

**FINDING OF NO SIGNIFICANT IMPACT**  
**FOR THE PROPOSED**  
**ARMY LODGING FACILITY AT FORT BENNING, GEORGIA**

## **1.0 INTRODUCTION**

Fort Benning has prepared an Environmental Assessment (EA) to identify and evaluate potential environmental and socioeconomic effects from constructing the proposed Army Lodging Facility in the Main Post Cantonment Area at Fort Benning, Georgia. Under the Proposed Action, Fort Benning would construct, operate, and maintain a new 860-room Army lodging facility. The EA was prepared in accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations at 40 Code of Federal Regulations (CFR) Parts 1500-1508, and Army NEPA Regulation at 32 CFR Part 651 (*Environmental Analysis of Army Actions*). The Final EA includes analysis and findings concerning the proposed lodging facility's potential construction and operational impacts, including mitigation measures to reduce any potential environmental impacts to less than significant. The Final EA is incorporated by reference.

## **2.0 PURPOSE AND NEED**

Fort Benning proposes to construct and operate a lodging facility to replace and improve the short-term and extended stay facilities on-post. The Proposed Action's purpose is providing adequate, quality Army Lodging to accommodate Soldiers attending training, Soldiers and their Family members traveling on official orders to the Fort Benning area, conference attendees, and official visitors. The lodging needs to be located in close proximity to military and Family support services and amenities.

Fort Benning currently utilizes three on-Post facilities to meet the temporary lodging demands of military personnel. Two of the current facilities, Building 83 and Building 399, have deficiencies which would require major renovations to maintain their suitability as use for lodging. Conditions analysis and feasibility studies determined that these two facilities cannot be economically renovated to meet Army lodging standards.

The Maneuver Center of Excellence (MCoE) will use these two facilities for future classrooms and administrative support. These building's reuse for non-lodging purposes will severely reduce Army temporary lodging capacity and will require Soldiers and their Families to seek temporary lodging off-post. If off-post temporary lodging is used, these families are more widely dispersed and must endure considerably more travel in order to access on-post support and services. This would adversely affect the mission, safety, and quality of life for Soldiers and their Families. The Proposed Action would replace the capacity lost and provide on-post temporary lodging facilities that meet current lodging standards.

## **3.0 DESCRIPTION OF THE PROPOSED ACTION**

The Proposed Action includes constructing a new temporary lodging facility at Fort Benning. The new facility design has 860 rooms (740 extended stay rooms, 60 standard rooms and 60 Family suites), a main entrance/lobby, continental breakfast room and food storage/preparation room, in-house laundry areas, maintenance, administration, and storage. The Proposed Action's permissible building height is five occupied (resided in) stories, plus an allowance for additional height limited to equipment (i.e. heating ventilation and air conditioning units) to support building system requirements. The Proposed Action

also includes parking for over 500 vehicles, vehicle control gates to the loading/delivery dock, a playground, and a separate grounds maintenance building. The lodging facility would require approximately 34-acres for construction limits and anti-terrorism and force protection setback requirements.

#### 4.0 DESCRIPTION OF THE ALTERNATIVES

The NEPA requires considering and evaluating a range of reasonable alternatives. The Army used screening criteria to determine which Action Alternatives are reasonable. Satisfying these screening criteria provides a location and building design that meets the proposed lodging facility's purpose and need, while potentially minimizing adverse environmental and operational effects. The proposed Army lodge planning process developed these alternatives:

- **Alternative A (No Action Alternative):** Under this Alternative, the proposed Army lodging facility would not be constructed.
- **Alternative B (Preferred Alternative):** Construct a temporary lodging facility with a maximum of five stories and capacity of 860 rooms in the Main Post Cantonment Area, north of Canby Park, on the site of the Old Faith School.
- **Alternative C:** Construct a temporary lodging facility with a maximum of five stories and capacity of 860 rooms in the Main Post Cantonment Area, south of the MCoE headquarters on Stewart Field.

Various other new lodging facility construction locations were considered, however, analysis indicated that those locations were not reasonable. While the No Action Alternative would not satisfy the Proposed Action's purpose or need, the No Action Alternative reflects the *status quo*, and serves as an Action Alternative evaluation benchmark.

#### 5.0 ANTICIPATED ENVIRONMENTAL EFFECTS

No significant adverse impacts, or significant cumulative effects are anticipated to any Valued Environmental Components (VECs) analyzed in the EA for all Action Alternatives. The No Action Alternative and Alternative C analysis indicates only negligible and minor adverse impacts may occur to the VECs. However, Alternative B (the Preferred Alternative) analysis, anticipated the potentially moderate adverse cultural resources impacts.

The Proposed Action's Preferred Alternative environmental analysis found the greatest potential impact and most challenging concern is the adverse effect on cultural resources. A visual analysis of effects to cultural resources was conducted within the area of potential effect (APE) to determine the potential adverse impacts of building design on the Main Post Historic District (MPHD) viewshed. This analysis demonstrated that constructing a five-story Army lodging facility at the Preferred Alternative site would minimize significant adverse effects to the MPHD. Through Army consultation with the Georgia State Historic Preservation Office (SHPO), and in accordance with the SHPO letter dated 14 July 2011, implementing some mitigation measures was proposed to further reduce the MPHD impacts.

The following mitigation measures reducing adverse cultural resource impacts to less than significant at the Preferred Alternative's site will be implemented:

1. Use of a low diffused intensity bulb, for street and parking lights, that points downward and/or has shielding to minimize light pollution into the historic housing area.
2. Eliminate any traffic cut-through possibilities through the historic housing area with the use of bollards.
3. Install a combination of 8-foot high fencing and tree and shrub landscaping that will provide an adequate visual screen during all seasons thereby reducing impacts to historic family housing to less than significant.
4. Use comprehensive land use planning to guide development for this area including design and scale of construction, traffic control, providing safe pedestrian pathways, and ensuring/maintaining adequate green space.

The EA identifies additional minimization measures to reduce potential adverse impacts to all the other VECs discussed and analyzed. The EA analyses also demonstrate that adhering to applicable Federal and State environmental laws, regulations, and permitting processes would minimize adverse environmental impacts resulting from implementing any of the Proposed Action Alternatives. Implementing these measures will further reduce potential environmental resources impacts or avoid the impacts altogether.

## **6.0 PUBLIC AVAILABILITY**

The Final EA and Draft FNSI were made available to the public for a 30-day comment period from 25 October through 25 November, 2011. An announcement that these documents were available was published via a Notice of Availability (NOA) in *The Columbus Ledger-Enquirer* and Fort Benning's *The Bayonet* in accordance with Army NEPA Regulation (32 CFR 651.36). These documents were also made available at several local libraries and were posted on the Fort Benning website at <https://www.benning.army.mil/garrison/DPW/EMD/legal.htm>.

The NOA for the Final EA and Draft FNSI were mailed to agencies, individuals, and organizations on the Fort Benning NEPA distribution (mailing) list for the Proposed Action, as identified in the Final EA. As part of Fort Benning's on-going, established process and dialogue with the Federally recognized Native American Tribes affiliated with the Fort Benning area, the Army provided each Tribe with a copy of these documents for consultation via review and comment.

Fort Benning received two (2) comments during the 30-day public comment period which are summarized below. All comments received were considered in preparation of this FNSI. No substantive comments or issues were raised during the public comment period that affected the Final EA's analysis or the decision of a FNSI.

1. The *Georgia Office of Budget and Planning, Georgia State Clearinghouse (State)* provided a Memorandum, Executive Order 12372 Review Process, on 28 of October 2011 (State ID # GA111028001). This Memorandum indicated the State's intent to provide comments on or before 25 November 2011. On 18 November 2011, the State provided written comments. These comments included:
  - No comments were provided by the *Georgia Department of Natural Resources' Environmental Protection Division, Wildlife Resources Division, or Historic*

*Preservation Division* during the 30-day public review period. The State assumed none of these agencies had any issues with the Proposed Action, and the State identified that: “this project is considered to be consistent with those state or regional goals, policies, plans, fiscal resources, criteria for developments of regional impacts, environmental impacts, federal executive orders, acts and/or rules and regulations with which this organization is concerned.”

- Based on the comments provided, the State concurs with the analysis presented in the Final EA.
2. The *United States Environmental Protection Agency, Region 4* (EPA Region 4) provided comments via e-mail to the Fort Benning NEPA Program Manager on 29 November 2011. These comments included:
- The EPA Region 4 concurred with the decision of the Army’s Preferred Alternative (Alternative B) with implementation of the appropriate mitigation measures as discussed in Section 5.0 above to avoid significant adverse effects to the viewshed of Fort Benning’s Historic District.
  - Consideration for potential impacts to streams and waterways from potential erosion and sediment runoff due to construction activities; and consideration of sustainable environmental design features.

The water resources analysis provided in the EA focused on surface water, storm water, groundwater, and wetlands within all Alternatives for the proposed Army Lodging Facility. Either Proposed Action Alternative would be designed in accordance with the Georgia requirements to comply with the National Pollution Discharge Elimination System (NPDES) for land disturbances, including: a NPDES permit and an Erosion and Sediment Pollution Control Plan (ESPCP); appropriate site-related Best Management Practices (BMPs) with monitoring and inspection; and adherence to turbidity limits as specified in the Georgia Erosion and Sediment Control Act (ECSA).

The Army requires all new construction meet the standards of sustainability and energy efficiency as defined by the United States Green Building Council’s Leadership in Energy and Environmental Design (LEED) program. The most energy efficient lighting; water conservation measures; heating, ventilation, and air conditioning controls (HVAC); and building envelope materials will be considered in the design/engineering of the proposed Army Lodging facility. All of the Proposed Action Alternatives will be required to achieve a LEED Silver certification as discussed in the EA.

## 7.0 CONCLUSION

After evaluating potential impacts, we concluded that both Proposed Action Alternatives would meet the purpose and need for an Army lodging facility at Fort Benning. Implementing either Proposed Action Alternative would have *negligible, minor, and moderate adverse* impacts to the VECs analyzed in the EA. No significant impact is expected to any VEC from implementing any Alternative presented in the EA; however, specific mitigation is required to avoid significant impacts to cultural resources for the Preferred Alternative. The No Action Alternative would not meet the purpose and need for providing an adequate lodging facility for Soldiers and their Families.


Selection of Alternative C (Stewart Field) would result in a minor adverse impact to land use as it is currently designated Training and Ranges and would be converted to Community Facilities. Stewart Field is the only lighted walking and running track currently on Fort Benning that can be used by Soldiers and their Families, retirees, and civilians for training, conditioning, and outdoor recreation activities such as the annual inter-armed forces Rugby competition and 4<sup>th</sup> of July Celebration. Construction of the proposed Army Lodging facility at this site would make Stewart Field unusable for training and recreation activities, and alternate locations would need to be found to provide comparable amenities for such activities.

The proposed location for Alternative B (the Preferred Alternative) was previously the site of Old Faith Middle School. As part of the Infrastructure Footprint Reduction Program, these buildings were demolished in 2009. This proposed Alternative location is currently an unutilized open space, and would cause negligible impacts to land use as the location is currently designated as Community Facilities. Selection of Alternative B (the Preferred Alternative) would require mitigation measures to avoid significant adverse effects to cultural resources as discussed in Section 5.0 above. However, due to the current availability and underutilization of this location, Alternative B is considered the Preferred Alternative for this proposed action.

Pursuant to NEPA, CEQ, and Army NEPA regulations, the implementation of the Preferred Alternative, (Alternative B), for the Proposed Action would not have a significant environmental or socioeconomic impact on the quality of the human or natural environment. In consideration of the analysis documented in the EA and the reasons outlined in this Mitigated FNSI, "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:

2 Dec '11  
Date

  
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Colonel, AG  
Garrison Commander