DRAFT FINDING OF NO SIGNIFICANT IMPACT

INTRODUCTION

In August 2012, the Assistant Secretary of the Army (Installations, Energy and Environment) established an energy goal attainment policy for all Active Army Installations. These goals relate to energy intensity reduction and implementing renewable energy projects at each Army Installation. Renewable energy is defined as energy generated from renewable sources, including the following: solar, wind, biomass, landfill gas, ocean (including tidal, wave, current, and thermal), geothermal (including electricity and heat pumps), municipal solid waste, new hydroelectric generation capacity (placed in service on or after January 1, 1999) achieved from increased efficiency or additions of new capacity at an existing hydroelectric project, and thermal energy generated by any of the preceding sources.

1. PURPOSE AND NEED

The purpose of the Proposed Action is to allow for the design, construction, operation, and maintenance of a 30MW Solar PV facility within the boundaries of Fort Benning. The need of the Proposed Action is to: (a) achieve renewable energy production on Army land in accordance with the *Energy Performance Goal and Master Plan for the Department of Defense* (10 USC 2911[e]), as amended, which requires that the Army produce or procure not less than 25 percent (%) of the total quantity of facility energy it consumes within its facilities during fiscal year 2025 and each fiscal year thereafter from renewable energy sources; (b) contribute to the Army's goal of generating 1 gigawatt (GW) of renewable electrical energy on Army land by 2025; and (c) contribute to compliance with the Energy Policy Act (EPAct) of 2005 requiring the Army's consumption of not less than 7.5% of the total quantity of facility electrical energy it consumes within its facilities during fiscal year 2013 and each fiscal year thereafter from renewable energy sources.

2. DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

Proposed Action: The Army proposes to enter a 35 year Utilities Easement, of approximately 250 acres to be located within the Fort Benning installation boundary, with Georgia Power. Georgia Power will design, construct, operate, and maintain a 30MW solar PV System. A PV System is an arrangement of components designed to produce electric power using the sun as a power source. The power-producing components of the PV System consist of a series of networked solar arrays, often called an array field. The power conducting system contains an inverter to convert the energy produced from DC to AC for use on the electrical grid and a transformer to boost voltage for feeding the power into the electrical grid. The Army is expected to consume a minimum of 51% of this power through the existing General Services Administration (GSA) Areawide Contract with Georgia Power.

Alternatives Considered and Evaluated: Section 3 of this EA presents a discussion of the alternatives evaluated. Based on the screening criteria analysis presented in *Section 3.2* of the EA, a No Action Alternative and three proposed action alternatives were analyzed:

- **No Action Alternative**: Under the No Action Alternative, the Army would not enter into a utilities easement agreement with Georgia Power to design, construct, operate, and maintain a 30MW solar PV generation system on Fort Benning. An opportunity to work towards the Army's goals, in accordance with 10 USC 2911 (e), of reducing energy intensity and usage of available renewable energy technology would be missed.
- **Alternative 1 (Dove Field Site – Preferred Alternative)**: This Alternative allows for production of 30MWs of solar PV arrays on approximately 250 acres located within training area W04 and the northern half of W05 **(Figure 3)**. This site is a contiguous parcel of land located immediately to the north of the Georgia Power Alabama Side Substation (GPASS) near the western boundary of Fort Benning within Russell County, Alabama.
- **Alternative 2 (Molnar Site)**: This Alternative allows for production of 30MWs of solar PV arrays on approximately 250 acres within training areas Z04 **(Figure 4)**. This is a mostly contiguous parcel located within Russell County, Alabama.
- **Alternative 3 (Landfill Site)**: This Alternative allows for the production of 30MWs of solar PV arrays on 250 acres located within training area P04 on the north side Martha Berry State Highway (US27/US280) **(Figure 5)**.

3. ENVIRONMENTAL ANALYSIS

Section 4 provides a description of the existing environmental and socioeconomic conditions at and surrounding the Alternatives being considered. As described in **Section 3.0**, these Alternatives include the No Action Alternative; Alternative One – Preferred Alternative (Dove Field Site); Alternative Two (Molnar Site); and Alternative Three (Landfill Site).

Section 4 provides information that serves as a baseline from which to identify and evaluate any individual or cumulative environmental and socioeconomic changes likely to result from the implementation of the Action Alternatives. The Region of Influence (ROI) of these Action Alternatives, and therefore of this EA, varies by specific VEC but is primarily contained within the site boundaries and surrounding, immediately adjacent lands.

Environmental Consequences and Comparison of Alternatives: The Environmental Consequences to Valued Environmental Components (VECs) were analyzed in relation to the Proposed Action and No Action Alternatives. VECs are categories of environmental and socioeconomic effects where categorization is conducted to enable a managed and systematic analysis of these resources.

Cumulative impacts, also discussed in Section 5 of the EA, are the combination of impacts of the Proposed Action, when added to other past, present, and reasonably foreseeable future actions, regardless of who undertakes those actions (40 Code of Federal Regulations [CFR] 1508.7). Cumulative impacts can result from actions occurring over a period of time that are minor when each is considered individually, but are significant when viewed collectively. Affected environment and environmental consequences, to include direct, indirect, and cumulative effects, were analyzed, as appropriate, Table 1 summarizes these findings of Chapter 4.

Table 1 : Comparison of the Potential Effects on the Evaluated Alternatives

VEC	NO ACTION ALTERNATIVE	(PREFERRED) ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3
Land Use	No effects.	Short and Long Term Minor effects during construction, operation and maintenance of facility.	Short and Long Term Minor effects during construction, operation and maintenance of facility.	Short and Long Term Minor effects during construction, operation and maintenance of facility.
Air Quality	No effects.	Short Term potential Moderate to Significant, effect during construction. Effects would be reduced through ADEM and Clean Air Act requirements. No Long-Term air quality effects.	Short Term potential Moderate to Significant, effect during construction. Effects would be reduced through ADEM and Clean Air Act requirements. No Long-Term air quality effects.	Short Term potential Moderate to Significant, effect during construction. Effects would be reduced through GaDNR and Clean Air Act requirements. No Long-Term air quality effects.
Noise	No effects.	Short Term, localized, Negligible effect during construction. No Long-Term noise effects.	Short Term, localized, Negligible effect during construction. No Long-Term noise effects.	Short Term, localized, Negligible effect during construction. No Long-Term noise effects.
Soils	No effects.	Short Term, Moderate adverse soils effects due to potential erosion during construction. Effects would be reduced through compliance with ADEM requirements.	Short Term, Moderate adverse soils effects due to potential erosion during construction. Effects would be reduced through compliance with ADEM requirements.	Short-Term, Moderate adverse soils effects due to potential erosion during construction. Effects would be reduced through compliance with GaDNR requirements.
Water Resources	No effects.	Short Term, Minor adverse effects during construction, operation and maintenance. Effects would be reduced through compliance with ADEM and Section 404 requirements.	Short Term, Minor adverse effects during construction, operation and maintenance. Effects would be reduced through compliance with ADEM and Section 404 requirements.	Short Term, Minor adverse effects during construction, operation and maintenance. Effects would be reduced through compliance with GaDNR and CWA Section 404 requirements.

Biological Resources	No effects	Short and Long Term Minor adverse effects due to loss of habitat for RCW future recruitment clusters. No effects on currently designated RCW partitions.	Short and Long Term Minor adverse effects due to loss of habitat for RCW future recruitment clusters. No effects on currently designated RCW partitions.	Short and Long Term Minor adverse effects due to potential impacts on RCW future recruitment clusters and one current cluster. No effects on currently designated RCW foraging habitat.
Cultural Resources	No effects.	No adverse effects during construction with mitigation. Mitigation measures proposed: avoidance by design.	No adverse effects during construction with mitigation. Mitigation measures proposed: avoidance by design.	No effects.
Socioeconomics (including Environmental Justice and Protection of Children)	No effects.	Short-Term positive impact for dollars being spent within the community. No effects to health and safety of children.	Short-Term positive impact for dollars being spent within the community. No effects to health and safety of children.	Short-Term positive impact for dollars being spent within the community. No effects to health and safety of children.
Utilities	No effects.	Short-Term, Negligible effect during construction and maintenance. Long-Term, Moderate beneficial effects during operation.	Short-Term, Negligible effect during construction and maintenance. Long-Term, Moderate beneficial effects during operation.	Short-Term, Negligible effect during construction and maintenance. Long-Term, Moderate beneficial effects during operation.
Transportation and Traffic	No effects.	Short and Long Term, localized, Negligible effect during construction, operation and maintenance.	Short and Long Term, localized, Negligible effect during construction, operation and maintenance.	Short and Long Term, localized, Negligible effect during construction, operation and maintenance.
Airspace	No effects.	Short and Long Term, Negligible effects during construction, operation and maintenance.	Short and Long Term, Negligible effects during construction, operation and maintenance.	Short and Long Term, Negligible effects during construction, operation and maintenance.
HTMW	No effects.	Short Term Minor adverse effects due to the potential for leaks of petroleum products related to construction. Long Term negligible effects during operation and maintenance.	Short Term Minor adverse effects due to the potential for leaks of petroleum products related to construction. Long Term negligible effects during operation and maintenance.	Short Term Minor adverse effects due to the potential for leaks of petroleum products related to construction. Long Term negligible effects during operation and maintenance.

Cumulative Effects	No effects.	No significant adverse cumulative effects.	No significant adverse cumulative effects.	No significant adverse cumulative effects.

4. PUBLIC REVIEW AND COMMENTS

This EA and a Draft Finding of No Significant Impact (FNSI) will be available to the public for a 30-day public comment period. The Notice of Availability (NOA) for the Final EA and Draft FNSI will be published in The Columbus Ledger-Enquirer, Fort Benning's The Bayonet and Saber, The Tri-County Journal, and The Stewart-Webster Journal Patriot Citizen in accordance with the Army NEPA Regulation (32 CFR Part 651.36). The Final EA and Draft FNSI will also be available at the following local libraries:

1. Columbus Public Library
2. Fort Benning Main Post Library
3. Cusseta-Chattahoochee Public Library
4. Phenix City – Russell County Library

In addition, the documents will be posted on the Fort Benning website at https://www.benning.army.mil/garrison/DPW/EMD/legal.htm. The NOA also have been mailed to all agencies/individuals/organizations on the Fort Benning NEPA distribution (mailing) list for the Proposed Action (see **Section 8.0**). The Army will make revisions, as appropriate, to the EA and FNSI based on the comments received.

5. FINDING OF NO SIGNIFICANT IMPACT

I have considered the results of the analysis in the EA, comments received within the public review period, and Fort Benning's needs. Based on these factors, I have decided to implement Proposed Alternative 1(Preferred Alternative) at Fort Benning by allowing Georgia Power, through a utilities easement, to design, construction, operation, and maintenance of a 30MW solar PV facility. Implementation of the Preferred Alternative will not have a significant impact on the quality of human life or natural environment.

This analysis fulfills the requirements of the National Environmental Policy Act (NEPA) of 1969, as implemented by the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508), as well as the requirements of the Environmental Analysis of Army Actions (32 CFR 651). Therefore, issuance of a FNSI is warranted and an Environmental Impact Statement (EIS) is not necessary.

FINDING OF NO SIGNIFICANT IMPACT
REVIEWED AND APPROVED BY:

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Date

_____
MICHAIL S. HUERTER
Colonel, Infantry
Garrison Commander