

DRAFT
FINDING OF NO SIGNIFICANT IMPACT
WHITE ELEMENTARY SCHOOL REPLACEMENT
FORT BENNING, GEORGIA

1.0 INTRODUCTION

Fort Benning has prepared an Environmental Assessment (EA) to identify and evaluate potential environmental and socioeconomic effects from the construction of a new elementary school in the Sand Hill Cantonment Area at Fort Benning, Georgia. Under the Proposed Action, Fort Benning would construct, operate and maintain a new elementary school to support the pre-Kindergarten through Grade 5 student population residing in the Patton Village neighborhood. This Proposed Action also includes demolition of the current White Elementary School in the Main Post Cantonment Area. This EA was prepared in accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations at 40 Code of Federal Regulations (CFR) Parts 1500-1508, and the Army NEPA Regulation at 32 CFR Part 651 (*Environmental Analysis of Army Actions*).

2.0 PURPOSE AND NEED

The purpose of the Proposed Action is to construct a new elementary school to support the student population residing in the recently developed Patton Village housing area. These students are currently being bused from Patton Village in the Sand Hill Cantonment Area to three different elementary schools on Main Post. Construction of a new elementary school within the Patton Village residential area would reduce the need for busing, provide a support facility for Soldiers and their Families, and allow the Fort Benning school system to operate more efficiently.

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, Patton Village students would continue to require busing to Main Post. Residents of Patton Village would not be provided the same level of amenities and support facilities as other neighborhoods on-Post, which could potentially affect the morale of Soldiers and their Families. This would also hinder implementation of current DoDEA 21st Century School initiatives to enhance educational opportunities with the continued use of out-dated facilities that are undersized (per current DoDEA design specifications), 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.

3.0 DESCRIPTION OF THE PROPOSED ACTION

This Proposed Action involves the replacement of the current Edward A. White Elementary School in the Main Post Cantonment Area with a new school to serve the recently developed Patton Village residential housing area within the Sand Hill Cantonment Area. 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 or three story facility that will consist of an information center, computer labs, fitness areas, kitchen and cafeteria areas, supply and administrative

offices, art and music specialty rooms, counseling center, and service docks in addition to primary educational classrooms. The new elementary school campus will also include site improvements such as covered walkways, sidewalks, utility connections, fire access lanes, playgrounds and shade structures, security fencing, landscape lighting, parking areas, and force protections measures. 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.

In conjunction with the construction of a new ES for Patton Village students, the current White ES on Main Post would be slated for demolition. The facilities of the current White 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 White ES does not meet DoDEA design standards and educational initiatives in terms of space quantity, functional adjacencies, and required spatial relationships. A total of nine buildings and ancillary facilities would be slated for demolition and the area would be returned as green space. Students currently attending White ES would be redistricted to attend Herbert J. Dexter Elementary School approximately one-half mile away on Main Post.

Renovation and conversion for other uses to meet other Installation mission needs have been considered. A change in functional use would require costly renovation and conversion to meet other Installation mission needs. As such, through economic analysis, it has been determined that complete demolition of the current White ES is the most cost effective option as discussed in **Section 3.4** of the EA.

4.0 DESCRIPTION OF THE ALTERNATIVES

The NEPA, CEQ, and the Army NEPA Regulation 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 only if it enabled Fort Benning to accomplish the primary mission of providing an elementary school for the student population of Patton Village, while identifying a cost effective reuse of the current White Elementary School to meet current Installation and mission needs. Alternatives for the Proposed Action were developed as part of the planning process. Per the screening criteria discussed in the EA, all of the reasonable Alternatives analyzed include demolition of the current White Elementary School. The Alternatives determined to be reasonable include:

- **Alternative C (Preferred Alternative):** The proposed location for this Alternative is directly adjacent to the northeastern portion of Patton Village in the Sand Hill Cantonment Area. The total proposed acreage impacted by this Alternative projection is 29 acres.
- **Alternative A:** The proposed location for the Alternative is directly north of Patton Village in the Sand Hill Cantonment Area. The total proposed acreage impacted by this Alternative projection is 24 acres.
- **Alternative D:** The proposed location for this Alternative is approximately 0.1 miles from the northern portion of the Patton Village in the Sand Hill Cantonment Area. The total proposed acreage impacted by this Alternative projection is 20 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.

5.0 ANTICIPATED ENVIRONMENTAL EFFECTS

The analysis contained in this EA indicates that for all of the Proposed Action Alternatives, only *short-term, minor* adverse effects would occur to Soils, Water Resources, Biological Resources, and Hazardous and Toxic Materials and Wastes due to construction, demolition, and operational activities. No significant adverse impacts to these resources are anticipated either in a *long-* or *short-term* basis.

Potential adverse effects to cultural resources, due to demolition of historically eligible structures, would be fully mitigated by implementing Army Alternative Procedures to identify and implement the appropriate action. HABS/HAER documentation would be required to be prepared by Fort Benning and submitted to the Georgia SHPO prior to the demolition of eligible structures, and would result in *no* adverse effects.

The EA analyses also demonstrates that adherence to applicable Federal and State environmental laws, regulations, and permitting processes would minimize adverse environmental impacts resulting from implementation of any of the Proposed Action Alternatives. This determination is based on the following:

- Application of Federal and State erosion control measures and NPDES permitting requirements to include preparation of an ESPCP detailing erosion and sedimentation control BMPs, and a minimum 25-foot surface water setback to minimize soil impacts during construction would be required prior to any construction activities.
- During construction activities under all of the Action Alternatives, the handling, disposal, use, and storage of solid waste, (including HTMW), would be in accordance with all applicable Federal and State laws and requirements.

6.0 PUBLIC AVAILABILITY

The Final EA and this Draft FNSI are available to the public for a 30-day public comment period. An announcement that these documents are available was published via a Notice of Availability (NOA) in *The Columbus Ledger-Enquirer*, *The Tri-County Journal*, and *The Stewart-Webster Journal Patriot Citizen*, and Fort Benning's *The Bayonet* in accordance with the Army NEPA Regulation. These documents are also available at several local libraries and are posted on the Fort Benning website at <https://www.benning.army.mil/garrison/DPW/EMD/legal.htm>. The NOA of the Final EA and Draft FNSI has been mailed to all agencies/individuals/organizations on the Fort Benning NEPA distribution (mailing) list for the Proposed Action, as identified in **Appendix D** of 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 has provided each Tribe with a copy of these documents for consultation via review and comment.

Written public comments should be addressed to:

- **Mr. John Brent**; Environmental Management Division Chief; IMBE-PWE-P; 6650 Meloy Drive; Building 6, Room 309; Fort Benning, Georgia 31905; or via-email at john.j.brent.civ@mail.mil.

For further information or to request a copy of the documents, please contact **Mr. John E. Brown**; 6650 Meloy Drive; Building 6, Room 309; Fort Benning, Georgia 31905; or call (706) 545-7549.

7.0 CONCLUSION

Based on this EA, it is concluded that the all of the Proposed Action Alternatives, with its associated facility construction and demolition would meet the purpose and need for a neighborhood elementary school to serve the student population of Patton Village in the Sand Hill Cantonment Area. Potential adverse effects are similar among all the Alternatives with Alternative D having the least amount of land disturbance. However, based on future residential development designs for Patton Village, Alternative C was considered to be the Preferred Alternative due to the fewest housing units lost per the proposed construction footprint. The No Action Alternative would not meet the purpose and need for providing an elementary school to serve the student population of Patton Village in the Sand Hill Cantonment Area.

Pursuant to NEPA, CEQ, and Army NEPA regulations, the implementation of Alternative C 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:

Date

JEFFREY FLETCHER
Colonel, AG
Garrison Commander