

FINDING OF NO SIGNIFICANT IMPACT

1 Introduction

Fort Benning has prepared this Environmental Assessment (EA) to examine the potential environmental consequences of implementing the Fiscal Year (FY) 19-24 Facility Reduction Program (FRP) 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 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 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 implement the Proposed Action, if at all.

2 Background

An Army Training and Doctrine Command (TRADOC) memorandum dated 1 November 1996, directed Army installations to support the "Winning the Infrastructure War" initiative via implementation of the IFRP (Infrastructure Footprint Reduction Program). Rather than incur the expense of maintaining outdated or unusable buildings and other structures (i.e., concrete pads and former building foundations, antiquated training equipment, etc.), infrastructure would be demolished and their various functions relocated. The IFRP continues to be implemented on the Installation through the development of the FRP. The FRP is a dynamic Fort Benning initiative with infrastructure being added to or removed from the proposed demolition inventory on the basis of evolving mission demands, utilization priorities, and available funding. Appendix A contains a listing of infrastructure currently proposed for demolition and commonly referred to as the FRP list.

An initial EA and Finding of No Significant Impact (FNSI) for the IFRP on Fort Benning were completed in 1997. The EA analyzed the No Action (Status Quo) Alternative plus two Action Alternatives. Alternative 2 involved the construction and utilization of an on-Post facility for the disposal of demolition wastes. The Preferred Alternative (Alternative 3) involved the transport of demolition wastes to an off-Post commercial facility. The EA's Preferred Alternative offered the most flexibility in disposal methods for wastes generated by demolition and was the alternative selected as outlined in the FNSI.

As a result of infrastructure being demolished or being removed from the program's demolition inventory due to reuse and other infrastructure being added, Supplemental EAs were prepared in 2002 and again in 2008. Both determined that the demolition of infrastructure on the FRP lists

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would not result in significant adverse effects; instead, all adverse effects were considered minor and further minimized through mitigation and/or monitoring activities. All total, Fort Benning has demolished an estimated 1.4 million square feet of buildings and structures over the last 15 years through the FRP and under a variety of other improvement projects.

More recent comprehensive and collaborative planning efforts by the Army have directed installations to continue optimizing land use and the management of existing facilities through site specific area development planning. Area Development Plans (ADPs) are developed from workshop style events guiding installation planning personnel and Army stakeholders through exercises which promotes short and long-term planning. Key components of the ADPs include the repurposing of existing facilities for optimal use, demolition of excess infrastructure and unneeded facilities, and providing area specific plans from which the Real Property Master Plan can be updated. An installation's Real Property Master Plan provides broad planning direction at the land use level for sustainable installation development that supports mission and environmental requirements. Fort Benning is currently in the process of updating its 2011 Real Property Master Plan.

3 Purpose and Need

The purpose of the Proposed Action is to optimize facility management through reducing buildings and structures. As a result of ongoing Army force structure transformations and modernization efforts at Fort Benning (Section 1.2), facility utilization priorities have again changed requiring an up-to-date FRP list to define which facilities are identified for demolition for FY19-24. The Proposed Action is necessary to continue the Installation's ongoing FRP and support compliance with the US Army TRADOC's IFRP and more recent Army strategies (DoA, 2016a and b). Implementing the Proposed Action would facilitate the identification/selection, demolition, and disposal of infrastructure considered obsolete/outdated, cost prohibitive to sustain, in excess of Army utilization needs, and in some cases contain potential human health and safety concerns. Other benefits include decreasing fixed facility costs (i.e., utilities and saving energy, reducing risks from structural deterioration, and making idle areas of an installation available for productive reuse. Upon completion of the FY19-24 FRP, Fort Benning will have eliminated more than two million square feet of space and made available millions of dollars in operations and maintenance funds for use in other areas annually.

4 Description of the Proposed Action

The Proposed Action is to implement the FY19-24 FRP at Fort Benning, GA. Implementation of the FRP could demolish, dispose, and remove from Real Property inventories approximately 150 buildings and structures equaling more than two million square feet. This tentative goal would occur over the next five years at various locations across Fort Benning's cantonment areas for an estimated cost of \$18 million. Ancillary structures would also be removed as part of the Proposed Action. Relocation of personnel, supplies, and/or equipment may include renovations and/or adaptive reuse of existing structures. Details of relocation and renovation are uncertain at this time, and those types of future actions will be subject to appropriate NEPA documentation as required.

5 Description of the Alternatives

Fort Benning developed a screening criteria to measure which alternatives are reasonable for further analysis. Any alternatives that failed to meet the criteria were eliminated from full consideration within this EA. Alternatives proposed must:

- Comply with the US Army TRADOC's IFRP and Army directives instructing optimized facility management through footprint reduction efforts;
- Be economically feasible (e.g., facility conversion or extensive renovation and reuse of buildings and structures on the FRP list would be less cost effective than new construction/replacement.

Alternatives carried forward for analysis in this EA include:

▪ **No Action Alternative**

Under the No Action Alternative, Fort Benning would continue to utilize approximately 150 building and structures considered cost prohibitive to sustain, in excess of Army utilization needs, and in some cases may contain potential human health and safety concerns associated with older and ageing infrastructure (e.g., lead based paints (LBPs), asbestos containing materials (ACMs), and/or structural deterioration). Occupied buildings would continue to incur excessive maintenance costs until new replacement facilities can be afforded to relocate current occupying activities and personnel. Currently utilized and unoccupied or abandoned buildings or structures would be demolished only as new projects requiring their removal are scheduled in the future. Note that the No Action Alternative does not meet the purpose and need for the Proposed Action but provides a baseline for comparison of other alternatives.

▪ **Alternative 1: Full Demolition**

Under Alternative 1, Fort Benning would implement the FY19-24 FRP by demolishing all of the structures identified in the FRP's proposed demolition list. Full demolition would preclude the expenditure of excessive maintenance and/or adaptive reuse/renovation costs associated with the utilization of older facilities. Personnel and activities currently occupying facilities to be demolished would relocate to available facilities. Demolished buildings and structures would become open space and in most circumstances the area would be available to be utilized in future projects.

▪ **Alternative 2: Selective Demolition**

Alternative 2 is similar to Alternative 1; however, Fort Benning would retain the 17 historic buildings identified on the FRP's proposed demolition list. Those 17 buildings are historic properties that are eligible for listing on the National Register of Historic Places per the National Historic Preservation Act. Fort Benning would implement the FY19-24 FRP by demolishing approximately 133 buildings and other structures and continue utilizing the historic structures as best as possible. As outlined in Appendix B, a considerable expenditure of funds to utilize and maintain the historic buildings would continue and many of these facilities would need adaptive reuse and other substantial renovations to sustain adequate and safe working conditions as they continue to age.

6 Anticipated Environmental Effects

The analysis contained in this EA indicates that the Proposed Action could have long-term, minor adverse impacts to Cultural Resources, under Alternative 1, and short-term, minor adverse impacts under Alternative 2. Other short-term, minor adverse impacts resulting from demolition activities would occur to Hazardous Materials and Waste, Soils, Water Resources, and Air Quality. Both Air Quality and Utilities would result in long-term, minor adverse impacts as a result of the No Action Alternative. VECs with negligible effects under the Action Alternatives includes Biological Resources, Land Use, and Noise. Additionally, long-term, beneficial impacts to Air Quality and Utilities would result from implementing the Action Alternatives due to reductions in emissions and energy demands.

As discussed in Section 4, these negligible effects to minor adverse direct/indirect impacts do not result in significant adverse cumulative effects when considering other past, present, and reasonably foreseeable future activities at Fort Benning. Adherence to Federal and State laws and regulations, as well as Installation management plans, and Army Regulations would minimize impacts of demolition and disposal activities to Air Quality, Cultural Resources, Hazardous Materials and Waste, Soils, and Water Resources.

7 Mitigation Measures

No mitigation measures, beyond compliance with applicable laws and regulations and indicated Fort Benning Plans, are required to avoid significant impacts under any of the Proposed Action alternatives. Additional mitigations identified within the EA are recommended to mitigate minor adverse impacts.

8 Public Availability

The Final EA and Draft FNSI were made available to the public for a 30-day public comment period from June 21 – July 23, 2018. 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. This includes Federally recognized Native American Tribes affiliated with the Fort Benning area and is part of the Installation's on-going, established process and dialog with each Tribe.

Fort Benning did not receive any comments during the 30-day public comment period. Therefore, there were no issues or concerns raised that affected the Final EA's analysis or decision of a FNSI for the Proposed Action.

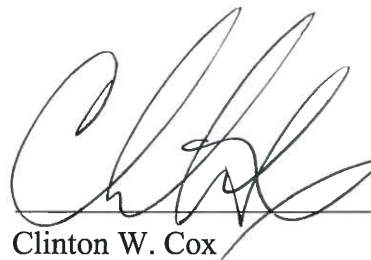
9 Conclusions

In consideration of the analysis in the EA, I have decided to implement Alternative 1: Full Demolition at Fort Benning. Implementation of the Alternative will not have a significant impact on the quality of human life or natural environment. Implementation of Alternative 2: Selective Demolition or the No Action Alternative also would not have a significant impact on the quality of human life or the natural environment. Notwithstanding, Alternative 2 and the No Action Alternative are less desirable in comparison with Alternative 1's to comply with the US Army TRADOC's IFRP and more recent Army efforts to optimize facility management through reductions to buildings and structures.

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). Therefore, issuance of a FNSI for the Action Alternatives is warranted and an EIS is not necessary.

FINDING OF NO SIGNIFICANT
IMPACT REVIEWED AND APPROVED
BY:

7 Aug 2018
Date


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