

FINDING OF NO SIGNIFICANT IMPACT

1 Introduction

Fort Benning prepared an environmental assessment (EA) to examine the potential environmental effects associated with the construction, operation and maintenance of a new United States Army Marksmanship Unit (USAMU) Complex. The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA); the regulations of the President's Council on Environmental Quality (CEQ); United States (US) Department of the Army (Army) Regulation 200-1, and the Army NEPA Regulation (32 Code of Federal Regulations [CFR] Part 651).

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. The information contained in the EA was reviewed and considered by the Army prior to the final decision on how to implement the Proposed Action, if at all.

2 Background

The USAMU was originally established in 1956 at the direction of President Dwight D. Eisenhower to raise the standards of marksmanship throughout the U.S. Army. Over the years the mission of the USAMU has expanded beyond competitive shooting to include marksmanship training for Soldiers, facilitate Army recruiting, and became a leader in small-arms research and development to increase the Army's overall combat readiness.

The current USAMU Headquarters (HQ), Building 243, was originally constructed in 1932 and was converted into the USAMU headquarters and operations facility in 1974.. In its present state, the USAMU HQ currently houses the administrative functions of the unit, the Custom Firearms Shop, and the ceremonial Hall of Fame which showcases the USAMU as "The Home of Champions" in efforts of recruiting for the Army. Ancillary support buildings for the Custom Firearms Shop include hazardous materials storage (Building 232), and equipment and materials storage in Building 370, as well as a number of pre-fab storage sheds. The current USAMU HQ and Custom Firearms Shop support facilities are located adjacent to the Western Hemisphere Institute for Security Cooperation Campus, between Stonewall Road and Bergen Street north of Sacrifice Field on Main Post, which is approximately one mile away from the centralized USAMU Range Complex.

Due to the age, original building design and layout, Building 243 is failing in meeting USAMU's mission, and does not meet Army mandated requirements for sustainability and energy conservation. Currently there is adequate space for the administrative function of the USAMU HQ, but the distribution of the space is inadequate, while other support functions (e.g. library, supply and storage, etc.), are undersized. The building contains asbestos and lead based paint throughout, and does not have a dedicated heating, ventilation, and air conditioning system, instead resorting to a nearby central heating plant and window units that frequently requires

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maintenance. The main HQ building has had various electrical, communications, and other systems improvements over the years, but many of them have detracted from the building's aesthetics and overall functionality, such as the entrance hall. The entrance hall which houses the ceremonial display area for USAMU's "Hall of Fame", does not effectively serve its intended purpose of being a recruiting tool, and does not present an appealing atmosphere to visiting dignitaries.

Furthermore, the current design and layout of Building 243 provides approximately 9,100 gross square feet to house the Custom Firearms Shop and arms vault, which is 38% of the required footprint per Army space requirements. Because of the inadequacy in size, the custom firearms shop lacks proper safety buffers around equipment and machinery. In addition, there are outdated exhaust, ventilation, fire suppression, and communications systems, and the facility lacks an adequate, serviceable loading dock for receiving and shipping of supplies, equipment, and large racks of weapons. This deficiency in space also difficult to conduct tours for potential recruits, visiting dignitaries, and foreign military personnel to showcase the research and development advancements and capabilities of the Custom Firearms Shop.

3 Purpose and Need

The Proposed Action (as described below) is necessary to provide adequate facilities at Fort Benning to accommodate the missions of the USAMU, and to centralize the location of the "Command and Control" with the range complex to better facilitate training, research and development of small arms, and recruitment. The use of multiple facilities at various sites results in an inefficient operation which degrades command and control. Centrally locating the USAMU BNHQ Complex with USAMU designated ranges would reduce the time and expense of moving military equipment and Soldiers for training and shooting competitions.

This project would provide a consolidated USAMU BNHQ Complex constructed in accordance with present day standards and space criteria. The BNHQ Complex would provide first class facilities to accommodate the unit, fully meet mission requirements and present an aesthetically pleasing appearance. The upgrades and expansion of the Custom Firearms Shop would enhance the research and development efforts of the USAMU, and strengthen the combat effectiveness of the entire Army through improvements to the accuracy and reliability of small arms weapon systems.

4 Description of the Proposed Action

The Proposed Action is to construct a USAMU Complex consisting of a Battalion Headquarters (BNHQ) with a ceremonial display area, library, classrooms, and administrative operations areas; a hazardous materials storage building; and a Custom Firearms Shop. Other facilities and infrastructure will involve secured organizational and personal vehicle parking, sidewalks, and utility services to include water, sewer, electric, natural gas, and stormwater drainage. The complex will also include a bus turn-out area to accommodate large groups of visitors.

5 Description of the Alternatives

The following screening criteria was developed to determine which Alternatives are reasonable. Satisfaction of the criteria would provide a location suited to meet the purpose of and need for the Proposed Action, while potentially minimizing adverse environmental and operational effects. Screening criteria include:

- **Location and Proximity:** The Proposed Action should centrally locate the USAMU BNHQ Complex and its operations in proximity to USAMU designated ranges to meet mission needs.
- **Training Compatibility:** The Proposed Action should be located in areas that do not conflict with or limit training, both during construction and operation. This includes avoiding impacts to training ranges, and clear of live-fire surface danger zones and explosive safety distances.
- **Functionality and Sustainability:** The Proposed Action should provide facilities that comply with current Army design standards for Battalion Headquarters; provide adequate space to enhance the functionality of a custom firearms shop and its supporting elements; and provide facilities designed to meet current Army standards for energy efficiency, information systems, and anti-terrorism/force protection.

Through this analysis, only two Action Alternatives, the Alternative 1 (Preferred Alternative), and Alternative 2 met all of the required screening criteria. Alternatives carried forward for analysis in this EA include:

- **No Action Alternative**

The No Action Alternative describes the status quo, but it does not meet the purpose and needs of the Proposed Action. CEQ and Army NEPA regulations require a No Action Alternative for comparison of potential environmental impacts with the Action Alternatives. Under the No Action Alternative, the proposed USAMU BNHQ Complex would not be constructed. The USAMU would continue to occupy Building 243 with outdated facilities lack functionality for administrative operations with sub-standard electrical, communications, lighting, and lack of heating and cooling systems that do not meet Army mandated requirements for sustainability and energy conservation, or Anti-terrorism/Force Protection standards. The Custom Firearms Shop would continue to operate in an undersized facility lacking current safety requirements, and no suitable loading dock for in and out movement of supplies and equipment. In addition, the ceremonial display area that houses the USAMU Hall of Fame will continue to be undersized and hinders recruitment efforts.

- **Alternative 1 - Preferred Alternative**

Under Alternative 1, the USAMU BNHQ Complex would be constructed along Alamo Road near the entrances to Parks and Hook Ranges. Approximately ten acres of vegetation removal and land disturbances are expected for the construction of the complex, and approximately three acres to accommodate stormwater control features, lines, and drains conveyances as well as utility tie-ins. This Alternative location for the USAMU BNHQ Complex consists of

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predominantly brush and small trees surrounded by mature, hardwood forest. Utility tie-ins would be within current utility easements as much as possible as existing water, sewer, and natural gas lines occur parallel to Alamo Road. An overhead power line runs from north to south through the site, and will need to be relocated along Alamo Road where the USAMU Complex will receive its electrical services. There are no existing storm drainage facilities at this site, and will require the construction of new storm drain lines and drainage inlets to route storm runoff to the existing storm drainage system approximately 700 feet to the southeast.

▪ **Alternative 2**

Under Alternative 2, the USAMU BNHQ Complex would be constructed within the Main Post Cantonment Area directly across from Fire Station No. 3 on the south side of Dixie Road. The proposed location is on a site previously known as “Soldier’s Plaza”, and would be near the entrances to Hibbs and Phillips Ranges of the USAMU Range Complex. Soldier’s Plaza previously consisted of 35 World War II wooden buildings that served as administrative offices for in-processing of Soldiers arriving for duty on Fort Benning. These buildings were demolished in 2015 as part of the Army’s Infrastructure Footprint Reduction Program, and the site has remained vacant since, consisting of mostly open grassy areas with some concrete walkways and mature hardwoods dispersed throughout. Approximately ten acres of vegetation removal and land disturbances are expected for the construction of the complex, and approximately 1.5 acres to accommodate stormwater control features as well as utility tie-ins. As this site was previously developed, the utility infrastructure is distributed throughout the site, and should not require any additional construction beyond the site footprint for connectivity, but will require some minor demolition of the concrete walkways left behind.

6 Anticipated Environmental Effects

The analysis contained in the EA illustrates that the Proposed Action would have potential short-term, minor adverse impacts as a result of construction activities to Hazardous Materials and Waste, Soils, and Water Resources. Valued environmental components (VECs) with negligible effects under the Action Alternatives includes Air Quality and Biological Resources.

As discussed in Section 4 of the EA, negligible to minor adverse direct/indirect impacts result in negligible to minor adverse cumulative effects when considering other past, present, and reasonably foreseeable future activities at Fort Benning. Adherence to federal and state laws and regulations, would minimize impacts of demolition and disposal activities to Air Quality, Biological Resources, Hazardous Materials and Waste, 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 Proposed Action Alternatives.

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 August 2 – August 31, 2018. An announcement

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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.

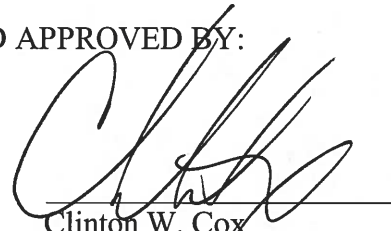
9 Conclusions

In consideration of the analysis in the EA, I have decided to implement the Preferred Alternative (Alternative 1). Implementation of either Action Alternative or the No Action would not have a significant impact on the quality of human life or natural environment. Alternative 1 is, however, preferred in comparison due to its more centralized location and aesthetic setting.

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:

11 Sept 2018
Date


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