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# **75<sup>TH</sup> RANGER REGIMENT FIELD AMMUNITION SUPPLY POINT**



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## **Environmental Assessment Fort Benning, Georgia**

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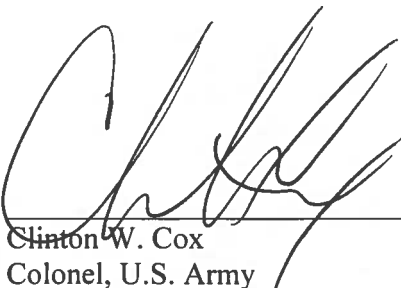
**February 2019**

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**75TH RANGER REGIMENT FIELD AMMUNITION SUPPLY POINT  
ENVIRONMENTAL ASSESSMENT  
FORT BENNING, GEORGIA**

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*14 FEB 2019*

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Date

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## SUMMARY

### 1 Introduction

Fort Benning has prepared this Environmental Assessment (EA) to examine the proposal by the 75<sup>th</sup> Ranger Regiment (75RR) to construct, operate, and maintain a Field Ammunition Supply Point (FASP) at Fort Benning, Georgia (GA) in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 US Code [USC] 4321 et seq.), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Part 1500-1508), and the Army NEPA Regulation (*Environmental Analysis of Army Actions*; 32 CFR Part 651). The information contained in this EA will be reviewed and considered by the Army prior to the final decision on how to proceed with the implementation of the Proposed Action, if at all.

### 2 Background

Fort Benning serves as the home to numerous deployable Army and other tenant units; including the 75RR. The 75RR is the Army's elite light infantry airborne special operations force that is part of the US Army Special Operations Command. The Regiment, headquartered at Fort Benning, GA is composed of three Ranger battalions and an additional Special Troops battalion. The primary mission of the Regiment is to plan and conduct special missions in support of US policy and objectives (Fort Benning, 2018). They perform a variety of direct action raids in hostile or sensitive environments globally, which include airfield seizure, special reconnaissance, personnel recovery, clandestine insertion, and site exploitation. The Regiment can deploy a battalion within hours of notification.

### 3 Proposed Action

The purpose of the Proposed Action is to provide an additional ammunition holding area (AHA) for the 75RR by constructing, operating, and maintaining a new FASP at Fort Benning, GA. The 75RR currently utilizes magazines and support buildings to store and secure arms, ammunition, and explosives (AAE) for both training and operational deployment. The current Ranger AHAs at Fort Benning are strategically located near routes and training areas commonly utilized by the 75RR and consist of earth covered magazines (ECMs) and modular storage vaults that are relocatable. This decentralized storage stratagem promotes flexibility and accessibility to maximize efficient training schedules and loadouts, while minimizing time between notifications to mobilize and force deployment.

The Proposed Action would disperse the 75RR's concentration of AAE among AHAs and increase their total net explosive weight (NEW) stockpiled, as determined by US Army Technical Center for Explosives Safety (USATCES) and DoD Explosive Safety Board (DDESB), and improve the 75RR's proficiencies for rapid deployment by streamlining initial loadout capabilities.

#### **4 Proposed Action Alternative**

Although a number of locations across Fort Benning exist from which a FASP could be sited, Section 1.3 (Purpose and Need) emphasizes that the site must promote flexibility and accessibility to make the best use of resources available in support of the 75RR. As a result, Fort Benning developed screening criteria for comparison against conceivable alternatives in an effort to narrow down the analysis to specific areas and reasonable alternatives. Alternatives that failed to meet the criteria were eliminated and not carried forth for consideration within this EA. The alternative must:

- Be an available parcel on Fort Benning with no less than seven contiguous acres in size and located within a one mile radius of the 75RR's compound;
- Meet the requirements to qualify for an explosives safety site plan as approved by USATCES and DDESB;
- Avoid areas that would present substantial safety and land use conflicts;
- Require minimal site preparations (e.g., undeveloped, level, sparsely forested trees, etc.) prior to construction;
- Avoid parcels where the Proposed Action would result in a "take" as defined by the US Fish and Wildlife Service (FWS) or significant adverse impacts to Federal Threatened and Endangered (T&E) species or their habitat;
- Support the mission requirements of the 75RR and the Installation.

As a result of the screening criteria, only one viable location was identified for potential placement of the FASB. As described below, this EA carries forward the analysis of potential impacts of two alternatives; the Preferred Action Alternative (PAA) and the No Action Alternative.

##### **▪ No Action Alternative**

Under the No Action Alternative, the 75RR would continue utilizing their current arrangement of AHAs. No new FASP would be constructed, operated, and maintained by the 75RR on Fort Benning. The 75RR's NEW and current stockpile of AAE would not increase and the opportunity to further streamline initial loadout capabilities for deployment through the construction of a FASP would be foregone. The No Action Alternative would not meet the Purpose and Need, but is required per NEPA regulations for decision makers and the public to evaluate potential effects of the Proposed Action by comparing impacts of all the Alternatives with baseline conditions.

##### **▪ PAA: Sightseeing Road**

Under the PAA, the 75RR would construct, operate, and maintain a new FASP on Fort Benning just west of Sightseeing Road and southeast of Lawson Army Airfield in the A01 training compartment. The parcel is less than 0.75 miles south of the 75RR's compound and could accommodate approximately 25 acres of total land disturbance. The total limits of disturbance includes the FASP, access roads, necessary utility connections, as well as erosion and sedimentation control features required during construction activities. The PAA is the only

proposed viable alternative meeting both the requirements of the screening criteria and the purpose and need for the Proposed Action (Section 2.2).

## 5 Environmental Consequences

The analysis contained in this EA indicates that the PAA could have minor adverse impacts to Hazardous Materials and Waste (HM&W), Land Use, Soils, and Water Resources. Potential adverse impacts would be considered short-term for HM&W, Soils, and Water Resources as a result of FASP construction activities. Ongoing operational activities have the potential to result in long-term, minor adverse impacts to HM&W and Land Use. Additionally, no environmental impacts are anticipated from the No Action Alternative. Environmental consequences of the Valued Environmental Components (VECs) fully analyzed are summarized in Table S.1 below.

As discussed in Section 4, these minor adverse direct/indirect impacts do not result in significant adverse cumulative effects when considering other past, present, and reasonably foreseeable future activities involving Fort Benning. Adherence to Federal and State laws and regulations, as well as Installation management plans, and Army Regulations would minimize impacts to HM&W, Land Use, Soils, and Water Resources. No additional mitigation measures are identified.

## 6 Conclusions

Implementation of either the PAA or the No Action Alternative would have no significant impact on the quality of human life or the natural environment. The PAA would meet the purpose and need of the Proposed Action by providing a FASP at Fort Benning to accommodate the missions of the 75RR. Therefore, a FNSI is warranted for this Proposed Action and does not require the preparation of an EIS.

**Table S.1: Summary of Direct and Indirect Environmental Impacts for Alternatives**

VEC	No Action	Action Alternatives
Air Quality	No impacts	No impacts
Biological Resources	No impacts	No impacts
HM&W	No impacts	<b>Short-term/long-term, minor adverse impacts</b> from an increase in HM&W disposal
Land Use	No impacts	<b>Long-term, minor adverse impacts</b> resulting from a loss of training land
Soils	No impacts	<b>Short-term, minor adverse impacts</b> as a result of ground disturbances
Water Resources	No impacts	<b>Short-term, minor adverse impacts</b> as a result of ground disturbances or potential spills

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# 1 PURPOSE, NEED, AND SCOPE

## 1.1 Introduction

Fort Benning has prepared this Environmental Assessment (EA) to examine the proposal by the 75<sup>th</sup> Ranger Regiment (75RR) to construct, operate, and maintain a Field Ammunition Supply Point (FASP) at Fort Benning, Georgia (GA) in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 US Code [USC] 4321 et seq.), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Part 1500-1508), and the Army NEPA Regulation (*Environmental Analysis of Army Actions*; 32 CFR Part 651).

The EA is used to determine and evaluate the potential environmental effects of the Proposed Action, identify possible/potential mitigation measures to lessen or eliminate adverse effects, and examine feasible alternatives to the Proposed Action. The intended audience of the EA is Army decision-makers, interested government agencies and non-governmental organizations, Federally recognized Native American Tribes, and members of the public. The effects analyses in this EA are based on a variety of sources and the best available information at the time of preparation. The information contained in this EA will be reviewed and considered by the Army prior to the final decision on how to proceed with the implementation of the Proposed Action, if at all.

## 1.2 Background & Study Location

Initially founded in 1918 as Camp Benning, Fort Benning is an Army Installation located near Columbus, GA, which supports more than 120,000 Active Duty Military, Family Members, Reserve Component Soldiers, Retirees, and Army Civilian Employees on a daily basis (Figure 1-1). The Installation is located on approximately 182,000 acres in southwest Georgia's Chattahoochee and Muscogee Counties and east Alabama's Russell County. Fort Benning plays a pivotal role in supporting the Army's overarching mission by providing the institutional training of Infantry and Armor Soldiers and leaders, basic and advanced individual training of new enlistees, and functional training in special skills needed to support the operating forces. The Armor and Infantry Centers and Schools were consolidated at Fort Benning to create the Maneuver Center of Excellence (MCoE) for ground forces training and doctrine development.

The Installation contains four cantonment areas: Main Post, Kelley Hill, Harmony Church, and Sand Hill (Figure 1-1). Within these cantonment areas, Fort Benning has its own offices, schools, shopping malls, medical facilities, housing, and churches. Fort Benning also has multiple training facilities, firing ranges, and maneuver training areas on the Installation. The cantonment areas on-Post provide a centralized location for community facilities and support services for Soldiers and their Families.

Fort Benning also serves as the home to numerous deployable Army and other tenant units, including the 75RR. The 75RR is the US Army's elite light infantry airborne special operations force that is part of the US Army Special Operations Command. The Regiment, headquartered at Fort Benning, GA is composed of three Ranger battalions and an additional Special Troops battalion. The primary mission of the Regiment is to plan and conduct special missions in

support of US policy and objectives (Fort Benning, 2018). They perform a variety of direct action raids in hostile or sensitive environments globally, which include airfield seizure, special reconnaissance, personnel recovery, clandestine insertion, and site exploitation. The Regiment can deploy a battalion within hours of notification.

### 1.3 Purpose and Need

The purpose of the Proposed Action is to provide an additional ammunition holding area (AHA) for the 75RR by constructing, operating, and maintaining a new FASP at Fort Benning, GA. The 75RR currently utilizes magazines and support buildings to store and secure arms, ammunition, and explosives (AAE) for both training and operational deployment. The current Ranger AHAs at Fort Benning are strategically located near routes and training areas commonly utilized by the 75RR and consist of earth covered magazines (ECMs) and modular storage vaults that are relocatable. This decentralized storage stratagem promotes flexibility and accessibility to maximize efficient training schedules and loadouts, while minimizing time between notifications to mobilize and force deployment.

The Proposed Action would disperse the 75RR's concentration of AAE among AHAs and increase their total net explosive weight (NEW) stockpiled, as determined by US Army Technical Center for Explosives Safety (USATCES) and DoD Explosive Safety Board (DDESB), and improve the 75RR's proficiencies for rapid deployment by streamlining initial loadout capabilities.

***Loadout (noun, military term):***

*The set of objects to be carried into battle and/or the transfer of those objects onto a vessel or vehicle (Wiktionary, 2017).*

***Net Explosive Weight (NEW):***

*The weight in pounds of explosives that is used to calculate explosive limits and explosive safety quantity distances (ESQD) (DoD, 2017).*

### 1.4 Decision to Be Made

The Army decision to be made and supported by information contained in this EA is whether to construct, operate, and maintain a new FASP at Fort Benning, GA. The Proposed Action consists of one Action Alternative, detailed in Chapter 2, along with the No Action Alternative. The final decision of which Alternative to implement will be documented in either a FNSI if no significant environmental impacts are expected, or a Notice of Intent (NOI) to prepare an EIS if significant environmental impacts are expected to occur as a result of the Alternatives. A FNSI will identify the Army's Preferred Alternative and mitigation measures that are essential to the reduction of identified impacts.

### 1.5 Scope of the EA

The National Environmental Policy Act (NEPA) of 1969, as amended, requires federal agencies to consider environmental consequences in the decision-making process. This EA identifies, documents, and evaluates the potential environmental effects of the proposal to construct, operate, and maintain a FASP at Fort Benning, Georgia (GA) in accordance with NEPA regulations issued by the President's CEQ (40 CFR Parts 1500-1508) and the Army's

*Environmental Analysis of Army Actions* (32 CFR Part 651). These federal regulations establish the content, administrative process, and substantive scope of the environmental analysis to ensure that decision-makers have a proper understanding of the potential environmental consequences of a Proposed Action and practical alternatives along with associated mitigation. At its essence, the EA's analysis is an evaluation (qualitatively) and/or measurement (quantitatively) of the environmental and socioeconomic effects anticipated resulting from the decision to be made. Under NEPA, this analysis of environmental and socioeconomic conditions only addresses those geographic locations, or region of influence (ROI), and environmental resources with the potential to be affected by the Proposed Action. Environmental resources and locations beyond the possibility of being affected by the Proposed Action are not analyzed. Consequently, the ROI, which includes all areas and lands with the potential to be affected, may vary between environmental resources.

The Army's NEPA regulation (32 CFR 651) warrants that the environmental analysis presented is proportionate to the nature and scope of the action, the complexity and level of anticipated effects on environmental resources, and the capacity of Army decisions to influence those effects in a productive, meaningful way from the standpoint of environmental quality. Project footprints, construction activities, and timeframes of the proposed alternative has been identified to the fullest extent possible at this time. In the absence of specific information, the EA's analysis conservatively estimates the environmental effects of the Proposed Action and addresses potential broad-level environmental impacts.

## **1.6 Public Involvement**

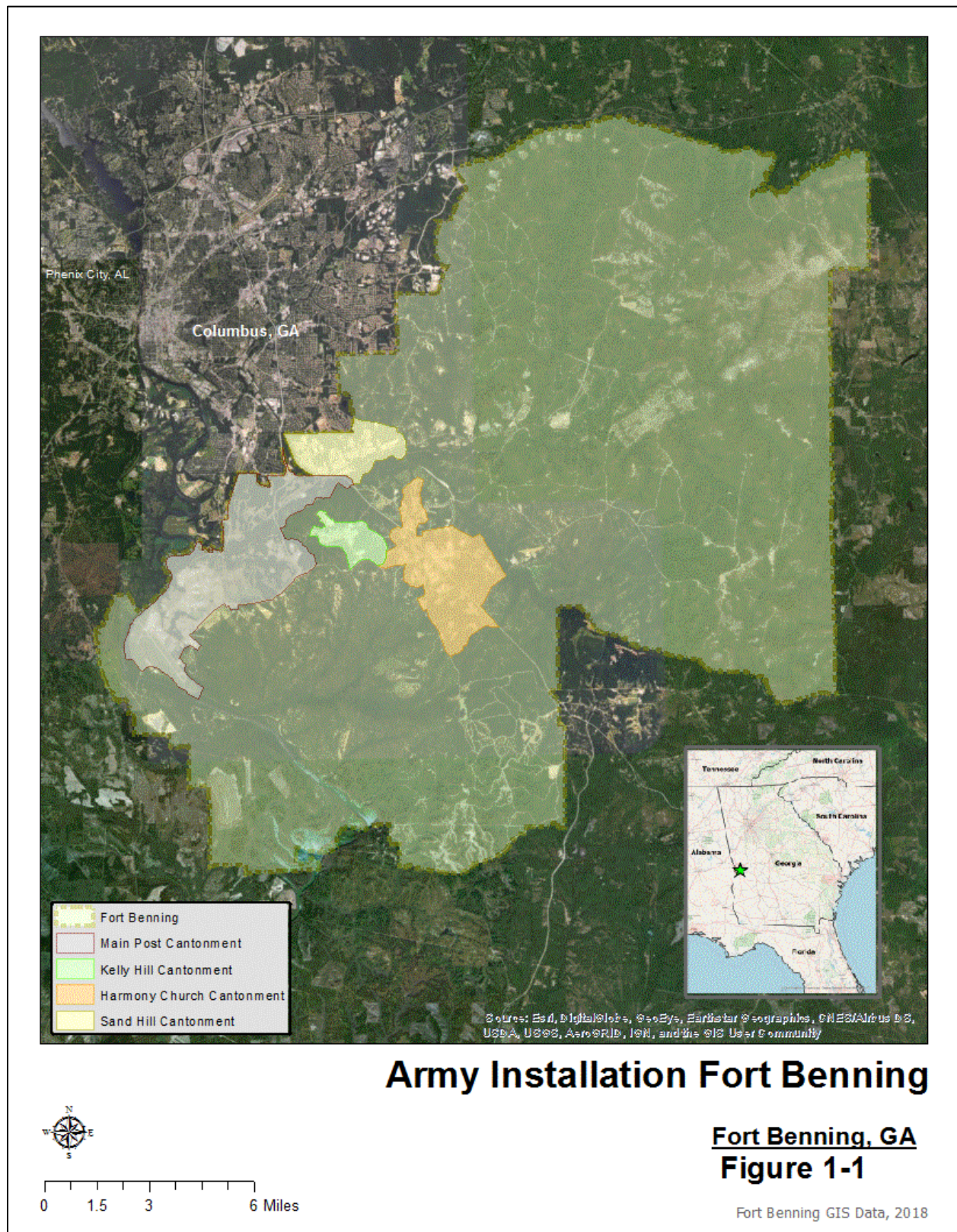
The CEQ and Army NEPA regulations provide opportunities for the public to participate in the public involvement process. Consideration of the views and information of all interested persons promotes open communication, provides additional information and public concerns to decision-makers, and enables better decision making. The EA and Draft FNSI were distributed to individuals and organizations on the distribution list in Chapter 8.0 for a 30-day review and comment period from February 27 – March 29, 2019. The Notice of Availability (NOA) was posted in the Columbus Ledger-Enquirer, The Journal, and Benning News (online) in accordance with the Army NEPA Regulation. These documents are also available at several local libraries and posted on the Fort Benning website (<http://www.benning.army.mil/Garrison/DPW/EMD/Legal.html>). The public comment period for the EA and Draft FNSI will last 30 days, ending on March 29, 2019. Written comments should be forwarded to:

Fort Benning Environmental Management Division  
IMBE-PWE-PC/O NEPA Program Manager  
6650 Meloy Drive  
Building 6, Room 309  
Fort Benning, GA 31905-5122

Electronic comments should be submitted to the NEPA Program Manager: Mr. John Brown ([john.e.brown12civ@mail.mil](mailto:john.e.brown12civ@mail.mil)).

The CEQ and Army NEPA regulations also require that an EA provides evidence through analysis to determine whether the Proposed Action might have significant adverse effects on the environment. Based on evidence and analyses presented within this EA and with consideration given to public and agency comments, the Army will make a determination as to whether implementation of the Proposed Action would have significant effects on the environment. If it is determined that the Proposed Action would have significant, adverse effects, a NOI to prepare an EIS will be issued. If it is determined that the Proposed Action would not have significant adverse effects, the Army may select an alternative for implementation.





## **2 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES**

### **2.1 Introduction**

This section describes the Proposed Action, the alternatives, and the alternatives screening criteria used in the development of the EA. The No Action Alternative, as required by NEPA (40 CFR 1502.14[d]), is described to provide a benchmark for comparison of the environmental impacts of other alternatives.

### **2.2 Proposed Action**

The Proposed Action is to construct a FASP for use by the 75RR at Fort Benning. Implementation of the Proposed Action would consist of construction, operation and maintenance. New construction would involve site preparation activities (i.e., grubbing, grading, etc.), installation of a gravel drive, secure perimeter fencing and access gates, reinforced concrete footers or pads/foundations to support modular ECMs and relocatable storage vaults and covered training area (residue yard), and connection of utilities and communications. Other potential site improvements may include berms, storm drainage, gravel parking areas, and other improved surfaces for walks and high traffic areas.

The ongoing activities associated with the general operation and maintenance of the FASP would be similar in nature to the routine upkeep of other buildings and grounds at Fort Benning. Such activities could include janitorial cleaning (to include the storage and disposal of cleaning material and waste); heating ventilation and air conditioning (HVAC) servicing; mowing; and the maintenance of lighting and/or miscellaneous equipment. Beyond periodic operation and maintenance activities, the FASP would also store and maintain AAEs and the storage and use of petroleum, oils, and lubricants (POLs) and other cleaning supplies and the disposal of associated waste.

### **2.3 Alternatives Screening Criteria**

Although a number of locations across Fort Benning exist from which a FASP could be sited, Section 1.3 (Purpose and Need) emphasizes that the site must promote flexibility and accessibility to make the best use of resources available in support of the 75RR. As a result, Fort Benning developed a screening criteria to be measured against conceivable alternatives in an effort to narrow down the analysis to specific areas and viable alternatives. Alternatives that failed to meet the criteria were eliminated from being carried forth for consideration within this EA. The alternative must:

- Be an available parcel on Fort Benning with no less than seven contiguous acres in size and located within a one mile radius of the 75RR's compound;
- Meet the requirements to qualify for an explosives safety site plan as approved by USATCES and DDESB;
- Avoid areas that would present substantial safety and land use conflicts;



- Require minimal site preparations (e.g., undeveloped, level, sparsely forested trees, etc.) prior to construction;
- Support the mission requirements of the 75RR and the Installation.

## **2.4 Alternatives Proposed**

As a result of the screening criteria, only one viable location was identified for potential placement of the FASB. As described below, this EA carries forward the analysis of potential impacts of two alternatives; the Preferred Action Alternative (PAA) and the No Action Alternative.

### **2.4.1 No Action Alternative**

Under the No Action Alternative, the 75RR would continue utilizing their current arrangement of AHAs. No new FASP would be constructed, operated, and maintained by the 75RR on Fort Benning. The 75RR's Net Explosive Weight (NEW) and current stockpile of AAE would not increase and the opportunity to further streamline initial loadout capabilities for deployment through the construction of a FASP would be foregone. The No Action Alternative would not meet the Purpose and Need as discussed in Section 1.3, but is required per NEPA regulations for decision makers and the public to evaluate potential effects of the Proposed Action by comparing impacts of all the Alternatives with baseline conditions.

### **2.4.2 PAA: Sightseeing Road**

Under the PAA, the 75RR would construct, operate, and maintain a new FASP on Fort Benning just west of Sightseeing Road and southeast of Lawson Army Airfield in the A01 training compartment. The parcel is less than 0.75 miles south of the 75RR's compound and could accommodate approximately 25 acres of total land disturbance. The total limits of disturbance includes the FASP, access roads, necessary utility connections, as well as erosion and sedimentation control features required during construction activities. The PAA is the only proposed viable alternative meeting both the requirements of the screening criteria and the purpose and need for the Proposed Action (Section 2.3). The location of the PAA is illustrated in Figure 2-1.

## **2.5 Alternatives Considered but Eliminated from Consideration**

The following alternatives were considered but eliminated from further analysis during the development of this EA for the reasons described in each section below.

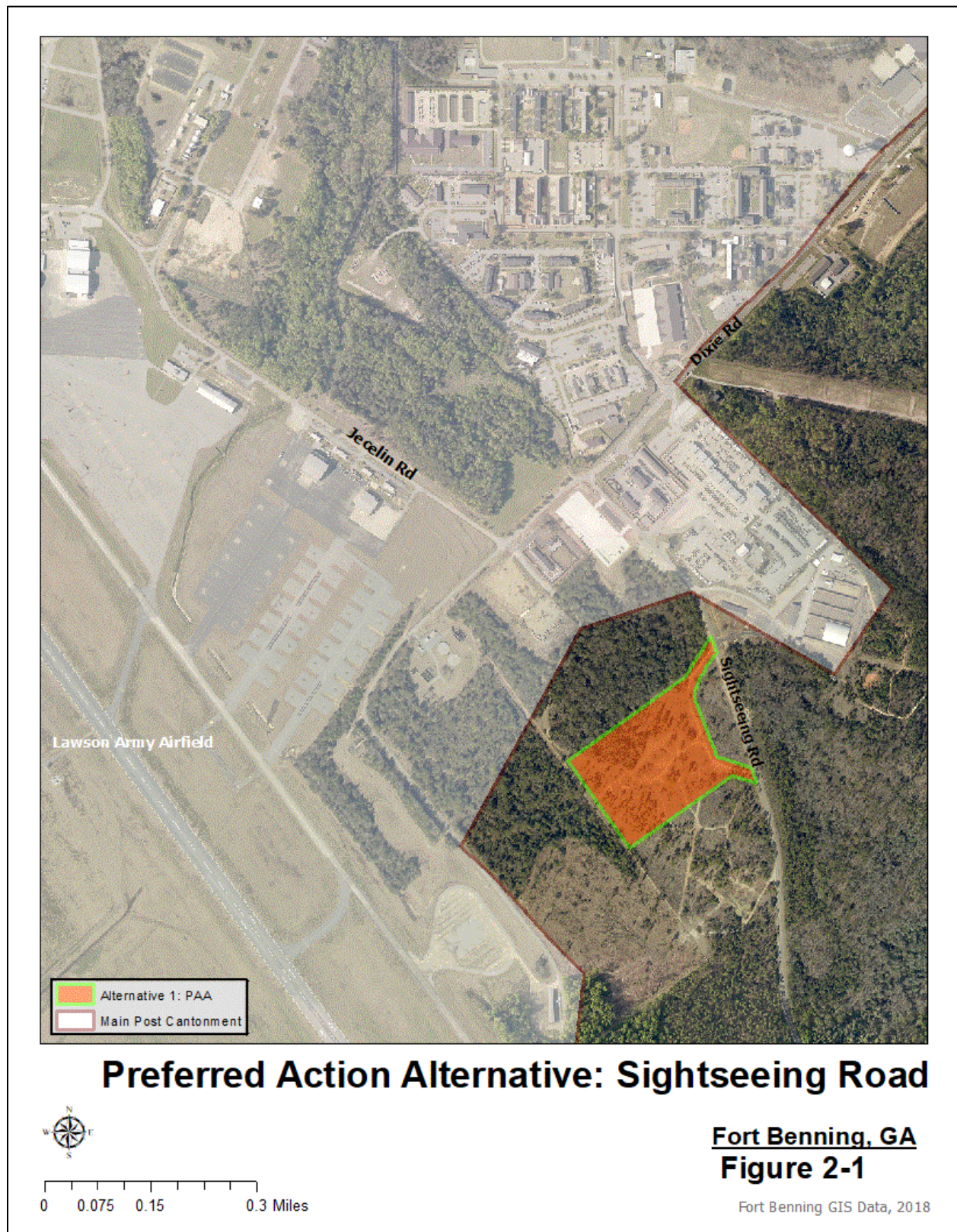
### **2.5.1 Former Central Issuing Facility (CIF)**

The former Main Post CIF (Building 2386) is located northwest of Lawson Army Airfield on Indianhead Road; approximately 0.75 mile from the Ranger compound. The facility is comprised of a warehouse and fenced open storage area that is currently utilized by the 75RR. The six acre storage area currently contains several modular, relocatable storage vaults for securing AAE. In an effort to limit the risk of fire and minor blast hazards, the 75RR stores only a selective assortment of small arms and munitions at this location. The Proposed Action implemented at this location would expand the current explosive safety quantity distances (ESQDs) into nearby

roadways and other occupied facilities; some of which house sensitive receptors. Due to the compound's limited size and encroachment of ESQDs, this alternative was not carried forward for further analysis.

### **2.5.3      Lawson Army Airfield or Airfield Buffer Areas**

Although Lawson Army Airfield has undeveloped space to meet the limits of disturbance of the 75RR FASP, the ESQDs would encroach upon the runway or occupied facilities. Additionally, the airfield's buffer areas were also eliminated from further consideration. These zones primarily neighbor the eastern margin of Lawson Army Airfield and western margin of the Ranger compound and exist as forested areas that strategically serve as a buffers to promote land use compatibility between the Airfield and the Main Post Cantonment Area. Reducing aircraft noise issues has generally been the primary driver of compatible land use planning and establishing buffer zones around airfields. These areas at Fort Benning also contain natural features (i.e., streams and drainage, sloped terrain, and ridgelines) that would present construction challenges. Consequently, these alternatives were not carried forward for further analysis.





### 3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

#### 3.1 Introduction

Chapter 3 describes the affected environment and the Proposed Action's potential environmental consequences. The affected environment portrays the current environmental setting at Fort Benning and forms a reference for analyzing and understanding the intensity of potential environmental impacts for each alternative.

Environmental consequences are characterized by their duration (i.e., short-term or long-term) and by the nature of their effects as being direct, indirect, and/or cumulative. The CEQ defines direct effects as those that are caused by the Proposed Action and occur at the same time and place. Indirect effects are caused later in time or farther removed in distance but are still reasonably foreseeable. Cumulative effects are incremental impacts of the Alternatives when considering other past, present, and reasonably foreseeable future actions (40 CFR Part 1508.7-8).

The affected environment and environmental consequences are described in each section as it applies to valued environmental components (VECs). VECs are fundamental elements of the physical, biological, or economic environment that may be affected by a proposed project, and include air, water, soil, terrain, vegetation, wildlife, fish, birds, and land use. Each VEC also has a defined ROI to describe the geographic extent or area that potential impacts could occur as a result of the Proposed Action.

Based on the results of the environmental analyses, this EA identifies whether a particular potential effect would be adverse or beneficial and to what extent. The following terms are used throughout this EA as a convention to indicate the relative degree of severity of potential impacts:

- **Beneficial:** A positive environmental impact.
- **Adverse:** A negative environmental impact.
- **Minor:** An environmental impact that could occur but the effects would be less than moderate and clearly would not be significant. Examples include actions where the potential consequences are negligible or possibly imperceptible.
- **Moderate:** An environmental impact that is not significant but is readily apparent. Instances include actions where the potential consequences requires additional precautionary measures to minimize adverse effects.
- **Significant:** An environmental impact which violates or exceeds regulatory or policy standards or exceeds the identified threshold. A significant impact may, however, be mitigated to less than significant.

Significance thresholds are described for each resource at the beginning of each environmental consequences discussion. A significance threshold is the stated level at which an impact is determined to become significant. Quantitative and qualitative analyses have been used in

determining whether a threshold would be exceeded. Thresholds have been developed in consideration of CEQ's guidance for determining significance (40 CFR Part 1508.27).

Impacts are also characterized as short-term or long-term. Short-term effects typically are those that would be temporary and associated with the construction phase of a project or maintenance activities, but would no longer be perceptible once construction and/or maintenance is completed. Long-term effects are those that would be permanent or would persist for the operational life of the project.

### **3.2 VECs**

The US Army Environmental Command (USAEC) NEPA Analysis Guidance Manual provides information on identifying VECs, which are those resources that are considered to be important by society and potentially at risk from human activities or natural hazards (USAEC, 2007). There are 16 VECs recommended for consideration by the USAEC Army NEPA Analysis Guidance Manual. For the purposes of this EA, some VECs identified in the USAEC manual have been combined with similar resource areas to focus and consolidate the discussion on potential impacts. The VECs presented in this EA are listed below:

- Air Quality
- Airspace
- Biological Resources
- Cultural Resources
- Facilities, Energy and Utilities
- Hazardous Materials and Waste
- Land Use
- Noise
- Safety
- Soils
- Socioeconomics, Environmental Justice and Protection of Children
- Traffic and Transportation
- Water Resources

#### **3.2.1 VECs Not Carried Forward for Analysis**

In an effort to focus on relevant environmental analysis and issues, the CEQ encourages concentrating on relevant environmental analysis in an EA. Similarly, NEPA promotes minimizing unnecessary analysis and discussion of minor issues that have little or no measurable environmental effect. Outlined below is the rationale for exclusion of VECs without the potential to be affected by implementation the Proposed Action. Accordingly, this section briefly describes those VECs that are not carried forward for further study.

##### **▪ Airspace**

Airspace will continue to be regulated by the Federal Aviation Administration (FAA) and Fort Benning will continue to manage the Airspace in accordance with applicable regulations. As

there are no changes to airspace classifications, training operations, airspace management protocols, or regulations proposed, Airspace is not analyzed further in this EA.

▪ **Cultural Resources**

The Proposed Action would not involve the disturbance of any historic properties eligible for listing on the National Register of Historic Places per the National Historic Preservation Act or cultural items as defined in the Native American Graves and Protections and Repatriation Act. Access to any sacred sites as defined in the American Indian Religious Freedom Act per Executive Order (EO) 13007 would not be impeded and continue per consultation agreements with the Native American Tribes that have a historical affiliation with the Fort Benning area. Therefore, impacts to Cultural Resources are not discussed further in this EA.

▪ **Facilities, Energy, and Utilities**

Columbus Water Works, Liberty Utilities, and Flint Energies own and manage the water and sewer, gas, and electric utilities, respectively, on Fort Benning. The sanitary sewage collection system connects to a Columbus Water Works operated treatment plant. Under the Proposed Action, utility systems (electric, water, sewer, and natural gas) would be connected to the FASP. Although detailed engineered construction designs have not been performed or specific utility demands been determined, no increases to demand, daily operations, or major changes to utility infrastructure are anticipated. Facilities would comprise a fraction of the total FASP footprint and follow the Army mandated guidelines for energy efficiency per the US Green Building council's Leadership in Energy and Environmental Design (LEED). Therefore, Facilities, Energy, and Utilities are not analyzed further in this EA.

▪ **Noise**

Fort Benning Operational Noise Contours are generated primarily by military aircraft and live-fire exercises of various weapons systems. Most noise producing activities within the Main Post Cantonment Area would be typical of any residential community (e.g., vehicular traffic, children playing, mowing grass, etc.), and would not change from current levels. Under the Proposed Action, noise resulting from the use of vehicles and heavy equipment for construction the FASP would be short-term and localized resulting in negligible Noise effects. There would be no increase in potential impacts to sensitive receptors (e.g. housing, schools, churches, etc.), within the Main Post Cantonment Area from the Proposed Action. Temporary increased levels of noise would terminate upon completion of construction, and the noise environment would return to pre-construction conditions. As the proposed FASP would not be considered in the category of a sensitive noise receptor, potential Noise impacts from nearby Larson Army Airfield and small arms ranges would be of no consequence. Therefore, Noise is not analyzed further in this EA.

▪ **Socioeconomics, Environmental Justice and Protection of Children**

EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations, directs each federal agency to "make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low income populations." As the Proposed Action is limited to Fort Benning, there would be no effects to minority or low-income populations. Therefore, there are no effects to Environmental Justice issues and no further discussion is warranted in this EA.

Children may suffer disproportionately, more so than adults, due to physiological and behavioral differences from environmental health risks and safety risks. EO 13045, Protection of Children from Environmental Health Risks and Safety Risks, requires federal agencies to identify disproportionately high and adverse impacts to children. The intent of EO 13045 was to prioritize the identification and assessment of environmental health and safety risks that may affect children, and to ensure that federal agencies' policies, programs, activities, and standards address these environmental and safety risks to children. The potential of the Proposed Action to cause environmental and safety risks to children is negligible. All construction activities areas would be monitored and controlled for only authorized access, (e.g., construction workers, project managers, mitigation monitors, etc.). During operation and maintenance, adherence to ammo storage requirements would prevent children from any access to the FASP. Therefore, no effects to children would occur.

The Proposed Action may have a short-term, negligible beneficial effect on the local economy during construction activities given the size of the proposed action and the other construction and economic activities in the region. This includes the potential for additional jobs and subsequent increased local spending by the workforce. None of the Alternatives would induce long-term population growth within the Installation or the surrounding communities. Therefore, the Socioeconomic effects from the Proposed Action would be indiscernible, and will not be analyzed further in this EA.

#### ▪ **Traffic and Transportation**

Traffic and Transportation includes the roadway system and traffic conditions for the roadway network serving Fort Benning. Fort Benning's on-Post road network is comprised of primary, secondary, and tertiary roadways. The Proposed Action includes minor improvements to existing trail segments to provide access to the FASP. Such activity would not represent an increase of personal, military, or construction vehicles to the extent that would impede vehicular traffic during construction activities or ongoing operation of the FASP. The primary access road to the PAA site is Sightseeing Road, a two-lane divided highway, which can accommodate the potential temporary increase in traffic flow. Therefore, no effects to Traffic and Transportation would occur and further analysis is not warranted in this EA.

### **3.2.2 VECs Carried Forward for Analysis**

After consideration of the anticipated impacts associated with the Alternatives, six VECs were selected and analyzed in detail in the following sections of this EA. These include Air Quality, Biological Resources, Hazardous Materials and Waste, Land Use, Soils, and Water Resources.

### **3.3 Air Quality**

The quality of air in a given location is generally described by the concentrations of various pollutants in the atmosphere. The Clean Air Act (CAA) (42 US Code 7401–7671q) gives the US Environmental Protection Agency (EPA) the responsibility to establish acceptable Air Quality Standards to protect public health and welfare, including the National Ambient Air Quality Standards (NAAQS) that determine acceptable concentration levels for six criteria pollutants. These pollutants include: carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), particulate matter (PM<sub>10</sub>)

or PM<sub>2.5</sub>), ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>) and lead (Pb). A region with Air Quality better than the NAAQS is designated as being in attainment; areas with substandard Air Quality are classified as nonattainment areas. A nonattainment designation generally is given to a region if the primary NAAQS for any criteria pollutant are exceeded at any point in the region for more than three days during a three year period.

### 3.3.1 Affected Environment

The ROI for Air Quality encompasses Fort Benning and the multi-county region including Muscogee, Chattahoochee, Harris, Talbot, and Marion Counties of GA and Russell and Lee Counties of AL. The EPA Region 4, the AL Department of Environmental Management, and the GA Department of Natural Resources regulate Air Quality within this airshed and on Fort Benning. This region has been classified by the EPA as an attainment area for all criteria pollutants; therefore, general conformity Air Quality regulations do not apply to federal actions within this region and is not discussed further in this EA.

#### *Title V Permit*

Fort Benning is designated as a major stationary source of air pollutants and operates under a CAA Title V Operating Permit (No. 9711-215-0021-V-03-0). The latest Title V permit was issued in March 2014 and is in effect for five years. The permit includes a list of emission sources, applicable regulations, emissions limits, and monitoring and record-keeping requirements. The permit is modified on a routine basis to account for the addition or removal of stationary and area pollutant sources.

Fort Benning currently has 11 boilers firing natural gas or liquefied petroleum gas that are greater than 10 million British thermal units per hour, and hundreds of smaller boilers or heaters. Although final site design and specifications of stationary sources (e.g., boilers, HVAC, etc.) required by the FASP is undetermined at this time, Fort Benning will be required to include the estimated annual emissions from these sources in the Installation's Title V permit once new construction is completed and operational.

#### *Fugitive Dust*

Fugitive dust refers to particulate matter suspended in the air from any source other than a stack, vent, or chimney. Common sources capable of generating fugitive dust include earth-moving activities, construction activities, disturbed surface areas, and vehicular movement. The State of GA requires compliance with its Fugitive Dust Rule (Rule 391-3-1-.02[n]), which stipulates the use of reasonable precautions (e.g., application of water, paving roads, covering truck beds transporting dusty materials, etc.) to prevent fugitive dust from becoming airborne and that fugitive dust opacity remain below 20 percent during construction.

#### *Prescribed Fire*

Fort Benning also generates emissions from prescribed fire activities as part of its ongoing ecosystem management program, as the area is historically a fire-based ecosystem. Prescribed burning is the largest single source of criteria pollutant emissions on the Installation (US Army, 2013). It is also a critical management tool for fire-dependent natural communities, Red-cockaded Woodpecker (RCW) habitat, and training area management.



The GA and AL Forestry Commissions administer each state's Smoke Management Plan, which details the basic framework of procedures and requirements for managing smoke from prescribed fires. The goal of each Smoke Management Plan is to minimize the public health and environmental impacts of smoke intrusion into populated areas from fires, avoid significant deterioration of Air Quality and potential CAA violations, and avoid visibility impacts in Class I prevention of significant deterioration (PSD) areas (US Army, 2013). The closest PSD Class I areas are the Sipsey Wilderness Area, AL, as well as Cohotta, Wolf Island, and Okefenokee Wilderness Areas, GA. All of these Class I areas are located more than 200 miles away, and unlikely to be affected by emissions generated at Fort Benning. Therefore, PSD is not further considered in this EA.

### *Greenhouse Gases*

Routine societal and developmental activities such as fuel combustion, deforestation, and other changes in land use, have the potential to result in the accumulation of trace greenhouse gases (GHGs) in the atmosphere. GHGs include water vapor, carbon dioxide (CO<sub>2</sub>), methane, nitrous oxide, O<sub>3</sub>, and several hydrocarbons and chlorofluorocarbons. An increase in GHG emissions is said to result in an increase in the earth's average surface temperature, which is commonly referred to as global warming. Global warming is thought, in turn, to affect weather patterns, the average sea level, ocean acidification, chemical reaction rates, and precipitation rates, all of which is commonly referred to as climate change.

Federal agencies address emissions of GHGs by reporting and meeting reductions mandated in laws, EOs, and policies. The publication of EO 13693, Planning for Federal Sustainability in the Next Decade, in March 2015 retained the goal to maintain federal leadership in sustainability and GHG emissions. EO 13783 of March 2017, Promoting Energy Independence and Economic Growth ordered the rescission of the August 2016 CEQ directive; Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews. As a result, the requirement for separately analyzing the effects of GHGs resulting from a proposed action was eliminated. Nevertheless, EO 13783 did not remove the requirement for assessing a proposed action's potential impact to Air Quality, which includes GHGs as required under NEPA. Therefore, the potential effects of climate change are included. GHG emission sources at Fort Benning include vehicle use, boilers, chillers, water heaters, and emergency generators.

## **3.3.2 Environmental Consequences**

Potential impacts to Air Quality would be considered significant if pollutant emissions associated with the Proposed Action would cause a violation of the CAA and/or cause an exceedance of an established Air Quality Standard.

### **3.3.2.1 No Action Alternative**

Under the No Action Alternative, the construction of a FASP would not occur. The 75RR's NEW and supply of AAE would not increase and continue to utilize existing facilities. Conditions within the ROI concerning Air Quality would remain unchanged and no impacts would be anticipated.

### 3.3.2.2 PAA: Sightseeing Road

The Proposed Action would result in minor increases in air emissions during construction activities from ground disturbing activities and vehicles onsite. Adherence to all applicable federal and state Air Quality protection requirements and GA Air Quality Rules, such as immediately dampening disturbed soils with water and covering truck beds transporting dust generating materials, will reduce fugitive dust emissions and minimize adverse effects to air quality. Construction would require permits, stipulating air quality best management practices (BMPs) to minimize potential impacts. Therefore, no adverse impacts to Air Quality would be expected to result from construction related activities.

Adverse effects to Air Quality resulting from operation and maintenance of the FASP would be minimized through DoD construction guidance requiring new construction to adhere to American Society of Heating, Refrigerating and Air-Conditioning Engineers Standard 189.1. At a minimum, the FASP would be required to meet Leadership in Energy and Environmental Design (LEED) Silver standards where applicable. Therefore, the PAA is not anticipated to adversely impact Air Quality.

### 3.3.3 Mitigation

Because the applicable laws and regulations will mitigate any potential air quality impacts, no mitigation measures warranted for Air Quality.

## 3.4 Biological Resources

Biological Resources include native or naturalized plants and animals and the habitats in which they occur. The dominant plant species make up plant communities, which in turn define the vegetation of an area. Habitat is known as the area or environment where resources and conditions are present that allow a plant or animal to survive.

### 3.4.1 Affected Environment

The ROI for Biological Resources is the area within the boundaries of Fort Benning. Fort Benning manages and conserves its Biological Resources through its Integrated Natural Resources Management Plan (INRMP). All proposed actions on the Installation are considered for their potential effects through the NEPA process, and in accordance with various EOs, US Fish and Wildlife Service (USFWS) Biological Opinions, Memorandums of Understanding, and State and Federal Endangered Species Acts. Biological Resources discussed in this EA include Vegetation, Fish and Wildlife, Migratory Birds, and T&E Species, which may be affected by construction or operational activities associated with the Alternatives.

#### *Vegetation*

According to Fort Benning's INRMP, there are more than 1,275 species of plants on Fort Benning located within approximately 29,000 acres of unforested areas and 150,000 acres of woodland. Loblolly and longleaf pine are the predominant conifers within the Installation, comprising approximately 80,000 acres of the woodland; the remaining 70,000 acres of woodland consist of approximately 15,000 acres of forested restricted access areas and 55,000 acres of hardwood forest (Fort Benning, 2015).

Fort Benning is located within the Longleaf Pine Ecosystem with vegetative cover distributed along two broadly defined ecological units or subsections; the Sand Hills and Upper Loam Hills. The northern portion of the Installation is part of the Sand Hills subsection characterized by well-drained soils and Longleaf pines (*Pinus palustris*). The Upper Loam Hills cover most of the southwestern area of Fort Benning and is characterized by heavier soils containing higher amounts of organic matter and increased water holding capacities. Natural vegetation is characterized as an Oak-hickory forest (e.g., Post Oak [*Quercus stellate*], White Oak [*Quercus alba*], Pignut Hickory [*Carya glabra*], Mockernut Hickory [*Carya tomentosa*]) (Fort Benning, 2015).

The undeveloped areas of Fort Benning generally consists of hardwood and pine trees, and are heavily wooded. The more developed cantonment areas consists primarily of hardwood tree species, decorative shrubs around buildings, and open grassed areas for green space and training facilities. The cantonment areas contain mature sycamore, oak, and other tree species lining many of the Installation's main streets and historic districts. The developed areas generally do not provide good habitat for wildlife. Development and human activity have forced native animal populations to less disturbed and less active areas of the Installation, such as training areas.

### Wildlife

Fort Benning is inhabited by more than 350 species of fish and wildlife, including 154 species of birds, 47 species of mammals, 48 species of reptiles, 25 species of amphibians, 67 species of fish, and nine species of mussels, as well as numerous insect and other invertebrate species (Fort Benning, 2015). Commonly encountered animals include American alligators, turtles, water snakes, wading birds, migratory waterfowl, American beaver, white-tailed deer (*Odocoileus virginiana*), feral swine (*Sus scrofa*), eastern wild turkey (*Meleagris gallopavo*), eastern gray squirrel (*Sciurus carolinensis*), raccoon (*Procyon lotor*), rabbits (*Sylvilagus spp.*), other small mammals, and a wide variety of songbirds. Reptiles and amphibians found on the Installation includes eastern coachwhip (*Masticophis flagellum flagellum*), eastern diamondback rattlesnake (*Crotalus adamanteus*) Florida pinesnake (*Pituophis melanoleucus mugitus*), southern hognose snake (*Heterodon simus*), eastern tiger salamander (*Ambystoma tigrinum*), and other species of the Longleaf Pine Ecosystem (Fort Benning, 2015).

Fort Benning supports a high diversity of native freshwater fishes, including both game and non-game species. Native non-game fishes include many species of shiners, darters, shad, and minnows, as well as the southern brook lamprey (*Ichthyomyzon gagei*). Popular game fish species include: largemouth bass (*Micropterus salmoides*), bluegill (*Lepomis macrochirus*), redear or shellcracker (*Lepomis microlophus*), black crappie (*Pomoxis nigromaculatus*), channel catfish (*Ictalurus punctatus*), white bass (*Morone chrysops*), and hybrid white bass (*Morone chrysops saxatilis*) (Fort Benning 2014).

The Fort Benning region is rich in invertebrate biodiversity. Common insects in stream systems include larval and adult stages of stoneflies, mayflies, midges, and caddis flies. As well, a wide variety of crustaceans such as crayfish, mussels, isopods, snails, and amphipods occur within the regional habitat. Mussels in particular are sensitive indicators of water quality and ecological integrity. At least four mussel species of conservation concern occur within Uchee Creek in AL

(Fort Benning 2014). Water bodies on Fort Benning commonly containing mussels include the Chattahoochee River, Victory Pond and Uchee, Cox, Shell, and Oswichee Creeks (Fort Benning, 2015).

Some of the species discussed herein provide outdoor recreational value in the form of hunting, fishing, and wildlife viewing. Management of these species includes ensuring adequate enforcement of hunting and fishing regulations. During training exercises, Fort Benning limits access for hunting and fishing inside the boundaries of the Installation because of safety and security concerns.

### *Migratory Birds*

According to Fort Benning's INRMP, there are approximately 150 species of birds protected under the Migratory Bird Treaty Act that may occur on Fort Benning either seasonally or year round. Most of these species are breeding residents or neotropical migrants for which the typical breeding season is spring through summer.

Section 315 of the 2003 National Defense Authorization Act provided that the Secretary of the Interior prescribe regulations to exempt the Armed Forces from the incidental taking of migratory birds during military readiness activities. Military readiness activity includes all training and operations of the Armed Forces that relate to combat. In accordance with 50 CFR 21.15 (Authorization Of Take Incidental To Military Readiness Activities), the regulation does not allow an installation to take migratory birds indiscriminately during readiness activities but requires that installations consider the protection of migratory birds when planning and executing military readiness activities. In addition, Fort Benning manages and conserves migratory bird species through its INRMP and considers effects to migratory birds in any proposed action via the NEPA process.

The Migratory Bird Treaty Act grants the Secretary of the Interior the authority to establish hunting seasons for species the USFWS has determined that hunting is appropriate; species for which there is a long tradition of hunting; and species for which hunting is consistent with their population status and long-term conservation. Two species of resident game birds at Fort Benning include the northern bobwhite quail (*Colinus virginianus*) and eastern wild turkey. Nineteen species of migratory game birds (at least 16 of which are waterfowl) include the mourning dove, common snipe (*Gallinago gallinago*), American woodcock (*Scolopax minor*), Canada goose (*Branta canadensis*), mallard duck (*Anas platyrhynchos*), wood duck (*Aix sponsa*), ring-necked duck (*Aythya collaris*), gadwall (*Anas strepera*), American wigeon (*Anas americana*), northern pintail (*Anas acuta*), American black duck (*Anas rubripes*), green-winged teal (*Anas crecca*), blue-winged teal (*Anas discors*), canvasback (*Aythya valisineria*), redhead (*Aythya americana*), bufflehead (*Bucephala albeola*), hooded merganser (*Lophodytes cucullatus*), northern shoveler (*Anas clypeata*), and lesser scaup (*Aythya affinis*) (Fort Benning, 2015).

### *Invasive Species*

In 1999, EO 13112 began requiring federal agencies to prevent the introduction of invasive species; to provide for their control; and to minimize the economic, ecological, and human health impacts that invasive species cause.

Common invasive plant species identified on Fort Benning include the tree species of Chinese Tallowtree (*Triadica sebifera*) and Mimosa (*Albizia julibrissin*), and shrubs such as Chinese Privet (*Ligustrum sinense*) and Multiflora Rose (*Rosa multiflora*). Invasive vine species include Kudzu (*Pueraria montana* var. *lobata*) and English Ivy (*Hedera helix*). Invasive grasses include Cogongrass (*Imperata cylindrical*) and Japanese Knotweed (*Fallopia japonica*). All are extremely aggressive invaders with the capability of forming dense assemblages and/or extensive root systems that displace native vegetation.

Fort Benning utilizes an integrated pest management approach to control invasive plant species. Integrated pest management involves using targeted, sustainable control methods that can include a variety of measures, such as habitat modification, biological control, mechanical control, physical control and the judicious use of pesticides. Specific procedures related to the control of invasive plant species are outlined in Fort Benning's Integrated Pest Management Plan (Fort Benning, 2013). The means used for the maintenance of the urbanized areas are largely effective in managing invasive species as well. Accordingly, invasive plants will not be discussed further in this EA.

Although a number of invasive animal species are common to the region, Fort Benning's primary concern has been with feral swine. Feral swine commonly jeopardize vegetation and soil surfaces as a result of "rooting" habits. Other effects include competition with native wildlife species, habitat disturbance, direct mortality of threatened and endangered species, and damage to military assets (e.g., cables, targetry, bivouac sites, turf grass, etc.). Fort Benning's management of this species focuses on controlling the population by establishing liberal hunting regulations such as no bag limits and expanded season lengths. In addition, trapping is conducted at strategic locations to minimize damage to military assets and sensitive plants (US Army Corps of Engineers [USACE], 2009). Specific procedures related to the control of feral swine are outlined in Fort Benning's Integrated Pest Management Plan (Fort Benning, 2015). The presence of urban areas, communities, and control methods for feral swine are effective in maintaining and managing populations within and near Fort Benning's cantonment areas. The Proposed Action would occur just beyond the more urbanized Main Post Cantonment Area and would have no effect on feral swine. Therefore, feral swine will not be discussed further in this EA.

#### *Endangered, Threatened, and Rare Species*

As described in the INRMP, there are 96 species (four amphibians, eight birds, seven fishes, four mammals, four mussels, nine reptiles, and 60 plants) of conservation concern found on Fort Benning. Plant and animal species listed as threatened, endangered, or proposed as such by the USFWS, the State of GA or the State of AL are recognized as special-status species. The Endangered Species Act (ESA) only protects federally listed species. State listed species are protected in the State of GA by the GA Wildflower Preservation Act or GA's Endangered Wildlife Act. The State of AL likewise protects a number of species through the Nongame Species Regulation (AL Administrative Code 220-2-.92). Although state listed species are not protected by the ESA, they may be considered for federal listing in the future and may be afforded special management attention by Fort Benning.



AR 200-1 (Environmental Protection and Enhancement) guides Army compliance with the ESA. The regulation requires an Endangered Species Management Component for listed and proposed species and critical habitat, a 100 percent inventory of suitable habitat for listed and proposed species that may occur on the Installation, and an initial thorough inventory of plants, fish, wildlife, and habitats on the Installation lands. Five federally listed or candidate species occur on Fort Benning. These are the Red-cockaded Woodpecker (*Picoides borealis*) (Endangered), American Alligator (*Alligator mississippiensis*) (Threatened for similarity in appearance), Wood Stork (*Mycteria Americana*) (Endangered), Relict Trillium (*Trillium reliquum*) (Endangered), Georgia Rockcress (*Arabis Georgiana*) (Candidate), and Gopher Tortoise (*Gopherus polyphemus*) (Candidate). The Bald Eagle (*Haliaeetus leucocephalus*) has been delisted but remains protected under the Bald and Golden Eagle Protection Act (Fort Benning, 2014).

#### *Unique Ecological Areas (UEAs)*

Fort Benning has identified several areas that have unique or rare ecological characteristics or that represent the best example of a particular habitat or plant community type. UEAs were chosen based on characteristics of their soil type, topography, slope, aspect, elevation, hydrology, flora, fauna, and other biotic and abiotic features. Many areas apparently contain remnant native plant communities that have experienced minimal disturbance relative to other similar communities. To conserve the ecological integrity of these areas, Fort Benning will use their designation as UEAs to ensure that current and future land-use planning and training activities take into consideration their presence and their preservation. The Proposed Action and Alternatives would not occur within or have any effects on UEAs. Therefore, UEAs are not discussed further in this EA.

#### *Habitat Conservation Outside of Fort Benning*

The Sikes Act authorizes the DoD to partner with non-federal governments or private organizations to establish buffers around military installations. The Army implements this authority through the Army Compatible Use Buffer (ACUB) program, which provides funding for the Army to work with state and local governments, non-governmental organizations, and willing land owners to help prevent encroachment of training areas and promote regional conservation efforts.

Through Fort Benning's partnership with The Nature Conservancy, off-Post conservation measures both buffer the Installation boundary from land uses incompatible with military training and promotes land management to protect and restore habitat for listed, imperiled, or at-risk species that impact Fort Benning's mission. The Proposed Action would not occur within or have any effects on Fort Benning's ACUB program. Therefore, these areas are not discussed further in this EA.

### **3.4.2 Environmental Consequences**

Impacts would be considered significant if one of more of the following conditions would result:

- Substantial loss or degradation of habitat or ecosystem functions (natural features and processes) essential to the persistence of native plant and animal populations;

- Substantial loss or degradation of a sensitive habitat, including surface waters that support high concentrations of special status species or migratory birds;
- Disruption of a federally listed species, its normal behavior patterns, or its habitat that substantially impedes the Installation's ability to either avoid jeopardy or conserve and recover the species; or
- Substantial loss of population or habitat for a state-protected species increasing the likelihood of federal listing action to protect the species in the future.

#### **3.4.2.1 No Action Alternative**

Under the No Action Alternative, construction of a FASP would not occur. No impacts to Biological Resources would be expected as a result of the No Action Alternative.

#### **3.4.2.2 PAA: Sightseeing Road**

Although construction activity has the potential to affect terrestrial wildlife through nominal displacement as a result of the removal of vegetation and possible habitat, soil disturbance, vehicle traffic, and incidental human activity, the PAA would be limited to the project areas and adhere to applicable federal and state laws, regulations, and permit requirements. The estimated 20 acres proposed represent the maximum limits of disturbance to accommodate for the facility footprint, road access, utility tie-ins, and anti-terrorism/force protection requirements. There are no Federally listed species or habitats within this alternative, and none nearby that would be disturbed. Additionally, these areas do not contain unique habitat supporting concentrations of special status species or migratory birds. As a result, no impacts to Biological Resources are anticipated under the PAA.

#### **3.4.3 Mitigation**

Adherence to Federal and state laws and Army regulations, as well as Installation management plans, would preclude potential impacts due construction, operation, and maintenance activities in the short- and long-term. Additionally, all proposed construction, operation, and maintenance activities will require analysis through Fort Benning's NEPA review process. A Request for Environmental Analysis through the submittal of an FB-144R form detailing the action or activity will be reviewed prior to implementation of the Proposed Action to ensure that the potential impacts fall within the analysis presented in this EA. Therefore, no additional mitigation measures are warranted.

### **3.5 Hazardous Materials and Waste**

Hazardous materials are comprised of any material or agent (biological, chemical, physical) that has the potential to cause harm to humans, animals, or the environment, either on its own or through interaction with other factors. Waste may be classified as hazardous due to its toxicity, reactivity, ignitibility, or corrosivity. Hazardous materials and waste (HM&W) are identified and regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); the Occupational Safety and Health Act; the Resource Conservation and Recovery Act (RCRA); the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA); and the Emergency Planning and Community Right-to-Know Act. The Clean Water Act also addresses

HM&W through Spill Prevention, Control, and Countermeasures (SPCC) and National Pollutant Discharge Elimination System (NPDES) requirements. This section evaluates the use, handling and storage, transport, and disposal of HM&W at Fort Benning as a result of the Proposed Action.

### **3.5.1 Affected Environment**

The ROI for HM&W includes the entirety of Fort Benning. Programs have been established at Fort Benning to:

- Control the entry of hazardous substances to the Installation;
- Safely manage hazardous waste and material handling and transportation within the Installation;
- Inform military and civilian employees of HM&W dangers;
- Minimize the risk of human exposure and release into the environment associated with these substances;
- Dispose of these substances in an environmentally sound manner when they are no longer useful.

#### *Hazardous Materials Use and Handling*

AR 200-1 requires Army installations to minimize the use of hazardous materials, as well as establish management procedures to ensure proper handling throughout their life cycle including procurement, storage, use, and disposal. In addition, installations are required to implement a Hazardous Waste Management Plan to ensure that hazardous waste is managed in compliance with applicable laws and regulations. AR 200-1 also includes requirements for the management of toxic substances in a manner that minimizes human exposure and environmental risk.

Routine operations on Fort Benning require the use of a variety of hazardous materials, including petroleum products, solvents, cleaning agents, paints, adhesives, and other products necessary to perform vehicle and equipment maintenance, military training activities, and training area upkeep. Petroleum, oil, and lubricants (POLs) and batteries are used to power both military and civilian equipment and vehicles, and pesticides are used to control plant and animal pests throughout the Installation. When not in use, these materials are generally stored at maintenance facilities in a cantonment area.

#### *Solid Waste Management*

Solid waste (that is not hazardous or toxic) at the Installation includes waste generated from Family housing, administrative areas, troop units, and contractors. Two separate solid waste haulers operate under contract on Fort Benning. All of Fort Benning's solid waste goes to a transfer station and then to permitted sanitary landfills located in Phenix City or Tallassee, AL. Both landfills have projected current and future capacity of more than 30 years (Fort Benning, 2017, Advanced Disposal, 2018).

Fort Benning's policy on recycling is governed by the October 2007, Policy Memorandum No. 200-1-8, entitled "Qualified Recycling Program." Under this policy, Army personnel and contractors are required to actively participate in the recycling program, and all of the proceeds



from the program are retained by the Installation. One recycling center processes recyclable items from industrial work areas, barracks, and Family housing areas. Administration area waste, which generally consists of office paper products, food wastes (from mess halls and restaurants), and cardboard and cans from receiving, mess halls, motor pools, etc., is delivered to the Fort Benning Material Recovery Facility to be packaged and sold. Yard waste material consists of leaves, limbs, grass clippings, etc., and is composted, mulched, and recycled as possible. Contractors and other users do not have permission to dispose of waste on Fort Benning. All construction and demolition wastes are taken off-Post by the contractor to a permitted recycling or disposal facility (Fort Benning, 2017).

#### *Toxic Substances Management*

Toxic substances that commonly occur on Army installations include asbestos-containing materials, lead-based paint, and polychlorinated biphenyls. These substances are almost exclusively affiliated and common with older construction and insulating materials and are not anticipated to be encountered with implementation of the Proposed Action. Therefore, toxic substance and their management are not discussed further in this EA.

#### *Radon*

Radon is a naturally occurring, colorless, odorless, radioactive gas produced by the decay of uranium in rock and soil. Radon is a known carcinogen, capable of causing direct damage to lung tissues and increasing the risk of lung cancer when inhaled. If present, radon gas will typically concentrate in airtight buildings and particularly in basements. The Army Policy for Radon as outlined in AR 200-1, Radon Policy Reduction Program, requires measurement of radon in newly constructed Army facilities and use of USACE design criteria for radon reduction in new construction. Radon information provided by EPA, Region IV, and statistics maintained by the GA Environmental Protection Division suggest that radon is not an issue of concern in the region (USACE, 2009). The Proposed Action is not anticipated to be affected by radon or its management; therefore, radon is not studied further.

#### *Contaminated Sites*

Past resource and waste management practices at DoD facilities have resulted in the presence of toxic and hazardous waste contamination at some installations, including Fort Benning. In response, Fort Benning has undertaken mitigation and cleanup activities under its Installation Restoration Program to manage these sites, which are referred to as Solid Waste Management Units (SWMUs) (Fort Benning, 2005a and b). The Fort Benning Environmental Management Division actively manages programs for addressing contaminated sites in compliance with RCRA and the National Oil and Hazardous Substances Pollution Contingency Plan.

Consistent with DoD policy, it is Fort Benning's policy to identify any known or potentially contaminated sites that may be affected by proposed construction to prevent the spread of any contamination and to ensure that construction workers and personnel who use the project areas are not exposed to unsafe conditions. SWMUs that need corrective action have been identified, surveyed, and are reviewed by Fort Benning, prior to any proposed construction projects. Those sites requiring corrective action may have recorded land use controls that allow the project planners and engineers to evaluate the nature of the contamination and take proper action to prevent the spread of contaminants to the environment or expose personnel as a result of

proposed construction. The nature of exposure protection includes the potential for subsurface vapor intrusion below buildings. For locations where contamination has occurred in the past but a determination of No Further Action has been made, this determination is based upon the documentation that all contaminant exposure avenues have been identified and that all exposure levels of any contaminants are below all EPA and GA Environmental Protection Division screening levels, and no protective measures or additional clean-up or land use controls are necessary.

As illustrated in Figure 3-1 and summarized in Table 3.5, fourteen SWMUs exist within 0.5 miles of the PAA. With the exception of FTBN-006 (Closed Landfill No. 6), all of the SWMUs mentioned have a status of No Further Action Required (NFA) as granted by the GA Environmental Protection Division (EPD). Closed Landfill No. 6 remains under corrective action for monitoring and bioremediation of groundwater.

***Bioremediation (noun):***

*A treatment process that utilizes naturally occurring organisms to break down contamination. This process includes the introduction of oxygen or other nutrients to enhance the cleanup of an aquifer (Water Encyclopedia, 2018).*

**Table 3.5: Solid Waste Management Units Identified**

SWMUs Sites Located Within 0.5 Mile Radius of the PAA		
<b>SWMU/AOC Number</b>	<b>Description</b>	<b>Hazardous Waste Permit Status</b>
FTBN-005	Closed Landfill No. 5	NFA (2002)
FTBN-006	Closed Landfill No. 6	Corrective Action
FTBN-007	Closed Landfill No. 7	NFA (2011)
FTBN-033A	Former Sewage Sludge Application Site No. 1	NFA (2001)
FTBN-034M	Closed Vehicle Washrack (Building 2908)	NFA (2001)
FTBN-035V	Active Vehicle Washrack (Building 2491)	NFA
FTBN-035W	Active Vehicle Washrack (Building 2492)	NFA
FTBN-035AA	Active Vehicle Washrack (Building 2920)	NFA
FTBN-036C	Waste Oil UST	NFA
FTBN-036H	Waste Oil UST	NFA
FTBN-036I	Waste Oil UST	NFA
FTBN-036J	Waste Oil UST	NFA
FTBN-042	Waste Water Treatment Facility No. 2	NFA
FTBN-066	Old Fire Training Pit	NFA (2008)

### *Pesticides*

Army installations have managed pests for decades using pesticides. The FIFRA mandates that the EPA regulates the use and sale of pesticides. Some of these chemicals historically used were banned under the FIFRA in the 1970s and 1980s; however, pesticide compounds often still endure within the environment today. Some of the most long-lasting and frequently used pesticides in the US that are now banned include organochlorinated insecticides more commonly

known or branded as DDT (dichloro-diphenyl-trichloroethane), heptachlor, endosulfan, chlordane, aldrin, dieldrin, and endrin.

### **3.5.2 Environmental Consequences**

An Alternative would be considered to have a significant adverse impact if:

- It resulted in noncompliance with applicable local, state, and federal regulations;
- An increase in the amount of hazardous waste generated or procured was beyond the waste management capacity of the Installation;
- Contaminated sites are disturbed causing adverse effects on ecological and human health by creating exposure pathways; or if

#### **3.5.2.1 No Action Alternative**

The No Action Alternative would not change the baseline conditions for management of hazardous materials, toxic substances, hazardous waste, or contaminated sites at Fort Benning. Fort Benning would continue to minimize any adverse impacts resulting from hazardous materials by following all applicable laws, regulations, and Army policy. Therefore, no impacts are anticipated.

#### **3.5.2.2 PAA: Sightseeing Road**

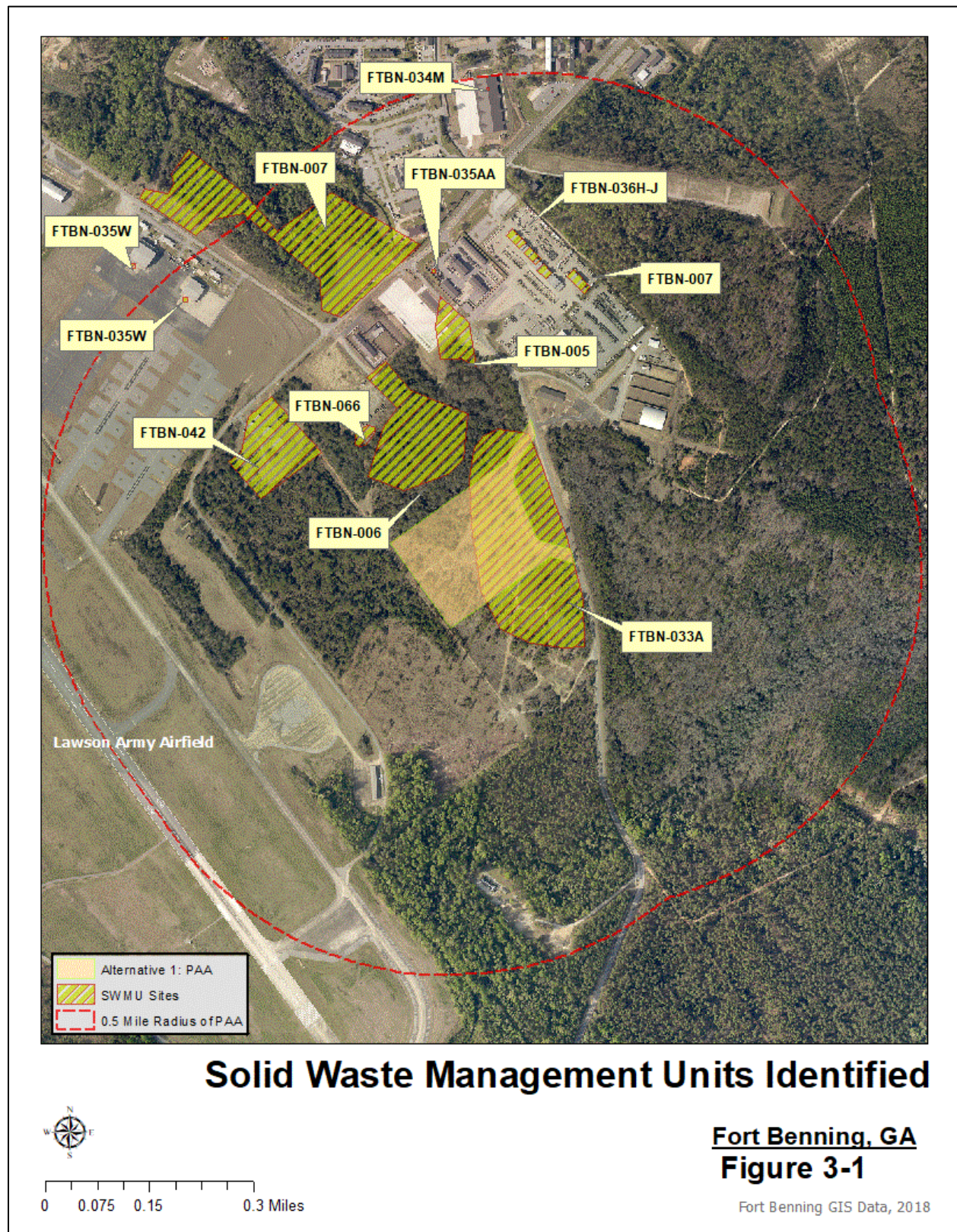
Under the PAA, approximately half of the 24 acre Former Sewage Sludge Application Site No. 1 (FTBN-033A) would be disturbed during construction activity. Although this unit was identified as a SWMU and described in a 1994 Fort Benning RCRA Facility Assessment, soil samples found no impacts to soils from sludge applications (USACHPPM, 1994). This site has not been used for sludge application in decades and was granted a NFA status by the Georgia EPD in 2001. The PAA's proposed location, approximately 600 feet south of Closed Landfill No. 6 (FTBN-006), would not disturb the landfill or have any effect upon the landfill's ongoing monitoring and bioremediation efforts. No impacts associated with known or potential contamination are expected under the PAA.

The quantity of hazardous materials such as petroleum, oil, and lubricants would increase slightly on the Installation in support of constructing a new FASP. This demand would be short-term and primarily related to and required by heavy equipment use, which will end with the completion of the construction phase. Over the long-term, facility and operational needs may involve the storage and use of hazardous materials such as cleaning agents, paints, adhesives, and other products for routine household, facility, and armament maintenance. The risk of uncontrolled release of hazardous substances during construction and long-term operation would be substantially minimized by following applicable federal and state laws and regulations and Army policy for handling, storage, and disposal of hazardous materials. Therefore, minor adverse impacts are anticipated from the use of hazardous material and disposal of waste. The duration of effects from implementation of the PAA would be short-term, due to construction activities, and long-term as a result of ongoing operation and maintenance of the FASP.

### **3.5.3 Mitigation**

Adherence to applicable federal, state, Army laws and regulation, and Army policy mentioned would mitigate any potential impacts due to construction and maintenance operations activities. Therefore, no mitigation measures are warranted.





### **3.6 Land Use**

Land Use includes current and planned uses and the regulations, policies, or zoning that may control the proposed utilization of land. The term land use refers to real property classifications that indicate either natural conditions or the types of human activity occurring on a parcel. Two main objectives of land use planning are to ensure orderly growth and compatible uses among adjacent property parcels or areas; however, there is no nationally recognized convention or uniform terminology for describing land use categories. As a result, the meanings of various land use descriptions, labels, and definitions vary among jurisdictions. Natural conditions of property can be described or categorized as unimproved, undeveloped, conservation or preservation area, and natural or scenic area. There is a wide variety of land use categories resulting from human activity. Descriptive terms often used include residential, commercial, industrial, agricultural, institutional, and recreational.

#### **3.6.1 Affected Environment**

Fort Benning covers approximately 182,000 acres in portions of Muscogee, Chattahoochee, and Russell counties. Fort Benning training lands consist of drop zones, landing zones, duded and non-duded impact areas, ranges, and maneuver areas. Maneuver areas and landing and drop zones are located throughout the Installation.

The ROI for Land Use includes Fort Benning's Main Post Cantonment Area and adjacent training and airfield lands that could potentially be affected by the Proposed Action. Land use within the Installation is planned in accordance with the Fort Benning Real Property Master Plan. The Proposed Action would locate the FASP approximately 1,100 feet southwest of the Main Post Cantonment Area. The site is centralized within a training area designated as A1. Surrounding land uses include Larson Army Airfield to the west and southwest, Training Areas (A2 and A29) to the south and east, and the Main Post Cantonment to the north.

Lands that are not used for training at Fort Benning are used to support cantonment functions. At approximately 8,850 acres, Main Post is the largest and most developed of the cantonment areas. It includes the MCoE and Garrison Headquarters, Infantry and Armor Schools, Cuartels Barracks Complex, Martin Army Community Hospital, Post Exchange, Commissary, and various Family housing areas. Lawson Army Airfield is located in the southernmost portion of Main Post. The areas of Main Post adjacent to the Chattahoochee River and Upatoi Creek are largely green space. Family housing and outdoor recreation dominate the northern portion of Main Post. The densely developed core of Main Post includes unaccompanied personnel housing, community facilities, training facilities, supply and storage, maintenance, industrial, and medical land uses.

The majority of training lands at Fort Benning are utilized year-round. The primary land use document guiding military training is the Fort Benning Range and Training Land Program (RTLTP) Development Plan (Fort Benning, 2006). The RTLTP Development Plan is prepared using the RTLTP planning process as defined in Army Ranges and Training Land Program (Army Regulation 210-21), dated 1 May 1997, and The Army Sustainable Range Program (Army Regulation 350-19), dated 30 August 2005. The RTLTP Development Plan provides a view of the available assets, identifies users, and establishes training needs based on Army training and



resource doctrine. The RTLP process addresses managing range facilities and training areas by establishing current requirements and utilization levels for available training assets.

Training areas are identified by their designated use, light maneuver training areas or heavy maneuver training areas. Light maneuver training areas are used for dismounted foot traffic, wheeled vehicles, and towed artillery training. Heavy maneuver training areas are used for training with both tracked and heavy wheeled vehicles and equipment, primarily on established trails but also some free maneuvering (cross country travel) of heavy equipment across appropriate terrain. Heavy maneuver areas can be used for light maneuver as well; therefore, all maneuver training areas are available for light forces. Training Area A-1 is designated for light maneuver.

The Army identifies land use areas that receive live-fire ordnance as duded and non-duded impact areas. A duded impact area is an area that is known or expected to contain unexploded live ammunition or a dud (an explosive ammunition that has been fired, has failed to function as designed, and as a result is of a hazardous or unpredictable condition). Access to duded impact areas is restricted to mission essential activities and coordinated with the Range Operations Center office prior to entry. Non-duded impact areas are those that receive munitions that do not include high explosive or dud-producing ordnance (such as training rounds or projectiles from small arms). Non-duded impact areas can be used for maneuver training at the expense of ceasing live-fire training when the associated SDZ overlap with the training area. At Fort Benning, duded and non-duded impact areas are concentrated in three range complexes on the Installation. The two primary duded impact areas are the K-15 duded impact area, located in the northeast corner of the Installation, and the A-20 duded impact area, located within the Alpha Range Complex 0.75 miles away east of Training Area A-1.

#### *AE Site Safety and Security*

In accord with Army policy and approved by USATCES and DDESB, an explosives safety site plan (ESSP) is required prior to new construction of any AE site (Department of the Army, 2011). Through this process, the USATCES provides the criteria and approval for establishing safe distances from military explosives. As illustrated in Figure 3-2 for the PAA, the safe distances, plotted as a circle with the location(s) of the handled/stored explosives at the center, provides ESQDs that designates the areas in which land use restrictions apply. An ESQD's size and shape is contingent on the approved NEW to be stored and site plan configuration (Department of Defense, 2008). Future development within an ESQD is either restricted or altogether prohibited in order to maintain safety of personnel and minimize the potential for damage to other facilities or personal property in the event of an accidental fire or explosion.

Through the Unified Facilities Criteria (UFC) 4-010-01 DoD Minimum Antiterrorism Standards for Buildings, the DoD has developed Anti-terrorism/Force Protection Standards (AT/FP) standards, to reduce the likelihood of casualties from potential terrorist attacks. Requirements may include mandated setbacks of parking areas from buildings, increased security measures such as barricades at military facility entrances and exits, AT/FP-compliant perimeter fences, and emergency notification systems and procedures. The Army Installation Design Standards contains information on installation planning, engineering design, and construction techniques that can preclude or minimize the effects of terrorist attacks upon existing and future facilities



(Department of the Army, 2004). It addresses the comprehensive planning process, facility site design, and building systems design. Additional criteria are available in Unified Facilities Criteria (UFC) 4-010-01 DoD Minimum Antiterrorism Standards for Buildings. Since any new construction under the Proposed Action would be designed and completed in accordance with AT/FP specifications and approvals by USATCES and DDESB, safety and security is not further discussed within this EA.

### **3.6.2 Environmental Consequences**

Factors affecting Land Use include compatibility with on-site and adjacent land uses and/or change to an existing land use. Impacts on land use would be considered significant if the Proposed Action was incompatible with surrounding land use or results in land use changes that degraded mission-essential training or necessary functions within the Main Post Cantonment Area.

#### **3.6.2.1 No Action Alternative**

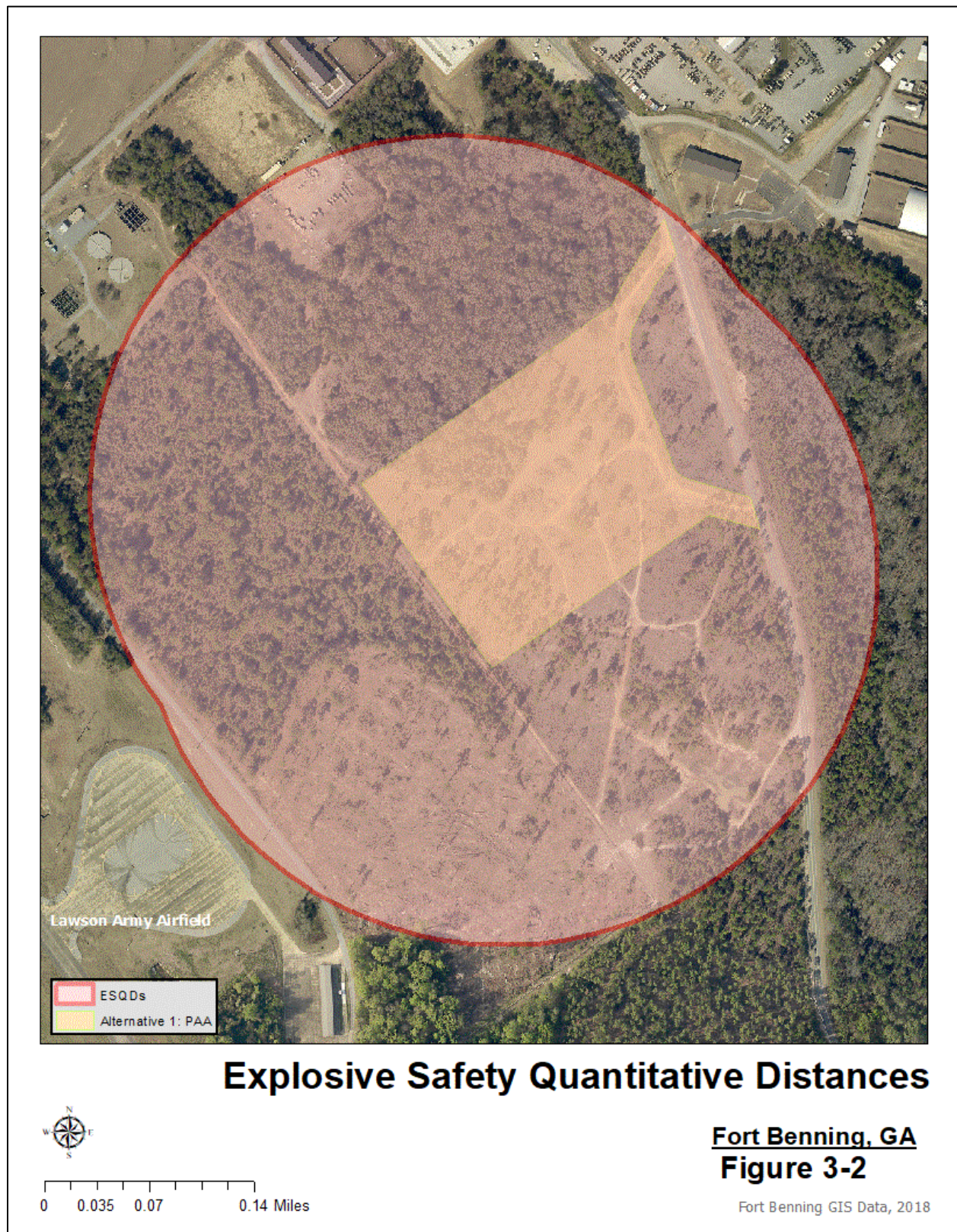
Under the No Action Alternative, the Proposed Action would not occur and there would be no change or effects to the current land use. Therefore, no impacts would occur with implementation of the No Action Alternative.

#### **3.6.2.2 PAA: Sightseeing Road**

Under the PAA, changes to land use would occur beginning with construction activities and continue with completion and ongoing operation of the FASP. The Proposed Action would replace approximately 20 acres of training land, within the A-1 Training Area, with a controlled access ammunition storage area. Permanent and long-term alterations to land use would occur within the project site and anticipated 1,500 foot ESQDs. As illustrated in Figure 3-2, no habitable structures currently exist within the ESQDs and future development inside these safety arcs would be restricted. The presence and preservation of these ESQDs and land use restrictions (e.g., habitable buildings, etc.) would preclude significant impacts to land use. The PAA would result in long-term, minor adverse impacts to land use and result from the small loss of light maneuver training land and changes to land use within the project area.

### **3.6.3 Mitigation**

Mitigation would include adherence to Army Installation Design Standards and preservation of ESQDs. Coordination and compliance with Fort Benning's Real Property and the Real Property Master Plan would preclude potential adverse impacts to land use from future development.





### 3.7 Soils

Soils are most often described in terms of their type, slope, physical characteristics, and relative compatibility or limitations with regard to particular activities. Two basic soil provinces make up Fort Benning: the GA Sand Hills and the Southern Coastal Plains. Based on the US Department of Agriculture, Natural Resource Conservation Service's soil survey "K factor," most of the soils found at Fort Benning, with the exception of southern portions of the Installation, are identified as low to moderately erodible when undisturbed (USACE, 2009). The degree of erodibility is determined by physical factors such as drainage, permeability, texture, structure, and percent slope. The rate of erodibility is based on the amount of vegetative cover, climate, precipitation, proximity to water bodies, and land use. Soil disturbing activities accelerate the erosion process by exposing soils to precipitation and surface runoff. Activities that disturb or remove vegetation are likely to increase the erosion hazard, particularly on slopes.

Potential impacts to prime farmland soils, protected under the Farmland Protection Policy Act (FPPA) (7 USC 4201; FPPA of 1981, as amended) are not analyzed in this EA, as no lands within Fort Benning have been classified as prime farmland. Therefore, there is no further discussion of prime farmland in this EA.

To prevent soil erosion during construction and consequent damage to federally listed species' habitat, or sedimentation of streams and wetland areas, the Army employs NPDES BMPs. The GA Department Natural Resources (DNR) and GA Soil and Water Conservation Commission outline NPDES BMPs for projects within GA. To meet the requirements of the federal NPDES construction permit program and GA Erosion and Sedimentation Control Act, construction projects involving one acre of land disturbance or more—including smaller sites that are part of a larger common plan of development that collectively disturbs one acre or more—to obtain an approved Erosion Sedimentation Pollution Control Plan (ESPCP), to submit a fee for the disturbed acreage, and to provide a Notice of Intent (NOI). The ESPCP prescribes activities to limit erosion and sedimentation from the site and includes a site description, list of BMPs to be used, BMP inspection procedures to be performed by qualified personnel, procedures for timely BMP maintenance, requirements for sampling of discharges or receiving streams for turbidity, and reporting requirements to the GA DNR Environmental Protection Division (EPD).

#### 3.7.1 Affected Environment

The ROI for Soils includes the Alternative's proposed construction footprints and areas immediately adjacent that could be directly and/or indirectly impacted by soil erosion and sedimentation from the Proposed Action.

Common soil types found within and nearby the cantonment areas consists of the Nankin, Troup, Bibb, Lucy, Fuquay, Orangeburg, Uchee, Troup, Ruston, Norfolk, Udorthents, Lakeland, and the Cowarts-Ailey series. Generally, soils on Fort Benning are highly susceptible to erosion if vegetation is removed, especially on steep slopes. The establishment and maintenance of appropriate vegetation and proper drainage systems is the fundamental means of addressing and avoiding extensive erosion of soils.

Minor earth disturbances are expected from construction activities. The acreages for the limits of disturbance for each Alternative represent the maximum, worst-case scenario based on project boundaries. The actual disturbance for the proposed construction will be determined prior to final site design and contingent upon topographical features, utility tie-ins, and the final engineered facility design for each project site.

### **3.7.2 Environmental Consequences**

Potential impacts would be considered significant if they would:

- Violate applicable federal or state laws and regulations, and/or fail to receive applicable state permits (e.g., NPDES construction permit) prior to initiating the Proposed Action;
- Substantially degrade soils, soil fertility, or soil productivity;
- Have substantial, highly noticeable influences on the rate of soil erosion or the ability of the soil to support vegetation expected to be present in the area.

#### **3.7.2.1 No Action Alternative**

No effect on Soils would be expected under the No Action Alternative. Under the No Action Alternative, no new FASP would be constructed and no ground disturbance would occur, and therefore no soils would be disturbed or changed.

#### **3.7.2.2 PAA: Sightseeing Road**

Under the PAA, soil erosion and sedimentation controls will be put in place, per the Clean Water Act (CWA) and the GA Erosion and Sedimentation Control Act, and appropriate NPDES permits will be obtained in prior to any land disturbing activities. Short-term, minor adverse impacts to soils within the ROI may occur during construction as up to 20 acres may be graded or otherwise experience land disturbance. No long-term effects to Soils would be anticipated, however, as all ground disturbances at the proposed site would be re-vegetated and stabilized.

### **3.7.3 Mitigation**

Federal and state permitting requirements would minimize the effects to soil resources during construction activities. Application of federal and state erosion control measures and NPDES permitting requirements include preparation of an ESPCP detailing erosion and sedimentation control BMPs, and as applicable a minimum 25-foot surface water setback to minimize soil impacts during construction. Additionally, adherence to federal and state laws and regulations would minimize impacts due to operations and maintenance activities in the long-term. Therefore, no additional mitigation measures are warranted.

## **3.8 Water Resources**

Water Resources include surface water and floodplains, groundwater and aquifers, and wetland resources. Activities that affects water quality, quantity, or rate of movement at one location within a watershed has the potential to affect the characteristics of water resources. The CWA of 1972 is the primary federal law that protects the nation's waters. The CWA prohibits the

discharge of any pollutant to waters of the US unless the discharge is authorized by a NPDES permit.

The ROI for Water Resources includes the western portion of the Main Post Cantonment Area and associated drainage basins that could be directly and/or indirectly impacted by the Proposed Action (Figure 3-2). General water quality concerns at Fort Benning include sedimentation from highly erodible soils, fecal coliform bacteria, storm water runoff from impervious areas, and loss of wetlands (USACE, 2007).

### **3.8.1 Affected Environment**

#### *Surface Water*

Surface water systems are typically defined in terms of watersheds. Watersheds are delineated into hydrologic units by the US Geological Survey using a nationwide system based on surface hydrologic features. Each hydrologic unit is identified by a unique hydrologic unit code (HUC).

The Chattahoochee River arises as a cold-water mountain stream in the Blue Ridge Province. Fort Benning is located within the Chattahoochee River basin (HUC 03130003), and the river flows adjacent and through approximately 15 miles of the Installation on its southwestern side, close to the cantonment areas. All surface waters within the ROI drain toward the Chattahoochee River, which includes Laundry and Swelson Creek and an unnamed intermittent stream east/south of the PAA. Laundry and Swelson Creek drains south directly into the Chattahoochee River.

#### *Stormwater*

Stormwater on the Installation drains via culverts, ditches, swales, and natural seepage and overland flow. Many of the soils at Fort Benning are characterized as susceptible to erosion, and many of the water quality issues for the streams in and around Fort Benning are related to high levels of sedimentation, particularly after storm events.

#### *Wetlands*

Wetlands constitute approximately 17,000 acres of the Installation's 182,000 acres (Fort Benning 2015). Wetlands are considered transitional areas between aquatic and terrestrial environments where the recurring presence of water, at or near the soil surface, drives the natural system and wildlife communities that use these areas. Jurisdictional wetlands, which the USACE regulates, are defined under the CWA as areas that are saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, etc. (EPA, 2018). Wetlands within the ROI are almost exclusively riparian and associated with the stream systems. Preliminary site planning information, using the National Wetlands Inventory and previously delineated wetlands, did not identify any known wetlands or streams within 1,000 feet of PAA site. Therefore, wetlands are not discussed further in this EA.

#### *Groundwater*

Fort Benning is located within the Coastal Plain hydrogeologic province of GA and AL. The principal groundwater source for Fort Benning is the Cretaceous Aquifer System. The regional



groundwater flow in the area is from north to south, and the aquifers in the Coastal Plain consist of porous sands and carbonates and include alternating units of sand, clay, sandstone, dolomite, and limestone that dip gently and thicken to the southeast. The Proposed Action would not affect groundwater resources; therefore, groundwater resources are not discussed further.

### *Floodplains*

A floodplain is an area of land adjacent to a stream or river that experiences flooding during periods of high water flows, usually a result of rain events. EO 11988, Floodplain Management, instructs federal agencies to consider the risks, danger, and potential impacts of locating projects within floodplains, and requires agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the modification of floodplains whenever there is a practicable alternative. The Federal Emergency Management Agency (FEMA) is the federal agency having lead responsibility for flood hazard assessment and mitigation. FEMA has adopted the 100-year floodplain as the base flood standard for areas subject to a one percent or greater chance of flooding in any given year.

The Chattahoochee River floodplain, and its associated blackwater and tupelo swamps, is located in the southwestern portion of the Installation, adjacent west of Fort Benning's Main Post Cantonment Area as illustrated in Figure 3.2. Also, Figure 3.2 illustrates the 100-year floodplain associated with the Chattahoochee River (FEMA, 2017, Fort Benning Geographic Information Systems [GIS], 2018). The PAA is located beyond the flood zones and would have no effect upon areas considered to have a one percent or greater annual chance of flooding. Therefore, such resources are not discussed further.

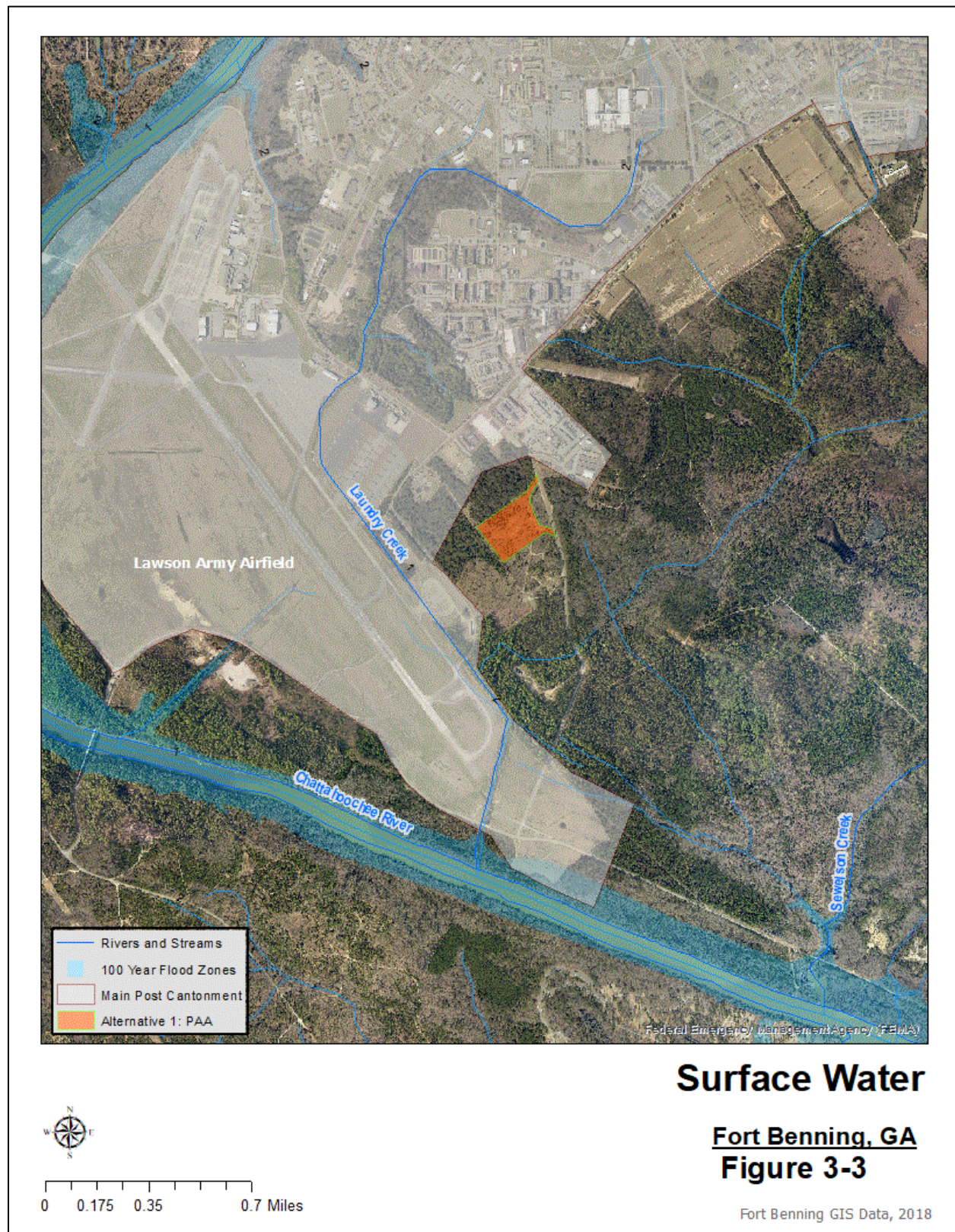
## **3.8.2 Environmental Consequences**

A significant adverse impact would occur to Water Resources if implementation of the Proposed Action would result in unpermitted adverse impacts to surface waters.

Surface water resources within Fort Benning could be adversely impacted from contamination from fuel/oil spills, pesticide residue, fired munitions residue, and untreated sewage bypass. These potential contamination sources are controlled and minimized by the implementation of Fort Benning Spill, Prevention, Control, and Countermeasure Plan, Fort Benning Installation Spill Contingency Plan, Storage Tank Management Plan, Stormwater Pollution Prevention Plan, and the NPDES permit requirements to prevent sewage bypasses. Nonpoint sources, more specifically sedimentation are the primary pollutant sources of concern for surface water resources at Fort Benning. Consequently, much of the Installation's water resources management is closely related to minimizing and repairing erosion caused primarily by ground disturbing activities.

### **3.8.2.1 No Action Alternative**

No effect on Water Resources would be expected under the No Action Alternative. The FASP would not be constructed and no adverse impacts to the watershed, surface, waters, and associated floodplains or groundwater would occur.





### 3.8.2.2 PAA: Sightseeing Road

Under the PAA, short-term, minor adverse effects to surface water resources are possible during construction activities as a result of ground disturbances. No long-term effects to water resources would be anticipated as the sites would be re-vegetated, where possible, and stabilized upon completion of construction activities. Potential impacts to Water Resources as a result of POL spills from vehicle and equipment failures would be precluded by compliance with applicable regulations to minimize the risks of minor spills occurring. In the event of an accidental POL spill, Fort Benning personnel will follow spill response procedures and an accident response team would be available immediately to minimize any adverse effects.

### 3.8.3 Mitigation

Adherence to regulatory requirements by implementation of the Proposed Action would avoid or minimize adverse impacts to Water Resources. A GA NPDES Construction Permit would be required prior to construction that involves more than one acre of land disturbing activity. Consequently, no additional mitigation measures are warranted.

## 3.9 Environmental Impact Summary

A summation of the direct and indirect impacts to the VECs carried forward for analysis are presented in Table 3.9 below.

**Table 3.9: Summary of Direct and Indirect Environmental Potential Consequences**

VEC	No Action	PAA: Sightseeing Road
Air Quality	No impacts	No impacts
Biological Resources	No impacts	No impacts
HM&W	No impacts	<b>Short-term/long-term, minor adverse impacts</b> from an increase in HM&W disposal.
Land Use	No impacts	<b>Long-term, minor adverse impacts</b> resulting from a loss of training land.
Soils	No impacts	<b>Short-term, minor adverse impacts</b> as a result of ground disturbances.
Water Resources	No impacts	<b>Short-term, minor adverse impacts</b> as a result of ground disturbances or potential spills.

## 4 CUMULATIVE IMPACTS

### 4.1 Introduction

In addition to identifying the direct and indirect environmental impacts of their actions, the CEQ's NEPA regulations require federal agencies to address cumulative impacts related to their proposals. A cumulative impact is defined in the CEQ Cumulative Impact regulations as: "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR §1508.7)." This section describes the process used to identify potential cumulative impacts related to the Proposed Action at Fort Benning and discusses those impacts for each of the resources addressed in Chapter 3.

#### 4.1.1 Identifying Cumulative Impacts

Guidance for assessing cumulative impacts has been provided by CEQ in *Considering Cumulative Effects under the National Environmental Policy Act* (CEQ, 1997b). The process involves identifying significant cumulative effects issues; establishing the relevant geographic and temporal extent (time frame) of the cumulative effects analysis; identifying other actions affecting the resources of concern; establishing the cause-and-effect relationship between the Proposed Action and the cumulative impacts; determining the magnitude and significance of the cumulative effects; and identifying ways in which the agency's proposal might be modified to avoid, minimize, or mitigate adverse, cumulative impacts.

CEQ regulations specify that cumulative impacts analyses encompass past, present, and reasonably foreseeable future actions. Past actions are generally included in the baseline described in the affected environment and No Action Alternative in Chapter 3; therefore, past actions that are part of the baseline are not included. Only in unique circumstances are past actions not included in the baseline and addressed in the cumulative impacts analysis. As appropriate and feasible, Chapter 3 notes past activities that may have contributed to the current affected environment and baseline conditions.

Projects to be addressed in this cumulative impacts analysis correspond to resources that the alternatives have potential to affect. The PAA would have negligible impacts to Air Quality and Biological Resources and would have no potential for incremental impacts considering other actions in the ROI. Therefore, these VECs are not carried forward for cumulative impacts analysis. VECs carried forward include HM&W, Land Use, Soils, and Water Resources.

An ROI was defined for each VEC in Chapter 3 under its Affected Environment. The ROI or geographic extent of the cumulative impacts analysis generally coincides with the ROI of each VEC and is described in Section 4.3. In addition, significance thresholds defined for each resource in Chapter 3 also apply to the assessment of cumulative impacts.

### 4.1.2 Past, Present and Reasonably Foreseeable Actions

This analysis considers present and reasonably foreseeable future actions as those actions that are currently under way, approved, and/or have identified funding. Actions beyond that become increasingly speculative and difficult to assess. The cumulative projects numbered below correspond with Figure 4-1 and illustrate their location on Fort Benning.

- 1) **Army 2020 Force Structure Realignment (FY13 – FY2020):** In 2013, the Army prepared a Programmatic EA to analyze the potential environmental and socioeconomic impacts associated with a proposed action consisting of a reduction in active Army end-strength from 562,000 to 490,000. Since the 2013 Programmatic EA was completed, DoD fiscal guidance has continued to change, and the future end-strength of the Army must be reduced even further than the 490,000 considered in the 2013 Programmatic EA. This resulted primarily as the second part of the 2011 Budget Control Act, commonly referred to as sequestration, came into effect. Army Force Structure Realignment decision for Fort Benning included the inactivation of the 3rd Armored Brigade Combat Team (a loss of approximately 3,400 Soldiers), and the activation of the 1-28th Infantry Brigade Task Force that consists of approximately 1,080 Soldiers. In 2016, a Record of Environmental Consideration documented that no significant environmental effects were expected from the realignment specific to Fort Benning. Note that Army 2020 Force Structure Realignment is not identified in Figure 4-1 due to its post-wide implications.
- 2) **Infrastructure Footprint Reduction Program (FY19-24):** Implementation of Fort Benning's FY19-24 Facility Reduction Program selects, demolishes, and disposes of buildings and other structures considered obsolete/outdated, cost prohibitive to sustain, in excess of Army utilization needs, and in some cases contain potential human health and safety concerns. The FRP could remove from Real Property inventories approximately 150 buildings and structures equaling more than two million square feet over the next five years. Fort Benning completed an EA for this action in fall of 2019. The Infrastructure Footprint Reduction Program is not identified in Figure 4-1 due to its numerous site locations across Fort Benning's cantonment areas.
- 3) **Artillery Firing Points Expansion and Maintenance of the Open Field Training Environment (FY16–18):** Improvements and long-term maintenance activities to existing training assets are needed to support the missions of the Airborne and Ranger Training Brigade, 75th Rangers, and the Field Artillery units of the Infantry School and the 1-28th Infantry Battalion Task Force, as well as other tenant and/or visiting units' training requirements. These assets include Drop Zones, Helicopter Landing Zones/Pick-up Zones, and Firing Points for Mortars and Howitzer guns, and are generally referred to as "open field training environments." Fort Benning expects to complete an EA by spring of 2019.
- 4) **Addition of a 13-Megawatt (MW) Photovoltaic (PV) Solar Facility (FY18-19) and Critical Load Support (FY19-20):** In 2014, Fort Benning prepared an EA for the construction, operation, and maintenance of a 30-MW PV solar system on approximately 250 acres of land on Fort Benning located at the Dove Field near the western boundary of Fort Benning within Russell County, AL. Final design of the PV system did not require



use of the entire 250 acre parcel. Approximately 80 acres of the originally evaluated site are being developed as an addition to the existing solar array to produce 13-MWs of supplementary renewable energy for the Installation to contribute to compliance with the Energy Policy Act of 2005 and provide critical load support in the event of an emergency.

- 5) **Tactical Unmanned Aerial Vehicle Hanger (FY17):** To support the 75th Ranger Regiment's Tactical Unmanned Aerial Vehicle Platoon, this 10,340 square foot facility would consist of maintenance bays, classrooms, storage, and administrative areas. Other ancillary support facilities will include hazardous materials storage, a Tactical Unmanned Aerial Vehicle Hanger runway, and personnel parking. This facility was constructed alongside other support facilities currently used for operations at Lawson Army Airfield.
- 6) **Bridge 27 Replacement (FY15-FY19):** Approximately four acres of disturbance connecting the Sand Hill Cantonment Area to First Division Road, including demolition of the existing bridge.
- 7) **Infantry One-Station Unit Training (OSUT) Extension (FY19):** The Army will extend OSUT for Infantry Soldiers from 14 weeks to 22 weeks to increase Soldier readiness, making them more lethal and proficient before they depart for their first duty assignments. The new course will include extended weapons training, increased vehicle-platform familiarization, extensive combatives training and a 40-hour combat-lifesaver certification course. Additional changes include more time in the field for both day and night operations and an increased emphasis on drill and ceremony maneuvers. Although the OSUT Extension would have post-wide implications construction projects supporting the action include the revitalization and modernization of the Malone Range Complex identified in Figure 4-1.

## 4.2 Cumulative Impacts by Resource

Table 3.9 provides a summary of potential direct and indirect environmental consequences for each Alternative as a result of the Proposed Action. As presented in the analysis below, the potential impacts do not result in significant adverse cumulative effects when considering all other past, present, and reasonably foreseeable future construction and/or maintenance activities at or near Fort Benning.

Air Quality and Biological Resources as analyzed in Chapter 3, would not be affected by the PAA. Therefore, these VECs are not discussed further in Chapter 4 as there were no anticipated adverse impacts and therefore no contributions to cumulative impacts.

### 4.2.1 HM&W

Present and reasonably foreseeable future cumulative projects that could adversely affect HM&W include those listed in Section 4.1.2, especially those that involve construction or solid or hazardous waste generation.

The Proposed Action would have both short-term, minor adverse impacts resulting from construction activities and long-term, minor adverse impacts resulting for operation and maintenance. This increase in HM&W would not lead to a cumulative increase in hazardous waste generation beyond the capacity of local or regional disposal facilities, even in combination with other projects. All future construction, operations and maintenance projects would follow all applicable regulatory requirements for the use, storage, and handling of hazardous material and waste. Therefore, when considering the past, present, and reasonably foreseeable projects listed, the PAA is would have no adverse cumulative effects to HM&W.

#### **4.2.2 Land Use**

All projects listed in Section 4.1.2 involve the utilization of land. Conformity with existing land uses and related plans are expected to preclude any conflicts to land use. Furthermore, the Proposed Action would be confined to land within the Fort Benning boundary and would have no impacts associated with encroachment within or adjacent to Fort Benning. Although the PAA has very minor land use change on Fort Benning, it would not combine with the other cumulative projects on or off the Installation; therefore, no adverse cumulative effects are anticipated involving land use.

#### **4.2.3 Soils**

Cumulative projects that could adversely affect vegetation and soils include all projects listed in Section 4.1.2. These projects may affect soils through disturbance, compaction, creation of impervious surfaces, and possible removal of impervious surfaces during the construction period. Although other construction activities across the Installation may adversely affect soils, soil erosion and sedimentation controls will be put in place per the Clean Water Act and the GA Erosion and Sedimentation Control Act. Appropriate NPDES permits would be obtained prior to each project with land disturbing activities.

The FASP would have only potential short-term and minor adverse impacts to soils; however those impacts would not combine with other cumulative projects due to the distance from other projects, the difference in timing, and other factors. Furthermore, the PAA and cumulative projects would be required to follow applicable federal, state and local laws and regulations, including NPDES requirements that mitigate potential cumulative adverse impacts to soils. Therefore, the PAA would have no cumulative impacts to soils.

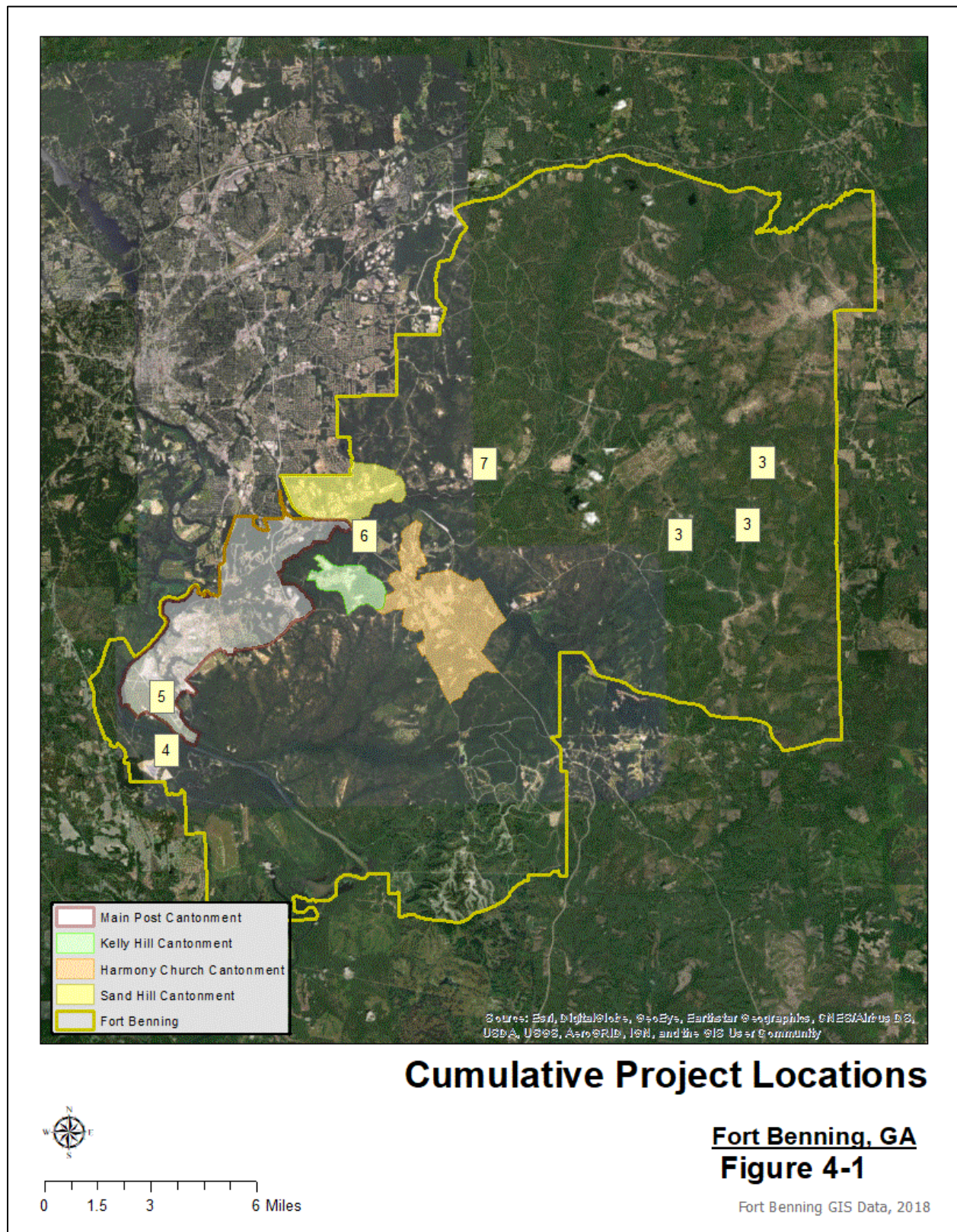
#### **4.2.3 Water Resources**

Cumulative projects that could affect Water Resources include all the Fort Benning projects that occur within or nearby the cantonment areas. This would exclude the Artillery Firing Points Expansion and Maintenance of the Open Field Training Environment project. The remaining projects have the potential to result in adverse effects to Water Resources (including water quality).

The PAA would have only short-term and minor adverse impacts to water resources. The cumulative projects listed would contribute to soil erosion, runoff, and surface contamination from pollutants such as hazardous materials and/or waste. Impacts to water are most likely to occur during rain events on an active construction site. Potential water impacts would be

substantially reduced for construction projects, as they must follow water quality requirements, (e.g. obtain and follow NPDES permits). The PAA's potential water quality impacts would not combine with the cumulative projects potential impacts due to distance, timing, and other factors. Therefore, the PAA would have no cumulative impacts to Water Resources.





## 5 CONCLUSIONS

The PAA would meet the Purpose and Need of the Proposed Action and provide a FASP at Fort Benning to accommodate the missions of the 75RR. Of the VECs fully analyzed in this EA, the PAA would have no impacts to Air Quality and Biological Resources. As a consequence of construction activities, potential short-term, minor adverse impacts to HM&W, Soils, and Water Resources may result. In addition, the PAA may have long-term, minor adverse impacts to Land Use and HM&W. The direct and indirect impacts are summarized in Table 3.9. The PAA is expected to have no cumulative impacts when considering other projects or proposals in or near Fort Benning.

Adherence to applicable federal and state laws and regulations would minimize potential adverse impacts of construction, operation, and maintenance activities associated with the Proposed Action. No additional mitigation measures were identified.

The No Action Alternative, i.e. not building the FASP and continuing the status quo, would have no impacts.

Implementation of either the PAA or the No Action Alternative would have no significant impact on the quality of human life or the natural environment. Therefore, a FNSI is warranted for this Proposed Action and does not require the preparation of an EIS.



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## 7 ACRONYMS AND ABBREVIATIONS

75RR	75 <sup>th</sup> Ranger Regiment
ACUB	Army Compatible Use Buffer
AL	Alabama
AR	Army Regulation
Army	U.S. Department of the Army
BMP	Best Management Practice
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CO <sub>2</sub>	Carbon Dioxide
CO <sub>2e</sub>	Carbon Dioxide Equivalent
CWA	Clean Water Act
DA PAM	Department of the Army Pamphlet
DoD	Department of Defense
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
ESPCP	Erosion Sedimentation Pollution Control Plan
FASP	Field Ammunition Supply Point
FEMA	Federal Emergency Management Agency
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FNSI	Finding of No Significant Impact
FY	Fiscal Year
GA	Georgia
GHG	Greenhouse Gas
HM&W	Hazardous Material and Waste
HVAC	Heating, ventilation, and air conditioning
INRMP	Integrated Natural Resources Management Plan
MCoE	Maneuver Center of Excellence
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NEW	Net Explosive Weight
NO <sub>2</sub>	Nitrogen Dioxide
NOA	Notice of Availability
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O <sub>3</sub>	Ozone
PAA	Preferred Action Alternative
Pb	Lead
PM <sub>2.5</sub>	Particulate Matter with a Diameter Less Than or Equal to 2.5 Micrometers

PM <sub>10</sub>	Particulate Matter with a Diameter Less Than or Equal to 10 Micrometers
POLs	Petroleum, oil, and lubricants
PSD	Prevention of Significant Deterioration
PV	Photovoltaic
RCRA	Resource Conservation and Recovery Act
RCW	Red-cockaded Woodpecker
ROI	Region of Influence
SO <sub>2</sub>	Sulfur Dioxide
SPCC	Spill Prevention, Control, and Countermeasure
SWMU	Solid Waste Management Unit
UEA	Unique Ecological Area
US/U.S.	United States
USACE	U.S. Army Corps of Engineers
USAEC	U.S. Army Environmental Command
USFWS	U.S. Fish and Wildlife Service
VEC	Valued Environmental Component

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## 9 DISTRIBUTION LIST

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U.S. Fish & Wildlife Service West Georgia Office P.O. Box 52560 Fort Benning, GA 31905	USFWS, Regional RCW Recovery & Longleaf Pine Coordinator Mississippi Field Office 6578 Dogwood View Pkwy Jackson, MS 39213	GSWCC, Region 5 4310 Lexington Rd Athens, GA 30605
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USEPA Region IV Regional Administrator 61 Forsyth St SW Atlanta, GA 30303	ADEM Office of the Director P.O. Box 301463 Montgomery, AL 36130	Georgia Wildlife Federation 11600 Hazelbrand Rd, NE Covington, GA 30014

The Nature Conservancy Chattahoochee Fall Line Office P.O. Box 52452 Columbus, GA 31905	The Georgia Conservancy 817 West Peachtree St, Suite 200 Atlanta, GA 30308	The Valley Partnership P.O. Box 1200 Columbus, GA 31902
Columbus Chamber of Commerce 1200 6th Ave Columbus, GA 31902	Defenders of Wildlife National HQ 1130 17 <sup>th</sup> St NW Washington, DC 20036	Chamber of Commerce Phenix City-Russell County 1107 Broad St Phenix City, AL 36867

### Federally Recognized Tribes that Consult with Fort Benning

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# **APPENDIX A**

## ***DRAFT FINDING OF NO SIGNIFICANT IMPACT***

## **DRAFT FINDING OF NO SIGNIFICANT IMPACT**

### **1 Introduction**

Fort Benning has prepared this Environmental Assessment (EA) to examine the proposal by the 75<sup>th</sup> Ranger Regiment (75RR) to construct, operate, and maintain a Field Ammunition Supply Point (FASP) at Fort Benning, Georgia (GA) in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 US Code [USC] 4321 et seq.), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Part 1500-1508), and the Army NEPA Regulation (*Environmental Analysis of Army Actions*; 32 CFR Part 651). The information contained in this EA will be reviewed and considered by the Army prior to the final decision on how to proceed with the implementation of the Proposed Action, if at all.

The EA evaluated the potential environmental effects of the Proposed Action, identified possible/potential mitigation measures to lessen or eliminate adverse effects, and examined reasonable alternatives for the Proposed Action. The intended audience of the EA is Army decision-makers, interested government agencies, federally recognized Native American Tribes, and non-governmental organizations, and members of the public.

### **2 Background**

Fort Benning serves as the home to numerous deployable Army and other tenant units; including the 75RR. The 75RR is the US Army's elite light infantry airborne special operations force that is part of the US Army Special Operations Command. The Regiment, headquartered at Fort Benning, GA is composed of three Ranger battalions and an additional Special Troops battalion. The primary mission of the Regiment is to plan and conduct special missions in support of US policy and objectives. They perform a variety of direct action raids in hostile or sensitive environments globally, which include airfield seizure, special reconnaissance, personnel recovery, clandestine insertion, and site exploitation. The Regiment can deploy a battalion within hours of notification.

### **3 Purpose and Need**

The purpose of the Proposed Action is to provide an additional ammunition holding area (AHA) for the 75RR by constructing, operating, and maintaining a new FASP at Fort Benning, GA. The 75RR currently utilizes magazines and support buildings to store and secure arms, ammunition, and explosives (AAE) for both training and operational deployment. The current Ranger AHAs at Fort Benning are strategically located near routes and training areas commonly utilized by the 75RR and consist of earth covered magazines (ECMs) and modular storage vaults that are relocatable. This decentralized storage stratagem promotes flexibility and accessibility to maximize efficient training schedules and loadouts, while minimizing time between notifications to mobilize and force deployment.

The Proposed Action would disperse the 75RR's concentration of AAE among AHAs and increase their total net explosive weight (NEW) stockpiled, as determined by US Army Technical Center for Explosives Safety (USATCES) and DoD Explosive Safety Board



(DDESB), and improve the 75RR's proficiencies for rapid deployment by streamlining initial loadout capabilities.

#### **4 Description of the Proposed Action**

The purpose of the Proposed Action is to provide an additional ammunition holding area (AHA) for the 75RR by constructing, operating, and maintaining a new FASP at Fort Benning, GA. The 75RR currently utilizes magazines and support buildings to store and secure arms, ammunition, and explosives (AAE) for both training and operational deployment. The current Ranger AHAs at Fort Benning are strategically located near routes and training areas commonly utilized by the 75RR and consist of earth covered magazines (ECMs) and modular storage vaults that are relocatable. This decentralized storage stratagem promotes flexibility and accessibility to maximize efficient training schedules and loadouts, while minimizing time between notifications to mobilize and force deployment.

The Proposed Action would disperse the 75RR's concentration of AAE among AHAs and increase their total net explosive weight (NEW) stockpiled, as determined by US Army Technical Center for Explosives Safety (USATCES) and DoD Explosive Safety Board (DDESB), and improve the 75RR's proficiencies for rapid deployment by streamlining initial loadout capabilities.

#### **5 Description of the Alternatives**

Although a number of locations across Fort Benning exist from which a FASP could be sited, Section 1.3 (Purpose and Need) emphasizes that the site must promote flexibility and accessibility to make the best use of resources available in support of the 75RR. As a result, Fort Benning developed screening criteria for comparison against conceivable alternatives in an effort to narrow down the analysis to specific areas and reasonable alternatives. Alternatives that failed to meet the criteria were eliminated and not carried forth for consideration within this EA. The alternative must:

- Be an available parcel on Fort Benning with no less than seven contiguous acres in size and located within a one mile radius of the 75RR's compound;
- Meet the requirements to qualify for an explosives safety site plan as approved by USATCES and DDESB;
- Avoid areas that would present substantial safety and land use conflicts;
- Require minimal site preparations (e.g., undeveloped, level, sparsely forested trees, etc.) prior to construction;
- Avoid parcels where the Proposed Action would result in a "take" as defined by the US Fish and Wildlife Service (FWS) or significant adverse impacts to Federal Threatened and Endangered (T&E) species or their habitat;
- Support the mission requirements of the 75RR and the Installation.

As a result of the screening criteria, only one viable location was identified for potential placement of the FASB. As described below, this EA carries forward the analysis of potential

impacts of two alternatives; the Preferred Action Alternative (PAA) and the No Action Alternative.

## **6 Anticipated Environmental Effects**

The analysis contained in this EA indicates that the PAA could have minor adverse impacts to Hazardous Materials and Waste (HM&W), Land Use, Soils, and Water Resources. Potential adverse impacts would be considered short-term for HM&W, Soils, and Water Resources as a result of FASP construction activities. Ongoing operational activities have the potential to result in long-term, minor adverse impacts to HM&W and Land Use. Additionally, no environmental impacts are anticipated from the No Action Alternative. Environmental consequences of the Valued Environmental Components (VECs) fully analyzed are summarized in Table S.1 below.

As discussed in Section 4, these minor adverse direct/indirect impacts do not result in significant adverse cumulative effects when considering other past, present, and reasonably foreseeable future activities involving Fort Benning. Adherence to Federal and State laws and regulations, as well as Installation management plans, and Army Regulations would minimize impacts to HM&W, Land Use, Soils, and Water Resources.

## **7 Mitigation Measures**

No mitigation measures, beyond compliance with applicable laws and regulations and associated required Fort Benning Plans, are required to avoid significant impacts under any of the PAA.

## **8 Public Availability**

The Final EA and Draft Finding of No Significant Impact (FNSI) were made available to the public for a 30-day public comment period from February 27 – March 29, 2019. An announcement that these documents are available was published via a Notice of Availability (NOA) in The Columbus Ledger-Enquirer, The Journal, and Benning News (online) in accordance with the Army NEPA Regulation. These documents are also available at several local libraries and are posted on the Fort Benning website at <http://www.benning.army.mil/Garrison/DPW/EMD/Legal.html>.

The NOA of the Final EA and Draft FNSI has been mailed to all agencies, individuals, and organizations on the Fort Benning NEPA distribution (mailing) list for the Proposed Action. As part of Fort Benning's on-going, established process and dialogue with the federally recognized Native American Tribes affiliated with the Fort Benning area, the Army has provided each Tribe with a copy of these documents for consultation via review and comment.

## **9 Conclusions**

In consideration of the analysis in the EA, I have decided to implement the PAA. Implementation of either the PAA or the No Action would not have a significant impact on the quality of human life or natural environment. The PAA would meet the purpose and need of the Proposed Action by providing a FASP at Fort Benning to accommodate the missions of the 75RR.

A FNSI is warranted for this Proposed Action and does not require the preparation of an Environmental Impact Statement (EIS). This analysis fulfills the requirements of the NEPA of 1969, as implemented by the Council on Environmental Quality regulations (40 CFR 1500–1508), as well as the requirements of the Environmental Analysis of Army Actions (32 CFR 651).

FINDING OF NO SIGNIFICANT IMPACT REVIEWED AND APPROVED BY:

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Clinton W. Cox  
Colonel, U.S. Army  
Garrison Commander

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Date