

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 the construction of 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 the Army NEPA Regulation at 32 CFR Part 651 (*Environmental Analysis of Army Actions*). The Final EA includes analysis and findings related to the potential impacts of construction and operations of the proposed lodging facility, including proponent-required mitigation measures to reduce any potential environmental impacts to less than significant.

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 purpose of the Proposed Action is to provide adequate and 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 have deficiencies which would require major renovations to maintain their suitability as use for lodging. The continued use of existing lodging facilities would require the Garrison to invest significant funds to renovate these buildings. Through conditions analysis and feasibility studies, it has been determined that these two facilities are not capable of being economically renovated to meet Army lodging standards.

As a result of Base Realignment and Closure actions, these two current lodging facilities are to be utilized in the future for classrooms and administrative support use. The reuse of these buildings for non-lodging purposes would severely reduce Army lodging capacity and would require Soldiers and their Families to seek lodging off-post. If off-post 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 when they are moved off-post into areas that lack military support services and amenities. The Proposed Action would replace the capacity lost by converting these facilities to more feasible reuse, and provide on-post lodging facilities that meet the current lodging standards.

3.0 DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action includes construction of a new lodging facility at Fort Benning. The new facility would be comprised of at least 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 permissible building height for the Proposed

Action is five occupied (resided in) stories, which includes 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, 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 Action Alternatives are reasonable. Satisfaction of these screening criteria would provide a location and building design suited to meet the purpose of and need for the proposed lodging facility, while potentially minimizing adverse environmental and operational effects. For purposes of analysis, an alternative was considered reasonable only if it enabled Fort Benning to accomplish the primary mission of providing an adequate, on-post lodging facility for Soldiers and their Families. Project components for all of the Action Alternatives would consist of constructing a lodging facility of a maximum of five stories, and with a capacity of 860 rooms. Alternatives for the proposed Army lodge were developed as part of the planning process and include:

- **Alternative A (No Action Alternative):** Under this Alternative, the proposed Army lodging facility would not be constructed
- **Alternative B (Preferred Alternative):** The proposed location for this Alternative is in the Main Post Cantonment Area, north of Canby Park, on the site of the old Faith School.
- **Alternative C:** The proposed location for this Alternative is in the Main Post Cantonment Area, south of the headquarters for the Maneuver Center of Excellence on the site of Stewart Field.

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 serves as a benchmark against which the Action Alternatives were evaluated. The No Action Alternative reflects the baseline environmental and socioeconomic conditions on Fort Benning as analyzed in the Maneuver Center of Excellence Environmental Impact Statement, (MCoE EIS, 2009).

5.0 ANTICIPATED ENVIRONMENTAL EFFECTS

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

For the Preferred Alternative, the environmental analysis of the Proposed Action found that 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 construction of a five-story Army lodging facility at the site of the Preferred Alternative would minimize significant adverse effects to the MPHD. Through Army

internal interdisciplinary review of building design and consultation with the Georgia State Historic Preservation Office (SHPO), some mitigation measures were proposed for implementation to further reduce the impacts on the MPHD.

The following proponent-required mitigation measures to reduce adverse impacts on cultural resources to less than significant at the site of the Preferred Alternative 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 such that it will reduce 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.

Additional minimization measures have been identified in the EA to reduce potential adverse impacts to all the other VECs discussed and analyzed in the EA. The EA analyses also demonstrate 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. Implementation of these measures will further reduce potential impacts to these environmental resources or avoid the impacts altogether.

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* and Fort Benning's *The Bayonet* in accordance with the Army NEPA Regulation (32 CFR Part 651.36). 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 for the Final EA and draft FNSI have been mailed to all agencies/individuals/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 has provided each Tribe with a copy of these documents for consultation via review and comment.

Written public comments should be addressed to:

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7.0 CONCLUSION

After evaluation of potential impacts, it is concluded that the all of the Proposed Action Alternatives would meet the purpose and need for an Army lodging facility at Fort Benning. Implementing either of the Proposed Action Alternatives would have *negligible*, *minor*, and *moderate adverse* impacts to the VECs analyzed in the EA. No significant impact is expected to any VECs as a result of implementing any of the Alternatives presented in the EA. However, if Alternative B is selected, then proponent-required mitigation measures to reduce adverse impacts on cultural resources must be implemented to avoid significant adverse effects, (as discussed in Section 5.0 of this Draft FNSI). The No Action Alternative would not meet the purpose and need for providing an adequate lodging facility for Soldiers and Their Families.

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:

Date

JEFFREY FLETCHER
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Garrison Commander