used to determine and evaluate the potential environmental consequences of the Proposed Action, identify possible/potential mitigation measures to lessen or eliminate adverse effects, and examine reasonable alternatives to the Proposed Action. The intended audience of the EA is Army decision-makers, interested government agencies, non-governmental organizations, federally recognized Native American Tribes, and members of the public. The effects analyses in this EA are based on a variety of sources and the best available information at the time of preparation. The information contained in this EA will be reviewed and considered by the Army prior to a final decision on how to proceed with the implementation of the Proposed Action, if at all.

2 Purpose and Need

Fort Moore is experiencing student capacity issues, and existing schools within the installation, such as at Dexter Elementary School, are aging and requiring more frequent maintenance and repair to expired and failing systems. The existing substandard environment will not be able to support curriculum requirements and will continue to impair the overall education program for students, thus not meeting the necessary learning objectives. Additionally, the required maintenance and repair of expired and failing systems will continue to strain maintenance capabilities and budgets.

The increased number of elementary school age children, including special education and full day or universal pre-kindergarten students residing on Fort Moore, has resulted in student capacity issues within Dexter Elementary School. As a result, there is a need to create a school environment that: meets the 600-student capacity need, supports 21st -century learning objectives, provides for overall consolidation, and decreases DoDEA's footprint within the Fort Moore installation.

The goal of DoDEA is "*provide an exemplary education that inspires and prepares all DoDEA students for success in a dynamic, global environment*". This goal requires schools of the future to be flexible and adaptable, allowing adjustments to new and innovative ways to deliver instruction, and meet the needs of all students. Facility design should satisfy the functional requirements and criteria to meet DoDEA's 21st-century school learning objectives that include innovation in education, curriculum delivery, use of technology, and the requirements for sustainability and energy conservation.

If the Proposed Action were not implemented, this would hinder the implementation of DoDEA 21st-century school initiatives to enhance educational opportunities with the continued use of outdated facilities that are undersized, lack optimal functionality for curriculum delivery and use of technology, require extensive maintenance and/or repairs, and do not meet Army mandated requirements for sustainability and energy conservation.

3 Description of the Proposed Action

The proposed action involves the replacement of the current Dexter Elementary School in the Main Post Cantonment Area with a new school. The new school will be designed per the standards of DoDEA's "21st-century education specifications" and have the capacity to accommodate a population of 600 students. The proposed new elementary school will be a two-story facility that will consist of improvements to signage, fencing, landscaping, exterior lighting, and utilities. It will also include the development of three playgrounds, hardcourts for basketball, a bicycle trail, and an open grassed field area. All classrooms and supporting facilities will be designed to be Americans with Disabilities Act (ADA) accessible and meet Anti-terrorism/Force Protection (AT/FP) requirements.

The facilities of the current Dexter Elementary School in the Main Post Cantonment Area would require extensive repair and maintenance to remain in operation as an elementary school facility. Based on DoDEA's current design standards, the configuration of the current Dexter Elementary School does not meet DoDEA design standards and educational initiatives in terms of space quantity, functional adjacencies, and required spatial relationships.

4 Description of the Alternatives

The NEPA, CEQ, and Army NEPA Regulations require a range of reasonable alternatives to be considered and evaluated. The Army used screening criteria to determine which Alternatives were reasonable. For purposes of analysis, an Alternative was considered reasonable if it enabled Fort Moore to accomplish the primary mission of providing an elementary school for the student population, while identifying financially feasible alternatives and the least disturbance to students' education.

Per the screening criteria discussed in the EA, all the Alternatives determined to be reasonable include:

- Alternative 1 (Preferred Alternative/Proposed Action)- Replace Dexter Elementary School at the Zuckerman Ave. Site: The proposed location of the alternative is at the Zuckerman Ave. Site. The total proposed acreage impacted by this Alternative project is 14 acres.

- Alternative 2- Replace Dexter Elementary School at the Existing School Site: The proposed location for this alternative is at the southern end of the current Dexter Elementary School site on the 18-acre property. The total proposed acreage impacted by this Alternative project is approximately 7.5 acres.

- No Action Alternative: Under this Alternative, the Proposed Action would not be implemented.

While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, the No Action Alternative reflects the *status quo* and served as a benchmark against which the Action Alternatives were evaluated.

5 Summary of Potential Environmental Effects and Proposed Mitigation

Resources Analyzed	No Action	Alternative 1: Replace Dexter Elementary School at the Zuckerman Ave. Site (Proposed Action)	Alternative 2: Replace Dexter Elementary School at the Existing Site
Utilities	Long-term, negative impacts as a result of aging and failing infrastructure.	Negligible, short-term impacts as a result of utility construction. Long-term, beneficial impacts resulting from energy and conservation measures incorporated into the design of the school.	Same as Alternative 1.
Air Quality	Long-term, minor adverse impacts as a result of emissions and energy use from outdated HVAC systems.	Negligible, short-term impact resulting from construction activities. Negligible to minor long-term adverse impacts from school emissions.	Same as Alternative 1.
Climate Change and Greenhouse Gas Analysis	No impacts	Minor, short-term effects from construction of the school.	Same as Alternative 1.

		Minor, long-term benefits from more efficient school systems.	
Wildlife and Migratory Bird Resources	No impacts	Negligible effects as a result of potential habitat loss.	Same as Alternative 1.
Vegetation Resources	No impacts	Minor, long-term effects as a result of vegetation removal. Minor, long-term benefits as a result of plantings.	Same as Alternative 1.
Threatened and Endangered Species	No impacts	No impacts	Same as Alternative 1.
Historical and Cultural Resources	No impacts	No adverse effect. Impact of new construction minimized and mitigated by design. The Army Alternate Procedures, as outlined in the 2018 Historic Properties Component, will be followed.	No adverse effect. Historic structures are present within the viewshed of the project area. Recent modern development has already impacted the integrity of the area, so no adverse effects are anticipated.
Noise	No impacts	Short-term, minor impacts as a result of construction activities.	Same as Alternative 1.
Geology and Soils	No impacts	Short-term, minor impacts as a result of ground disturbances.	Same as Alternative 1.
Traffic and Transportation	Long-term, adverse impacts as a result of congestion with traffic and limited pedestrian access.	Long-term, minor impacts as a result of construction activities. Long-term benefits as a result of reduced traffic in the area and increased pedestrian opportunities.	Long-term, moderate impacts as a result of construction activities and traffic increase in an already congested and busy area.
Water Resources	Long-term, minor impacts as a result of inadequate stormwater runoff.	Short-term, minor adverse impacts as a result of construction activities. Significant long-term, benefits as a result of stormwater management.	Same as Alternative 1.
Hazardous, Toxic, and Radioactive Waste	No impacts	Negligible to minor effects from hazardous material	Negligible effects from hazardous material storage and handling

		storage and handling during construction.	during construction.
Land Use	No impacts	Negligible, short-term impact during construction. Positive, long-term impact due to relocation of dog park and additional recreational opportunities at the new school.	Same as Alternative 1.
Safety	No impacts	Negligible, short-term impacts during construction.	Same as Alternative 1.

6 Finding of No Significant Impact (FONSI)

The EA titled “Environmental Assessment for the Dexter Elementary School Replacement, Fort Moore, Georgia,” was prepared and evaluated pursuant to the National Environmental Policy Act (Public law 91-190, 42 USC. 4321 et seq.). This EA concluded that the proposed action does not constitute a “major Federal action significantly affecting the quality of the natural and human environment,” when considered individually or cumulatively in the context of the proposed action, including both direct and indirect impacts. Therefore, the preparation of a more detailed environmental document, an Environmental Impact Statement, was not required.

7 Public Availability

The EA and the Draft Finding of No Significant Impact (FONSI) were available to the public for a 30-day public comment period starting on 21 November 2024. An announcement that these documents were available was published via a Notice of Availability (NOA) circulated to individuals and organizations on the distribution list and posted in the Citizen of East Alabama, Columbus Ledger-Enquirer, and The Journal. Hard copies of the EA and Draft FONSI were made available for public review at four libraries in the region: Phenix City-Russell County Library, Columbus Public Library, Cusseta-Chattahoochee Public Library, and Milton E. Long Library on Fort Moore. These documents are also available on the Fort Moore website at https://www.moore.army.mil/Garrison/DPW/EMD/Legal.html.

The NOA of the EA and Draft FONSI was mailed and e-mailed to all agencies/individuals/organizations on the Fort Moore NEPA distribution (mailing) list, as identified in Section 9 of the EA. As part of the Fort Moore’s on-going, established process and dialogue with the Federally recognized Native American Tribes affiliated with the Fort Moore area, the Army provided each Tribe with a copy of these documents for consolidation via review and comment.

Comments received by 21 December 2024 were considered prior to reaching any decisions.

No substantive comments were received.

8 Conclusions

Based on this EA, it is concluded that Alternative 1, Proposed Action Alternative, with its associated facility construction, would meet the purpose and need for a neighborhood elementary school. Potential adverse effects are similar among all the alternatives. Alternative 1 has been selected as it best meets the purpose and need for the proposed action. This alternative would address the needs of the current and future planned neighborhoods on Main Post and would provide 21st-century learning objectives to include innovation in education, curriculum delivery, use of technology, and the requirements for sustainability and energy conservation. The Zuckerman Ave. site, due to its proximity to the neighborhoods that it would serve, would provide better access to the community, including pedestrian access. No short or long-term significant adverse impacts are anticipated under this alternative. Sustainability measures for energy and water conservation are incorporated into the design which further reduces the impacts to resources. The site design has included a 25-foot buffer to avoid impacts to water resources on site. Additionally, impacts to historic and cultural resources are addressed. The No Action Alternative would not meet the purpose and need for providing an elementary school to serve the student population of the Main Post Cantonment Area.

Pursuant to NEPA, CEQ, and Army NEPA Regulations, the implementation of Alternative 1 for the Proposed Action 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:

27 January 2025
Date

Evans
Jerel D. Evans
Colonel, U.S. Army
Garrison Commander

Dexter Elementary School Replacement
Fort Moore, Georgia
Final Environmental Assessment and Finding of No Significant Impact

Appendix B - Clean Water Act

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, SAVANNAH DISTRICT
4751 BEST ROAD, SUITE 140
COLLEGE PARK, GEORGIA 30337

November 18, 2024

Regulatory Division
SAS-2024-00928

Mr. Brent Widener
NEPA Program Manager
Department of the Army
AMIM-MOP-EP
Environmental Management Division
6650 Meloy Drive, Building 6, Room 309
Fort Moore, Georgia 31905-5122

Dear Mr. Widener:

I refer to your request received on October 21, 2024, concerning the construction of the proposed Dexter Elementary School. The 14-acre project site is located south of the intersection of Zuckerman Avenue and 1st Division Road in Fort Moore, Chattahoochee County, Georgia (centered at approximately latitude: 32.35715, longitude: -84.949778). This project has been assigned number SAS-2024-00928, and it is important that you reference this number in all communication concerning this matter.

We understand that implementation of the project will involve the construction of a new elementary school campus to include buildings, parking, stormwater ponds and access roads. All activities will take place in uplands and there will be no impacts to aquatic resources. Based on the information provided, the proposed activities would not involve a discharge of dredged or fill material subject to the regulatory jurisdiction of the U.S. Army Corps of Engineers (USACE), as depicted on the attached drawing, prepared by Schenkel Shultz, entitled “Sheet A1 Overall Landscape Plan”.

Consequently, I have determined that no Department of the Army Permit would be required under Section 404 of the Clean Water Act for the proposed project. In the event changes to this project are contemplated, I recommend that you coordinate with us prior to proceeding with the work. Revisions to your proposal may invalidate this determination. The enclosed exhibit entitled, “SAS-2024-00928 Aquatic Resources Map”, dated November 13, 2024, as prepared by CESAS-RD-P identifies the delineation limits of all aquatic resources within the proposed project area. The wetlands were delineated in accordance with criteria contained in the 1987 "Corps of Engineers Wetland Delineation Manual,” as amended by the most recent regional supplements to the manual. Please note, should this delineation require reverification, it is subject to change based on site conditions at the time of reevaluation. Should you encounter any additional potentially jurisdictional waters within the construction area,

please contact this office so that we may determine if Department of the Army Authorization is required.

The delineation included herein has been conducted to identify the location and extent of the aquatic resource boundaries and/or the jurisdictional status of aquatic resources for purposes of the Clean Water Act for the particular site identified in this request. This delineation and/or jurisdictional determination may not be valid for the Wetland Conservation Provisions of the Food Security Act of 1985, as amended. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should discuss the applicability of a certified wetland determination with the local USDA service center, prior to starting work.

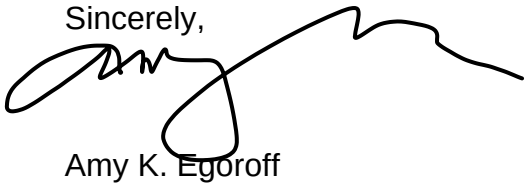
This communication does not convey any property rights, either in real estate or material, or any exclusive privileges. It does not authorize any injury to property or invasion of rights, or any infringement of federal, state, local laws, or regulations. It does not obviate the requirement to obtain state or local assent required by law for the activity described herein. It does not affect your liability for damages that may be caused by the work, nor does it authorize any interference with any existing or proposed federal project. If this information you have submitted, and on which the USACE has based its determination is later found to be in error, this decision may be revoked.

Thank you in advance for completing our on-line Customer Survey Form located at https://regulatory.ops.usace.army.mil/customer-service-survey/. We value your comments and appreciate you taking the time to complete a survey each time you interact with our office.

An electronic copy of this letter has been provided to the following party: Ms. Suzanne Hill at suzanne.hill@usace.army.mil.

If you have any questions regarding this determination, please do not hesitate to contact me at (678) 422-6571, or amy.k.egoroff@usace.army.mil.

Sincerely,



Amy K. Egoroff
Lead Biologist, Piedmont Branch

Enclosures

A1 OVERALL LANDSCAPE PLAN

1"=60'-0"

SCHENKEL SHULTZ

SAS-2024-00928

0 375 750 1,500
ft

Map Center: 84.948278°W 32.356907°N

Map Created by: Amy Egoroff

Date: 11/13/2024

Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere
Projection: Mercator Auxiliary Sphere

Dexter Elementary School Replacement
Fort Moore, Georgia
Final Environmental Assessment and Finding of No Significant Impact

Appendix C –Public Comments

From: Horton, Brittnea Ira CIV USARMY ID-TRAINING (USA)
To: adam.e.wolf.ctr; Monroe, E Madison CIV USARMY CESAS (USA)
Subject: FW: Share Your Views Form
Date: Thursday, November 21, 2024 5:00:58 PM

Adam and Madison,

Please file for the admin record. No context on the email but it appears Senator Ossoff received/acknowledged receiving our announcement of the Dexter EA.

Britt Horton
Chief
Planning & Support Branch, EMD - DPW
USAG Fort Moore
Mobile: (706) 587-0330

From: Office of U.S. Senator Jon Ossoff <senator_ossoff@ossoff.senate.gov>
Sent: Thursday, November 21, 2024 1:54 PM
To: Horton, Brittnea Ira CIV USARMY ID-TRAINING (USA) <brittnea.i.horton.civ@army.mil>
Subject: Re: Share Your Views Form

> You don't often get email from senator_ossoff@ossoff.senate.gov. Learn why this is important

Thank you for contacting me and my office. Please know that we have received your message and are grateful to you for reaching out to us.

My team and I are working hard every day to deliver for the people of Georgia, and hearing directly from our constituents is key to that effort. Your concerns, feedback and questions will receive my and my office's full attention, and we will get back to you as soon as we can.

Please do not hesitate to reach out to us at any time with further concerns or for any help we may be able to provide.

Warm wishes,

Senator Ossoff

From: Horton, Brittnea Ira CIV USARMY ID-TRAINING (USA)
To: Monroe, E Madison CIV USARMY CESAS (USA); adam.e.wolf.ctr
Subject: FW: Thank you
Date: Thursday, November 21, 2024 5:02:53 PM

See below and file for the admin record on the Dexter EA for Senator Warnock.

Britt Horton
Chief
Planning & Support Branch, EMD - DPW
USAG Fort Moore
Mobile: (706) 587-0330

From: Office of U.S. Senator Raphael Warnock <do_not_reply@warnock.senate.gov>
Sent: Thursday, November 21, 2024 2:04 PM
To: Horton, Brittnea Ira CIV USARMY ID-TRAINING (USA) <brittnea.i.horton.civ@army.mil>
Subject: Thank you

> You don't often get email from do_not_reply@warnock.senate.gov. Learn why this is important

Thank you for sharing your thoughts with me. Your views are important to my work in the United States Senate on behalf of the people of Georgia and I appreciate you taking the time to share them with me. I will be sending you a more substantive response to your specific concerns, but in the meantime, I want to let you know that I received your message and value your comments.

If you have written regarding a problem you are having with a federal agency, a caseworker in one of my Georgia offices will be contacting you shortly. To expedite direct contact with a caseworker you may also call my Atlanta office for assistance.

Again, thank you for taking the time to share your thoughts with me.

Sincerely,
Reverend Raphael Warnock
United States Senator

ALABAMA-COUSHATTA TRIBE OF TEXAS
TRIBAL HISTORICAL PRESERVATION OFFICE
571 State Park Road 56 • Livingston, TX 77351 • (936) 563-1181

12/05/2024

United States Army, AMIM-MOP -EP
Environmental Management Division
Attention: NEPA Program Manager
6650 Meloy Drive; Building 6, Room 309-B
Fort Moore, Georgia 31905

SUB: Dexter Elementary School Replacement

Greetings sir / madam:

The Alabama-Coushatta Tribal Historical Preservation Office is deeply committed to the historic preservation of its history, heritage, and historic lands. We seek the preservation of our historic lands, culture, artifacts, and natural habitat. Thank you for your submission of your department's Section 106 inquiry.

After a careful review of your documents, scope of work, and geographic reference point, we have come to the following conclusion:

While we are interested in your project, we do not have the resources to devote our full attention to this project or it is outside of our current urgent need scope of work reference point. Please keep us abreast of further work of your organization as our focus may change in the future.

We urge caution and care in protection of natural resources and of any heritage items of interest you may discover. Please let us know if there is a discovery and if we can be of assistance in the matter.

Thank you,

Delvin Johnson, Tribal Historical Preservation Officer
Alabama Coushatta Tribe of Texas
571 State Park Rd 56, Livingston, TX 77315
Johnson.Delvin@actribe.org
936.563.1181

the Chickasaw Nation
Department of Culture and Humanities
Office of the Secretary | Post Office Box 1548 | Ada, OK 74821-1548 | (580) 436-7258

Bill Anoatubby
Governor
Chris Anoatubby
Lt. Governor

December 18, 2024

Ms. Brittnea Horton
Environmental Specialist
United States Army
Environmental Management Division
6650 Meloy Drive, Building 6
Fort Moore, GA 31905

Dear Ms. Horton:

Thank you for the letter and invitation to comment on the Final Environmental Assessment (EA) and Draft Finding of No Significant Impact (FONSI) for the proposed Dexter Elementary School Replacement project at Fort Moore, Georgia. We understand that the Final EA and Draft FONSI have been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA) and you are seeking public comment regarding the proposed project.

The Chickasaw Nation Historic Preservation Division does not complete reviews under NEPA. Our office completes reviews under Section 106 of the National Historic Preservation Act. However, this specific project is outside of our area of interest. Therefore, we do not request government-to-government consultation on this project. While the Chickasaw Nation has no objection to the undertaking, we respectfully defer to the federally recognized First American tribe(s) that have identified a connection to the project area.

We appreciate your efforts to preserve and protect significant historic properties. If you have any questions, please contact Ms. Karen Brunso, tribal historic preservation officer, at (580) 272-1106 or by email at hpo@chickasaw.net.

Sincerely,

Lisa John, Secretary
Department of Culture & Humanities

cc: brittnea.i.horton.civ@army.mil

Dexter Elementary School Replacement
Fort Moore, Georgia
Final Environmental Assessment and Finding of No Significant Impact

Appendix D – Cultural Resources

November 2024

Prepared by:
Planning Branch
U.S. Army Corps of Engineers, Savannah District

Dexter Elementary School Replacement
Fort Moore, Chattahoochee County, Georgia
Section 106 Determination of Effects

1. Undertaking Location and Description

Fort Moore (formerly Fort Benning) is an Army Installation that was founded in 1918 and is located on approximately 182,000 acres in southwest Georgia in Chattahoochee and Muscogee Counties and southeast Alabama in Russell County. As the home of the Maneuver Center of Excellence, Fort Moore plays a significant role in supporting the Army's mission and is an invaluable military readiness training platform. To support the Army's mission, Fort Moore must possess the infrastructure and facilities necessary to support military training and the quality of life of the Soldiers and their families, which includes providing educational services to all children on the installation.

Fort Moore is beginning to not only experience student capacity issues, but existing schools within the installation, such as at Dexter Elementary School, are aging and requiring more frequent maintenance and repair to expired and failing systems. The existing substandard environment will not be able to support the curriculum and will continue to impair the overall education program for students, thus not meeting the necessary learning objectives. In addition, if a new facility is not provided, the required maintenance and repair of expired and failing systems will continue to strain maintenance capabilities and budgets. Fort Moore proposes the construction of a replacement campus for the Dexter Elementary School to meet installation capacity demands, as well as provide an environment to support quality education.
The U.S. Army Corps of Engineers (Corps), Savannah District is acting in a supporting role for the proposed replacement of the existing Dexter Elementary School at Fort Moore in the Chattahoochee County portion of the installation. Two alternatives have been proposed:

Alternative 1 (Proposed Action/Preferred Alternative) proposes to construct a new elementary school on Zuckerman Avenue at Green Field. This property is located within the Main Post Cantonment Historic District (Figures 1 and 2).

Alternative 2 proposes to replace the elementary school at the existing location, which is adjacent to historic base housing that dates to the 1960s and 1970s.

2. Area of Potential Effects

The Area of Potential Effect (APE) is defined as a half mile radius around the proposed project area. The APE takes into account the proposed construction areas, staging areas and access roads for construction, and the surrounding area that may be adversely affected in terms of changes to the viewshed of nearby historic properties.

3. Efforts to Identify Historic Properties

This area served as the location of Camp Benning, which was in use from 1918 until 1922, at which point it was renamed to Fort Benning before becoming Fort Moore in 2023. Prior to its use for military purposes, this area had a rich prehistoric and historic past. Fort Moore has nearly 4,000 documented archaeological sites within its boundaries, of which approximately 800 sites are either eligible or potentially eligible for listing on the National Register of Historic Places (NRHP). There is also one historic district (Main Post Cantonment Historic District), which is pertinent to this undertaking.

The project area has been included as part of at least two historic building surveys of Fort Moore. The first of which is the Historic Building Survey, conducted in the 1980s (Wood 1987). The second of which was the Historic Open Spaces Survey, performed in 2010 (Griffin and Nolte 2010). The project area is located within the Main Post Cantonment Historic District, which has both regional and national significance. The project area is also located along a historic walk developed by the installation. The project area is not indicated as a historically open space as part of the 2010 survey, as this area was always used for various purposes in support of the activities occurring in the open spaces (e.g., placement temporary structures for events). There were previously no known concerns regarding development of this area, as some level of development may have been anticipated, but no development ever occurred. In the 2010 Brockington report, Green Field was determined to be a historic open space, and it is considered a contributing element to the Main Post Cantonment Historic District. In 2014, the historic district's boundaries were redrawn to include Green Field as part of the Main Post Cantonment Historic District (Whitacre et al. 2010; Figure 2).

Survey data from Georgia's Natural, Archaeological and Historical Resources GIS (GNAHRGIS) database shows that five archaeological sites were identified within a half mile radius of the proposed project area (Table 1). All sites are recommended ineligible for the NRHP as documented in several investigation reports (Elliott 1997, 1999, 2001). The Corps has determined that the project scope, as proposed, will have no adverse effect on these sites, as they are located outside of a 100-meter buffer of the project area.

Table1: Identified cultural resources within half mile APE of project area.

Site Number/Name	**NRHP Status**	**Site Description**
9CE1594	Not Eligible	Historic artifact scatter and prehistoric lithic scatter
9CE2024	Not Eligible	Historic artifact scatter
9CE2021	Not Eligible	Prehistoric artifact scatter
9CE1580	Not Eligible	Historic landfill (Fort Benning's Landfill #4)
9CE2619-Phillips Range Cemetery	Not Eligible	Historic cemetery

There are no documented intensive archaeological surveys performed within the project area, so it is possible that there may be inadvertent discoveries during any intrusive activities.

4. Effects to Historic Properties

The proposed Dexter Elementary School replacement site (**Alternative 1**) is located within the Main Post Cantonment Historic District, and the possibility was investigated that the new construction could have an adverse effect on historic properties per 36 CFR 800.5(a)(1)(v). *Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features*;

The initial design was revised in 2024 to better incorporate the building into the surrounding historic district, and GA SHPO concurred in September 2024 that the revised design that incorporates a Spanish Revival style is compatible with the surrounding district. In addition to the building design, the landscaping plan has been provided to GA SHPO to indicate which trees would be maintained and the trees that need to be removed/replaced due to safety and construction concerns. Additional reviews will be performed at the major design stages in accordance with the HPC SOPs. With the changes to the building design and implementation of the landscaping plan, there are no adverse effects posed to the historic district due to close adherence to the HPC SOPs and ensuring continued technical reviews by GA SHPO and implementation of their feedback.

Temporary effects include construction traffic and noise within the surrounding area. Permanent effects from constructing a new school would include noise disturbance to the historic setting due to increased traffic influx from cars and buses. The combination of elevated noise and increased traffic would change the experience and feel of the historic district.

The Corps, in consultation with the Georgia State Historic Preservation Office (SHPO), has determined that the current Dexter Elementary School site (**Alternative 2**) is anticipated to have no adverse effect on historic properties. This determination is due to several factors. The school is of modern construction, so any additions to the existing school or constructing a new school at the current location would not be a concern. There are several modern structures near the elementary school, including a large, multi-level hotel and gas station, that already impact the viewshed. There are no documented archaeological sites within the area, and the level of previous ground disturbance indicates that inadvertent discoveries would be unlikely. The current school location is outside of the Fort Moore Main Post Cantonment Historic District (primarily 1930s and 1940s period of significance). There are, however, historic base housing structures across the street from the current school that date to the 1960s and 1970s. A reassessment of the Main Post Cantonment Historic District has now extended its boundaries to include the base housing that is adjacent to the existing elementary school. In consultation with Fort Moore and GA SHPO staff, it was agreed that these structures, as part of the historic district, would be a no adverse effect determination if a new school building is constructed near the location of the current school due to the other factors mentioned above.

5. Section 106 Consultation

On November 15, 2023, the Corps conducted a site visit and meeting at both project areas with members of DPW and GA SHPO to discuss the proposed plans for each

site. The site visit coincided with the annual meeting with consulting Tribes and GA SHPO that is held in line with the Army Alternate Procedures for compliance with Sections 106 of the NHPA. The consulting Tribes participated in a site visit on November 14, 2023, and no concerns were expressed during their meeting.

The 35% Design was submitted to the GA SHPO on 22 March 2024 and comments were provided on 22 April 2024. Based on these comments, the building design went through a major revision to better incorporate the building into the surrounding historic district. The revised design was provided to GA SHPO on 29 August 2024. GA SHPO responded to the revised design on 6 September 2024 to state that the Spanish Revival style is compatible with the surrounding district. GA SHPO continues to serve as a technical reviewer under the Army Alternate Procedures (GA SHPO Reference Number: TA-240321-001/Muscogee).

References Cited:

Elliott, Daniel T.

1997. *Cultural Resources Inventory of Compartment A5, Fort Benning Military Reservation, Fort Benning, Georgia*. Report prepared by Southern Research, Inc. Ellerslie, Ga.

1999. *Cultural Resources Survey of Compartments A5 and A7, Fort Benning Military Reservation, Chattahoochee County, Georgia*. Report prepared by Southern Research, Inc. Ellerslie, Ga.

2001. A *Cultural Resource Survey of the Main Post, Fort Benning Military Reservation, Chattahoochee and Muscogee Counties, Georgia*. Report prepared by Southern Research, Inc. Ellerslie, Ga.

Fort Benning.

2018. Historic Properties Component of the Integrated Cultural Resource Management Plan. Final Execution November 2019.

Griffin, Stacey, and Kelly Nolte.

2010. *Historic Open Spaces Survey, Historic Main Post Cantonment, Fort Benning, Georgia*. Report prepared by Panamerican Consultants, Inc. Tuscaloosa, Al.

Whitacre, Stacey, David Baluha, and Scott Butler.

2020. Phase I Survey of a 4.75-acre Tract in Russell County, Alabama, and Phase II Testing of 30 Sites at Fort Benning, Chattahoochee and Muscogee Counties, Georgia. Report prepared by Brockington and Associates, Norcross, Ga.

Wood, Dean.

1987 *Historic Building Survey of Fort Benning, U.S. Army Infantry Training Center, Georgia*. Report prepared by Southeastern Archeological Services, Inc. Athens, Ga.

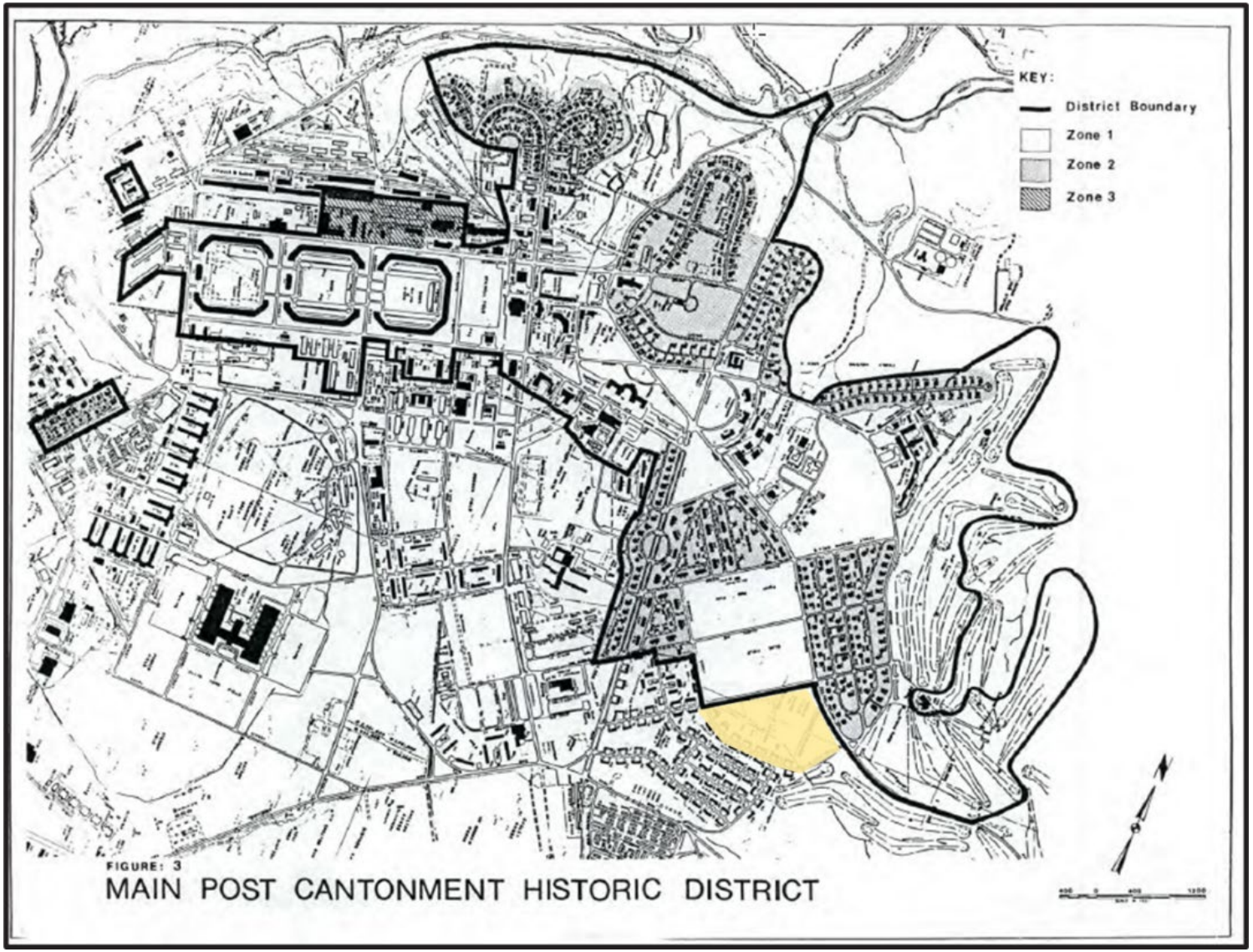


Figure 1: Map of the original Main Post Cantonment Historic District with Green Field highlighted yellow.

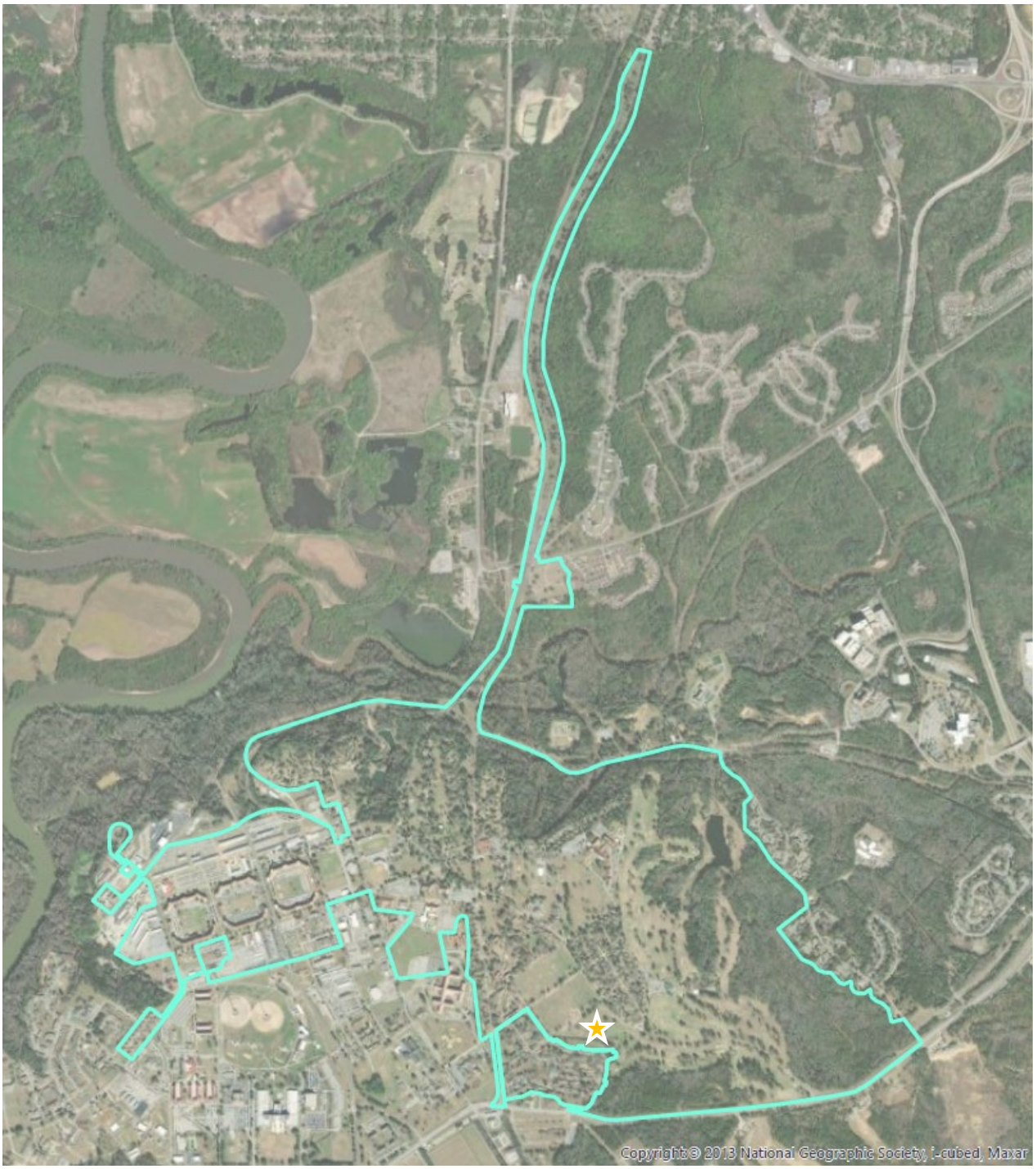


Figure 2. The historic district boundaries were reassessed and redrawn to include areas such as Green Field (indicated with a star).