



**FINAL**  
**FINDING OF NO SIGNIFICANT IMPACT**  
**PROPOSED IMPLEMENTATION OF THE**  
**INSTALLATION INFORMATION INFRASTRUCTURE MODERNIZATION PROGRAM**  
**FORT BENNING, GEORGIA**

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### **Introduction**

Fort Benning prepared and published a Final Environmental Assessment (EA), incorporated herein by reference, evaluating the potential environmental and socioeconomic effects of the proposed implementation of the **Installation Information Infrastructure Modernization Program (I3MP)** at the approximately 182,000-acre Fort Benning, Georgia Military Installation. A draft Finding of No Significant Impact (FNSI) was published with the Final EA. This public review period extended from 25 September through 25 October 2010.

I, as the Garrison Commander of Fort Benning, am the Federal decision-maker concerning this proposal. As required by the National Environmental Policy Act of 1969 (NEPA; 42 USC 4321 *et seq.*), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 CFR Part 1500-1508), and the Army NEPA Regulation (*Environmental Analysis of Army Actions*, Final Rule, 32 CFR Part 651), the potential effects of this Federal Proposed Action were analyzed in the Final EA. This Final FNSI documents the Federal decision concerning this Proposed Action.

### **Purpose and Need**

The purpose of the Proposed Action is to provide for required, effective, and capable communications across Fort Benning, linking training and support facilities, including all four cantonment areas and other training areas. This communications connectivity will allow Fort Benning to operate more efficiently, more safely, and more securely than under current conditions. The Proposed Action will improve voice and computer data communications, as well as two-way radio and wireless communications, across and around the entire Installation.

The Proposed Action is needed to allow new and existing training and support facilities to operate at their full capability, in a coordinated and controlled fashion. Under current conditions, a lack of communications tower coverage results in areas of the Installation where two-way radios do not function. This presents a safety issue for those Soldiers and staff who rely on two-way radios to communicate their activities, including Army units, police, fire protection, forestry, and environmental staff. Also under current conditions, several of the existing and new facilities at Fort Benning remain unconnected via a dedicated, sufficiently sized, and capable communications system. While these facilities are able to function, their ability to work in a coordinated, controlled, integrated, and effective manner is compromised. Some buildings, while able to be occupied, are not able to meet their mission requirements as designed. This impedes Fort Benning's training mission.

## **1. Description of the Proposed Action and Alternatives**

### **Proposed Action**

The Proposed Action is to improve communication and associated training support by installing, operating, and maintaining needed communications infrastructure, including aboveground towers and underground communications cables, across Fort Benning. This infrastructure will allow the various training facilities, support facilities, and personnel at Fort Benning to communicate with one another more effectively. In addition, the infrastructure will allow transmission of voice and computer data around the Installation without delay. Specific Environmental Protection Measures (EPMs) are incorporated into the Proposed Action to ensure significant adverse environmental effects are avoided, including effects to soils, water, biological, and cultural resources. These EPMs are spelled out in detail in **Section 2.2.3** of the Final EA, and will be implemented in concert with either Action Alternative.

### **Alternatives Considered**

As the initial step in the planning process, the US Army Information Systems Engineering Command (ISEC) developed a proposed I3MP layout, including towers and underground cable, for Fort Benning to achieve the purpose of and need for the Proposed Action. Fort Benning reviewed this initial configuration and determined

that certain components, such as the proposed towers and some sections of the proposed cable alignment, could impact important environmental resources and training operations.

Therefore, Fort Benning identified EPMs and screening (evaluation) criteria to guide the environmentally and operationally sensitive "re-design" of the Proposed Action, including both locations and methods. Implementation of the EPMs as part of the Proposed Action, and satisfaction of the screening criteria by an individual alternative, would provide locations and infrastructure best suited to meet the purpose of and need for the Proposed Action, while minimizing adverse environmental and operational effects - in other words, a "reasonable" alternative.

The Army then applied these criteria to various, initially considered alternatives to narrow the number of alternatives and to identify which alternatives were "reasonable." Through this process, the Army identified the following reasonable alternatives:

- **Modified ISEC Layout Alternative (Preferred Alternative):** Implement the proposed I3MP generally as designed by ISEC but modified to minimize adverse training and environmental effects. This alternative includes modifications to ISEC's original design to avoid impacts to existing sensitive environmental resources and range operations at Fort Benning. This alternative includes approximately 76.8 miles of underground cable and two 100-foot, self-supporting communications towers.
- **Expanded ISEC Layout Alternative:** Implement the proposed I3MP generally as designed by ISEC (and as modified under the Preferred Alternative), but include additional communications towers and underground infrastructure to provide increased system operability at Fort Benning. This alternative includes an *additional* approximately 9.9 miles of underground cable (as compared to the Preferred Alternative) and a total of four 100-foot, self-supporting communications towers, two more than the Preferred Alternative.
- **No Action Alternative:** Continue with operations as currently conducted and "approved" at Fort Benning and do not implement the I3MP. This would include continuing to rely on deficient communications methods across Fort Benning, and operating facilities at below design capacities and capabilities.

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.

## 2. Environmental Analysis

The Final EA's analysis determined that implementation of the I3MP under the Preferred Alternative or the Expanded ISEC Layout Alternative, with implementation of the integral EPMs, will not have significant adverse impacts, either individually or cumulatively, on the environment. The Final EA identified additional mitigation measures to further reduce or avoid effects to soils, water resources and wetlands, biological resources, and cultural resources.

Based on the Final EA's analysis, implementation of the Preferred Alternative or the Expanded ISEC Layout Alternative would result in similar environmental effects. As compared to the Preferred Alternative, the Expanded ISEC Layout Alternative would improve I3MP system redundancy to Camp Darby, located in the southeastern portion of Fort Benning, and complete the redundant circuit of IT connectivity in this portion of the Installation. In addition, this Alternative would also provide additional communications tower coverage on Fort Benning, as compared to the Preferred Alternative. Therefore, the Expanded ISEC Layout Alternative would better meet the purpose of and need for the Proposed Action and would better improve emergency services communication capabilities. A significant, long-term positive telecommunications effect would occur under either Action Alternative; the more robust Expanded ISEC Layout Alternative would result in greater positive effects. However, both Action Alternatives would satisfy the Proposed Action's purpose and need.

The enhanced operability of the Expanded ISEC Layout Alternative would result in only minor additional environmental effects as compared to the Preferred Alternative. These include potential adverse effects to

one additional intermittent stream and approximately 0.50 acres of additional wetlands. Under the Expanded ISEC Layout Alternative, minor additional ground disturbance would occur at the additional construction locations as compared to the Preferred Alternative; the Expanded ISEC Layout Alternative would affect up to 21 additional acres of ground within Fort Benning (i.e., 163 acres versus 142 acres). However, implementation of the EPMs will ensure these minor additional adverse effects are maintained at acceptable levels or avoided.

Overall, either Action Alternative would result in the following effects. For Socioeconomics and Utilities, either Action Alternative would result in either positive or negligible effects. Minor, or less-than-significant adverse effects may occur to: Aesthetics and Visual Resources; Air Quality; Noise; Soils; Water Resources and Wetlands; Biological Resources; and Cultural Resources. The Final EA's analysis indicated that no effects are expected to the other environmental resources analyzed, and that no significant adverse cumulative effects are anticipated.

The No Action Alternative was not found to satisfy the purpose of and need for the Proposed Action. In addition, this Alternative would result in the continuation of long-term, less-than-significant adverse Land Use (i.e., inability to use existing and planned Fort Benning facilities to their full capability) and Emergency Services/Health and Safety (i.e., limited communication) effects. This would result in a long-term adverse effect to the safety, security, and operational efficiency of training and support activities at Fort Benning.

### **Mitigation**

The EPMs (**Section 2.2.3**) and the mitigation measures (**Table ES-1**) identified in the Final EA will be implemented. These include mitigation measures for potential construction-related impacts to soils, water resources and wetlands, biological resources, and cultural resources. Implementation of these measures will further reduce the severity of identified adverse impacts or avoid the impacts altogether.

## **3. Public Review and Comment**

The Final EA and the draft FNSI were made available to the public for a 30-day public comment period from 25 September through 25 October 2010. 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* on 24 September 2010 in accordance with the Army NEPA Regulation (32 CFR Part 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/EMD/program/legal/index.htm](https://www.benning.army.mil/EMD/program/legal/index.htm). The NOA of the Final EA and draft FNSI were mailed to all agencies/individuals/organizations on the Fort Benning NEPA distribution (mailing) list for the Proposed Action, as identified in **Section 7** of the Final EA. As part of our 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.

This 30-day public comment period has concluded. Fort Benning received five (5) comments during this public comment period; these comments are summarized below. No substantive comments or issues were raised during the public comment period that affect the Final EA's analysis or my decision.

1. The ***Department of the Army, Savannah District, Corps of Engineers (USACE)*** responded in writing on 18 October 2010. The USACE informed Fort Benning that "if any of the proposed infrastructure crosses any water of the US, a Section 404 permit would be required." This issue and permitting process were properly identified in **Section 5.4.4** of the Final EA. The Proposed Action will comply with Section 404 of the Federal Clean Water Act, including obtaining any associated, required permits prior to installation.
2. The ***State of Alabama, Alabama Historical Commission*** (i.e., State Historic Preservation Officer, or SHPO) responded in writing on 29 September 2010. The SHPO questioned if any portion of the Proposed Action would occur in Alabama. No portion of the Proposed Action would occur in Alabama.
3. The ***Unified Government of Cusseta-Chattahoochee County (County)*** responded via e-mail on 22 September 2010. The County requested a copy of the Final EA. Fort Benning provided the County with a copy of the Final EA via the Fort Benning website, referenced above.




3. The **Unified Government of Cusseta-Chattahoochee County (County)** responded via e-mail on 22 September 2010. The County requested a copy of the Final EA. Fort Benning provided the County with a copy of the Final EA via the Fort Benning website, referenced above.
4. The **Chattahoochee County Board of Tax Assessors (Board)** responded via e-mail on 22 September 2010. The Board questioned if the proposed communications towers would serve a commercial purpose. If the proposed communications towers served a commercial purpose, the towers would be subject to state personal property consideration. As identified in the Final EA, the proposed communications towers would serve exclusively a military purpose, and would not serve a commercial purpose. Therefore, the proposed towers are not subject to state personal property consideration. The Board also questioned Fort Benning's methods of publicly circulating the Final EA and Draft FNSI. Fort Benning complied with all requirements to publish the Final EA and Draft FNSI, and made all reasonable, good faith efforts to provide these documents to the potentially affected public. Finally, the Board requested mapping showing the locations of the proposed communications towers. Fort Benning provided the Board with a copy of the Final EA, including mapping, via the Fort Benning website, referenced above.
5. The **Georgia Office of Budget and Planning, State Clearinghouse (State)** provided a Memorandum, Executive Order 12372 Review Process, on 24 September 2010 (State ID# GA100924002). This Memorandum indicated the State's intent to provide comments on or before 22 October 2010. On 22 October 2010, the State provided written comments. These comments included:
  - No comments were provided by the Georgia Department of Natural Resources - Wildlife Resources Division or Soil & Water Conservation Commission. The State assumed that neither agency has issues with the Proposed Action.
  - 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 impact, 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.

#### 4. Finding of No Significant Impact

After careful review of the Final EA and all comments received, I have concluded that implementation of either Action Alternative would not generate significant controversy or have a significant adverse impact on the quality of the human or natural environment. I have reviewed and approved the Final EA and I commit to implement the mitigation measures specified in the Final EA, without exception. The Final EA's analysis fulfills the requirements of the NEPA and the CEQ Regulations. An Environmental Impact Statement will not be prepared.

22 NOV 10  
Date

  
**THOMAS D. MACDONALD**  
Colonel, Infantry  
Garrison Commander  
Fort Benning, Georgia