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**FINAL  
ENVIRONMENTAL IMPACT STATEMENT**

**BRAC 2005 AND TRANSFORMATION ACTIONS AT  
FORT BENNING, GA**

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**October 2007**

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*Prepared for*  
**Garrison, U.S. Army Infantry Center**  
Fort Benning, GA

*Prepared by*  
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**VOLUME II: Comments and Responses**







**VOLUME II**  
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# COMMENTS AND RESPONSES

## Introduction

This volume contains comments received from federal, state, and local agencies, organizations, and the general public at the public meeting on May 10, 2007 for the BRAC 2005 and Transformation Actions at Fort Benning, GA Draft Environmental Impact Statement (EIS) and during the entire Draft EIS comment period which began on April 20, 2007 and closed on June 4, 2007. In accordance with the National Environmental Policy Act (NEPA), public and agency comments were reviewed and substantive comments incorporated into this final EIS.

## Comment Response Process

Comments on the Draft EIS were generated through written correspondence and oral testimony during the public comment period. The following process was used for reviewing and responding to these comments:

- All comment letters and oral testimony were reviewed carefully and assigned a unique number. This number was also assigned to the commenter.
- Within each comment letter or testimony, substantive comments were identified and bracketed. These bracketed comments were then reviewed by a resource specialist and provided a response. Three guidelines were used for determining substantive comments.
  1. The comment questioned the proposed action, alternatives, or other components of the proposal.
  2. The methodology of the analysis or results was questioned.
  3. The use, adequacy, and/or accuracy of data were questioned.
- The individual bracketed comments were assigned a response code corresponding to a specific resource and arranged by commentator. The responses to comments appear in the Response section of this volume. Due to the similarity of many comments, some comments were assigned the same response.

An alphabetical directory of commenter's names, with their associated comment number, and page number where the commentator's letter and/or testimony begins is also provided in this volume.

## Locating Your Comment

The directory provides an alphabetical listing of commenter's by last name. After locating your name, note the number in the first column. This number was assigned to your comment letter and is stamped on the upper right-hand corner of the letter or wherever space was provided.

The comments are printed in numerical order and are organized into two sections—from the public and from the government and/or agency. Public comment letters begin with 0001 and government/agency comments begin with 8000 (Table 1).



**Table 1: Comment Location**

<b>Comment Number</b>	<b>Last Name</b>	<b>Page Number</b>
0001	Garrard	C-1
0002	Dasher	C-2
0003	Queen	C-3
0004	Lyde	C-4
0005	Ditchfield	C-5
0006	Prevatt	C-8
0007	Speaker 1	C-10
0008	Speaker 2	C-12
0009	McCuean	C-18
0010	Garrard	C-26
0011	Glitzenstein	C-30
0012	Garrard	C-33
0013	Hamlett	C-38
0014	Woodward	C-39
0015	Freeman	C-40
8001	Neubauer	C-41
8002	Jackson	C-42
8003	Holcomb	C-43
8004	Hogue	C-52
8005	Mueller	C-54
8006	Brown	C-64

### **Locating Responses to Comments**

All comments were given a response code; the resource categories and the associated response code are listed below. All comments not requiring additional responses were given a “Thank You” (TY) response. Responses are found in the Response section of this volume (Table 2).



**Table 2: Resource Response Codes**

<b>Resource</b>	<b>Response Code</b>
Army	A
Air Quality	AQ
Biology	B
Cultural	C
DOPAA	D
General	G
Hazardous Waste/Toxic Materials	HZ
Noise	N
Land Use	L
Public Involvement	PI
Socioeconomics	S
Safety	SF
Soils	SL
Transportation	T
Thank You	TY
Utilities	U
Water	W







## **COMMENTS**







-----Original Message-----

From: Robert [mailto:garr4665@bellsouth.net]  
 Sent: Friday, April 20, 2007 9:40 AM  
 To: Biff Hadden; Wes Driver; G Jones  
 Cc: Brown, John W CTR USA  
 Subject: DEIS socio econ info

Looked briefly over the socio economic section of DEIS.  
 Gross inaccuracies in income and employment data.  
 eg permanent party income averagae ~ \$24,378 average cost of home over  
 25% of national median of \$222,000 available housing is 11,000 units,  
 this is vacant only a workforce accounts for 34% of ROI employment- more  
 like 1/4 and total ROI employment is about 160,000.  
 30,000 housing units on ft b

S-001

many of these bad numbers can be countered with figures readily  
 available on the internet and summarized in 1 page am especially  
 disappointed in some of the local interview sources and interpretation

S-002

at first glance, the credible numbers seem to come from Education sector  
 and city planning

I plan to rebut these data.  
 I have more than one client that may be having due diligence on  
 financing conducted as I write this, these sloppy numbers would likely  
 cross their desks and receive disproportionate credibility, as the DEIS  
 is the "big kid" study on the block currently and will be used as  
 reference by lots of people

Do either of you have recent median sales price for Cols multilist  
 housing?

S-003

would suggest that the BRAC committee present the correct picture and I  
 have 90% of the figures already

look for your feedback.  
 be back in town late Monday and be at majority of small business week  
 activities.

tnx  
 Bob



P U B L I C   H E A R I N G

Statements from the public regarding the BRAC  
2005 and Transformation Actions at Fort Benning,  
Georgia, Environmental Impact Statement Public  
Meeting, reported by Thomas A. Savage, RPR, and  
held 10 May 2007, in Columbus, Georgia.

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Columbus, Georgia 31902  
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1                                      SPEAKER NUMBER 1                                      **000002**

2                                      Jesse Dasher

3

4                                      MR. DASHER: I just would like to see  
5                                      some small environmental contractors coming out

A-001

Page 1



Public Hearing Transcript.txt  
6 instead of giving it all to the big  
7 environmental companies. I've been here since  
8 1990, and the Government keeps promising small  
9 business. And since 1990, it has gone bigger  
10 and bigger and bigger. And the small  
11 businessman has been cut out more and more and  
12 more. That's since 1990.

13 We used to get small jobs, but we  
14 don't get anything now. It's all big companies.  
15 I was able to bid on more contracts in 1992 than  
16 I am now.

17  
18 SPEAKER NUMBER 2  
19 Tom Queen 000003  
20

21 MR. QUEEN: Actually, I don't know if  
22 I'm speaking for the DOT or on my own. We're  
23 welcoming the growth that Fort Benning's about  
24 to have, but serious thought needs to be made to  
25 transportation issues both inside and outside of

2

1 Fort Benning.

2 A possible solution to some of the  
3 gridlock that may be expected in parts of  
4 Columbus could be alleviated if we would look at  
5 reopening Moye Road between Buena Vista Road and  
6 Cusseta or Custer Road. And even if a guardrail  
7 was put up on the rights of way so as to keep  
8 motorists on the road itself and off of Fort

T-001

T-002



Public Hearing Transcript.txt  
9 Benning, that would serve access to the eastern T-002  
10 area of Columbus. It would also help Fort  
11 Benning and their access out of Fort Benning and  
12 to places north and east of Columbus.

13 I hope that the Fort Benning decision  
14 makers as well as the Columbus area  
15 transportation and political decision makers  
16 will get together to work out a solution that  
17 will be a win-win for each party.

18  
19 SPEAKER NUMBER 3  
20 William Lyde 000004  
21

22 MR. LYDE: I'm concerned about the  
23 frequency of noise at the range on the back side  
24 of Moye Road.

25 Right now, I'm the president of the

3

1 homeowner's association out there. Frequency of  
2 the noise right now is bearable. You can bear  
3 it now. But I know when the Army schools get  
4 here, the noise is going to increase.

5 And, so, we're saying has anybody  
6 considered the amount of frequency and how much N-001  
7 it's going to effect the 120 families that live  
8 off of Moye Road and Moye Estates. Because  
9 looking at the blue line on the chart up here,  
10 it shows where -- actually, the red line, also,  
11 shows where the noise, the frequency of it will

Page 3



12 increase, but the noise level will probably stay  
13 the same.

14 So I just have my concerns about that  
15 and see if anybody has looked at that.

16

17 SPEAKER NUMBER 4

18 Owen Ditchfield **000005**

19

20 MR. DITCHFIELD: What I would like to  
21 do is flip through my marked pages here and  
22 indicate what I found.

23 We are looking at Volume 1, page 4-46,  
24 bottom of the page, last paragraph. It says,  
25 "Fort Benning has two schools on the

4

1 installation, a primary school and a high  
2 school."

3 In fact, it has six elementary schools  
4 and one middle school and no high school. I  
5 don't know who wrote that.

6 And it says both schools are at full  
7 capacity, we're probably at less than 50 percent  
8 capacity right now. Exact figures can be gotten  
9 from the superintendent's office.

S-004

10 On Page 4-47, under the subheading,  
11 "Shops and Services," it says, "AAFES operates a  
12 post exchange with a movie theater and a variety  
13 of stores." The movie theater is not part of  
14 the post exchange system, and it is physically

S-005



Public Hearing Transcript.txt  
15 located in the post exchange.

16 On Page 4-48, under "Public Services"  
17 subhead, the second paragraph says, "The  
18 Muscogee County Sheriff's Department provides  
19 law enforcement services in the immediate Fort  
20 Benning area." The primary provider of law  
21 services is the Columbus Police Department with  
22 the sheriff doing some patrolling and serving  
23 court notices. But the primary law enforcement  
24 is the Columbus police.

S-006

25 And when they say, "immediate area of

5

S-007

1 Fort Benning," I guess they mean off post.  
2 Obviously, the provost marshal would be on post.

3 It also says, "assisted by the  
4 Columbus city police department and the Bibb  
5 City police department." Bibb City has not been  
6 an independent entity for years. They don't  
7 have a police department. They are part of  
8 Columbus. My daughter has a house there.  
9 That's how I know.

S-008

10 On Page 4-49, Table 4.4-5, race  
11 ethnicity, and poverty status, they have these  
12 percentages and they add up to way over a  
13 hundred percent. Now, some, like two or more  
14 races, I realize that can be counted more than  
15 one place, but they need to look at those  
16 numbers because they just don't make sense -- to  
17 me they don't, as a layman reading this the

S-009



18 first time.  
19 On Page 4-56, under Paragraph 4.5.1.1,  
20 description of on- and off-post roadways, the  
21 bottom of the first paragraph says, "South  
22 Lumpkin Road and Victory Drive" -- let's see.  
23 wait a minute.  
24 Okay. It says -- what it says is  
25 correct about the four main access roads.

6

1 That's correct. But it says, "The main gate to  
2 Fort Benning is located at the intersection of  
3 Benning Boulevard and South Lumpkin Road,  
4 approximately two miles within the installation  
5 boundary." In fact, Benning Boulevard and South  
6 Lumpkin Road do not intersect. You have to turn  
7 onto Custer Road to get to the intersection with  
8 Benning Boulevard off of South Lumpkin Road.

T-003

9 And there are actually two access  
10 points there. The one they are referring to  
11 probably should say Benning Boulevard just  
12 before you reach Custer Road, which is where the  
13 cemetery is.

14 On Page 4-61, under the heading, "Air  
15 Transportation," it says -- this is funny. You  
16 can quote me as saying this is funny: "There  
17 are four commercial airlines operating out of  
18 Columbus Metropolitan Airport." we're trying to  
19 keep one. Somebody's looking at some very old  
20 data. I didn't think I was going to read this

T-004



21 much of it. The more I found, the more I wanted  
22 to read.

23 Okay. Here's another great one. On  
24 Page 6-12, there is a table saying, "Media  
25 Points of Contact." It lists everything except

7

G-001

1 the Ledger-Enquirer.

2 That's Volume 1. I think there was  
3 only one thing in Volume 2. I didn't read every  
4 word but I skimmed through it.

5 In Volume 2, on Appendix D, Table D-1,  
6 it talks about traffic flow and the place from  
7 which the traffic is flowing in or out. And it  
8 lists lots of things. The one thing it should  
9 list but doesn't is the Fort Benning schools.  
10 You have teachers and some parents who live off  
11 post and are waiting to move on post bringing  
12 their students to school and we have school  
13 buses.

T-005

14 That's major traffic, I can tell you,  
15 because on days we don't have school, I drive  
16 and we don't have much traffic.

17 I think that's it. I'm sure I can  
18 find more.

19

20 SPEAKER NUMBER 5

21 Victor Prevatt

000006

22

23 MR. PREVATT: My comments are about



24 this new range they are going to build here,  
25 this DMPTR range, which I was -- it's awful

8

1 close to my house, which is right across the  
2 creek, which I'm sitting right there on the  
3 hill, right next to the creek.

N-002

4 And if they shoot those Abrams tanks  
5 there, it's going to make a heck of a noise.  
6 Because I feel like they've already been out  
7 there and tested some of it, myself, when I was  
8 home.

9 And, you know, the sound people over  
10 here, they've got decibel guidelines to go by,  
11 and I feel like that would be way outside of  
12 what they are telling me that they've got, you  
13 know, to go by.

N-003

14 So I'm just wanting to comment on that  
15 and see if we could possibly, at least, have  
16 them check the decibels to see how bad it really  
17 is. I mean, that's quite a few people who live  
18 right here along this creek. I mean, I'm  
19 talking about right along the creek right here,  
20 along with myself.

A-004

21 of course, there's a lot of people  
22 that live, you know, right on up there, I'm  
23 talking about within a mile or so right there.  
24 But I'm living within a couple of hundred yards  
25 of the base line there and so are these folks.

9



Public Hearing Transcript.txt

1 And this range is just within a very short  
2 distance of the line right there.

3 This Hastings Range over here, the one  
4 they are talking about closing down, it's a  
5 pretty good bit further off, and they just shoot  
6 those Bradleys right there, I was just wondering  
7 if they considered just keep shooting those  
8 Bradleys out there and forget about those Abrams  
9 and those big cannons right next to the base  
10 there, within a few hundred yards of the base.

D-001

N-004

11 And that's about my comments, if  
12 you'll take that into consideration.

13

14 SPEAKER NUMBER 6

000007

15 Anonymous Speaker 1

16

17 SPEAKER: We done this last year at  
18 Columbus State. It's the same setup, same  
19 forum. We have not had a public forum for the  
20 people that lives out there yet.

PI-001

21 This is a bunch of eyewashes. They  
22 have ranges out there that's all ready that they  
23 can use, impact areas that's not already  
24 equipped for all the ranges. The people that  
25 have looked at this don't know what they're

D-002

10

1 doing.

Page 9



Public Hearing Transcript.txt

2           They got different degrees and  
3   everything else. They giving the woodpeckers  
4   more prestige than they giving the citizens out  
5   there.

6           On the already existing range, we have  
7   anywhere from five to six ranges closed down  
8   because of the woodpeckers. Now they want to  
9   put more ranges right across the street, within  
10   a hundred feet from person -- from people  
11   property.

D-003

12           Where it was in 1954, where it was  
13   only a couple hundred people living out there  
14   along the Chatsworth Road, now it's a few  
15   thousand people living out there.

16           They hadn't put any thought in  
17   environmental impact. The ranges that they are  
18   planning on putting out there is already  
19   existing property in the Malone complex that can  
20   already be put there. In the Malone complex,  
21   it's enough room for them there. There in alpha  
22   20 impact area, along Dixie Road, Jamestown  
23   Road, there's enough ranges to put ranges into  
24   there that they hadn't even considered.

D-004

D-005

25           You got contractors out there that's

11

1   steadily burning up land to be able to bid with  
2   the Government to be able to establish a  
3   position to test their weapons to sell it to the  
4   Government that's holding land. The

Page 10



Public Hearing Transcript.txt

5 utilization -- on land utilization reports  
6 hadn't been used. Most of the hot ranges that's  
7 out there, they don't even use them for hot  
8 ranges, they use them for cold ranges.

A-005

9 we need to have a serious public forum  
10 instead of this eyewash that's going on.

11

12 SPEAKER NUMBER 7

13 Anonymous Speaker 2

000008

14

15 SPEAKER: My family moved out there in  
16 1957. And we live in the corner, right where  
17 Hastings Range is. We're the closest properties  
18 to Hastings Range.

19 So in the 1970s, early Seventies, my  
20 family, my sisters and I and our children, were  
21 out in our garden. It was very close to the  
22 border where the maneuvers take place. And we  
23 were picking our vegetables.

24 And there was a big maneuver, big  
25 thing going on. The commander or whoever of

12

1 Fort Benning was demonstrating something,  
2 probably at Hastings Range at that time.  
3 Helicopters were flying over.

4 The kids all got out waving. They  
5 kept coming over. Then they started coming  
6 over, swooping down, to try to get us to go back  
7 home, which wasn't that far from our garden.

Page 11



Public Hearing Transcript.txt

8 And so we didn't. The kids just had a ball  
9 waving at the soldiers in the helicopters.  
10 So we heard them pack everything up  
11 and move. And this one helicopter came over,  
12 you could tell it had some kind of officers in  
13 there, and waved at us. And then they left.  
14 It wasn't but a few months later, we  
15 get in the newspaper that they are wanting to --  
16 this commander has proposed to take over the  
17 properties in Marion County from that place to  
18 the power lines, to 41, and down almost to Buena  
19 Vista. So that went before Congress. I have my  
20 paperwork -- at least I had my paperwork. It  
21 still should be in that same place.  
22 So Congress adjourned without making  
23 any decision on it. What was decided was that  
24 they would take a 10-year study of environmental  
25 impact because that was about the time that law

13

1 was passed that anything had to go through an  
2 environmental impact study.  
3 So we wait 10 years, then we get  
4 another notice. And they are proposing again to  
5 take part of that, but they shortened it because  
6 of safety reasons, because people being there.  
7 It was very sparsely populated at that time.  
8 It's really grown up in the last five years.  
9 And so then there was another 10  
10 years. They had to do another study because of  
Page 12



Public Hearing Transcript.txt

11 the people that had moved in and everything. So  
12 it's been like a 10-year thing ever since.

13 Then Hastings Range was put over there  
14 very close to where I live, about half a mile  
15 from where we are. You know, it's not that far.  
16 So then people complained about the noise,  
17 foundations cracking, windows rattling, pictures  
18 falling off the wall. You know, trying to make  
19 a case to get them to move. Well, we're talking  
20 about the Government moving. We're not talking  
21 about a handful of people moving. To me, it  
22 just didn't make sense. You know, that's not  
23 going to happen.

24 So there was a study done about some  
25 of the people that live there had already been

14

1 vacated from the portion of Fort Benning that  
2 the Hastings Range is on, back in the Fifties,  
3 and some of these older people were very old,  
4 too old to try and pick up a second time and  
5 moving. So it was decided to wait for their  
6 demise. That has already happened now.

7 So then we start getting that Fort  
8 Benning is going to not buy the properties but  
9 they are going to make all these improvements,  
10 and they are going to put another range out  
11 here. In fact, they are going to put the bigger  
12 ranges out there for maneuvering. And one of  
13 the meetings I went to was that Hastings Range

A-006

Page 13



Public Hearing Transcript.txt

14 would be the smallest range. And then they were  
15 going to put another one over there for the  
16 bigger ranges and everything.

17 In the 1960s, when the Vietnam war was  
18 going on, the Army had asked the landowners out  
19 there if they could do maneuvers on their  
20 properties to give them training of working  
21 around civilians. My father agreed to that on  
22 our property. He had 200 acres. And they came  
23 in.

24 And it was not unusual for us to get  
25 off the school bus and see tanks in our yard, in

15

1 our fields, and have them spend the night out  
2 there in our fields. It was not unusual for us  
3 to see that. Kids thought it was a hoot, you  
4 know.

5 But you know, eventually, that part of  
6 it went away. I know that we had a house on the  
7 other end of the property. Now, part of the  
8 agreement was that they would do bivouac, which  
9 was clean up the area, clean up the area. This  
10 particular house had no inside walls in it, but  
11 it was a block house with a roof on it and doors  
12 and windows. This is where we stored our cotton  
13 when we picked our cotton and put it in. And  
14 there was an open well.

15 when they left, we had no house and  
16 the well was full of blocks. So when I got

Page 14



Public Hearing Transcript.txt

17 married and put my house there, we had to get  
18 the well cleaned. My father didn't put in a  
19 complaint to the Army about that. He just  
20 couldn't do that.

21 So, you know, everybody tells me that  
22 this is not going to be where we're going to  
23 have to move. Eventually, we're going to have  
24 to move. The noise pollution, the noise  
25 whenever they shoot those big guns, you can hear

16

N-005

1 the repercussions coming through the trees. You  
2 can feel the shakes. When they would bring the  
3 planes over to drop, sometimes they would be  
4 glowing enough you could see inside them. Many  
5 times we have seen that.

6 We are very accustomed to seeing the  
7 helicopters, the fireworks. We don't come to  
8 special occasions for fireworks, we sit on the  
9 porch and watch them.

10 We are close enough that we know when  
11 there's going to be deployments before it ever  
12 gets in the news because of the increased  
13 training that's in the area. So we're very  
14 close.

15 So the reason I'm here is just to find  
16 out how far along they've gotten with this and  
17 see how much more time we've got before we start  
18 looking for another place to live. We're not  
19 planning on moving, we're not intending to move,

A-007

Page 15



Public Hearing Transcript.txt

20 but eventually, it will happen. People tell me,

21 no, they can't do that. They won't do that.

22 But eventually they will.

A-007

23 That's basically it.

24

25

17





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#### VIA ELECTRONIC MAIL

June 4, 2007

Mr. John Brent  
Fort Benning Directorate of Public Works  
Environmental Management Division  
Bldg. #6 (Meloy Hall), Room 310  
Fort Benning, GA 31905

Dear Mr. John Brent:

The Georgia Chapter of The Nature Conservancy is pleased to offer public comment on the Draft Environmental Impact Statement for Fort Benning's BRAC and Transformation Actions. Our chapter has a long working relationship with Army installations in Georgia and with Fort Benning in particular, and has the unique perspective of both a working partner and a concerned conservation advocate as we consider the proposed actions.

As has been previously stated publicly by our staff working at Fort Benning, we are impressed and gratified by the enormous attention to detail and the many efforts to minimize harmful impacts undertaken by our Army partners and their associates throughout this process. The Army remains perhaps the best and broadest steward of biological diversity and functional ecology in Georgia. It achieves this distinction not only by skilled application of ecological management practices inside Army installations, but also by providing support to organizations like ours to promote conservation incentives on private lands outside of Fort Benning.

At the same time, we are concerned about the inevitable harmful impacts that will occur as the proposed BRAC/Transformation actions proceed. Our comments can be divided into three main areas of concern: (1) **rapid growth and development** of the greater Fort Benning / Columbus metro area, with unfortunate impacts on air, water, traffic, infrastructure, and quality of life; (2) adverse impacts on the recovery and viability of two **federally-listed endangered species**, the red-cockaded woodpecker and the relict trillium; (3) adverse impacts on **imperiled species and habitats** that receive no federal protection and hence may not have been as carefully assessed as those for which the U.S Fish and Wildlife Service has jurisdiction. In each case, we feel that the impacts could be minimized by taking certain reasonable and prudent measures which we briefly describe along with a more detailed description of each concern.

#### Rapid Growth and Development

*Concerns.* The likely ripple effect of Fort Benning's expanded mission throughout the economy of the greater Columbus area has been well-described and publicized throughout the community. There is little doubt that impacts will include sharply higher population growth, increased traffic congestion, increased demands on services



and infrastructure, increased water use, more rapid conversion of greenspace and rural land to urban land-use and impervious surface, and more development and population pressure along Fort Benning's boundaries. The DEIS language downplays these impacts as being consistent *in character* with existing plans, projections, and expectations of socioeconomic and land-use changes. However the impacts are not at all consistent *in rate of change*, which threatens to exceed the ability of this community to plan well for the scope of these changes, to accommodate them materially, and to fund the necessary planning and implementation. We're concerned that the number and scale of construction projects planned for cantonment areas alone in 2007-08 may have serious impacts on traffic, sedimentation, and monitoring capacity. But The Nature Conservancy is most concerned about the longer-term threat of unplanned, poorly-planned, or hastily-planned growth and development throughout the region. This threat (whether related to BRAC/Transformation or not) ranks highest among all potential threats to our conservation objectives in the Chattahoochee Fall Line area and across the Southeast. Especially vulnerable are already-strained watersheds, including flows and supplies of clean water for both human consumption and aquatic biodiversity. Inefficiencies resulting from over-rapid growth and development have significant impacts as well. Fort Benning itself is facing serious "incompatible encroachment" issues on its northern and western boundaries as communities rush to build infrastructure, raising the likelihood of noise and smoke complaints.

L-001

Some of the mechanisms to minimize the negative impacts of rapid/excessive growth and development have been in place since 2004-05 as the BRAC announcement emerged. These include approved funding for a Joint Land Use Study (JLUS), a well-publicized Sustainability Initiative, and a proposal for an Army Compatible Use Buffer (ACUB) program. We are pleased that the ACUB program has rapidly developed into an operational and well-funded initiative that promises to deflect growth from some critical areas along Fort Benning's west and east boundaries, and protect some important habitat areas. But ACUB is perhaps not as well-integrated as it should be with other planning and development interests inside and outside of Fort Benning. The JLUS seems to have been in a holding pattern for 2-3 years but has recently shown signs of progress. The Sustainability Initiative showed tremendous promise in 2004-05 as a way to involve the community intimately in a shared future for greater Columbus and Fort Benning. The spotlight was on a "triple bottom line" of mission, environment, and community. The work culminated two years ago with a well-attended workshop at the Columbus Convention and Trade Center, right on the eve of the first BRAC announcement. Since then, we've seen little progress on this initiative.

*Recommended measures:* The Sustainability Initiative should be revitalized and re-publicized in the context of making the impacts of BRAC/Transformation actions a shared responsibility of all stakeholders in the community. JLUS and ACUB should be on the agenda of all parties involved in regional planning, economic development, water management, and conservation. Sustainability, JLUS, and ACUB objectives should "roll off the tongue" of both local politicians and planners. All these initiatives should be considered as a means for communication, and where possible, funding, to help the greater Columbus community respond to the looming changes ahead.

A-008



### Federally-listed Endangered Species

#### Red-Cockaded Woodpecker

*Concerns.* Probably no potential impact of the proposed BRAC/Transformation action has been scrutinized more intently than its effect on the recovery of the endangered red-cockaded woodpecker (RCW). The biological assessment concludes, after many analyses and assumptions, that under the preferred alternative, 32 out of 308 managed RCW clusters on the installation will be *taken*. The assessment further concludes that the proposed actions are “likely to adversely impact” the recovery of the species. A potential 10% drop in the recovery population, and a likely adverse impact on the recovery of the species, are obviously causes for significant concern. Balancing this concern are the observations that (1) many of the “taken clusters” will remain on the landscape with habitat attributes below accepted minimum thresholds but may actually survive (as some existing “marginal” clusters are surviving today), (2) enough *potential* habitat exists on Fort Benning, that with proper management and after all actions addressed by this DEIS are completed, the recovery target of 428 active clusters can still be reached several decades hence, and (3) even if all “taken” clusters succumb, the remaining population should be viable enough to repopulate new habitat.

Most would agree that the science and management issues surrounding many of these observations are very uncertain. The actual “take” may be far lower, or far higher, than 32 clusters. The thresholds of habitat quality, both quantity and character of habitat required, were fluid throughout the assessment process and experts can justify many divergent assumptions. Potential habitat created by forest management practices (and the passage of time) may or may not be functional decades hence. The residual population following these actions (and/or the residual or newly created habitat) may or may not remain viable in a transitional forest, with unprecedented training intensity, increasing challenges to prescribed burning, and changing climate. Additional actions necessary to maintain the readiness of U.S. Armed Forces may be required beyond the timeframe of this DEIS, further eroding the likelihood of recovery. **These uncertainties add up to the Conservancy’s primary concern with RCW impacts, that the proposed actions leave very little margin for error in the conservation and recovery of this population.**

B-001

We commend the flexibility demonstrated by the training planners in considering the shift of a heavy maneuver corridor from an area densely populated with RCWs (part of Alternative A) to an area of marginal or minimally-restored habitat and no RCWs (Alternative B) despite considerable extra cost, survey needs, and other practical issues that might have argued against this shift. The Conservancy agrees that of the two locations, Alternative B represents the least damaging to RCW today. Unfortunately it introduces another concern not addressed in the DEIS, that this new maneuver corridor (“Good Hope”) might effectively isolate Fort Benning’s RCW population from future off-post habitat to the south.

B-002

*Recommended Measures for RCW:* The Conservancy is satisfied that most of the range/corridor/berm layout and placement measures to minimize the impact of the proposed actions have probably been considered and exhausted, and that the



monitoring necessary to assure the validity of viability and restoration assumptions will be undertaken as well as can be expected.

One area where the need for these measures may not be fully realized is the aforementioned Good Hope Maneuver Corridor, around or through which RCWs may someday have an opportunity to expand into new territory. If at all practical, longleaf pine reforestation, prescribed burning, and habitat monitoring should be continued in strategic parts of this corridor to facilitate such future expansion, which may be vital to accommodating future training needs elsewhere. Additional planning and mapping of the vehicle maneuver network through this area should be undertaken with habitat connectivity in mind.

A-009

In addition, for all the maneuver corridors that impact RCW habitat, we recommend some sort of marking or control mechanism that confines vehicle impacts within the boundaries illustrated on the maps. We note also that while habitat impacts associated with lighter combat vehicles (e.g. Bradleys) can be significant, they were not mapped in the illustrations of impacted RCW habitat (e.g. western arm of the Southern Maneuver Corridor). We encourage such lighter-maneuver areas be included in monitoring programs.

A-010

An additional type of measure we strongly recommend, in light of the “margin of error” problem we emphasize above, is to secure additional land or interests in land to facilitate the geographic expansion of the RCW population, whether to the south, west, or east. Each of these directions offers at least long-term potential if lands can be managed appropriately. Even non-contiguous habitat parcels of appropriate size, with appropriate management, can promote regional health and viability of the RCW species and minimize the adverse impact resulting from these actions. The aforementioned ACUB program is one mechanism to achieve such a population expansion. Additional ACUB funding, and/or new emphasis to build or support off-post RCW refugia as ACUB projects, would be reasonable and prudent measures. Alternatively, the Army may wish to explore and fund strategies outside of ACUB to promote regional RCW conservation (e.g. inject on-the-ground conservation funding into SERPPAS, or secure additional training lands to decrease the pressure placed on current RCWs “in the way.”) Regardless of the specific approach, we strongly advocate tangible measures that increase both habitat extent and population numbers beyond the residual Fort Benning core, thereby reducing the likelihood that the core is whittled down too close to the bone.

A-008

#### Relict Trillium

*Concerns.* The other endangered species on Fort Benning which is likely to be adversely affected is relict trillium, a rare plant for which Fort Benning’s occurrences have been deemed “vital to recovery” by the U.S. Fish and Wildlife Service. Numerous individuals will be damaged or destroyed by construction of a road and firing ranges in the Randall Creek drainage. The DEIS proposes these individuals be translocated to recipient sites on or off Fort Benning. The Conservancy’s concern here is not only the irreversible loss of a very specialized habitat and the risk to the genetic diversity of a fragile species, but also the rather low likelihood that a translocation program on this scale could actually be successfully implemented to retain the full suite

B-003



of genetic diversity represented by the affected plants, and the full suite of species and functions represented by the plant community and the broader ecosystem it occupies.

B-003

*Recommended measures for relict trillium:* Though small and discrete (compared to extensive forest habitats occupied by RCWs), the habitat patches occupied by relict trillium represent an extremely narrow set of conditions, from soil moisture and fertility, to the structure and leaf-out timing of the forest canopy. The marginal cost to conservation of destroying any acre of this habitat (and often it may be *only* an acre where the conditions exist) may be far greater than that associated with many other more extensive or variable habitats. Therefore the most important recommendation we can make for this particular impact is to *move or avoid the affecting action* if at all possible. If this is not possible, there are two measures we would consider reasonable and prudent: (1) Conserve the genetic diversity represented by the affected plants (including those likely to be adversely affected by edge effects, canopy disruption, invasive species, etc.). Such genetic conservation may be more effectively achieved by seed collection and/or vegetative propagation, followed by outplanting to existing nearby populations, than by physically translocating a large number of plants. But both strategies should be attempted. This measure addresses only the genetic diversity concern. (2) Identify and protect otherwise at-risk populations of this species, beyond that which is already occurring under the ACUB program. For instance, assuring the protection of a relict trillium occurrence anywhere in its range, regardless of its proximity to Fort Benning, with ACUB funding and/or an ACUB easement would certainly be a reasonable way to minimize (though not completely offset) the adverse impact of losing an occurrence of this fragile habitat on Fort Benning.

A-012

### **Imperiled Species and Habitats**

When assessing direct ecological impacts of the proposed actions, the NEPA process necessarily places a tremendous amount of scrutiny on federally-listed species like the aforementioned RCW and Relict Trillium. This emphasis on listed species can be disproportionate in the context of the full suite of ecological attributes The Nature Conservancy is dedicated to protecting. We were pleased that the DEIS recognized potentially adverse impacts to a high priority species at-risk, the state-threatened gopher tortoise, and to certain Unique Ecological Areas (UEAs). An additional impact we consider adverse, mentioned but not categorized as adverse in the DEIS, is damage to the Longleaf Pine Loamhills UEA.

#### **Gopher Tortoise**

*Concerns.* Even before the contemplation of BRAC/Transformation actions, Fort Benning well-recognized the importance of the gopher tortoise, not only in the context of stewardship responsibility and Army Regulation 200-3, but also for the need to avoid the additional training and construction restrictions that federal listing would likely bring. The U.S. Fish and Wildlife Service is currently considering a petition to list the tortoise as threatened or endangered in the eastern part of its range (it is already listed west of Alabama's Tombigbee River). The Army and other stakeholders are simultaneously considering entering into a Cooperative Conservation Agreement (CCA) with the U.S. Fish and Wildlife Service that would promote pro-active range-wide conservation measures intended to assure the continued existence of the species



and lessen any potential incentive for federal listing. The DEIS recommends pre-project relocation/fencing, and adherence to existing INRMP policies, to reduce the impact (approximately 10% of the known tortoise locations at risk) such that it is not adverse. We are concerned that these measures may be inadequate to mitigate the scale of the impact, which threatens not only the animals but also the burrow-habitat (and commensal species) such habitat supports. The adequacy of these measures should be considered in the pro-active spirit of the aforementioned CCA. We also note that a Gopher Tortoise Management Plan is under development by Fort Benning but has not yet been published, so the adequacy of existing installation policies are difficult to assess.

B-004

*Recommended measures for gopher tortoise.* We recommend that Fort Benning secure additional land or interests in land to facilitate the continued existence of the gopher tortoise in the Fall Line sand hills east and west of Fort Benning. Tortoise conservation is in fact an existing objective of Fort Benning's ACUB. Additional ACUB funds, and/or new emphasis and priority to build or support off-post tortoise populations as ACUB projects, would be reasonable and prudent measures. Alternatively, the Army may wish to explore and fund strategies outside of ACUB to promote regional tortoise conservation (e.g. inject on-the-ground conservation funding into SERPPAS, or secure additional training lands to decrease the pressure placed on current tortoises "in the way.") Regardless of the specific approach, we strongly advocate tangible measures that increase both habitat extent and population numbers beyond Fort Benning's current population.

A-008

#### Longleaf Pine Loamhills UEA (Compartment A17)

*Concerns.* While only 5.6% of this UEA is impacted, that represents 65 acres of one of the highest-quality longleaf pine plant communities on Fort Benning. The impact is not simply degradation from increased training, it is permanent clearing of the forest. The specific plant association found here is categorized by NatureServe scientists as the "Pinus palustris / Schizachyrium scoparium / Verbesina aristata association," and ranked G2-G3 in imperilment. This imperilment rank (which carries with it no state or federal protection) means that NatureServe and The Nature Conservancy considers the plant association to be globally imperiled, or at best globally vulnerable. The vast majority of third-party certified forest lands in the U.S are required to protect and manage species and communities ranked G2 or rarer. We recognize and appreciate that Army training planners have gone to great lengths to reduce and reposition the cleared acreage associated with the 2011 QTR machine gun range planned for this site, but we remain concerned at the scale of this irreversible impact on a rare plant association. The loss to conservation here is disproportionately higher than that associated with loss of an equivalent area of RCW foraging habitat in many other parts of Fort Benning.

B-005

*Recommended measures for Loamhills UEA.* Much like the relict trillium scenario described above, the most important recommendation we can make for this particular impact is to *move or avoid the affecting action* if at all possible. We wonder if this project could be shifted further into the current footprint of Griswold Range, to the south and east, or relocated/colocated along some other portion of the A20 or K15 impact areas. Unlike relict trillium sites, it is difficult to envision a scenario whereby

A-011



the biological and genetic diversity associated with this plant community could be captured and conserved. No single species gives this site the major part of its conservation significance. Nevertheless, unavoidable impacts to this plant community should be addressed by giving partner organizations and volunteers ample opportunity and funding to relocate portions of the groundcover community to recipient sites in the region. "Micromanagement" of the project footprint, with assistance of the same partners to minimize impacts to the groundcover, should also be considered. The uniqueness of this particular vegetation assemblage makes additions of equivalent habitat challenging, whether via ACUB or new UEA acreage. However, enabling those strategies should certainly be part of the response as well.

A-013

#### Prosperity Church UEA (Compartment E5)

*Concerns.* This UEA is an outstanding example of late-successional upland oak-hickory forest with little or no sign of the past agricultural practices that are so ubiquitous across much of Fort Benning and the southeast. The DEIS correctly observes that the Southern Maneuver Corridor (supporting the operation of heavily-armed combat vehicles in a training context) would adversely impact a large portion of this UEA through erosion, spread of weeds, increased fire frequency, and degradation of adjoining areas. To this we would add potential loss of both canopy and midstory trees important to the unique ecological character of the site. Concerns expressed previously (for RCW habitat) about the distance beyond mapped travel corridors that vehicles might maneuver, and the free operation of more lightly-armed vehicles outside the mapped corridors, apply here as well. Mitigation measures proposed in the DEIS include careful siting and design to avoid impacts to the most sensitive areas. We are concerned that, unlike a fixed firing range, a maneuver corridor does not lend itself to siting and design considerations; to some extent vehicles must be able to maneuver through "unscripted" situations in order to constitute realistic training.

A-014

*Recommended measures for Prosperity Church UEA.* We encourage planners to re-map this maneuver corridor by narrowing or shifting the impacted area to avoid this UEA. We further recommend some sort of marking or control mechanism that confines vehicle impacts within the boundaries illustrated on the maps, and that "light-maneuver" vehicles receive equivalent guidance if operating through this area. The uniqueness of this UEA's land-use history makes additions of equivalent habitat challenging, whether via ACUB or new UEA acreage. However, enabling those strategies should certainly be part of the response as well.

A-011

#### Chattahoochee Backwaters UEA (Compartment CC2, etc.) and points downstream

*Concerns.* This UEA is an important part of the Chattahoochee River floodplain and has perhaps the highest ecological integrity of any part of the Chattahoochee River corridor through Fort Benning. Of additional concern are off-post parts of the same floodplain corridor south of Fort Benning, in the vicinity of Riverbend Park and Hitchitee Creek. The DEIS accurately describes the potential for adverse impact to this area's hydrology and ecology from heavily-armed vehicles operating in the erodible soils of the Good Hope Maneuver Corridor, upstream and up-watershed from this portion of the Chattahoochee floodplain corridor. Construction of numerous hardened low-water crossings in support of these activities will contribute significantly to stream



sedimentation even before extensive upland ground disturbance begins. Hitchitee Creek, just off-post to the south, is already designated as limited/impaired due to sedimentation. We are concerned that the mitigation measures described in the DEIS consist primarily of compliance with existing regulations and BMPs, and that the full impact of water-crossing construction and heavily-armed vehicle training in the Good Hope Maneuver Corridor may overwhelm such measures.

W-001

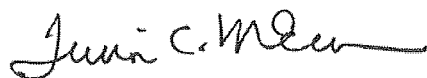
*Recommended Measures for the Chattahoochee watershed.* The Good Hope Maneuver Corridor is, on balance, the most environmentally favorable location for these activities. The "Alternative A" location in the northern part of the installation heavily impacts RCW habitat, rare plant communities, and more-erodible soils to a greater extent than Good Hope. Given the necessity of the Armor School's activities at Fort Benning, we therefore support the Good Hope location but strongly recommend that the actual vehicle-maneuver network be further confined to protect hydrology and soil stability. The concerns expressed above with respect to RCW-habitat connectivity through the Good Hope area are consistent with this measure.

A-015

### Conclusion

The Nature Conservancy commends the Army, in particular its Fort Benning and regional staffs and various partner agencies and contractors, for the enormous amount of assessment and analysis carried out in a short amount of time to identify, and in many cases minimize, the impacts of the proposed actions. We have identified several concerns that remain despite the quantity and the quality of the Army's work. We are gratified for the opportunity to express them, and feel certain that many of the concerns are shared. Throughout our commentary, we have offered ideas and recommended measures to further minimize the impacts about which we're most concerned. The Conservancy hopes our comments will be considered in the spirit of stewardship, cooperation, and good faith that has always characterized our relationship with Fort Benning.

Sincerely,



Tavia C. McCuean  
Vice President & State Director

Cc: Tom Greene  
Randy Tate  
Wade Harrison



To: Mr. John Brent  
Fort Benning Draft EIS Comments

Comment sent by Bob Garrard to Jay Brown on June 4, 2007

S-005

#### 4.4 Socio Economics

**Note:** My comments have been in part based on comparison of the Fort Benning Draft EIS with that of Fort Lee/Fort AP Hill VA. In addition, ROI (Regions of Interest) and personnel increases were identified for 7 major bases, including Benning, that were included in the November 23, Federal Register Notice of Intent to Prepare an EIS. I also reviewed the Fort Meade, MD EIS, developed by the Louis Berger Group, Inc, the same consultant preparing the Fort Benning EIS.

Comments are presented following. As comments are being submitted electronically, portions of the Benning Draft EIS, Federal Register, Census, and other documents are not included here. Most are readily available online.

1/ The Socio-Economic Section contains considerable data that is either erroneous, misleading, sketchy, extremely out of data, or otherwise inadequate. In particular, the median Home Values Table 4.4-2 (page 4-45) bear no relationship to the correct median values from the 2000 Decennial Census.

S-010

2/ Further detailing item 1/, erroneous data appears to be partly due to use of third or fourth party data sources. The source Stats Indiana 2006a Trulia 2007 was used for the incorrect home values.

S-011

Note that I accessed the correct data for median owner housing value from the 2000 Census, via its website, extracted and downloaded it, and used it in comments, in under 14 minutes. This should not be a burden to the consultant but just a simple effort to "get it right."

It is possible that the incorrect data was related to recent real estate sales. However, based on review of other impact studies which used 2000 Census data for home values, the correct data should have been provided in the table. Other



To: Mr. John Brent  
Fort Benning Draft EIS Comments

data such as recent sales prices, etc should be identified properly, explained and discussed in the text. Presenting such erroneous data may be worse than omitting it entirely.

3/ There is a missing data element, Public Services which should have been included. The Benning EIS shows the existence of only 7 elements under the affected environment, whereas the Fort Meade study shows 8. While the subject may be addressed elsewhere in the study, the specific section was omitted in the Benning Study. Omission is a serious flaw and should be corrected.

S-012

4/ Overall, the Socio Economic Section is very weak. I closely reviewed the Fort Lee/Hill EIS Socio Economic Section and compared with the Fort Benning EIS. Benning's is extremely small, about 1/3 the size of the Fort Lee Section, which I believe is a very good Socio Economic product. Benning's is sketchy. It provides confusing information on the local economy (industry groups). It contains minimal analysis or discussion. It lacks readability, clarity, completeness and continuity.

S-013

The instructions for EIS in the BRAC Law state: "These analyses will include consideration of the direct environmental and socio economic effects of these actions and the cumulative impacts of other reasonably foreseeable actions affecting the installations."

The final Benning EIS may be the only EIS which many persons, local or distant, see or chose to examine. As with other EIS's it contains a large volume of technical and other detail. Many who look at the Benning EIS are likely to read only small sections to which they can more closely relate, such as socio economic and community data. Other persons that tend to rely on the EIS for these type data may be presented with a poor first impression of the Tri-Communities—Fort Benning, Columbus and Phenix City. that is not justified. This could work against the best interest of all. These communities deserve better.



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No matter how minimal the apparent extent of socio economic impacts, the consultant should have included this particular element, and in the proper location, if for no reason other than completeness.

#### Other

Comments on the following, which may not be part of the responsibility of, the consultant developing the Benning EIS, are also provided.

The November 23, 2005 Notice of Intent to Prepare EIS was for several major installations including Fort Benning. These studies were for identical purposes relating to Army Transformation/BRAC. The Notice begins on Page 70793 of the Federal Register.

The projected military and nonmilitary personnel gains for these range from 5,500 at Fort Meade, MD to 18,000 at Fort Belvoir, VA. Fort Benning, with a gain of approximately 10,000 personnel, falls into the middle range.

Benning has the smallest ROI (Region of Interest), the Columbus MSA, among the 7. The smaller Columbus MSA contains approximately 285,000 population, only a fraction of other ROI areas, such as Colorado Springs, Richmond or Baltimore, but faces substantial growth. Columbus could be reasonably expected to experience more extensive socio economic and community affects, such as housing and schools, than posts in much larger ROI's.

The Notice identified only 1 major area of potential significant off post impacts for Benning, "increased noise impacts to the surrounding public." It is difficult to understand why only noise off post was identified as a significant potential impact.

Georgia Department of Transportation and Columbus are committed to major road expansions and highway interchanges. However, the projected addition to the MSA is up to 30,000 residents, including personnel and dependent family members, school children, and private motor vehicles. These additions will take place over fewer than 3 years. The projected population increase of 10%, is far

A-016



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over and above typical growth trends with which the area must contend. It is difficult to understand how traffic and schools off post were not identified as significant potential impacts, at the outset.

A-016

#### Other Comments

I did not review or read except for minimal review of subjects, the other sections of the Benning study. I have several general comments.

1/ The overall coverage of the Draft seemed to be good, with substantial detail, conclusions and documentation. I trust that other sections have been reviewed and suitable comments submitted as needed.

2/ The public hearing format was extremely beneficial and extremely well staffed by the study consultant staff, DOD, Fort Benning and others.

3/ Given the magnitude of the EIS process and number of studies needed, some shortcomings may be expected in the Draft but generally the information presented should be correct.

I continue to expect that the Mobile District, Corps of Engineers will engage responsible consultants on EIS Studies. I trust that the consultant on this study is a responsible one, is concerned in maintaining its good name, will make the needed changes to the Fort Benning Draft EIS, and will also correct, as needed, any weak Socio Economic sections of other EIS's, such as Fort Meade during the completion process.

In conclusion, I believe that the Socio Economic Section of the Fort Benning Draft Environmental Impact Statement should be corrected and expanded, particularly as identified above.



Draft Environmental Impact Statement  
 BRAC 2005 and Transformation Actions at Fort Benning, GA  
 Comments: Jeff S. Glitzenstein, PhD, Tall Timbers Research Station, Tallahassee, FL

I am an experienced botanist/plant ecologist with considerable expertise in management and restoration of longleaf pinelands in particular as well as other southeastern habitats including upland mesic forest. I am one of a few botanists who can recognize virtually all of the numerous longleaf ground layer plants regardless of reproductive condition. I have propagated and initiated new populations of rare plant species including federally endangered *Schwalbea americana* (American Chaffseed).

I disagree with conclusions presented in the draft EIS, especially the suggestion that “adherence to Integrated Natural Resource Management Plan procedures and prescribed practices would minimize” admittedly severe vegetation impacts to “non-adverse”. The plain fact of the matter is that substantial areas of irreplaceable high quality natural habitat would be permanently and irrevocably destroyed and no subsequent management actions could begin to compensate in any meaningful way for this loss. Two populations of federally endangered species would also be severely impacted. My greatest concerns are summarized as follows:

B-005

- (1) A substantial area of high quality fire maintained pineland would be adversely affected by the preferred Alternative B. The area of greatest concern is the *Schizachyrium scoparium* / *Verbesina aristata* vegetation type in the Longleaf Loamhills Unique Ecological Area in compartment A17 west of Griswold Machine Gun Range. Approximately 250 acres would be completely destroyed and another 180 acres potentially seriously impacted. On May 23, 2007, I toured this area with several other biologists. I found this whole area to be characterized by an extremely high diversity of ground layer herbs including *Anthaenaria villosa*, *Aristolochia serpentaria*, *Aster concolor*, *Aster tortifolius*, *Aster undulatus*, *Ceanothus americanus*, *Coreopsis major*, *Desmodium floridanum*, *Dichanthelium commutatum*, *Elephantopus elatus*, *Eupatorium rotundifolium*, *Galactia macrei*, *Euphorbia corollata*, *Helianthus divaricatus*, *Hieracium gronovii*, *Ionactis linariifolius*, *Lactuca graminifolia*, *Mimosa quadrivalvis*, *Onosmodium virginianum*, *Orbexilum pedunculatum*, *Paspalum bifidum*, *Penstemon australis*, *Pteridium aquilinum*, *Rhynchosia difformis*, *Rhyhyncosia reniformis*, *Salvia azurea*, *Schizachyrium scoparium*, *Scleria triglomerata*, *Sorghastrum nutans*, *Sorghastrum secundum*, *Sporobolus junceus*, *Stylodon carnea*, *Tephrosia virginiana*, *Tetragonotheca helianthoides*, *Solidago odora*, *Verbesina aristata*, and numerous plants of the rare *Phaseolus sinuatus*, a species of conservation concern. In addition to the UAE there is another 1300 acres at least of longleaf pineland listed as Longleaf Loamhills that would be adversely affected according to Table 4.12-12. The available information suggests that this may be of lower ecological quality than the UEA but it is not evident to me based on what I have managed to read of the DEIS that this entire habitat was thoroughly investigated. It is troubling that almost 10% of the rare Loamhills habitat would be negatively impacted albeit some or much of that may be of indifferent quality. Given the



effort throughout the southeast to conserve and restore the so-called Longleaf Pine Ecosystem one would hope that at least the known high quality habitat in the UEA could be saved.

A-011

- (2) Similarly Table 4.12-12 lists 4,732 acres or 6.8% of longleaf sandhills as likely to be adversely impacted. Not having had the opportunity to investigate this area in the field I am uncertain how much may be of good ecological quality or at least salvageable. Based on what I have been able to glean from the DEIS my assumption is that there has been little field investigation or systematic prioritization of what is most worth saving or protecting out of this threatened habitat.
- (3) Approximately half of Prosperity Church UEA would be eliminated by preferred alternative B. This UEA is a mature upland mixed hardwood forest with a preponderance of *Carya glabra*, *Quercus alba*, and *Quercus falcata*, in the overstory. *Pinus taeda* is present but not dominant. Small trees, shrubs and vines include *Aesculus pavia*, *Cornus florida*, *Diospyros virginiana*, *Ulmus alata*, and *Vitis rotundifolia*. The understory is very rich with shade tolerant herbs including *Agrimonia pubescens*, *Arisaema triphyllum*, *Asclepias obovata*, *Asplenium platyneuron*, *Desmodium nudiflorum*, *Desmodium rotundifolium*, *Dioscorea villosa*, *Mitchella repens*, *Passiflora lutea*, *Prenanthes serpentaria*, *Sanguinaria canadensis*, *Sanicula marilandica*, *Smilax biltmoreana*, *Spigelia marilandica*, *Spiranthes* spp., *Uvularia perfoliata*, and *Viola soraria*. Canopy tree ages probably exceed 150 years. Based on the richness of the understory it is likely that this forest is an example of an original association that has survived till the present without large scale soil disruptions. Furthermore, the occurrence of a true upland hardwood dominated forest, as opposed to fire suppressed pineland, is itself very unusual in the Coastal Plain. Given the small area of this UAE, its undisturbed condition and its rarity, one would think it could have been avoided in the planning process.
- (4) A proposed new road would impact the Randall Creek north population of relict trillium (*Trillium reliquum*). There are approximately 12 known total populations of this plant scattered across a narrow range in AL, GA and SC. Fort Benning is one of the global strongholds for this plant with five known populations. The road construction would apparently eliminate a dense patch of this plant, totaling approximately 200 or more individuals. According to the DEIS, the USFWS has concluded as a consequence of a section 7 consultation that the proposed road project will likely adversely effect the continued existence of the species. The DEIS states that necessary and sufficient measures will be determined to mitigate the adverse impacts, but the possible remedies have not yet been decided. Possibilities include transplantation to other sites but no information is presented about the likely success of such a project. To my knowledge the species has not been successfully transplanted nor is there monitoring or experimental data on such a procedure. To proceed under these circumstances is a violation of the Endangered Species Act.
- (5) A total of 32 clusters of the federally endangered red-cockaded woodpecker would be eliminated by preferred alternative B and up to 108 clusters would potentially be negatively impacted by Alternative A. As is the case with relict

A-011

B-003



trillium, USFWS has issued a likely to adversely affect ruling on the effects of Transformation activities on this species. Even alternative B, which attempts to minimize impacts, would “likely be adverse because of the magnitude of the impact and its interference with long term goals to recover the species at Fort Benning. Despite this conclusion, the Army is proposing to proceed with the work. Some measures to mitigate the effects are discussed, but the DEIS makes no claim these will be sufficient to alter the likely to adversely affect conclusion. Proceeding under these circumstances would likely be a violation of the Endangered Species Act.

B-006

In summary, the BRAC transformation at Ft Benning will result in substantial and severe losses of valuable ecological habitat and rare species populations. Furthermore it is not clear to me that there has indeed been a systematic effort to investigate and characterize the potentially impacted areas. I am hopeful that it may still be possible to avoid the worst of the losses.

I appreciate the opportunity to submit these comments.



DATE 1-Jun-07

TO: MR. JOHN BRENT

FROM: BOB GARRARD  
1822 FOREST AVENUE  
COLUMBUS, GA 31906  
706 323 4868

SUBJECT: COMMENTS  
DRAFT FORT BENNING EIS  
SOCIO ECONOMIC SECTION

ATTACHED ARE MY COMMENTS REGARDING THE DRAFT BRAC EIS.  
I HAVE ONLY SKIMMED OTHER SECTIONS SO I WILL NOT COMMENT ON THEM,  
AND TRUST THAT OTHERS HAVE GIVEN THEM CAREFUL REVIEW.  
THANK YOU FOR THE OPPORTUNITY TO COMMENT IN THIS PROCESS.



## COMMENTS REGARDING FORT BENNING BRAC DRAFT EIS SOCIO ECONOMIC SECTION

### 4.4.1.1

#### SOCIO ECONOMIC

#### ECONOMIC DEVELOPMENT

#### REGION ECONOMIC ACTIVITY

#### INSTALLATION CONTRIBUTION TO THE LOCAL ECONOMY

THE SIZE OF BENNING RELATIVE TO THE LOCAL REGION OF INTEREST IS OVERSTATED. THE DEIS STATES THAT BENNING IS 34% OF THE REGION OF INTEREST.

FOLLOWING IS AN ACCURATE PICTURE OF THE RELATIONSHIP OF THE SIZE OF BENNING TO THE REGION.

WHILE A SUBSTANTIAL 26.6% SHARE, THE RELATIONSHIP OF BENNING TO THE REGION IS CONSIDERABLY LESS THAN THE 34% CITED.

#### FORT BENNING

MILITARY	32,772	
FEDERAL	3,307	
NAF & OTHER	5,383	
NON MILITARY SUBTOT/	8,690	
TOTAL	41,462	26.6%
		=====

S-014

#### REGION OF INTEREST

MILITARY	32,772
NON AG CIVILIAN WAGE AND SALARY EMPLOYME	123,000
(INCLUDES NONMILITARY SUBTOTAL ABOVE)	

TOTAL WAGE AND SALARY AND MILITARY	155,772	100.0%
(COLUMBUS MSA)	=====	=====

#### ECONOMIC ACTIVITY FOR MUSCOGEE COUNTY

UNDER ECONOMIC ACTIVITY FOR MUSCOGEE COUNTY, THE STUDY EMPHASIZES ONE SECTOR "HEALTH CARE AND SOCIAL ASSISTANCE" WHILE DEEMPHASIZING OTHERS " INFORMATION AND MANAGEMENT., ETC."

THIS TYPE OF DESCRIPTION PROVIDES LITTLE USABLE INFORMATION.

IT SHOULD BE REVISED TO BRING THE SOCIO ECONOMIC SECTION UP TO A CREDIBLE LEVEL.

WHILE A SOCIO ECONOMIC SECTION SHOULD BE BRIEF, IT SHOULD BE ACCURATE.



## 4.4.1.2

## DEMOGRAPHICS

THE DEIS STATES THAT "THE FIVE COUNTIES COMPRISING THE ECONOMIC ROI ARE PRIMARILY RURAL IN CHARACTER." THIS DIRECTLY CONTRADICTS THE MAP AT 4-19 WHICH DEPICTS THE URBAN GROWTH OF COLUMBUS AND MUSCOGEE COUNTY. METROPOLITAN AREA COUNTIES RUSSELL AND HARRIS PROVIDE A LARGE NUMBER OF COMMUTERS.

COLUMBUS METROPOLITAN AREA POPULATION IS APPROXIMATELY 285,000. FORT BENNING ACTIVE MILITARY AND DEPENDENTS, AND CIVILIAN WORKFORCE, IS ESTIMATED TO TOTAL APPROXIMATELY 60,000. THUS, THIS MILITARY RELATED POPULATION IS APPROXIMATELY 21% OF THE REGION.

S-015

THE DEMOGRAPHICS SECTION FAILS TO POINT OUT THAT THE REASON FOR DECLINING POPULATION IN CHATTAHOOCHEE COUNTY IS FORT BENNING. AREAS OF CHATTAHOOCHEE OUTSIDE BENNING ARE GROWING. THIS SHOULD BE CORRECTED.

S-016

## SALARIES

PAY FOR PERMANENT PARTY TROOPS IS UNDERSTATED.

TYPES OF REGULAR COMPENSATION RECEIVED BY ALL MILITARY. SUCH AS SUBSISTENCE PAY, ADD CONSIDERABLY TO MILITARY COMPENSATION. BY UNDERSTATING COMPENSATION, EARNINGS ARE UNDERSTATED. THE MILITARY STANDARD OF LIVING IS GROSSLY MISPRESENTED. THE APPEARANCE OF MERELY BASE PAY DATA PORTRAYS THE MILITARY PERMANENT PARTY AS LARGELY LOW INCOME PEOPLE. CONTRAST THIS WITH THE PAY DATA IN THE FORT MEADE DEIS.

	FORT BENNING PAY ANNUAL	MONTHLY
AVERAGE ANNUAL CIVILIAN SALARIES	\$29,377	\$2,448
PERMANENT PARTY AVERAGE	\$24,378	\$2,032

FORT BENNING'S 2004 COMMAND DATA SUMMARY WAS USED TO ESTIMATE MEDIAN RANK/PAY FOR SPECIALIST/CORPORAL. COMMENSURATE TO THE RANK OF E4. E4 IS ALSO THE MOST PREDOMINANT RANK AT BENNING ACROSS ALL STAFF.

S-017

THE 2007 CURRENT COMPENSATION FOR AN E4 WITH 5 YEARS OF SERVICE IS \$41,831. DATA ON MILITARY COMPENSATION IS READILY AVAILABLE AT VIA THE DOD WEBSITE

2



4.4.1.3  
HOUSING  
VALUES

DATA FROM  
TABLE 4.4-2

COUNTY	MEDIAN HOUSING VALUE OWNER OCCUPIED
CHATTAHOOCHEE	\$107,855
MUSCOGEE	\$280,799
RUSSELL	\$77,105
HARRIS	\$254,783
MARION	\$151,250

SOURCE CITED IS 2000 CENSUS.

THE "MEDIAN" HOUSING VALUES CONTAINED IN TABLE 4.4-2.  
DATA FROM 2000 CENSUS DATA ARE CLEARLY INCORRECT.  
THE SOURCE CITED IS "STATS INDIANA 2006A TRULIA 2007".

CORRECT DATA IS SHOWN FOLLOWING. NOTE THAT THE  
TOTAL TIME TO OBTAIN THE CORRECT INFORMATION VIA THE  
INTERNET TO THE RELEVANT CENSUS BUREAU DATA  
AND INPUT TO THIS TABLE WAS UNDER 15 MINUTES.

S-010

<u>COUNTY</u>	
CHATTAHOOCHEE	\$63,800
MUSCOGEE	\$84,000
RUSSELL	\$71,500
HARRIS	\$122,700
MARION	\$70,400
GEORGIA	\$111,200
UNITED STATES	\$119,800

4.4.1.4  
QUALITY OF LIFE  
INSTALLATION HOUSING  
THE TEXT GIVES

"IN 2006 THERE WERE MORE THAN 30,000 HOUSING UNITS ON FORT BENNING."  
HOUSING UNITS DO NOT CORRELATE WITH BARRACKS UNITS,  
EVEN THOUGH TABLE 4.4-3 PROVIDES A BREAKDOWN OF BENNING HOUSING,  
AT A MINIMUM THIS IS HIGHLY CONFUSING TO THE READER.

S-018

3



IMPORTANCE OF DEIS DATA

THE LIFE OF THE EIS WILL EXTEND BEYOND THE IMMEDIATE EIS PROCESS. THE DRAFT AND FINAL EIS CAN BE EXPECTED TO BE WIDELY QUOTED. BY LOCAL USERS, AND NONLOCAL USERS INCLUDING THOSE WHO MAY BE IN INVESTING IN THE REGION. A FLAWED AREA PROFILE IN THIS EIS WILL PRESENT A VERY POOR FIRST IMPRESSION THAT IS NOT JUSTIFIED.

IT APPEARS THAT SOME DATA WERE OBTAINED FROM THIRD OR FOURTH PARTY SOURCES WHICH FAILED TO SUPPLY CORRECT FIGURES.

OTHER DATA WAS CLEARLY INCORRECT POSSIBLY REFLECTING A LACK OF ATTENTION TO QUALITY AND CONSISTENCY.

A FIRM WITH CONSIDERABLE EXPERIENCE IN PREPARING AN EIS FOR MILITARY BASES IS EXPECTED TO SUPPLY CORRECT, RELIABLE, WELL SUMMARIZED DATA, THIS EXTENDS TO SOCIO ECONOMIC DATA. AS WELL AS ENVIRONMENTAL DATA.

ADEQUATE INFORMATION IS READILY AVAILABLE FOR THE ITEMS. WHICH SHOULD BE CORRECTED OR IMPROVED.

FORT BENNING AND THE LOCAL COMMUNITIES DESERVE BETTER.SUMMARY

THE OVERALL CONCLUSIONS OF THE DRAFT EIS WITH RESPECT TO SOCIO ECONOMIC CONDITIONS AND IMPACTS ARE SUPPORTABLE.

HOWEVER, THE SOCIO ECONOMIC DATA PROVIDED GIVES ERRONEOUS, INCOMPLETE OR MISLEADING DATA.

FOR EXAMPLE, THE ALL THE HOUSING VALUE DATA IS INCORRECT.

THE DESCRIPTION OF THE LOCAL ECONOMY IS WEAK. COMPARED WITH THE EXCELLENT ORGANIZATION, MAPS, GRAPHS AND OTHER AIDES TO UNDERSTANDING THE dEIS, THE SOCIO ECONOMIC SECTION IS POOR.

THE FINAL EIS SOCIO ECONOMIC SECTION SHOULD REFLECT THE LEVEL OF QUALITY AND CONSISTENCY THAT APPEARS TO BE PRESENT IN OTHER PORTIONS OF THIS DRAFT.

## PRINCIPAL SOURCES:

US CENSUS BUREAU 2000 CENSUS ONLINE  
 NOTE: TIME TO OBTAIN HOUSING VALUES WAS UNDER 15 MINUTES.  
 US COMMERCE DEPT, BEA (BUREAU OF ECONOMIC ANALYSIS)  
 GEORGIA DEPT OF LABOR  
 DFAS OFFICIAL US DOD PAY SITE  
 FORT BENNING COMMAND DATA SUMMARIES





United States Army  
Environmental Impact Statement (EIS) for the  
BRAC 2005 and Transformation Actions at Fort Benning  
Comment Sheet

Please provide comments no later than June 4, 2007 to ensure consideration in the Final EIS. Comments may be submitted at the meeting or mailed to the address on back. Please note, the name, city, and state of persons making comments will appear in the Final EIS.

MY CONCERN CAN BE DESCRIBED BY SAYING I WILL BECOME A CASUALTY OF THE FT BENNING RANGE EXPANSION PROJECT. I WILL NO LONGER HAVE THE RIGHT TO ~~THE~~ QUIET ENJOYMENT OF MY PROPERTY. MY HOUSE ALREADY SHAKES, WINDOWS RATTLE & CABINET DOORS BANG WHEN LARGE CALIBER WEAPONS ARE FIRED. NOW, I AM EXPECTED TO ENDURE A 100 OR MORE TANK ROUNDS A NIGHT WHEN I WOULD NORMALLY BE SLEEPING. IT IS QUITE CLEAR THAT COLUMBUS & MARION CO. RESIDENTS ARE EXPECTED TO JUST TAKE THE NOISE & BOUNDING.

WHO IS GOING TO COMPENSATE ME FOR LOSS OF MARKET VALUE ON MY HOME WHEN I CHOOSE TO SELL? THIS PROJECT IS GOING AHEAD REGARDLESS OF THE IMPACT TO ADJOINING RESIDENTS WITHOUT ANY RECOARSE TO US. WE ARE SUPPOSED TO TAKE ONE FOR OUR COUNTRY.

I UNDERSTAND & HAVE ALREADY EXPERIENCED THE NOISE & PHYSICAL IMPACT OF ~~DEFENDING~~ ARMY ARTILLERY FIRE A YEAR IN VIETNAM ON FIRE BASES. SO, DON'T TELL ME IT WON'T CAUSE ANY PROBLEMS. BESIDES I'VE ALREADY PAID MY DUE TIME IN SERVICE.

THIS PUBLIC HEARING DOES NOT GIVE RESIDENTS THE UNDERSTANDING OF THE NEGATIVE IMPACT OF THE RANGES & FIRING POSITION. I BELIEVE THIS PLAN GIVES LITTLE CARE TO THE IMPACT TO COLUMBUS & MARION CO. RESIDENTS.

THERE IS AMPLE ACRESAGE AVAILABLE TO MAXIMIZE THE DISTANCE OF RANGE ESPECIALLY SMALL ARMS FARTHER AWAY FROM RESIDENTS. THIS PLAN DOES NOT CHOOSE TO PUT DISTANCE BETWEEN NOISE/RANGES & RESIDENTS. YOU JUST DO NOT SEEM TO CARE!

YOU ARE HARMING MY FAMILY & MY PROPERTY WHICH CAN NEVER BE RECOVERED.

Name:

Mailing Address:

Email Address:

Please Print  
RONALD S. HANLEY

MIDLAND, GA 31820

Please check here if you would NOT like to be on the mailing list \_\_\_\_\_

Would you like to receive a hard copy \_\_\_\_\_ or CD ☒ of the Final EIS of Engineers, Mobile District  
Volume II: Comments and Responses Environmental Impact Statement - Fort Benning, GA  
C-38 October 2007

A-026

PI-001

D-003





United States Army  
Environmental Impact Statement (EIS) for the  
BRAC 2005 and Transformation Actions at Fort Benning  
Comment Sheet

Please provide comments no later than June 4, 2007 to ensure consideration in the Final EIS. Comments may be submitted at the meeting or mailed to the address on back. Please note, the name, city, and state of persons making comments will appear in the Final EIS.

I hope that the changes to Ft Benning continue to be a net positive force to the area while maintaining a careful caretaking approach to environmental concerns. Considering the magnitude of the changes I am impressed with the Army's concern for the local impact, both to Columbus proper and to the surrounding environment.

Name: John Worde, and Please Print  
Mailing Address: Columbus GA 31901  
Email Address:

Please check here if you would **NOT** like to be on the mailing list       .  
U.S. Army Corps of Engineers, Mobile Bay        or CD X of the Final EIS?





United States Army  
Environmental Impact Statement (EIS) for the  
BRAC 2005 and Transformation Actions at Fort Benning  
Comment Sheet

Please provide comments no later than June 4, 2007 to ensure consideration in the Final EIS. Comments may be submitted at the meeting or mailed to the address on back. Please note, the name, city, and state of persons making comments will appear in the Final EIS.

I AM GLAD TO ATTEND THIS FUNCTION!  
I AM GOING TO PASS A LOT OF THIS GOOD  
INFORMATION ALONG TO THOSE SOLDIERS WE KNOW OF  
THAT ARE MOVING TO FT BENNING.

Thanks for all your efforts!

Please Print

Name: STEVE FREEMAN MILITARY RELOCATION COORDINATOR  
Mailing Address: MEDLAND GA 31820  
Email Address: \_\_\_\_\_

Please check here if you would NOT like to be on the mailing list Yes

Would you like to receive a hard copy ☒ or CD ☐ of the Final EIS? of the Corps of Engineers, Mobile District  
Volume II: Comments and Responses Environmental Impact Statement - Fort Benning, GA  
C-40 October 2007





008001

STATE OF ALABAMA  
ALABAMA HISTORICAL COMMISSION  
468 SOUTH PERRY STREET  
MONTGOMERY, ALABAMA 36130-0900

COLONEL (RET.) JOHN A. NEUBAUER  
EXECUTIVE DIRECTOR

May 3, 2007

TEL: 334-242-3184  
FAX: 334-240-3477

John Brent  
Fort Benning Directorate of Public Works  
Environmental Management Division  
Meloy Hall (Building 6) Room 310  
Fort Benning, Georgia 31905

Re: AHC 07-0717  
DEIS BRAC 2005 & Transformation Actions  
Fort Benning Georgia  
Russell County, Alabama

Dear Mr. Brent:

Thank you for the opportunity to review the Draft EIS. It appears to be well thought out and highly detailed. Our review appears to indicate that all proposed activities will take place within the State of Georgia. If this is not correct, please indicate which activities are being considered for the Alabama portion of Fort Benning.

We appreciate your efforts on this project and we look forward to receiving your response. Should you have any questions, my point of contact for this matter is Greg Rhinehart at (334) 230-2662. Please have the AHC tracking number referenced above available and include it with any correspondence.

Sincerely,

Colonel (Ret.) John A. Neubauer  
State Historic Preservation Officer

JAN/GCR/gcr

THE STATE HISTORIC PRESERVATION OFFICE  
[www.preserveala.org](http://www.preserveala.org)





## OFFICE OF PLANNING AND BUDGET

Sonny Perdue  
Governor

Shelley C. Nickel  
Director

GEORGIA STATE CLEARINGHOUSE MEMORANDUM  
EXECUTIVE ORDER 12372 REVIEW PROCESS

TO: John Brent  
Fort Benning DPW  
Environmental Mgt. Div.  
Meloy Hall (Bldg. 6), Rm. 310  
Fort Benning, GA 31905

FROM: Barbara Jackson *BJ*  
Georgia State Clearinghouse

DATE: 4/26/2007

SUBJECT: Executive Order 12372 Review

APPLICANT: U.S. Dept. of the Army - Fort Benning, GA

PROJECT: Draft EIS: BRAC 2005 and Transformation Actions at Fort Benning, GA

STATE ID: GA070426009

The applicant/sponsor indicated that a copy of this document was directly submitted to our state reviewers for this project: DNR's Environmental Protection Division; Soil & Water Conservation Commission; DNR's Historic Preservation Division. Provided that positive comments are forthcoming from these reviewers, the State level review of the above-referenced proposal will have been completed, and the proposal will have been found to be consistent with those state or regional goals, policies, plans, fiscal resources, criteria for Developments of Regional Impact (DRI), environmental impacts, federal executive orders, acts and/or rules and regulations with which the state is concerned.

/bj

Form NCC  
January 2004

Office: 404-656-3855

AN EQUAL OPPORTUNITY EMPLOYER  
270 Washington Street, S.W., Atlanta, Georgia 30334

Fax: 404-656-7916



Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive, S.E., Suite 1252 East, Atlanta, Georgia 30334-9000  
Noel Holcomb, Commissioner  
404/656-3500

Environmental Protection Division  
Carol A. Couch, Ph.D., Director  
404/656-4713

June 4, 2007

Mr. John Brent  
Fort Benning Directorate of Public Works  
Environmental Management Division  
Meloy Hall (Bldg. 6), Room 310  
Fort Benning, Georgia 31905

Dear Mr. Brent:

Enclosed are comments by the Georgia Department of Natural Resources (DNR) on the *Draft Environmental Impact Statement (EIS) for BRAC 2005 and Transformation Actions at Fort Benning, Georgia*, dated April 2007. This is a compilation of comments from DNR's Environmental Protection Division, as well as from the Historic Preservation Division and the Wildlife Resources Division. These comments are based on review of the draft EIS, of the presentation and material offered at the Public Meeting and Open House held on May 10, 2007 in Columbus, Georgia, and of information obtained from the meeting of state and federal agencies held at Fort Benning on February 20, 2007. DNR's State Parks and Historic Sites Division reviewed the draft EIS and has no comment.

DNR fully supports the Army's mission in Georgia and the BRAC 2005 and Transformation Actions at Fort Benning described in the EIS. In light of its critical mission and the pending actions, DNR applauds the commitment shown by the Army and Fort Benning to stewardship of the region's natural and cultural resources. As witnessed by this EIS and elements of the Mitigation and Monitoring Plan contained therein, Fort Benning recognizes its duty and embraces its role in preserving these resources and in protecting the health, well-being and quality of life of its neighbors in Georgia and Alabama.

DNR appreciates the opportunity to submit these comments on the draft EIS. We offer them in the spirit of full partnership with the Army and Fort Benning in stewardship of Georgia's natural and cultural resources. We intend for them to be constructive and useful. If you have any questions or need additional information, please contact Dr. Marlin Gottschalk at (404) 657-5419.

Sincerely,



Noel Holcomb  
Commissioner  
Department of Natural Resources



Carol A. Couch, Ph.D.  
Director  
Environmental Protection Division

NH/CAC:mgc

Enclosure

cc w/enclosure: General Phil Browning, Governor's Office  
Ray Luce, Historic Preservation Division  
Dan Forster, Wildlife Resources Division



**Draft Environmental Impact Statement  
BRAC 2005 and Transformation Actions at Fort Benning, GA  
April 2007**

**Comments by the Georgia Department of Natural Resources  
June 4, 2007**

Comments by the Georgia Department of Natural Resources (DNR) focus on select sub-chapters of Chapter 4 – Affected Environment and Environmental Consequences – of Volume I of the draft environmental impact statement (EIS). We have organized them in sequence by relevant sub-chapter number. They do not necessarily cross-reference to citations in the Executive Summary, the appendices contained in Volume II of the draft EIS or other sub-chapters.

As a general comment, the DNR's Environmental Protection Division (EPD) notes that the EIS mentions continued participation by Fort Benning in voluntary partnerships focused on environmental stewardship and sustainability, such as the Range Sustainment Initiative. As required by Executive Order, Fort Benning has implemented an environmental management system and was one of the first military installations to join EPA's Performance Track program, a voluntary program that encourages continual environmental improvement. There was no mention as to the impact of the Transformation project on the aspects/commitments listed in their EMS and performance track application. In 2005, Fort Benning initiated the development of its 25-year strategic plan, its roadmap to becoming a sustainable Installation. There are no references to the impact of Transformation activities on the goals outlined in this plan.

A-027

If Fort Benning is not involved in the Southeast Regional Partnership for Planning and Sustainability, this might be an additional avenue for coordinating the activities to minimize potential environmental impacts through public-private partnerships.

## **Chapter 4: Affected Environment and Environmental Consequences**

### **4.1 Introduction**

In the second bullet in the first paragraph under sub-section 4.1.1 Methodology, "Georgia Department of Environmental Quality" should be corrected to read "Georgia Department of Natural Resources".

G-001

### **4.5 Transportation**

Under both transformation alternatives, the EIS predicts increased traffic during the morning and afternoon peak commuting hours and severe congestion impacts at on-base intersections. Travel models show this congestion will decrease level of service at these intersections to thresholds of failure. While the EIS does not propose specific mitigation measures, it does recognize that implementation of traffic study recommendations would reduce these impacts. The recommendations include road widenings, intersection improvements, new traffic signals and coordination/optimization of traffic signals.

T-006



EPD recommends that transportation demand management (TDM) tools be considered to reduce commuter traffic and congestion. TDM generally reduces the number of single-occupancy vehicles on the road through programs that encourage carpooling, van pooling, public transportation and teleworking, where suitable and appropriate. Traffic congestion can also be relieved by shifting commuter travel off the peak hours through flexible work schedules and compressed work weeks, again, where suitable and appropriate. In addition to congestion relief, these programs reduce vehicular emissions that contribute to local air quality impacts (see comments below on Sub-chapter 4.8 of this EIS).

A-017

The Georgia Department of Transportation and The Clean Air Campaign are currently working with Robins Air Force Base on TDM programs to relieve increased traffic generated by a shift to off-base housing. For more information on TDM programs in Georgia, see [www.cleanaircampaign.com](http://www.cleanaircampaign.com), or contact The Clean Air Campaign by phone at 1-877-CLEANAIR or direct at 404-817-7762 or by e-mail at [mail@cleanaircampaign.com](mailto:mail@cleanaircampaign.com).

#### 4.6 Utilities

The Fort Benning water system is in the process of merging with the Columbus Water Works (CWW). Upon completion, the CWW will provide drinking water to the Base and operate and maintain it. The existing Fort Benning water treatment plant, which is now being maintained and operated by CWW, will be formally closed. The planned the transition of Fort Benning water system to CWW will be finalized no later than October 2007. The EIS should address the final disposition of the Upatoi Creek water intake facility and the permits held by Fort Benning for the six active Public Water Systems (GA2150002-US Army Infantry Center, GA2150011-Carmouche Range, GA0530004-Camp Darby, GA0530005-Hastings Range, GA0530007-Griswald Range, GA0530009-McKenna Mount Range) and two inactive water systems (GA0530006-Kunzig Range, GA0530008-Pinetree Range). The EIS should also address the disposition of water withdrawal from the three drinking water wells located in the Uchee Creek Recreation Area in Alabama and the public water system that supports the marina and recreation area.

U-001

U-002

Columbus Water Works has adequate drinking water supply capacity and the necessary infrastructure in place to meet the water demands at the Base, now and in the future. We do not anticipate any problem with the drinking water service. However, given the growth in water demand, the EIS should confirm that the Columbus Water Works' water withdrawal permit provides for adequate withdrawal to meet this increased demand.

U-003

Also, the EIS should clarify how the post-transformation population total of 42,088 was calculated and used to estimate future water demand. In Table 3.3-1, the baseline population is shown as 35,847. In Table 2.2-1, the additional transformation population is estimated to be 14,069. The sum of these two totals 49,916. Moreover, while the projected population of 42,088 is used elsewhere in the EIS, the projected water consumption total of 5.98 MGD would calculate to a projected population of 39,866, using the EIS assumption of 150 gallons per person-day.

U-004

The EIS should demonstrate that Fort Benning's two wastewater treatment plants and conveyance systems have the capacity to receive an increase of 3.5 MGD untreated sewage should consolidation with CWW's wastewater treatment facilities not occur as planned for June 2007. The EIS should also demonstrate that there is additional land application capacity for the corresponding treated wastewater and that there is additional landfill capacity for the

U-005

U-006



corresponding dewatered sludge from the wastewater treatment plant. Should consolidation occur and the on-base wastewater treatment facilities no longer needed, the EIS should address disposition of those facilities and any plan to increase the capacity of the sewage conveyances to CWW's wastewater treatment plant(s).

U-006

In the first paragraph under *Wastewater System* in sub-section 4.6.2.2 Transformation Alternative A, correct "Georgia Drinking Water Rule 391-3-6" to read "Georgia Water Quality Control Rule 391-3-6."

U-007

According to information provided in the EIS, Fort Benning generates an estimated 1,800 tons of solid waste per month. This solid waste is hauled by private contractor to a transfer station in Phenix City, Alabama. The waste is then transferred to a landfill operated by Waste Management. According to the EIS, the landfill capacity is unknown. While the EIS found no adverse impacts associated with solid waste generation, there were no calculations or estimates provided to quantify the potential impacts to solid waste due to the increased population or associated construction activities. Based on the 2005 per capita Georgia municipal solid waste disposal rate, post-transformation solid waste generation at Fort Benning is estimated to be 58,140 tons per year. If the diversion rate remained the same, it is estimated 30,814 tons of solid waste would be disposed of per year. This represents a 43% increase over the amount currently disposed. The EIS should demonstrate there will be additional municipal solid waste capacity to accommodate the anticipated volume leaving Fort Benning for the Phenix City transfer station and the destination municipal solid waste (RCRA Subtitle D) landfill(s).

U-008

Solid waste infrastructure also may be impaired due to the construction of access control points. To accommodate a visitor control center, entry control points, and traffic control devices, currently programmed for FY2007, the existing material recycling facility (MRF) may be moved to another location. The consequences of this action, including future NEPA compliance requirements, were not discussed in the EIS. If the MRF is moved, Fort Benning's capability to recycle solid waste would be negatively impacted until the new facility could be relocated. Loss of the MRF would significantly impact Benning's Qualified Recycling Program and possibly its Pollution Prevention Measure of Merit (MoM), also known as a Non-Hazardous Solid Waste Diversion Rate. The MoM ensures the diversion rate for non-hazardous solid waste is greater than 40%, while ensuring integrated non-hazardous solid waste management programs provide an economic benefit when compared with disposal using landfilling and incineration alone. No discussion of how solid waste material would be handled during the transition was included in the EIS. Considering the tonnage recycled at Benning, a waste management plan describing how and where the materials will be stored and processed by commodity is critical to ensuring the materials will not be landfilled during the transition period. The EIS also did not address the management/recycling of scrap tires generated at the base. EPD's Waste Reduction and Abatement Program would be available to assist in identifying businesses to collect and process the material in the interim.

U-009

U-010

U-011

The EIS did not include estimates of the amount of construction and demolition debris that will be generated. Per the EIS, contractors are not allowed to dispose of debris in Fort Benning's inert landfill. Since Fort Benning is required to follow sustainable design standards and meet the USGBC's LEED standard, it is assumed that a certain level of recycling of construction waste will occur to meet the LEED pre-requisites. It is unclear if Fort Benning has investigated the markets for these materials. A waste management plan describing how and where the materials will be processed by commodity is critical to ensuring the materials will not be landfilled.

U-012

A-019



Additionally, expansion of the mission and the vast amount of needed construction provide new opportunities to further promote the use of environmentally preferable products. For example, the running track to be constructed in the Harmony Church cantonment could be made from recycled scrap tires. The purchase of environmentally preferable products not only helps Fort Benning meet federal requirements, but it also supports recycling infrastructure and job creation in Georgia. There are also opportunities to encourage the use of compost and mulch as part of mitigation measures to minimize adverse impacts to soils, as well as mitigation during building and road construction and maintenance. Potential opportunities also exist to use compost on firing ranges to control runoff.

#### 4.7 Noise

During a Compliance Evaluation Inspection by EPD staff on May 2 – 4, 2007, a number of personnel attached to the base expressed their concern about noise and encroachment by the Modified Record Fire Ranges. Visual inspection disclosed private residences within one hundred feet of the base boundary along this portion of the property adjoining U. S. Highway 80. The likelihood of accidental or unwitting release of military munitions to areas outside the base is thus greatly increased. Range sustainability and encroachment are both negatively impacted by this proximity. While this is not an issue within the purview of EPD, it is noted here as an issue that may become a major concern by the community.

SF-001

#### 4.8 Air Quality

While the EIS identifies a few small point source emission units that may require permitting, it seems unlikely that major source New Source Review (NSR) will be triggered.

The EIS does not account for all mobile source emissions increases expected with the BRAC 2005 and transformation actions. While it addresses commuter travel and construction emissions, it omits on-site mobile emissions for operations, i.e., transport of personnel and material within the installation and training in the maneuver areas with military vehicles, e.g., tanks and other armored vehicles. It also omits emissions from Lawson AAF and from vehicles delivering construction materials and consumer goods for on-base personnel. Although mobile source emissions and fugitive dust from military tactical vehicles and equipment and other types of mobile sources are exempt from Georgia vehicle emission regulations, those emissions will contribute to air quality challenges in the Columbus region. They should be included in the emissions inventories for both Alternative A and Alternative B.

AQ-001

Emissions of mobile source air toxics, originating from the combustion of gasoline, diesel and other transportation fuels, should be estimated and included in the on-base inventory of on-base hazardous air pollutants (HAPs), which currently only includes HAP emissions from firing of ordnance during training. When warranted, “hot spot” analyses of HAPs should be conducted to evaluate risks to the health of on-base personnel.

AQ-002

While not required, it would be useful to model the contribution of estimated increased emissions of VOC, CO, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> to local ozone and particulate matter concentrations to determine if the National Ambient Air Quality Standards for these criteria pollutants will be exceeded in the area. This would help Columbus and surrounding communities plan for and

AQ-003



maintain healthful air that meets the new PM<sub>2.5</sub> standard and perhaps a new revised ozone standard.

Construction-related PM<sub>2.5</sub> emission levels are not high enough to trigger general conformity if the area is designated non-attainment for PM<sub>2.5</sub>. However, general conformity could be triggered for NO<sub>x</sub> if the area is designated nonattainment for ozone, or if designated nonattainment for PM<sub>2.5</sub> and we cannot make a demonstration of insignificance for NO<sub>x</sub>.

Since air quality in the Columbus area is already threatened by increased emissions related to growth in the region, the EIS should address mitigation measures for mobile sources associated with Fort Benning. These include TDM measures for commuters and on-site travel, as described above in the comments related to Sub-section 4.5 – Transportation, and voluntary controls for diesel engines. These controls include the use of retrofitted, re-powered or new diesel-powered construction equipment and on-site personnel or freight transport vehicles, as well as adopting anti-idling measures and using “clean” diesel fuel, e.g., ultra-low sulfur diesel or biodiesel.

A-020

#### 4.9 Hazardous and Toxic Materials and Waste

Asbestos issues for the most part are adequately and accurately addressed in the EIS. However, we offer the following suggestions:

- Increased emphasis should be placed on the importance of ensuring a thorough asbestos inspection prior to renovation or demolition of existing structures; and
- Increased caution should be exercised if “trade cuts” are used in large remediation projects. This is the practice of cutting dry wall with a circular saw and is frequently used in the remediation of mold. It should be noted that when this practice is employed dry wall joints can be cut through and sometimes the joint compound contains asbestos containing material.

A-021

The EIS only addresses lead-based paint. We recommend that is also address other lead-based coatings, e.g. shellacs, varnish, stains. Appropriate wipe samples should be taken after renovation activities in target housing and child occupied facilities that contain lead-based coatings to ensure a lead dust hazard does not exist after renovation activities are completed. This problem was recently encountered after renovation of Ft. Benning officer housing. Also, all soils should be tested where structures are being renovated and there are known lead-based coatings present. Soils should be cleaned up to at least the HUD Standards for bare residential soils.

A-022

A lead-based paint inspection and risk assessment must be conducted at the child development center if children under the age of 6 years use the facility. Currently the plan for the facility is to cover the lead-based paint with non-lead based paint. This practice is acceptable, but is considered an “interim-control” under Georgia rules. Lead safe work practices must be used when preparing the surface of lead-based paint for re-painting, and lead-based paint chips must be properly managed and tested by TCLP prior to disposal. Also, Georgia accredited/certified firms and workers should be used to conduct this work.

One of the new on-base projects is the construction of a new hospital. Based on the information provided in the EIS, the existing hospital will be used for another purpose. If renovation of the existing building does occur, it is likely that materials may be contaminated with mercury,

A-023



asbestos, lead-based paint or radioactivity. The EIS should address how these hazards will be identified and handled.

A-023

The EIS also addresses radon. While the EIS listed no adverse impacts associated with radon and recommended no additional testing, due to the high level of soil disturbance from construction activities, we recommend that buildings where the soil has been disturbed near the foundation be tested for radon per EPA protocols.

A-024

The EIS in several locations refers to Fort Benning as having formerly operated under Hazardous Waste Facility Permit Number HW-021(CA), e.g., see page 4-118. This is in actuality the current permit number; the prior permit was numbered HW-021(S)(2).

HZ-001

The Armor School and the other units being gained will substantially increase the generation of hazardous waste and use of hazardous materials. We have the following recommendations related to that increase, that are not noted in the EIS:

- Current infrastructure and procedures for management of hazardous waste and hazardous materials will likely need improvement in order to maintain compliance, based on this increase.
- Fort Benning will need to much more closely track its management process for hazardous waste, so as not to exceed its required 90-day storage limit, or will need to obtain a permit for storage of those wastes.
- Fort Benning should improve its hazardous waste and hazardous materials compliance and add hazardous waste handling staff to accommodate the increased generation.
- Fort Benning should add at least one position dedicated to providing “milk-run” waste pickup services to the new units because of the remoteness of some of the new generation points.

HZ-002

The location of all Solid Waste Management Units (SWMUs) in relation to the proposed impacted areas should be evaluated to determine if the proposed construction or operations activity will have an impact on the installation’s investigation and remediation of soil, groundwater, surface water, or sediment contamination, and to ensure proper management of potential remediation wastes. In the EIS, please include the need to provide a map(s) prior to any construction or change in land use, showing the proposed impacted areas - construction development and changes in land use - for both Transformation Alternative A and Alternative B and overlaid with the identified location of all active and inactive SWMUs to evaluate potential for disturbance of contaminated areas during construction and other proposed activities.

HZ-003

Please note that the location of all VOC soil contamination and VOC groundwater contamination plumes in relation to the proposed impacted areas should be identified to evaluate possible sources of unacceptable health risks via indoor air vapor intrusion pathway. In the EIS, please include the need to provide a map(s) prior to any construction or change in land use, showing the proposed building/activity locations for both Transformation Alternative A and Alternative B and overlaid with any identified location of VOC soil contamination and VOC groundwater contamination plumes, so that preventive mitigation measures can be implemented.

HZ-004



#### 4.10 Water Resources

The EIS did not identify the Chattahoochee River through Muscogee and Chattahoochee Counties as a State-Designated River Corridor to be protected through comprehensive planning at the local level. We suggest that Fort Benning contact those counties to determine the type and contents of any local ordinances adopted to protect the river corridor and that such ordinances be acknowledged in the EIS sections describing or listing applicable management practices or measures.

W-002

The primary potential impacts to water quality within the areas of transformation activities are related to erosion and sedimentation issues as a result of land-disturbance activities; elevated stormwater runoff and in-stream bank erosion resulting from the increased post-construction impervious area; deterioration of buffer zones; and encroachment by construction and other activities of the 25-foot buffer for "State waters". The nature of these impacts implies that best management practices (BMPs) be implemented to minimize erosion and sediment transport processes to surface waters.

This project, if it disturbs one acre or more, will be permitted under the NPDES General Storm Water Construction Permit for Common Developments. Fort Benning will be responsible for compliance with this permit over the five years and approximately 19,000 acres of construction-related land-disturbing activity.

There are six 303(d) listed stream segments for biota impairment occurring within the bounds of Fort Benning. The impairments are the result of sediment in the streams. Five of these segments may potentially be impacted by the transformation activities. It is therefore imperative that mitigation measures be implemented to prevent further erosion and sediment transport to the listed segments, and to prevent future impairment of other waters within the Fort Benning boundaries. A segment of the Chattahoochee River that occurs immediately downstream from Fort Benning is included on the 303(d) list for exceedances of the fecal coliform standards. In addition, Fish Consumption Guidelines apply to this segment because of PCB levels previously found in fish tissue.

W-003

W-004

While the EIS specifically identifies the impaired streams within or near Fort Benning, it should also note that in addition to TMDLs, revised TMDL implementation plans have been prepared for those impaired segments and supplied to Ft. Benning's contractor. These plans will be evaluated and revised in the future. The plans and acceptance dates should be specifically identified and described in appropriate EIS sub-sections and acknowledged in sub-sections and tables describing or listing applicable management practices or measures.

W-005

Listed segments and their associated watersheds should be acknowledged and discussed in general and specific area discussions of alternatives and mitigation measures and "Mitigation Measures". Listed segments should be addressed in the evaluations and highlighted in Tables 4.10-2 thru 10.

W-006

While the amount affected relative to the total on the base seems insignificant, the loss 27 acres of aquatic habitat and the loss of wetland function from 980 acres of severely degraded or lost wetland should be addressed as a priority. Should the Corps of Engineers determine that an individual Section 404 Permit is required for the project, a Section 401 Water Quality Certification should concurrently be sought from the Georgia Environmental Protection Division. Section 404 permitting is discussed in the document and potential impacts identified in Table 4.10-3.

W-007



In general, the EIS presents a full range of mitigation measures to address the potential water resource issues that may arise. The EIS should at a minimum include the following.

- Strict requirements should be applied where stream buffer variances are necessary. Variances should be granted only when there are no alternatives. To prevent further degradation of the 303(d) listed stream segments, variances should be avoided unless alternative BMPs can be applied which will prevent an increase in sediment load to these streams.
- As stated above, Total Maximum Daily Loads (TMDLs) have been developed for all the 303(d) listed streams occurring within Fort Benning boundaries. These should be reviewed and, as available, TMDL Implementation Plans should be followed.
- The EIS states that the working dog population will be increased on the Installation. The containment area for these dogs should be maintained so as to minimize the potential for fecal coliform contamination of adjacent waters.

W-008

#### 4.11 Geology and Soils

The EIS does not address the soil needs for construction of infrastructure and/or training areas. EPD currently does not have any permitted surface mining operations on file for Fort Benning. The EIS should indicate whether such operations are anticipated to fill construction material demands and, if needed, identify which site/areas may be mined and require permits.

SL-001

#### 4.12 Biological Resources

The Wildlife Resources Division (WRD) of DNR has been engaged indirectly through the U.S. Fish & Wildlife Service (FWS) on biological resource issues on Ft. Benning. Since the largest wildlife impact is the loss of red-cockaded woodpecker (RCW) habitat, this has been the primary area of interest. WRD understands that FWS has worked diligently for months with the Army to reduce the loss of habitat, and we think that the impacts have been reduced to an acceptable level.

#### 4.13 Cultural Resources

The Historic Preservation Division (HPD) of DNR has no specific comments at this time, because the information in the EIS provided is too general to allow comment on impacts to specific cultural resources. It is our understanding that Ft. Benning will be consulting with us when they have more detailed information on effects, as part of the Army's Alternate Procedures for compliance with Section 106 of the National Historic Preservation Act.

C-001





# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Richard B. Russell Federal Building  
75 Spring Street, S.W.  
Atlanta, Georgia 30303



9043.1  
ER 07/357

June 5, 2007

Mr. John Brent  
Fort Benning Directorate of Public Works  
Environmental Management Division  
Building #6 (Melody Hall) Room 310  
Fort Benning, GA 31905

RE: Comments of Draft Environmental Impact Statement for Base Realignment and Closure 2005 and Transformation Actions at Fort Benning, Georgia

Dear Mr. Bent:

The U.S. Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) and has the following comments to provide for your consideration.

Because of early coordination between the Fort Benning Army Installation and the U.S. Fish and Wildlife Service (Service), there is a significant reduction of projected impacts to two federally endangered species [e.g., red-cockaded woodpecker (*Picoides borealis*, RWC) and the relict trillium (*Trillium reliquum*)]. On April 18, 2007, the Service entered into formal consultation with Fort Benning regarding the Base Realignment and Closure process. At the time of this review, consultations for both species are ongoing.

Fort Benning has concluded that the proposed action may adversely affect RCW's. The preferred alternative projects an incidental take for 32 potential breeding groups of RCWs. Other projects were not presented in this DEIS based on the lack of tangible resources. As money becomes available, additional consultation between the Service and Fort Benning will need to occur to ensure the conduct of proper Endangered Species Act assessments.

The Installation will avoid or minimize impacts to wetlands to the greatest extent practicable. Habitat restoration or by purchase of wetlands credits will compensate for unavoidable impacts to wetlands. The restoration, enhancement or creation of wetlands at locations to be determined by the Corps of Engineers' Clean Water Act permitting process. We will provide comments to the Corps of Engineers during that permit process.

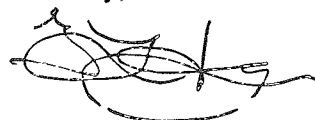
We believe Fort Benning has produced environmental documentation that presents an adequate analysis of expected impacts to fish and wildlife resources, and has articulated the need to



engage the Department if future detail reveal conditions that has not been addressed in their environmental documents.

We appreciate the opportunity to review this DEIS. If you should have any questions, concerning these comments please contact Sandy Tucker, Field Supervisor of the Service's Athens Ecological Services Office at (706) 613-9493.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gregory Hogue', with a stylized flourish at the end.

Gregory Hogue  
Regional Environmental Officer

cc:

FWS Region 4 – Atlanta  
FWS Field Office - Athens  
OEPC, Washington





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW  
ATLANTA, GEORGIA 30303-8909

June 7, 2007

John Brent  
Fort Benning Directorate of Public Works  
Environmental Management Division  
Meloy Hall (Building 6), Room 310  
Fort Benning, Georgia 31905

SUBJECT: Draft Environmental Impact Statement for BRAC 2005 and Transformation Actions  
at Fort Benning, Georgia; CEQ Number 20070155

Dear Mr. Brent:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Draft Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The U.S. Department of the Army (Army) proposes to implement several actions related to the reorganization and overall military transformation process at Fort Benning in Chattahoochee and Muscogee Counties, Georgia, and Russell County, Alabama. The specific interrelated actions that form the basis for this EIS include: 1) Base Realignment and Closure (BRAC) 2005 recommendations; 2) Army Modular Force (AMF) transformation activities; 3) Global Defense Posture Realignment (GDPR) actions related to relocation of overseas assets; and 4) other personnel movements.

Fort Benning consists of approximately 181,275 acres of federally-owned land south and east of Columbus, Georgia, and south of Phenix City, Alabama, on the banks of the Chattahoochee River. Virtually all of the training facilities and 93 percent of the total land area is in Georgia, with the remaining land (~12,000 acres) in Alabama. Currently, there are approximately 16,800 military personnel, 9,400 students (daily average or the number of students being trained on any one day, based on annual attendance), and 7,600 civilian employees stationed at Fort Benning. The total personnel gain at Fort Benning due to the proposed transformation actions would be approximately 14,069, including 4,486 military, 8,357 students, and 1,226 civilian employees

Infrastructure development under the proposed action would occur within the four cantonment areas of Fort Benning (Main Post, Harmony Church, Kelley Hill, and Sand Hill) and training ranges. In general, development to support transformation activities include: headquarters buildings/facilities supporting administrative and operational functions; numerous barracks complexes to house Armor School student trainees; instructional/training classroom facilities; vehicle maintenance instruction facilities; vehicle maintenance shops; motor pools; and wash stands. To support the increased Fort Benning population, utility, road, and communication systems would be upgraded or built depending on the facility location; the existing hospital would be replaced; dental and medial clinics built; and some existing health facilities expanded. Child




development centers will be established to meet increased pre- and elementary-school population, as well as a physical fitness center, chapel, lodging, and dining facilities.

In the Draft EIS, the Army considered three alternatives. The no action alternative consists of an analysis of Fort Benning's operations in November 2005. The two action alternatives (Alternatives A and B) include similar development in the cantonment areas, with the exception of an interchange in Harmony Church. The primary difference between Alternatives A and B is the location of proposed training areas on Fort Benning. Alternative A includes expansion of existing ranges in the northern portion of the base; whereas, Alternative B includes development of a new, heavy maneuver training area in the southern portion of the base. The Army identifies Alternative B as the preferred alternative.

Based on our review of the Draft EIS, EPA has environmental concerns associated with the proposed action. The overall area of disturbance associated with Alternative B is approximately 19,100 acres, compared to 10,741 acres for Alternative A, which does not include development of the Good Hope Maneuver Area. Development activities have the potential to directly and/or indirectly affect approximately 1,228 acres of aquatic habitats, 329 acres of wetlands, water quality associated with clearing operations and construction, and the development of new stream/wetland crossings. In addition, this project would adversely affect several federal- and state-listed endangered, threatened and sensitive species. EPA also has concerns that the expansion of training operations associated with this proposal may increase impacts beyond Fort Benning's boundaries, particularly related to potential changes in air quality and noise exposure. EPA recommends several actions that Fort Benning could implement during construction and long term operations to assist the Columbus metropolitan area in meeting air quality standards in the future. EPA supports a comprehensive monitoring program to ensure that the ongoing impacts from military training are assessed and appropriately addressed/mitigated once identified.

EPA rates the Draft EIS EC-2 (Environmental Concerns-with more information requested). Enclosed are definitions of EPA ratings. Also enclosed are specific review comments which provide greater detail regarding the environmental concerns, additional information requested, and EPA recommendations to address these concerns. We appreciate the opportunity to review the proposed action and are prepared to assist you in implementing any of the measures, described in our comments, to help in addressing the potential impacts of the proposed action. Feel free to contact me at (404) 562-9611 or Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,



Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Policy and Management

Enclosures



## U.S. ENVIRONMENTAL PROTECTION AGENCY ENVIRONMENTAL IMPACT STATEMENT (EIS) RATING SYSTEM CRITERIA

EPA has developed a set of criteria for rating Draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft.

### RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

- LO (Lack of Objections): The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.
- EC (Environmental Concerns): The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.
- EO (Environmental Objections): The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental objections can include situations:
  1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
  2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
  3. Where there is a violation of an EPA policy declaration;
  4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives;
  5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.
- EU (Environmentally Unsatisfactory): The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:
  1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
  2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
  3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

### RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

- 1 (Adequate): The Draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.
- 2 (Insufficient Information): The Draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the Draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the Final EIS.
- 3 (Inadequate): The Draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the Draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the Draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised Draft EIS.



**Draft Environmental Impact Statement for BRAC 2005 and Transformation Actions at  
Fort Benning, Georgia**

**SPECIFIC EPA REVIEW COMMENTS**

**Environmental Justice**

The Draft EIS does not include a detailed analysis of the potential for disproportionately high and adverse human health or environmental effects of this project on minority and/or low-income populations. The EIS includes a limited examination of impacts to potential environmental justice (EJ) communities by analyzing demographic and economic data in the affected counties and "region of influence" (ROI) comparing it to the statewide averages. EPA recommends that NEPA documents include general screening protocols to identify potential EJ areas by comparing the minority and low-income characteristics of smaller geographic areas (project area) with those of a larger geographic area (reference area). By using multi-county averages as the ROI and project area, the analysis in the Draft EIS does not accurately identify the potential for impacts to EJ communities immediately adjacent to Fort Benning. Therefore, EPA recommends that the Final EIS evaluates the potential environmental impacts to low-income and minority communities using census information from the 2000 U.S. Census at the block group and block level. The block group data level should be used because it provides the best combination of demographic accuracy and data accessibility. The appropriate reference area could be either the statewide average or perhaps the five-county ROI. EPA also recommends some additional field work to verify some conclusions using the census data. Field verification should include an assessment of impacts (e.g., noise exposure) to identified residences within low-income and minority communities, instead of relying on percentages of block groups or other mapping units and should assist in quantifying the potential for disproportionate impacts to these communities.

S-019

**Traffic**

The Draft EIS states that, "Concurrently to the preparation of this EIS, the Installation is conducting the Fort Benning Comprehensive Traffic Study. This study will make recommendations for the Installation's transportation investments that would result in better operation as well as capacity expansion to accommodate future growth. However, since these projects are not funded yet, they are not included as part of the present analysis." The Draft EIS concludes that there would be severe traffic impacts resulting from implementation of either Alternative A or B. However, it is unclear if completion of projects identified in the Comprehensive Traffic Study or at the end of Section 4.5 will adequately mitigate the negative impacts of additional traffic, since they do not appear to be included in the analysis. Based on the significant increase in numbers of intersections that are failing (LOS E or F), EPA has concerns about localized carbon monoxide (CO) hot-spots that would be created as a result of the proposed action.

EPA's primary concern is the lack of any discussion of consideration of alternative transportation management strategies for Fort Benning to address the transportation system



deficiencies that will be created by the transformation actions. For example, the Draft EIS describes limited existing on-base and off-base mass transit options for Fort Benning employees.

Currently there is only one bus route serving Fort Benning every 90 minutes. Given the potential designation of the Columbus area as nonattainment for the fine particulate matter standard (see Air Quality comments below), EPA recommends that Fort Benning develop a comprehensive alternative transportation program, especially for commuters. This program should promote telecommuting, the use of mass transit, and car pooling, and establishing no-cost or low-cost mass transit (possibly hybrid electric or natural gas powered) between popular points on the base and in the Columbus area. This initiative could be similar to those programs developed by other military installations, such as Fort Bragg and Camp Pendleton. By providing useable and convenient alternatives to driving through the installation, these installations have made significant steps towards helping the areas maintain or improve air quality and improve level-of-service problems at key intersections by decreasing the expected traffic demand. This type of program would benefit the environment while simultaneously providing a benefit for many in the Fort Benning community.

A-017

#### Solid Waste

The Draft EIS states that all Fort Benning sanitary waste is transported to a state-permitted transfer station in Phenix City and then sent to a landfill operated by Waste Management. The capacity of this landfill is unknown. It also does not appear that there are any acceptable on-base landfills. The Draft EIS concludes that the solid waste generated by the proposed action "would be within the capacity of the existing waste collection and disposal system." The information in the Draft EIS does not support this conclusion, and EPA recommends that the Final EIS provide additional information to describe how the additional solid waste will be appropriately handled after full build-out from the proposed action.

U-008

#### Noise

Section 4.7 discusses the ongoing noise impacts of various training activities at Fort Benning. The section includes a depiction of various noise zones based on average noise levels associated with different training activities. In several instances, it appears these noise zones extend outside of the boundaries of Fort Benning. The Draft EIS identifies a 400 percent increase in off-Post land areas within Zone II and other areas where annoyance levels might approach those typically found within Zone II. Zone II is described as generally incompatible with noise sensitive land uses, such as residences. The Draft EIS does not contain any maps depicting these residences or quantification of the numbers of impacts to these areas. In addition, there is no discussion of the magnitude and frequency of any historical noise complaints from the surrounding communities that have been collected as part of the noise complaint monitoring system described in the Draft EIS.

N-006

EPA recommends that the Final EIS include a more thorough discussion of the noise impacts of continuing operations, specifically related to monitoring of past noise complaints and identification of affected adjacent communities. EPA also recommends that any residences exposed to noise levels within the 65+ day-night average sound level (DNL) contours (Zone II)

N-007



be acquired from willing seller residents to help mitigate such noise exposure. EPA supports development of land use plans and ordinances for lands outside Fort Benning to limit possible future complaints from developers and or businesses not compatible with Fort Benning's operations. EPA suggests that Fort Benning continue to utilize the noise complaint system for affected residents to report any noise complaints or other incidents. Also, EPA recommends that periodic noise monitoring occur with such a frequency to determine any expansion ("creep") of the noise contours over time and possible incorporation of additional residences.

N-007

The Draft EIS also identifies that a number of noise sensitive land uses on-base (e.g., residences, hospital, and child development center) will be exposed to incompatible noise levels in Zones II and III. The site for the proposed trainee barracks would be partially within Zone III, and the site for the proposed new hospital would be partially within Zone II. EPA's primary recommendation would be to relocate these noise sensitive receptors outside of these incompatible noise zones as part of the final siting and design process. However, EPA understands the land use constraints for siting alternatives based on existing and future training requirements. Therefore, EPA recommends that the Army strongly consider the use of sound-proofing and other sound insulation measures in new building construction to reduce interior noise levels and minimize the impacts of noise exposure in these noise sensitive sites, especially for the new hospital, child development centers, and chapel. Including these measures as part of new construction would likely be less expensive than retrofitting the same buildings at a later point in time.

N-008

#### Air Quality

Section 4.8 of the Draft EIS considers only criteria air pollutants and potential impacts of the National Ambient Air Quality Standards (NAAQS). Criteria pollutants are important, affecting air quality over a large region. However, the Draft EIS does not address hazardous air pollutants or "air toxics" which can cause cancer and other serious health effects among people living or working in the vicinity of the sources. The Fort Benning transformation will involve mobile sources (transportation, training, construction, and service vehicles), area sources, and indoor sources that will emit air toxics in the vicinity of significant numbers of people who work, live, attend school or day care facilities, or are hospitalized at Fort Benning. Area and mobile sources contribute significantly to the nationwide risk from breathing outdoor sources of air toxics, according to EPA's National-Scale Air Toxics Assessment for 1999 (the most recent assessment available - visit <http://www.epa.gov/ttn/atw/nata1999>). Indoor sources of air toxics are particularly important, given that people spend about 90 percent of their time indoors, leading to long exposure times. Therefore, EPA recommends that the Final EIS address ways to reduce or mitigate the impact of these emissions on people.

AQ-003

AQ-005

EPA published a final rule in February addressing the control of hazardous air pollutants from mobile sources. That rule provides new standards for exhaust and evaporative emissions from passenger vehicles, new limits on the benzene content of gasoline, and standards for portable fuel containers that will reduce emissions of toxics from gas cans that can be found in many garages. Details concerning this rule can be found in the Federal Register, Volume 72, Number 37, February 26, 2007, Page 8428. Looking beyond these regulations, there are

AQ-006



numerous actions that Fort Benning could take to reduce exposures from mobile sources. For example, Fort Benning could establish anti-idling policies for trucks; retrofit diesel engines to reduce emissions; require that all construction diesels be retrofitted; and promote alternative transportation management options.

Area sources are the numerous, smaller sources that support populations, for example gas stations, dry cleaners, vehicle refinishing shops and paint stripping operations, electroplating shops, hospital sterilizers, incinerators, solvent cleaners, boilers, medical waste incinerators, and many others. Some area sources are already covered by regulations; others will soon be subject to regulations. Several suggestions for reducing emissions from area sources are included in Healthy Air – A Community and Business Leaders Guide (<http://www.epa.gov/air/toxicair/guide.html>). Many of the suggestions in this book could not only reduce emissions of air toxics, but also improve efficiency and cut costs.

Indoor sources of air toxics are particularly significant because the typical person spends 90 percent of his/her time indoors. EPA notes that all vertical building construction projects starting in Fiscal Year 2008 will be LEED certified. Will indoor environmental quality be a priority in these buildings or does the Army expect most of the LEED score for the buildings to be based on other aspects of the building design and construction? EPA recommends that structures built under the transformation actions meet the LEED standards for neighborhood development, where appropriate (<http://www.usgbc.org/DisplayPage.aspx?CMSPageID=148>). EPA also suggests that the Army consult EPA's Indoor Air Quality website ([www.epa.gov/iaq](http://www.epa.gov/iaq)) for suggestions on how to reduce indoor pollution sources.

AQ-007

The Draft EIS discusses the new fine particulate matter (PM<sub>2.5</sub>) standard of 35 ug/cubic meter, but indicates that actions will be taken only if the area does not meet the NAAQS in 2010. Instead, EPA recommends that Fort Benning assist the Columbus metropolitan area to prevent violations of the PM<sub>2.5</sub> standard by implementing several actions during construction and long term operations associated with the transformation activities. Examples of actions that could be undertaken include:

- Develop a phased initiative to switch all non-tactical vehicles to run on biodiesel. Changes to 20 percent biodiesel/ultra-low sulfur diesel (ULSD) blend can reduce PM<sub>2.5</sub> emissions by up to 30 percent. In addition, biodiesel has the additional benefits of a linear decrease in polyaromatic hydrocarbon (PAH) emissions (air toxics) and a decrease in toxicity. B100 fuel does not require DOT hazardous material designations.
- Establish policies that all construction equipment operated on the installation shall operate on a minimum of B20 fuel. These policies will help decrease the emissions from construction related activity that will occur during the crucial air quality period prior to official designations of attainment/nonattainment in 2010. EPA recommends that this should be done prior to the letting of construction contracts in order for these potential costs to be included in bid specifications (at current rates B20 is cheaper than ULSD in some areas).
- Develop construction bid specifications that require contractors to use diesel equipment that meets a minimum Tier 2 designation or retrofit existing equipment to achieve a minimum of 20 percent reduction in PM<sub>2.5</sub> emissions.

AQ-008



- Develop a comprehensive alternative transportation program (see previous comments on traffic).

AQ-008

The Draft EIS discusses that new boilers may remain exempt from permitting requirements. While this may be the case, PM<sub>2.5</sub> emissions are the primary winter-time pollution problem and since the boilers are operating during that period, they can have an impact that should be addressed. Any diesel boiler can operate on biodiesel (fuel grades B5-B100) and PM<sub>2.5</sub> emissions would be significantly reduced. EPA recommends consideration of using biodiesel fuel for any diesel boilers on the installation including but not limited to the new hospital boiler. This should serve to not only decrease PM<sub>2.5</sub> emissions, but should decrease PAH emissions and ensure a healthy civilian and enlisted work force. Furthermore, use of B100 fuel would decrease the storage requirements due to the characteristics of B100. This would also decrease sulphur emissions significantly since B100 contains very little sulphur.

AQ-009

Appendix E contains the detailed air quality impacts assessment and calculations. Based on our review of this Appendix, it appears that the mobile source emissions were based on emissions factors derived from the CARB EMFAC 2002 mobile emissions model, which utilizes California vehicle-based emissions only. The vehicles modeled in EMFAC 2002 are California emission-rated vehicles which are not available in the rest of the United States. EPA recommends that the Final EIS should use the MOBILE vehicle emission factor model to calculate mobile source emissions. Otherwise, these emissions may be underestimated. It is also unclear how much of the increased traffic associated with operations is accounted for in the Draft EIS. With all of the additional training sites, how will the soldiers get to the locations? Are the vehicle emissions and traffic patterns accounted for in this appendix?

AQ-010

AQ-011

AQ-012

Overall, the Draft EIS indicates that if the Columbus area is designated nonattainment for PM<sub>2.5</sub>, then the installation would have to reevaluate its emission control efforts in 2010 or 2011.

Based on our series of comments, EPA proposes a different approach for Army consideration. Since substantial transformation activity may be occurring during the compliance monitoring period for the next round of nonattainment designations, Fort Benning has the opportunity to proactively implement some strategies that can reduce particulate pollution. EPA recommends that Fort Benning consider and implement all reasonable and appropriate measures to reduce/prevent emissions from the construction and operation activities thus facilitating the area's efforts to retain its attainment status.. Our staff stands ready to assist Fort Benning in implementing reasonable and appropriate measures to mitigate for the potential air quality impacts of the proposed action.

AQ-020/AQ-008

#### Hazardous and Toxic Materials/Wastes

The Draft EIS states that radon, "...tends to occur more commonly in the western and midwestern parts of the U.S." and "...will typically concentrate in airtight buildings and particularly in basements." These statements are somewhat misleading as elevated radon levels can be found across the nation and in many parts of Georgia; in airtight structures as well as in buildings with more traditional air exchange rates; and in buildings with basements, crawl spaces, and in slab-on-grade construction. Elevated radon concentrations can even be found in



high-rise buildings. The distribution of radon levels varies according to many factors. EPA recommends a continuation of the requirement to measure radon levels in newly constructed Army facilities and periodic testing of homes for harmful levels of radon.

AQ-024

#### Wetlands/Water Quality Impacts

The Draft EIS does not identify any specific alternatives considered for range and non-range project locations to avoid or minimize impacts to jurisdictional waters of the United States. Furthermore, the precise locations of project siting, within the cantonment and training range areas, may change following finalization of design and issuance of the Record of Decision. As the overall project continues into later design phases, EPA recommends consideration of design modifications, as appropriate, to further minimize the impacts of individual projects to jurisdictional waters, including wetlands.

W-009

The Draft EIS states that wetland permits and possible mitigation activities will be defined prior to construction of any projects affecting jurisdictional wetlands in accordance with the regulatory requirements of the U.S. Army Corps of Engineers (USACE). EPA reiterates that any land clearing operations involving vegetation removal with mechanized equipment such as front-end loaders, backhoes, or bulldozers with sheer blades, rakes or discs in wetlands; or windrowing of vegetation, land leveling, or other soil disturbances are considered placement of fill material in wetlands. Any unavoidable wetland impacts should preferably be mitigated within the same watershed to result in no net loss of aquatic functions, not just wetland acreage. Although we understand the final mitigation plans cannot be prepared until later in the design process, EPA recommends that Fort Benning should consider potential mitigation needs for the different alternatives.

W-010

EPA has concerns about degradation of water quality in various waterways from sediment and other pollutants. The Draft EIS identifies potential impacts resulting from erosion of disturbed soils. Soil loss and soil erosion could greatly increase due to extensive land clearing and construction activities. Cut and fill activities and construction equipment usage, specifically heavy earth-moving equipment, could result in soil loss due to wind erosion and soil compaction. All appropriate steps should be taken to address potential impacts to water quality within streams and wetlands. Mitigation measures related to protection of water quality should be tailored depending on the condition of the specific water resource as well as the severity of the potential impacts. Specifically, those waterbodies not currently meeting their designated uses should receive additional protection to ensure that water quality problems are not exacerbated. Monitoring commitments should be included to ensure that water quality and in-stream habitat are fully protected. Stormwater controls (e.g., silt fences and hay bales) should be monitored and replaced periodically for the duration of construction and maintained to help ensure success. Specific comments on the proposed mitigation and monitoring plan are included below.

W-011

#### Monitoring

Appendix G describes the proposed mitigation and monitoring plan for actions associated with this Draft EIS. EPA supports the need for a comprehensive monitoring program to ensure



that the ongoing impacts from military training are assessed and appropriately addressed/mitigated once identified. However, Sections 4.1.2 and 4.1.3 also describe important monitoring and adaptive management protocols that are currently not listed in Appendix G. The Draft EIS states that, "Another tool used to manage resources and to minimize impacts to the environment (associated with training and operations) is the Integrated Training Area Management (ITAM) program." It is unclear what additional aspects of this program would be potentially incorporated into Fort Benning's current and proposed monitoring protocols. However, EPA supports adoption of the ITAM program for Fort Benning as well as on-the-ground damage inspections followed by damage assessments and repair to assist in developing long-term mitigation for continuing operations. EPA also supports implementation of the specific Best Management Practices (BMPs) identified in the Draft EIS. These practices should be applied and adequately enforced to attain appropriate results.

App-G-1

App-G-2



# preserveALA

ALABAMA HISTORICAL COMMISSION

May 31, 2006

Environmental Management Division  
IMSE-BEN-PWE-P (Mr. Brent)  
Building #6 (Meloy Hall), Room 310  
Fort Benning, Georgia 31905-5122

Re: AHC 2006-0864; Fort Benning Infrastructure Reshaping, Russell County, Alabama

Dear Sir:

Upon review of the above referenced project, the Alabama Historical Commission has determined that we will need additional information in order to complete our review of your project. Please forward the following information to our office at your earliest convenience.

The above referenced project's potential to impact cultural resources is unclear. Will historic buildings/structures be altered or demolished? Will there be ground disturbing activities which could impact archaeological resources? Please elaborate on this issue so that we may provide accurate comments.

We appreciate your efforts on this issue. Should you have any questions, please contact Amanda McBride of our office. Please reference the AHC tracking number above in all correspondence.

Very truly yours,



Elizabeth Ann Brown  
Deputy State Historic Preservation Officer

EAB/ALM/alm



468 South Perry Street  
Montgomery, Alabama  
36130-0900

tel 334 242-3184  
fax 334 240-3477



## **RESPONSES**







Comment Number	First Name	Last Name	Specific Comment Number	Army Response
0001	Robert	Garrard	S-001	The data in the EIS are accurate and were based on readily-available and industry-accepted data sources used at the time of the analysis.
0001	Robert	Garrard	S-003	Fort Benning considered using 2000 census data; however, to present more current housing price information, the website Trulia.com was used as a source. Where possible, all of the ROI counties most recent housing sales, or houses currently on the market were shown, and the median was determined from these listings.
0001	Robert	Garrard	S-001	In Table 4.4-3 the 30,000 number includes enlisted barracks (unaccompanied housing) which account for 25,190.
0001	Robert	Garrard	S-002	Economic data was taken from USBLS, USBEA, Census Bureau. These are all reliable sources of socioeconomic data.
0002	Jesse	Dasher	A-001	Fort Benning has contract procedures for small business set asides that allow small business to compete for contracts. For more information, please contact Fort Benning's Directorate of Contracting office.
0003	Tom	Queen	T-001	Fort Benning has no plans to reopen Moye Road at this time. Refer to Section 1.4.3.3.
0003	Tom	Queen	T-002	Fort Benning has no plans to reopen Moye Road at this time. Refer to Section 1.4.3.3.
0004	William	Lyde	N-001	Yes, the frequency of operations (averaged on a daily basis over the year), the time of day and night of these operations, and the type of caliber weapon used were all considered in the noise calculations (see Section 4.7 for the noise analysis and Appendix B for the types of weapons modeled). The effects to adjacent communities were also analyzed and can be found in Sections 4.7.2.2 and 4.7.2.3. Minimizing potential noise impacts on communities adjacent to the Post was an important factor in location and orientation of the proposed ranges.
0005	Owen	Ditchfield	T-005	The facilities identified in Table D-1 are only those that are included as part of proposed action presented in the various action alternatives. The trips identified in this table are those "new" trips that would be expected if those facilities were constructed; that is to say, those trips above and beyond those that are already occurring.
0005	Owen	Ditchfield	S-004	Corrected.
0005	Owen	Ditchfield	G-001	Correction required to include the Ledger-Enquirer. They were contacted and included in the distribution throughout the NEPA process.
0005	Owen	Ditchfield	S-005	Corrected.
0005	Owen	Ditchfield	S-008	Corrected.



Comment Number	First Name	Last Name	Specific Comment Number	Army Response
0005	Owen	Ditchfield	S-007	Corrected.
0005	Owen	Ditchfield	S-006	Corrected.
0005	Owen	Ditchfield	S-009	The numbers were accurate in the EIS. Racial demographics often add up to more than 100 percent because people may identify themselves with more than one race.
0005	Owen	Ditchfield	T-003	Corrected to state that the main gate is located near the intersection of Benning Boulevard and Custer Road, with another access control point near Custer Road and South Lumpkin Road intersection.
0005	Owen	Ditchfield	T-004	Correction made to indicate one commercial airline, Delta Connection run by ASA.
0006	Victor	Prevatt	N-003	As presented in Section 4.7, the noise levels, on average, from large caliber weapons have been calculated using accepted modeling and including weapons use during the 24-hour time period over a year--both on existing and proposed ranges.
0006	Victor	Prevatt	D-001	The DMPRC EIS analyzed the Hastings Range as in operation for potential direct and indirect impacts; however, the DMPRC EIS cumulative impacts analysis considers Hastings Range being closed only temporarily for possible construction of a Digital Multi-Purpose Training Range (DMPTR) in that area. There is no intention to stop training in the Hastings Range area in the near future. The BRAC-Transformation DEIS studied updated plans in the cumulative actions (pages 4-293 to 4-296) to construct a DMPTR, an Infantry Platoon Battle Course (IPBC), and Convoy Live Fire Exercises (CLFX) after 2014 in the Hastings Range area. Figure 4.15-3 and Section 4.15.5.6 evaluates and illustrates the anticipated noise levels under cumulative actions
0006	Victor	Prevatt	A-004	The decibels were modeled using the latest data associated with current and future weapon systems. The decibels do not change, they remain the same for each weapons system. However, the distance the sound travels is dependent on weather conditions, see Section 4.7 for further information.
0006	Victor	Prevatt	N-002	Operations and associated noise at the Digital Multi-Purpose Range Complex (DMPRC) were evaluated in a separate EIS; please refer to that document for detailed noise studies regarding that range. Operational noise was also included in the BRAC - Transformation DEIS studies, and the noise contours found in Figure 4.7-4 and in discussions on pages 4-100 through 4-102. There would be an increase in Zones LUPZ , II, and III contours in some areas. While not anticipated to cause health issues, increase in Noise Zones II and III may create increased noise management issues.



Comment Number	First Name	Last Name	Specific Comment Number	Army Response
0006	Victor	Prevatt	N-004	The DMPRC is currently under construction and operations at the DMPRC are expected to remain as depicted in the DMPRC EIS and associated record of decision. Planning for BRAC-Transformation ranges showed that tank training in the Hastings range area will continue to be needed to meet training requirements. See also response to comment D-001.
0007	Anonymous	Speaker 1	D-005	A-20 ordnance duded impact area cannot be accessed routinely due to safety concerns, so new ranges cannot be built within A-20. Rather than creating additional duded impact areas on Post, the proposed action sites additional ranges to make use of existing duded impact areas where possible. The Alpha 20 impact area is currently be used to a great extent (see Figure 4.14-2) and would support a new Qualification Training Range. Therefore, the impact area was considered in establishing ranges. See also D-002 and D-002 responses.
0007	Anonymous	Speaker 1	D-004	The Malone complex is already being utilized for range operations (see Figure 4.14-2) and would be used by the additional Army personnel expected under the proposed action. Additional ranges would conflict either with access, surface danger zones, or would preclude use of other ranges. See also response to D-002.
0007	Anonymous	Speaker 1	A-005	All ranges are currently utilized and will continue to be used. See Section 2.4.3 and last paragraph in Section 3.2.1.1 for a disucssion on ranges.
0007	Anonymous	Speaker 1	D-002	As indicated in Sections 2.4.3 (proposed ranges), 3.2.1.1 (alternatives consideration), and 4.14 (safety) the proposed Transformation action calls for more ranges than can be accommodated by Fort Benning on their existing ranges.
0007	Anonymous	Speaker 1	D-003	Under federal regulation, the Army must consider the impacts on the RCW, a federally listed species. See also response to comment D-002.
0007	Anonymous	Speaker 1	PI-001	The forum of the public meeting was chosen to ensure that the time was convenient, the location was central, and everyone was given equal opportunity to comment.
0008	Anonymous	Speaker 2	A-007	See response to comment comment A-006.



Comment Number	First Name	Last Name	Specific Comment Number	Army Response
0008	Anonymous	Speaker 2	A-006	Extensive efforts were made to reduce adverse impacts on the community while planning to meet the mission requirements to train our Soldiers. Implementation of the BRAC Law requires new facilities at Fort Benning, and this action is not related to the 1970s action describing acquisition of property in Marion County. Analysis in this DEIS indicates the expected extent of the potential impacts due to the proposed action, including those near Hastings Range. Most range improvements near Hastings Range are proposed for years 2014 or later (IPBC, DMPTR, and CLFX), as detailed in the cumulative analysis that presents a long-term and comprehensive view (see pages 4-293 to 4-296). Before those specific range improvements could be implemented, further NEPA analysis would be required, including the potential noise and other impacts on the nearby community.
0008	Anonymous	Speaker 2	N-005	The Army acknowledges that vegetation does not prevent the transmission of sound vibrations. Weather conditions do impact the distance that sound travels. See also response to comment N-003.
0009	Tavia	McCuean	L-001	The Army has worked closely with the community to assist it with its planning. The EIS properly characterizes the impacts.
0009	Tavia	McCuean	A-014	Noted; however, the Army supports the mitigation measures identified.
0009	Tavia	McCuean	B-004	Per mitigations Section 4.12.3, Fort Benning will monitor to determine effectiveness.
0009	Tavia	McCuean	A-009	Concur. The Army applied siting criteria, see Section 3.2, to minimize impacts to sensitive species and habitat, without conflicting with the military mission. Opportunities will be developed to continue to manage for RCWs.
0009	Tavia	McCuean	B-001	Agreed. Thresholds used in BA and EIS were developed by the Army, in consultation with USFWS, using the best available science, with the understanding that unforeseen circumstances will become apparent and will be addressed during the RCW demographic and habitat monitoring.
0009	Tavia	McCuean	B-005	Noted. Fort Benning recognizes the importance of this plant association in the UEA and efforts will be made to reduce and/or avoid impacts within this UEA.
0009	Tavia	McCuean	B-003	Fort Benning will make every attempt to design projects to avoid impacts. The USFWS, during formal consultation process, will determine if this is a viable option or provide other alternatives. See Appendix F, Biological Assessment, Section 9.6 discussion of translocation.



Comment Number	First Name	Last Name	Specific Comment Number	Army Response
0009	Tavia	McCuean	A-015	The Army sited the maneuver networks to minimize impacts to the natural environment. A training plan is being developed to further define maneuver areas. Topography and training requirements will dictate maneuver lanes.
0009	Tavia	McCuean	W-001	To address the magnitude of the construction and training that will occur in the Good Hope Area, an integrated erosion control system for watershed management is being developed to go above and beyond the BMPs established by the Georgia Department of Natural Resources. The Army will monitor Good Hope maneuver area and have mechanisms to maintain, repair and restore the landscape.
0009	Tavia	McCuean	A-013	The Army will consider the suggestion to work with partners.
0009	Tavia	McCuean	A-012	Fort Benning is currently in consultation with the USFWS to protect and preserve the relict trillium population. The relict trillium endangered species management plan prescribes measures to minimize impacts to the species. See also response to A-011.
0009	Tavia	McCuean	A-011	The Army applied siting criteria, see Section 2.4.3 and Section 3.2, to minimize impacts to sensitive species and habitat, without conflicting with the military mission.
0009	Tavia	McCuean	A-010	As needed, heavy use areas will be marked. Monitoring will continue as currently practiced in the light maneuver areas.
0009	Tavia	McCuean	B-002	Noted. Connectivity of potential off-property habitat is not addressed in the EIS or BA because it is too speculative at this point. Opportunities may exist to establish future corridors.
0009	Tavia	McCuean	A-008	Fort Benning will continue to explore the opportunities to work with TNC and other partners through ACUB and other programs to secure land interests.
0010	Robert	Garrard	S-010	See response to comment S-003.
0010	Robert	Garrard	S-012	Public services are addressed at the end of Section 4.4.1.4.
0010	Robert	Garrard	A-016	While the NOI did not specifically identify all potential impacts, these were evaluated in the EIS.
0010	Robert	Garrard	S-011	See response to comment S-003.
0010	Robert	Garrard	S-013	See response to comment S-001.
0011	Jeff	Glitzenstein	A-011	The Army applied siting criteria, see Section 2.4.3 and Section 3.2, to minimize impacts to sensitive species and habitat, without conflicting with the military mission.
0011	Jeff	Glitzenstein	B-003	Fort Benning will make every attempt to design projects to avoid impacts. The USFWS, during formal consultation process, will determine if this is a viable option or provide other alternatives. See Appendix F, Biological Assessment, Section 9.6 discussion of translocation.
0011	Jeff	Glitzenstein	B-005	Adverse impacts would be minimized. Table ES-6 and Appendix G-1 revised.



Comment Number	First Name	Last Name	Specific Comment Number	Army Response
0011	Jeff	Glitzenstein	B-006	At the time of this comment a likely to adversely affect determination has not been made by the USFWS. However, once the Biological Opinion has been rendered, Fort Benning will comply with the reasonable and prudent alternatives.
0012	Robert	Garrard	S-014	The 34 percent stated currently was determined using Bureau of Labor Statistics data, which include the total of persons employed in each ROI county (some of whom may work outside the ROI). On the other hand, it appears that the commentor used Bureau of Economic Analysis data which include total number of employed in the ROI and would total 25 percent. See Section 4.4.1.1.
0012	Robert	Garrard	S-017	The 2005 salary information was used for consistency and comparison purposes in the EIS and include only base pay not total compensation.
0012	Robert	Garrard	S-010	See response to comment S-003.
0012	Robert	Garrard	S-015	Personnel breakdown data were revised and are shown in Table 2.2-1. These revised data were used as the basis for much of the revised socioeconomic analysis.
0012	Robert	Garrard	S-016	The demographics data presented are accurate. The data in the EIS are accurate and were based on readily-available and industry-accepted data sources used at the time of the analysis.
0012	Robert	Garrard	S-018	In Table 4.4-3, the word 'units' was removed from the title and column headings.
0013	Ronald	Hamlett	HZ-002	Extensive efforts were made to reduce adverse impacts on the community while planning to meet the mission requirements to train our Soldiers. The Office of the Staff Judge Advocate, Claims Department, is the proper office to submit any claims for alleged damage to property caused by Army activities.
0014	John	Woodward	TY	Thank you for your comment during the public comment period for the Draft EIS. Public and agency involvement is an important part of the NEPA process.
0015	Steve	Freeman	TY	Thank you for your comment during the public comment period for the Draft EIS. Public and agency involvement is an important part of the NEPA process.
8001	John A.	Neubauer	TY	Thank you for your comment during the public comment period for the Draft EIS. Public and agency involvement is an important part of the NEPA process.
8002	Barbara	Jackson	TY	Thank you for your comment during the public comment period for the Draft EIS. Public and agency involvement is an important part of the NEPA process.
8003	Noel	Holcomb	A-023	The hospital has undergone extensive renovations to remove hazardous substances. Any future renovations would follow applicable federal, state and local regulations.



Comment Number	First Name	Last Name	Specific Comment Number	Army Response
8003	Noel	Holcomb	A-022	Revised to reflect that paint includes all coatings in Section 4.9.1.2. Fort Benning's Lead-based Management Plan which includes such things as lead-based paint, coatings and soils and risk assessments. The plan also includes safety procedures for the workers who conduct this work.
8003	Noel	Holcomb	U-002	Neither of the proposed alternatives would impact Uchee Creek campground, therefore, this is not addressed in the EIS.
8003	Noel	Holcomb	U-010	Tires are already recycled and would continue to be recycled under Transformation, see Sections 4.6.1.6 and 4.6.2.2. Solid waste section (4.6.2.2) revised to include tires.
8003	Noel	Holcomb	A-020	Fort Benning is actively working to include 'green' language in construction contracts. Fort Benning is already using ultra-low sulfur diesel and is exploring the use of other alternative fuels in non-tactical vehicles.
8003	Noel	Holcomb	C-001	Georgia HPD was provided a copy of Appendix I which contained all known information on anticipated impacts to cultural resources. Due to the sensitive nature of the information only the executive summary of the appendix was included in the DEIS. Fort Benning will continue to use the Army Alternate Procedures (AAP) as defined in the Historic Properties Component of the Integrated Cultural Resources Management Plan to comply with Section 106 of the National Historic Preservation Act. See Section 4.13.1.2 for details on the AAP.
8003	Noel	Holcomb	HZ-001	Corrected.
8003	Noel	Holcomb	G-001	Corrected.
8003	Noel	Holcomb	AQ-003	Evaluation of impacts to the regional air quality is presented in Section 4.8.2.2.
8003	Noel	Holcomb	A-019	Per existing Army regulations, the existing Fort Benning waste management plan would be updated to reflect the Transformation actions. Section 4.6.1.6 revised to reflect current construction contractors disposition of solid waste and construction waste under the LEED program. Appendix G also includes construction contractor requirements for developing plans for managing solid waste. Future construction contracts require LEED Silver compliance as stated in Chapter 3.2.2.1. This encourages contractors to examine opportunities to minimize solid waste and use environmentally-preferable materials.
8003	Noel	Holcomb	U-007	Corrected.
8003	Noel	Holcomb	HZ-002	A new hazardous materials/waste control center will be constructed as part of the Armor School complex. Comments recommending more closely tracking management process and additional staff are noted.



Comment Number	First Name	Last Name	Specific Comment Number	Army Response
8003	Noel	Holcomb	W-002	No projects are proposed within 100 feet of the river, 4.10.2 revised to reflect this.
8003	Noel	Holcomb	U-009	The existing MRF would not be closed until the new MRF construction complete and operational.
8003	Noel	Holcomb	AQ-001	Currently all criteria pollutants are in attainment, therefore mobile source emissions were not calculated.
8003	Noel	Holcomb	W-008	Noted. Requirements will be followed and are addressed in Section 4.10 and Appendix G. See also response to W-005.
8003	Noel	Holcomb	W-006	See response to comment W-005.
8003	Noel	Holcomb	SF-001	See Figure 4.14-2 and Section 4.14.1. Ranges are designed so ordnance is fired away from the installation boundary, and surface danger zones are contained completely within Fort Benning.
8003	Noel	Holcomb	U-004	Corrected in Section 4.6.2.2 to be a total of 14,069 population increase for Transformation actions. There would be only a 1.8 mgd increase in water demand due to Transformation activities. Existing 30 mgd permitted water withdrawal capacity can accommodate this increase.
8003	Noel	Holcomb	W-003	Appendix G contains the mitigation and monitoring plan, which identifies mitigation measures for soil erosion.
8003	Noel	Holcomb	U-009	The existing MRF would not be closed until the new MRF construction complete and operational.
8003	Noel	Holcomb	A-027	Goals would likely be impacted, however, this plan is a living document and is currently being integrated into the MCOE BRAC Campaign plan which covers Transformation activities. The plan will be available once it has been completed. As Fort Benning progresses with the Transformation actions, the EMS and Performance Track goals will be updated annually.
8003	Noel	Holcomb	HZ-004	See response to HZ-003.
8003	Noel	Holcomb	W-004	Fort Benning is currently implementing a PCB Management Plan. PCBs in fish tissue would continue to be monitored in accordance with the Fort Benning PCB Management Plan. The PCB Management Plan is available for review at the Fort Benning Environmental Management Division.
8003	Noel	Holcomb	U-011	That is correct. As stated in the EIS, Section 4.6.2.2, the contractors would have the responsibility to dispose of waste. To clarify, it is anticipated that the bulk of new construction would not require demolition of existing structures. As a result, it is anticipated that the proposed action would not result in substantial increase in construction and debris waste.
8003	Noel	Holcomb	HZ-003	Section 4.9.1.4 revised.



Comment Number	First Name	Last Name	Specific Comment Number	Army Response
8003	Noel	Holcomb	A-017	The Army will encourage managers, where feasible, to participate in various strategies to reduce transit impacts. Revisions made to Section 4.5.1.1 and Appendix G to reflect TDM programs that could be applied under either Alternative A or B.
8003	Noel	Holcomb	A-021	Noted. Page 4-121 addresses asbestos and that the Army would follow all existing federal, state, and local permit and plan procedures.
8003	Noel	Holcomb	T-006	Traffic study recommendations have been adopted. Section 4.5.3 has been revised to reflect this change.
8003	Noel	Holcomb	A-024	Army Regulation 200-1 Chapter 9, states that all new buildings will be tested for radon before turning over to the Army. As presented in 4.9.1.2, previous studies have shown that this area is not of the geological characteristics for radon emissions.
8003	Noel	Holcomb	U-008	The Salem, AL solid waste landfill is able to support increased volume of population; there is 10 million tons of capacity, over a life span of 75 years. The EIS has been revised to reflect this information.
8003	Noel	Holcomb	U-006	CWW is responsible for managing sludge disposal, and at this time there are no land applications being considered at Fort Benning. Section 4.6.1.2 corrected accordingly. As stated in 4.6.2.2, the existing infrastructure on Post is sufficient to meet demand. Disposition of these facilities was addressed in the privatization EA, and the increase to capacity is addressed in 4.6.2.2. Consolidation is still expected to occur.
8003	Noel	Holcomb	U-003	CWW is currently permitted for 90 mgd. Current consumption is 54 mgd; Section 4.6.2.2 revised to reflect this information.
8003	Noel	Holcomb	U-005	The existing facilities can support this increase in demand. Calculations in Section 4.6.1.2 and 4.6.2.2 corrected.
8003	Noel	Holcomb	U-001	CWW holds all the GA permits and is studying options to meet Fort Benning's increased potable water demand. Use of the Upatoi Creek water intake facility may be necessary to accommodate that demand. See Section 4.6.2.2.
8003	Noel	Holcomb	W-007	Concur.
8003	Noel	Holcomb	SL-001	Noted. Fort Benning will coordinate with Georgia to ensure compliance with all permits.
8003	Noel	Holcomb	W-005	TMDL plans are addressed but the approach in this EIS is explained in Section 4.10.1.1. Acceptance dates can not be specified at this time. Management practices and measures are found throughout 4.10 and 4.10.3 specifically. Mitigation already required to minimize impacts under existing rules and regulations would be undertaken as presented. The Army did not identify mitigation measures in this NEPA document since they are already addressed through existing plans and permitting processes.



Comment Number	First Name	Last Name	Specific Comment Number	Army Response
8003	Noel	Holcomb	AQ-002	Currently all HAPS do not exceed threshold levels, therefore mobile source emissions were not calculated.
8004	Heinz J.	Mueller	N-006	General location description is provided in the EIS and maps (Figure 4.7.1) are sufficient, see also Table 4.15-5. Updated Section 4.7.1 to indicate no ordnance-related noise complaints since September 11, 2001.
8004	Heinz J.	Mueller	N-007	Acquisition of properties in Zone II is not a feasible mitigation. A Joint Land Use Study is underway to study and recommend land use plans to limit incompatible land use around Fort Benning.
8004	Heinz J.	Mueller	N-008	Mitigation through installation of extra noise attenuating materials was considered but not adopted because new facility construction materials attenuate noise. In addition, the Noise Control Act of 1972 (PL 92-574 1972) does not apply to military training.
8004	Gregory	Hogue	TY	Thank you for your comment during the public comment period for the Draft EIS. Public and agency involvement is an important part of the NEPA process.
8005	Heinz	Mueller	AQ-011	Refer to response comment AQ-001. Trainees use existing Army transit modes such as buses specifically designated for training logistical support.
8005	Heinz J.	Mueller	W-009	Agreed, 4.10.3 specifies use of modifications during the design process to avoid and minimize impacts.
8005	Heinz	Mueller	AQ-009	Fort Benning only uses natural gas with the exception of back up generators at Martin Army Hospital. All future boilers will be natural gas burning boilers.
8005	Heinz	Mueller	AQ-005	Fort Benning is working on plans to use alternative fuels which would reduce emissions. According to Georgia Rules for Air Quality Control, any new industrial processes will include pollution control technology to reduce emissions.
8005	Heinz	Mueller	AQ-012	See response to comments A-020 and AQ-008. Also refer to Table 4.8-4 for reducing fugitive dust.
8005	Heinz	Mueller	AQ-006	See response to comment A-020.
8005	Heinz J.	Mueller	App G-1	In accordance with AR 350-19, Sustainable Range Program, ITAM would continue based on available funding. Appendix G also reiterates the environmental monitors.
8005	Heinz J.	Mueller	W-010	Wetlands will be mitigated in the same watershed as much as possible. Wetlands will be mitigated under the U.S. Army Corps of Engineers Section 404 permitting process.
8005	Heinz J.	Mueller	W-011	Concur. Section 4.10.3 and Appendix G 4.c and G 4.d specifically address mitigation measures and monitoring.



Comment Number	First Name	Last Name	Specific Comment Number	Army Response
8005	Heinz	Mueller	AQ-008	Fort Benning currently uses ultra-low sulfur in all diesel. There are no distributors of B-20 fuel in this area. Contractors with long term post-wide contracts who have offices on post are being encouraged to use their own alternative fuels and install tanks for those fuels in the lay down areas. Fort Benning has been working with the Columbus Metropolitan area for over 2 years to implement measures to reduce PM <sub>2.5</sub> emissions.
8005	Heinz J.	Mueller	App G-1	To clarify, Sections 4.1.2 and 4.1.3 describe ongoing programs that would continue.
8005	Heinz	Mueller	AQ-004	See response to comment AQ-003.
8005	Heinz	Mueller	AQ-010	The model used in this EIS substituted conventional vehicle emission factors for the CA vehicles.
8005	Heinz	Mueller	AQ-007	Contractors must meet LEED silver level. How they meet that standard is left to the discretion of the construction contractor.
8005	Heinz J.	Mueller	S-019	2000 Census block groups evaluated in environmental justice analysis and incorporated into respective affected environment and environmental consequences sections.
8006	Elizabeth	Brown	TY	Thank you for your comment during the public comment period for the Draft EIS. Public and agency involvement is an important part of the NEPA process.