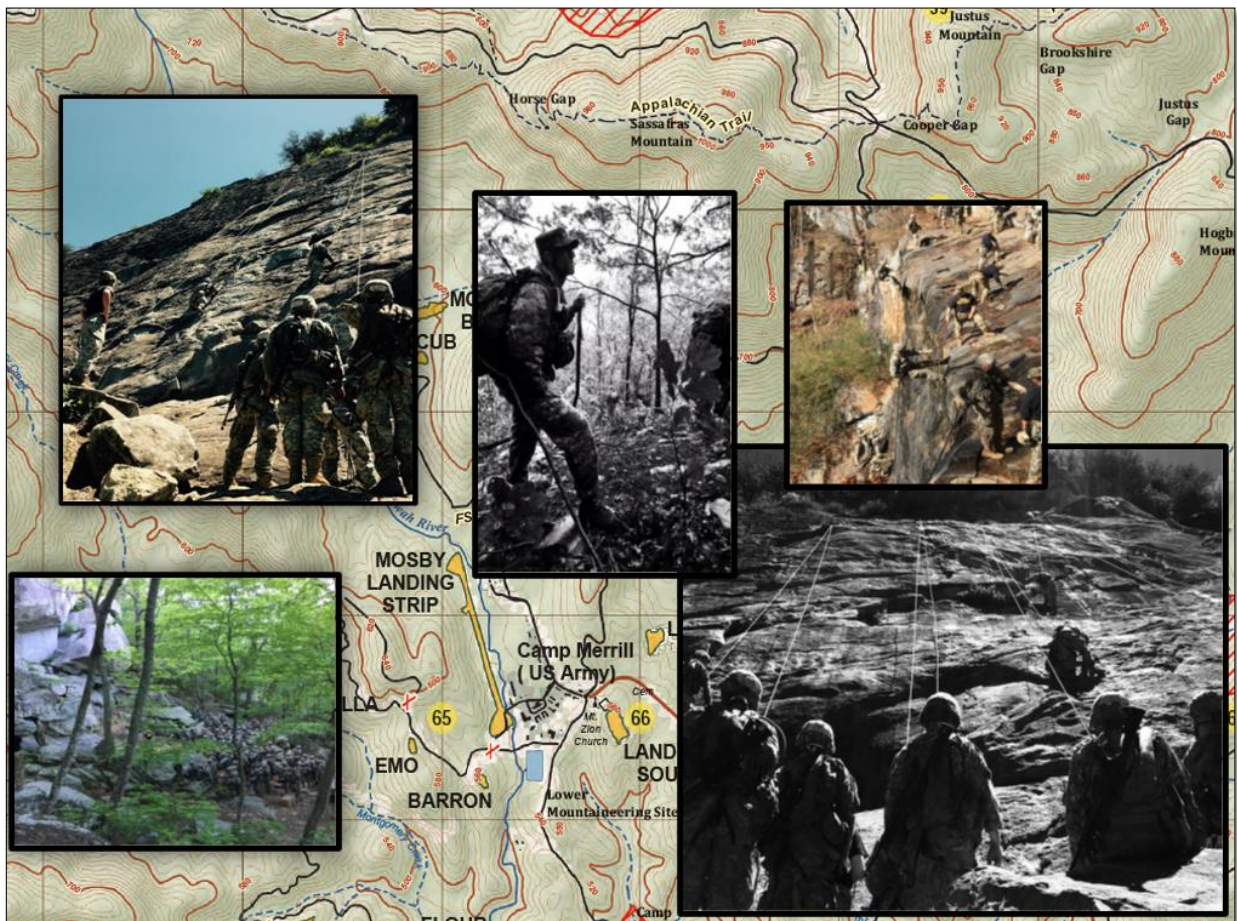


Environmental Assessment

FirstNet Network and Communications Tower at Camp Frank D. Merrill



Dahlonega, Lumpkin County, Georgia

January 2023

**Directorate of Public Works
Environmental Management Division**

ENVIRONMENTAL ASSESSMENT

**FIRSTNET NETWORK AND
COMMUNICATIONS TOWER AT
CAMP FRANK D. MERRILL**

**Prepared by:
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Environmental Management Division
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3 FEB 23

Date

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EXECUTIVE SUMMARY

INTRODUCTION

The Proposed Action considered within this Environmental Assessment (EA) is for a FirstNet Network and Communications Tower at Camp Merrill, Lumpkin County, Georgia. This EA has been prepared to identify and evaluate potential environmental and socioeconomic effects from the proposed construction of a 308-ft Self-support lattice tower that will be enclosed within a 100-ft x 100-ft fenced compound. The total area of ground-disturbance is anticipated to be approximately 0.023-acres.

All construction activities would occur on the U.S. Army maintained land, Camp Frank D. Merrill. Figure 1-1 depicts an overall site map of the area and Figure 2-1 shows an aerial map of the project site location.

As required by the National Environmental Policy Act of 1969 (NEPA; 42 United States 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 potential environmental and socioeconomic effects of this Federal Proposed Action are analyzed in this EA.

NEPA and Federal implementing regulations collectively establish a process by which the Army considers the potential environmental impacts of its proposed actions and invites the involvement of interested members of the public prior to deciding on a final course of action. As such, this EA will facilitate the decision-making process regarding the Proposed Action and its reasonable Alternatives. This EA will also provide the basis for determining if a Finding of No Significant Impact (FNSI) is appropriate, or if an Environmental Impact Statement (EIS) is required.

PROPOSED ACTION

This NEPA analysis is to evaluate the potential environmental effects associated with the construction, operation, and maintenance of a 308-foot lattice style Self-supporting FirstNet Network communications tower that will integrate with the rest of the FirstNet system. The Proposed Action includes compliance with all applicable federal and state laws and regulations and Army requirements.

The communication tower will be a Self-support lattice tower with a full height of 308-ft. Tower height breakdown includes the tower at 300-ft, strobe lights installed at 300-ft, antenna protrusion at 305-ft, and a lightning rod up to its highest point of 308-ft. The lights will be medium intensity, dual obstruction strobe lights that will be red at night and white during the day. The tower will be contained in a proposed 100-ft X 100-ft (10,000 SF or 0.23 acres) compound. The compound will include perimeter security fencing, one 6'-8" X 6'-8" prefabricated walk-in cabinet, and a stand-alone 20kW Diesel powered emergency generator mounted on a prefabricated elevated helical foundation. A contractor for AT&T will construct the proposed FirstNet tower; however, AT&T will provide the operations and maintenance and the FirstNet broadband services over a 25-year contract.

PURPOSE AND NEED

The purpose of the Proposed Action is to provide capable and reliable FirstNet Broadband communications both on and off Camp Merrill by constructing a proposed FirstNet communications tower complete with antennas and supporting equipment to increase the coverage area.

The First Responder Network (FirstNet) Authority provides a broadband wireless network dedicated to first responders across all U.S. States and territories. FirstNet is not a commercial network; it's a public safety platform allowing first responders to share information more quickly and provide redundant communication systems in emergency, natural disasters, and times when the grid may be down. FirstNet public safety platform will provide coverage and capacity with preemption for First Responders such as Fire, Police, and Security. Camp Merrill maintains contact with Fort Benning First Responders but also has a mutual aid agreement with the City of Dahlonega. AT&T FirstNet Network will enhance mutual aid interoperability with other local, state, and federal first responders and surrounding communities during critical incidents.

Additionally, the Land Mobile Radio (LMR) antenna is proposed to be connected to the communications tower and will improve the LMR two-way radio capabilities across and around the entire Camp Merrill and training areas. The 5th Ranger Training Battalion conducts the "mountain" phase of Ranger training on Camp Merrill as well as Lake Lanier, Mount Yonah, Brawley and Black Mountains, U.S. Forest Service Roads and within the Chattahoochee National Forest. The geography of the training area outside Camp Merrill within the Chattahoochee National Forest transitions from low elevations (valleys) to high elevations and mountains.

PROPOSED ACTION ALTERNATIVES

The Army used screening criteria to determine which Alternatives are reasonable. Satisfaction of these screening criteria will 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 used for this Proposed Action consisted of:

Five alternatives were identified however one alternative was identified as "reasonable" to meet the purpose and need of the Proposed Action. The No Action Alternative is also discussed below.

- **No Action Alternative**

While the No Action Alternative would not satisfy the purpose or need for the Proposed Action, this alternative was retained to provide a comparative baseline against which to analyze the effects of the Proposed Action. The No Action Alternative would serve as a benchmark against which the effects of the Proposed Action can be evaluated.

- **Alternative 1 : Preferred Alternative**

The Action Alternative would be sited on the Camp Merrill Cantonment adjacent to a new communications shelter. This location is on the highest elevation as possible without interfering with training activities. Proposed location is conducive with the Real Property Master Plan (RPMP) and Area Development Plan (ADP) addendum for Camp Merrill.

ENVIRONMENTAL CONSEQUENCES

The existing condition of the environmental resources at Camp Merrill potentially affected by the considered Alternative and consequences of the implementation is presented in **Section 3**.

Analysis consists of a comparison of the Alternative potential environmental effects to each environmental resources area or Valued Environmental Component (VEC). A total of 14 VECs were considered for analysis in the EA. A summation of VECs fully analyzed, environmental effects, and mitigation measures for potential adverse effects to VECs are summarized in **Table ES-1. Section 4** of the EA presents an analysis of the potential cumulative effects from implementing the Action Alternative and the No Action Alternative.

TABLE ES-1. Comparison of Potential Effects to VECs Fully Analyzed for the Proposed Action Alternative.		
VEC	NO ACTION ALTERNATIVE	ACTION ALTERNATIVE (Preferred)
Biological Resources	No effects.	<p>Potentially <i>negligible, short-term and negligible long-term</i> effects to Etowah darter. Compliance with NPDES BMPs would be required during construction.</p> <p>Potentially <i>direct; short-term, negligible</i> effects. Bird species and other wildlife may temporarily experience loss of habitat from construction disturbance and site preparation process but would be expected to relocate to suitable habitat elsewhere in the ROI.</p> <p><i>Direct; long-term, negligible</i> effects to migratory birds may potentially occur from possible collision with tower or antennae. Proposed tower is a Self-supporting lattice design with 3-legs and no guy wires. Low impact tower features such as no guy wires may preclude (or prevent) collision effects to migratory birds.</p>
Cultural Resources	No effects.	Potential <i>negligible adverse</i> impact to Cultural Resources and “no adverse effect” to historic properties under the NHPA.
Aesthetic and Visual Resources	No effects.	<p><i>Indirect, negligible short-term and negligible long-term</i> effects given the current topographic and forest (trees and shrubbery) features. In the event the trees and shrubbery at Sassafra Mountain Scenic Vistas were cleared (trees and shrubbery removed) to create a manicured look, the Proposed Action could potentially have <i>indirect, short-term, minor adverse</i> effects and <i>indirect, long-term, minor adverse</i> effects to the Aesthetic and Visual Resources.</p> <p><i>In-direct, minor, short-term adverse</i> effects from tower construction would largely be visible to visitors in a cemetery. As an optional mitigation, a vegetative screen could be planted to the north of the cemetery’s fence.</p>
Airspace and Safety	No effects.	<i>No effects</i> are expected in the <i>short-term</i> or <i>long-term</i> . Tower notification and licensing requirements are required before construction initiation. A “no hazardous” Air Analysis study may also be required.

Of the 14 VECs considered, ten were dismissed from full analysis based on the potential for impacts that are considered negligible or non-existent and are summarized in **Table ES-2**.

Table ES-2. VECs Not Fully Analyzed for the Proposed Action Alternative.		
VEC	NO ACTION ALTERNATIVE	ACTION ALTERNATIVE (Preferred)
Air Quality	No Effects.	<i>Negligible, short-term</i> localized increase in air emissions during construction. <i>Negligible, long-term</i> localized increase in air emissions from generator testing and re-fueling. Federal limits emergency generator use to 500 hours per year.
Noise	No effects.	<i>Negligible, short-term</i> localized effects during construction. <i>Negligible, long term</i> localized effects from intermittent generator testing or emergency use.
Socioeconomics (including Environmental Justice and Protection of Children)	No effects.	<i>No effects</i> in the <i>short-term</i> or <i>long-term</i> . No effects to health and safety of children.
Utilities	No effects.	<i>Negligible, short-term</i> localized effects during construction. <i>Negligible, long term</i> localized effects with energy use.
Transportation and Traffic	No effects.	<i>Negligible, short-term</i> localized effects during construction. No effects in the <i>long-term</i> .
Land Use, Energy, & Security	No effects.	<i>Negligible, short-term</i> localized effects during construction. No effects in the <i>long-term</i> .
Hazardous and Toxic Materials and Waste	No effects.	<i>Negligible, short-term</i> localized effects during construction. <i>Negligible, long term</i> localized effects during maintenance of tower and generator re-fueling.
Soil and Erosion	No Effects	<i>Negligible, short-term</i> localized effects during construction and maintenance.

CONCLUSION

The analysis contained in this EA indicates that for the most part, implementation of the Proposed Action would have *direct, short and long-term, negligible* effects to Biological Resources. Aesthetic and Visual Resources are expected to have *indirect, negligible short-term and negligible long-term* effects given the current topographic and forest (trees and shrubbery) features. In the event the trees and shrubbery at the Sassafras Mountain Scenic Vistas were cleared (trees and shrubbery removed) to create a manicured look, the Proposed Action could potentially have *indirect, short-term, minor adverse effects* and *indirect, long-term, minor adverse effects* to the Aesthetic and Visual Resources. In addition, the ROI on Camp Merrill Cantonment Area includes a cemetery with potential *short-term, minor adverse effects* to Aesthetic and Visual Resources due to the thinning of a vegetative screen north of the cemetery fence. *No effects* in the *short-term or long-term* are expected to Airspace and Safety. There will be potential *negligible adverse impacts* to Cultural Resources and “*no adverse effect*” to historic properties under the NHPA. Adherence to Federal and State laws and regulations would minimize potential impacts due to construction, operation, and maintenance activities.

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TABLE OF CONTENTS

EXECUTIVE SUMMARY	ES-1
1.0 PURPOSE AND NEED	1-1
1.1 Introduction.....	1-1
1.2 Background.....	1-1
1.3 Proposed Action.....	1-2
1.4 Purpose and Need	1-3
1.5 Decision to Be Made.....	1-4
1.6 Scope of the Environmental Assessment	1-5
1.7 Public Agency Involvement.....	1-5
1.7.1 Public Review of Final EA & Draft FNSI	1-5
2.0 SCREENING CRITERIA AND POTENTIAL ALTERNATIVES.....	2-1
2.1 Screening Criteria	2-1
2.2 No Action Alternative.....	2-1
2.3 Alternative 1: Communications Shelter, (Preferred Alternative).....	2-1
2.4 Alternatives Considered but Eliminated from Further Study.....	2-3
2.4.1 Waste Water Treatment Plant Field	2-3
2.4.2 Closed Landfill 6 Area.....	2-3
2.4.3 Old Ammunition Holding Area (AHA)	2-3
2.4.4 Existing Water Tower	2-4
3.0 AFFECTED ENVIRONMENT AND CONSEQUENCES	3-1
3.1 Introduction.....	3-1
3.1.2 Valued Environmental Components (VECs)	3-2
3.1.3 VECs Not Carried Forward for Analysis	3-2
3.1.4 Analyzing Impacts and Region of Influence.....	3-5
3.1.5 Mitigation Measures	3-5
3.2 Biological Resources	3-5
3.2.1 Affected Environment.....	3-5
3.2.2 Environmental Consequences	3-5
3.2.3 Migratory Birds.....	3-6
3.2.4 Special Status Mammal Species	3-7
3.2.5 Etowah Darter	3-9
3.2.6 Other Mammal Species with Threatened Status	3-12
3.3 Cultural Resources	3-12
3.3.1 Affected Environment.....	3-12
3.3.2 Environmental Consequences	3-18
3.4 Aesthetic and Visual Resources.....	3-18
3.4.1 Affected Environment.....	3-18
3.4.2 Environmental Consequences.....	3-19

3.5	Airspace and Safety	3-28
3.5.1	Affected Environment.....	3-28
3.5.2	Environmental Consequences	3-28
4.0	CUMULATIVE EFFECTS ANALYSIS METHODOLOGY.....	4-1
4.1	Past, Present, and Reasonably Foreseeable Actions	4-1
4.2	Cumulative Effects Analysis	4-2
5.0	CONCLUSION	5-1
6.0	REFERENCES CITED	6-1
6.1	PERSONS CONSULTED	6-2
7.0	ACRONYMS AND ABBREVIATIONS.....	7-1
8.0	PREPARERS.....	8-1

LIST OF FIGURES

Figure 1-1: Camp Frank D. Merrill.....	1-6
Figure 1-2: 5RTB Training Locations	1-4
Figure 1-3: Alternative 1: Camp Merrill Topography (DEM Color).....	1-7
Figure 2-1: Alternative 1: Aerial View Map Communication Shelter Site	2-2
Figure 2-3: Alternative 1: Preferred Alternative Camp Merrill Topography.....	2-4
Figure 3-1: Etowah River : Camp Merrill, Georgia.....	3-11
Figure 3-2: Cultural Resources within Study Area.....	3-16
Figure 3-3: Viewshed Analysis: Topography	3-21
Figure 3-4: Viewshed Analysis: Topography around A.T.	3-23
Figure 3-5: Viewshed Analysis: Vegetation	3-24

LIST OF TABLES

Table ES-1: Comparison of Potential VECs Fully Analyzed	ES-3
Table ES-2: VECs Not Fully Analyzed	ES-4
Table 3-1: Previously Identified Archaeological Sites	3-17

PHOTOGRAPHS

Photo 2-1: Alternative 1: Photograph Communication Shelter Site	2-2
Photo 3-1a: Photograph Sassafras Mountain Vista 1	3-25
Photo 3-1b: Photograph Sassafras Mountain Vista 1 (Tripod)	3-26
Photo 3-2a: Photograph Sassafras Mountain Vista 2.....	3-26
Photo 3-2b: Photograph Sassafras Mountain Vista 2 (Tripod)	3-27

APPENDICIES

Appendix A : DRAFT Finding of No Significant Impact (FNSI)	59
Appendix B : FirstNet – Camp Merrill AT&T Coverage Map’s.....	66
Appendix C : Distribution List.....	72

1.0 PURPOSE AND NEED

1.1 Introduction

This NEPA analysis is to evaluate the potential environmental effects associated with the construction, operation, and maintenance of a 308-foot lattice style self-supporting FirstNet Network communication tower, a prefabricated walk-in cabinet, and an emergency generator on Camp Merrill land, in Lumpkin County, Georgia.

This Environmental Assessment (EA) has been prepared 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, 1 January 2007). Under NEPA and its implementing regulations, Federal agencies are required to consider the environmental impacts of major proposed actions in the form of an EA or Environmental Impact Statement (EIS).

The CEQ's Final Rule: Update to the Regulations Implementing the Procedural Provisions of the NEPA (87 FR 23453) for a Phase 1 rulemaking (hereinafter CEQ's 2020 NEPA Updates) and went into effect September 14, 2020. Since that time, a Memorandum from the Assistant Secretary of the Army dated May 19, 2022, titled Implementation of Council on Environmental Quality Revisions (hereinafter Army's 2022 NEPA Updates) was released to implement the new requirements of the 2020 CEQ update for NEPA analysis conducted after May 2022. As such, this EA has been prepared in accordance with the CEQ's 2020 NEPA Updates and the Army's 2022 NEPA Updates.

This 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 this EA is Army decision-makers; interested government agencies (i.e., U. S. Forest Service (USFS) and National Park Service (NPS)); State Historic Preservation Office (SHPO), federally recognized Native American Tribes; stakeholders such as the Appalachian Trail Conservatory (ATC) and the Georgia Appalachian Trail Conservatory (GATC); other 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 proceed with the implementation of the Proposed Action. This EA will also provide the basis for determining if a Finding of No Significant Impact (FNSI) is appropriate, or if an Environmental Impact Statement (EIS) is required in accordance with the above regulations.

1.2 Background

Fort Benning

Fort Benning is an Army Installation located outside 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). Fort Benning is home to the Maneuver Center of Excellence (MCoE) for ground forces training and doctrine development and 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. Additionally, Fort Benning serves as home to the MCoE with numerous deployable Army and other tenant units.

Camp Merrill

Camp Frank D. Merrill (herein after Camp Merrill) is located near Dahlonaga, Georgia, in North Georgia on approximately 282 acres of land about 184 miles from Fort Benning, Georgia. The federal property was previously managed by the Department of Agriculture, U. S. Forest Service but is now managed by the U. S. Army through a land swap agreement that occurred in October 2015. Camp Merrill is a Satellite Area of Fort Benning and is home to the second phase of U. S. Army Airborne Ranger Training Brigade (ARTB). The ARTB is composed of three Ranger Training Courses, each conducting different phases of Ranger training. The 4th RTB conducts training in woodland type terrain at Fort Benning and the 6th RTB trains in tropical like environment at Eglin Air Force Base, Florida. The 5th RTB conducts the "mountain" phase of Ranger School on Camp Merrill and in the Chattahoochee National Forest (Figure 1-1). The Army invested resources to develop Camp Merrill's supporting infrastructure of an airfield, buildings, ranges, and training land to support the formidable training effort for the 5th Ranger Training Battalion.

FirstNet will be built by AT&T

The First Responder Network Authority provides a broadband wireless network dedicated to First Responders across all U.S. States and territories. FirstNet is not a commercial network; it's a public safety platform allowing first responders to share information more quickly and provide redundant communication systems in emergency, natural disasters, and times when the grid may be down. FirstNet public safety platform will provide coverage and capacity with preemption for First Responders such as Fire, Police, and Security. It also enhances mutual aid interoperability with surrounding communities during critical incidents.

The First Responder Network Authority, in accordance with Public Law 112-96, The Middle-Class Tax Relief and Job Creation Act of February 2012, was established and directed to deploy FirstNet. The Fragmentary Order 01 to Operations Order 20-047 (OPORD 20-047) titled, Installation Management Command (IMCOM) First Responder Network (FirstNet) Transition for First Responders states, "The purpose of the operation is to transition Garrison First Responders to FirstNet in order to provide priority and pre-emption during routine and emergency situations and enhance interoperability with other local, state, and federal first responders. OPORD 20-047 further explained, "This will enhance the Army's capability to save lives and protect property in the Strategic Support Area." The First Responder Network Authority selected AT&T to build and operate FirstNet. FirstNet is being developed at approximately 72 Army Installations.

1.3 Proposed Action

The Proposed Action includes the construction, operation, and maintenance of a communications tower on Camp Merrill that will integrate with the rest of the FirstNet system. The Proposed Action includes compliance with all applicable federal and state laws and regulations and Army requirements. The tower would be a Self-support lattice tower with a full height of 308-ft. Tower

height breakdown includes the tower at 300-ft, medium intensity strobe lights installed at 300-ft, antenna protrusion at 305-ft, and a lightning rod up to its highest point of 308-ft. The FirstNet tower would be contained in a proposed 100-ft X 100-ft (10,000 SF or 0.23 acres) compound. The compound will include perimeter security fencing, one 6'-8" X 6'-8" pre-fabricated walk-in cabinet, and a stand-alone 20 kW Diesel powered emergency generator mounted on a prefabricated elevated helical foundation.

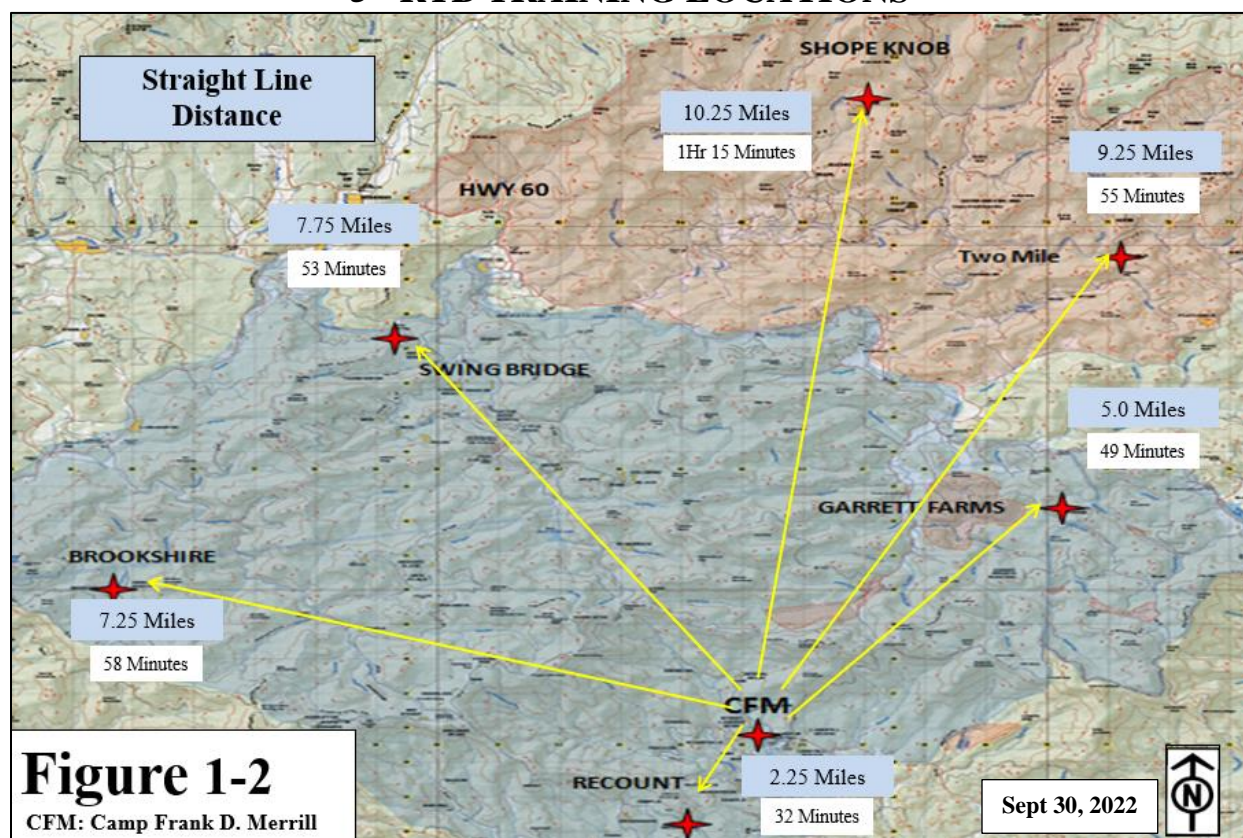
The lights will be medium intensity, dual obstruction strobe lights that will be red at night and white during the day. The Federal Aviation Administration sets the requirements for lighting (FAA Advisory Circular 70/7460-1 L Change 2, med-dual system – Chapters 4, 8, (M-Duel) and 12) and determines the type and location of tower lights based on aircraft safety and safe navigable airspace.

A contractor for AT&T will construct the proposed FirstNet tower; however, AT&T will provide the operations and maintenance and the FirstNet broadband services over a 25-year contract. According to OPORD 20-047, this is a requirement obtained through a FAR contract and all privately owned buildings, structures, and utilities on government owned land within Army installations will be reported as Real Property (RP). Upon construction completion, the tower will be transferred to U.S. Army ownership by way of a DD Form DD 1354, Transfer and Acceptance of DoD Real Property. The Army will lease the land under the tower and related equipment to FirstNet broadband services and the Army will contract with FirstNet for operation and maintenance.

1.4 Purpose and Need

The purpose of the Proposed Action is to provide capable and reliable FirstNet broadband communications both on and off Camp Merrill by constructing a proposed FirstNet communications tower complete with antennas and supporting equipment to increase the coverage area. As mentioned in Section 1.2 above, the 5th RTB conducts the “mountain” phase of Ranger training on Camp Merrill as well as Lake Lanier, Mount Yonah, Brawley and Black Mountains, Forest Service Roads and within the Chattahoochee National Forest. Figure 1-2 below reflects the straight-line distance to training locations.

5th RTB TRAINING LOCATIONS



Camp Merrill maintains contact with Fort Benning First Responders but also has a mutual aid agreement with the City of Dahlonega. AT&T FirstNet Network will enhance mutual aid interoperability with other local, state, and federal first responders and surrounding communities during critical incidents. Additionally, the Land Mobile Radio (LMR) antenna is proposed to be connected to the communications tower and will improve the LMR two-way radio capabilities across and around the entire Camp Merrill and nearby training areas.

The geography (topography or natural terrain) of the training area outside Camp Merrill within the Chattahoochee National Forest transitions from low elevations (valleys) to high elevations and mountains. Figure 1-3 reflects the topography using various shades of color for the differences in elevation. Existing AT&T coverage maps and a proposed AT&T coverage map can be found in Appendix B. The proposed AT&T coverage will extend a good distance outside Camp Merrill.

1.5 Decision to Be Made

The decision to be made is whether or not to execute the Proposed Action as described above, and if so, at what location on Camp Merrill. One Action Alternative to construct the FirstNet communications tower is proposed as detailed in Chapter 2, along with the No Action Alternative. The final decision will be documented in either a Finding of No Significant Impact (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 Proposed Alternative. A

FNSI will identify the Army's preferred alternative and any mitigation measures that are essential to the reduction of identified impacts. A draft FNSI is at Appendix A.

1.6 Scope of the Environmental Assessment

This EA analyzes the potential environmental effects associated with the Proposed Action as described above. The Proposed Action does not include any projects at Fort Benning. A FirstNet communication tower for Fort Benning underwent a separate and appropriate level of NEPA analysis because the actions are far apart and not dependent on each other. Any proposed actions outside of this EA's defined Proposed Action and alternatives would require appropriate NEPA Analysis. Such required site-specific NEPA analysis would be submitted to the Environmental Management Division (EMD) within the Directorate of Public Works (DPW) using the Fort Benning Form 144R to initiate the environmental review process (NEPA process) prior to any funding or decision to implement. Adhering to this process would be consistent with other construction projects on Camp Merrill as well as on Fort Benning to ensure that any future changes in the locations of environmental resources (e.g., changes in the locations of endangered species), utilities, or other elements are addressed with the most current information available.

1.7 Public and Agency Involvement

1.7.1 Public Review of the Final EA and Draft FNSI

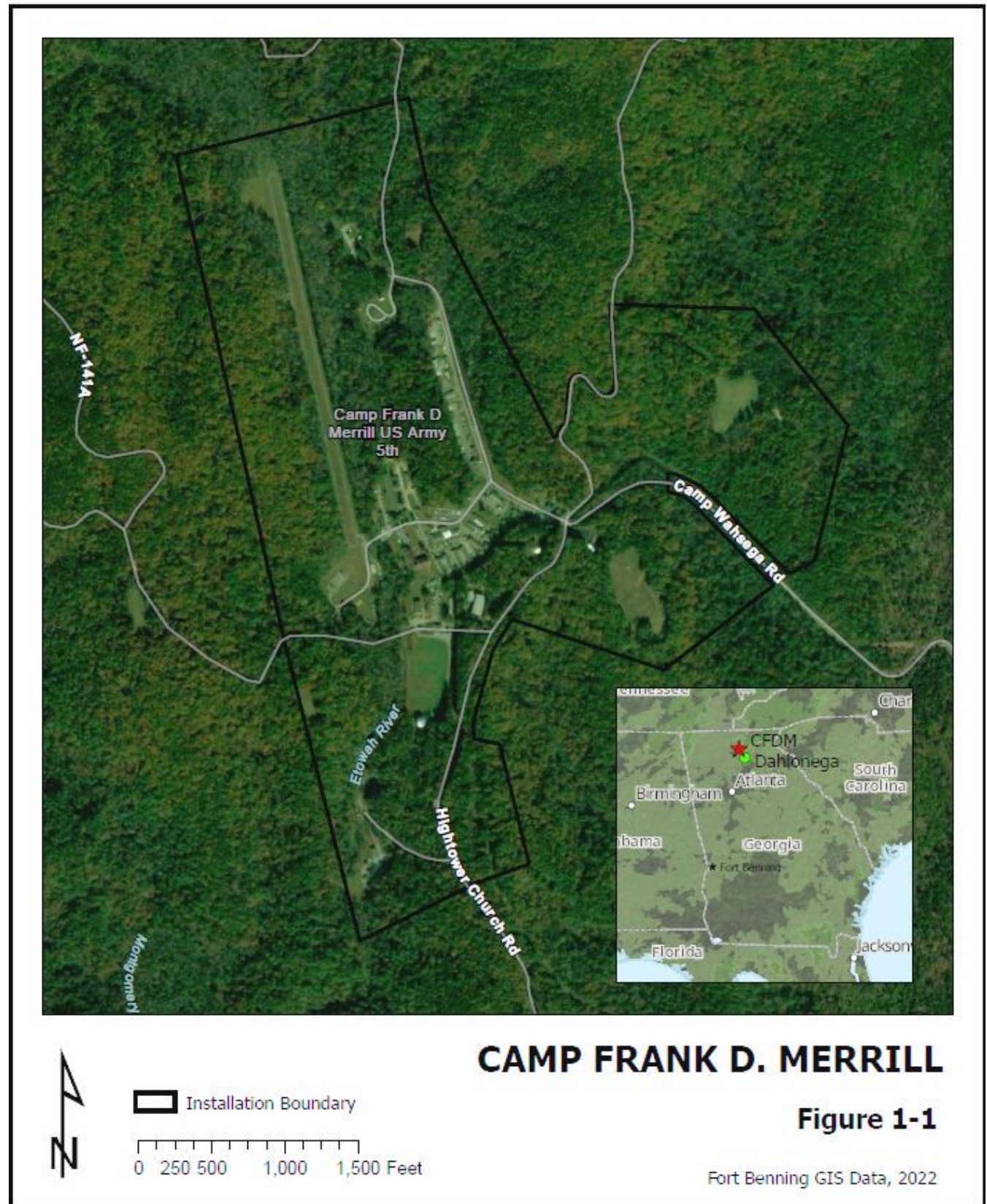
This EA and a Draft Finding of No Significant Impact (FNSI) will be available to the public for a 30-day public comment period. The Notice of Availability (NOA) for the Final EA and Draft FNSI will be published in *The Columbus Ledger-Enquirer*, *The Dahlonega Nugget*, *North Georgia News*, *The News Observer*, and *Times Courier*.

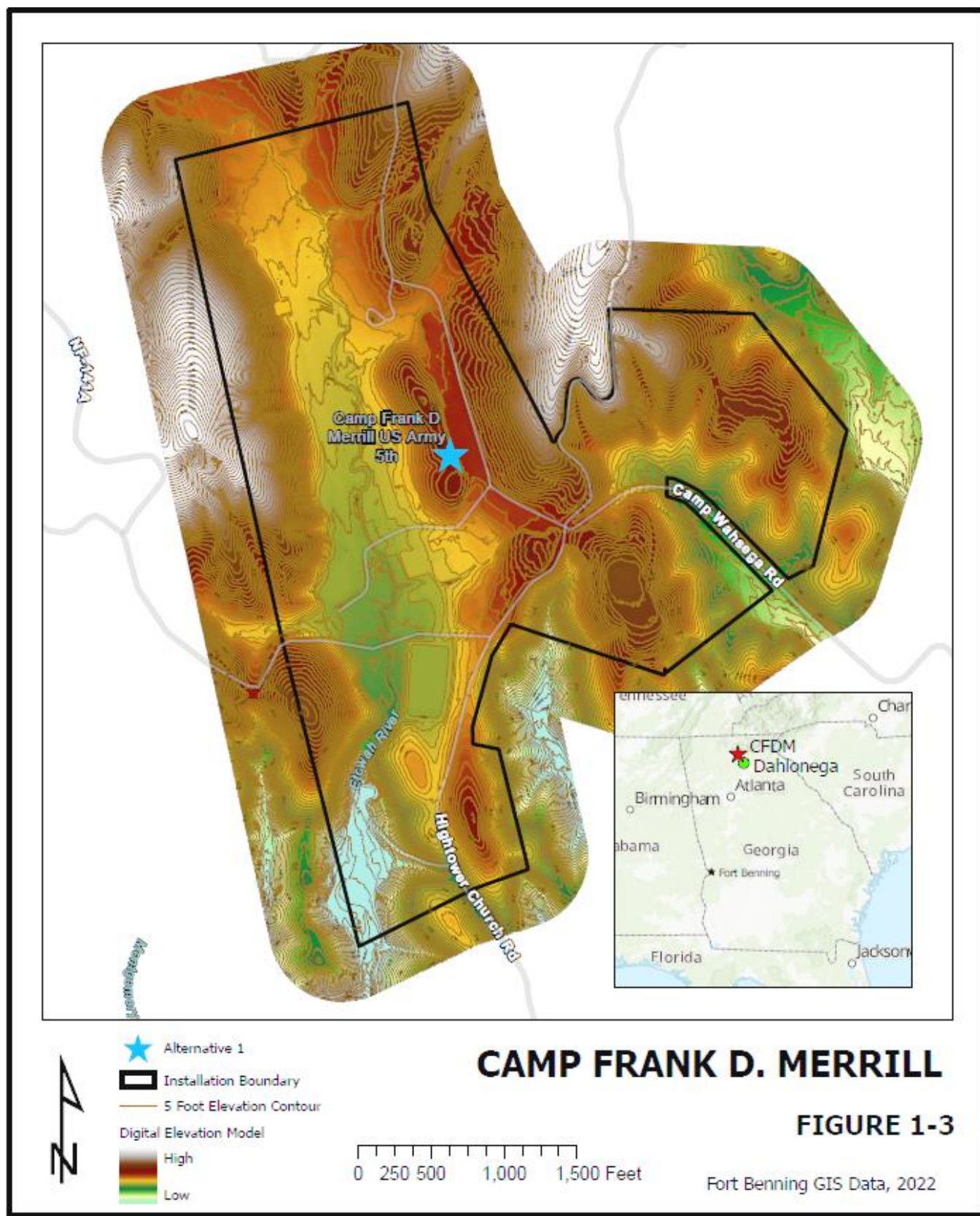
In accordance with the Army NEPA Regulation (32 CFR Part 651.36). The Final EA and Draft FNSI will also be available at the following Georgia libraries:

- | | |
|---|---------------------------------|
| 1. Columbus Public Library | 5. Union County Public Library |
| 2. Milton E. Long Library | 6. Lumpkin County Library |
| 3. Cusseta-Chattahoochee Public Library | 7. Fannin County Public Library |
| 4. Gilmer County Library | 8. Camp Frank D. Merrill Museum |

In addition, the documents will be posted on the Fort Benning iSportsman website at <https://ftbenning.isportsman.net/news.aspx>. The NOA has also been mailed to all agencies/individuals/organizations on the Fort Benning NEPA distribution (mailing) list for the Proposed Action (see **Appendix C**).

At the end of this 30-day public comment period, all comments submitted will be considered in the Garrison Commander's decision making. As appropriate, the Garrison Commander may then execute the FNSI and proceed with implementation of the selected Alternative. If it is determined that implementation of the selected Alternative would result in significant impacts that cannot be mitigated to less-than-significant levels, a Notice of Intent (NOI) to prepare an EIS will be published in the Federal Register, or the Proposed Action will not be implemented.





2.0 SCREENING CRITERIA AND POTENTIAL ALTERNATIVES

2.1 Screening Criteria

Army and NEPA regulations require the development and consideration of the Proposed Action and reasonable alternatives. Reasonable alternatives meet the Purpose and Need and provide options for implementing the Proposed Action, specifically the location on Camp Merrill. Screening criteria are used to narrow down alternatives for further analysis. Any alternatives that failed to meet the following criteria were not reasonable and were eliminated from further analysis. Alternatives to construct the Proposed FirstNet Network communications tower are required to:

- Be conducive with the Real Property Master Plan (RPMP) and Area Development Plan (ADP) addendum for Camp Merrill.
- Not interfere with mission-essential training and be compatible with necessary functions within the cantonment area;
- Have a stable land surface free of underground utilities and other infrastructure;
- Be located on high ground for optimum coverage in all areas in which the 5th RTB trains. Training is conducted on Camp Merrill, Mount Yonah, and in the mountains and the lower valleys of the Chattahoochee National Forest;
- Be accessible for tower and generator maintenance and generator refueling;
- Accommodate 100-ft X 100-ft compound (0.23 acres) with security fencing and/or barriers to prevent unauthorized access to the location;
- Be free from pedestrian traffic and vehicular traffic; and,
- Avoid excessive costs for construction, operations, and maintenance.

2.2 No Action Alternative

Under the No Action Alternative, the Proposed FirstNet communications tower, walk-in cabinet, and emergency generator would not be constructed on Camp Merrill. The 5th RTB would continue to rely on LMR with repeater sites located several miles away while training days at a time in the mountains and lower valleys of the Chattahoochee National Forest. First Responders would not transition to the FirstNet public safety platform allowing first responders to share information more quickly and to provide redundant communication systems in emergency, natural disasters, and times when the grid may be down. In addition, the enhanced interoperability ability with other local, state and Federal First Responders would not be available. The No Action Alternative will serve as a baseline for assessing the impacts of the other Alternatives even though it does not meet the Purpose and Need detailed in Section 1.4.

2.3 Alternative 1: Communications Shelter (Preferred Alternative)

Alternative 1 is the Army's preferred alternative as reflected in Figure 2-1 and Photo 2-1 below. Two new parking spaces and an existing asphalt road was repaved as part of a previous project to connect a new, Army owned communications shelter (recently constructed as part of the Camp Merrill ADP addendum to Camp Merrill Real Property Master Plan) to Camp Wahsega Road. This road would be utilized to access the tower compound for construction and maintenance activities.

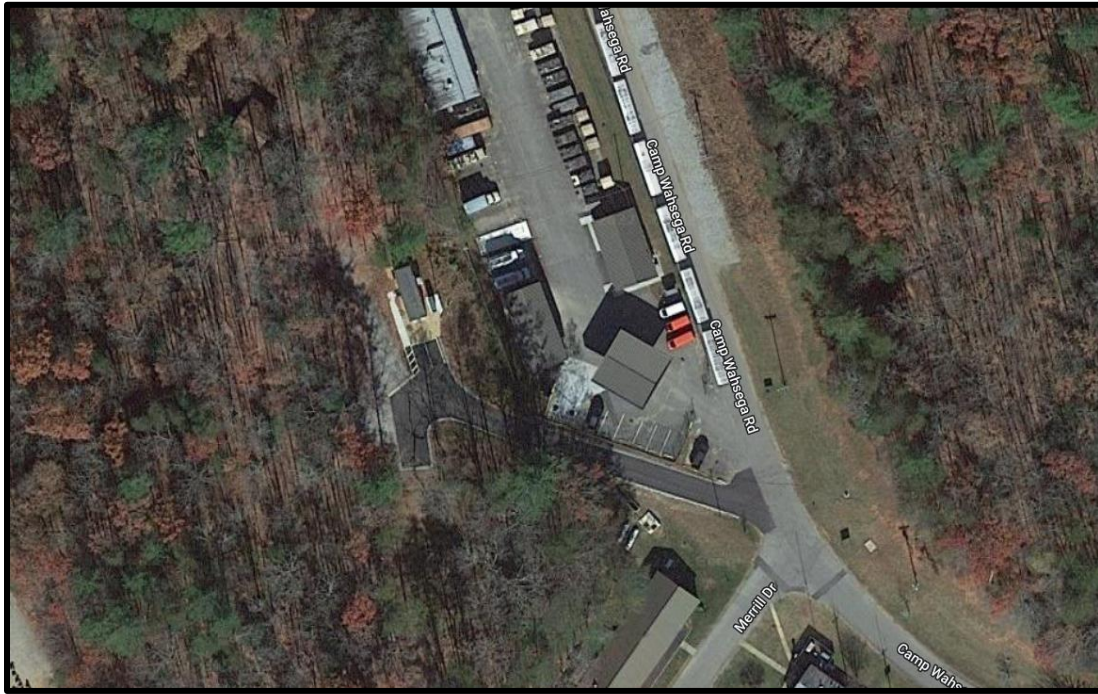


Figure 2-1 Alternative 1 Aerial Map Google Earth Created Sept 27, 2022



Photo 2-1 of Alternative 1 Photo D. Thomson July 26, 2022

Minimal site improvements will be required, including spreading gravel as needed and the removal of approximately 14 trees within the proposed tower compound. Power service is already available and located adjacent to the compound. The compound will be on the highest possible elevation on the main cantonment area in a secured location. Figure 2-3 reflects the topography on the main cantonment area of Camp Merrill. This location is conducive with the RPMP and ADP, and it does

not interfere with training or mission requirements. Camp Merrill's RPMP and the ADP addendum is on file with Fort Benning's DPW Master Planning Division. A hard copy can be made available by request through Fort Benning's Master Planner. Alternative 1 would meet the Purpose and Need for the Proposed Action and is considered reasonable according to the screening criteria.

2.4 Alternatives Considered but Eliminated from Further Study

Several project alternatives were investigated during the location selection process as discussed below.

2.4.1 Wastewater Treatment Plant Field

The Wastewater Treatment Plant (WWTP) Field was considered as an alternative due to the wide-open space and accessibility to southern sky. This site location, however, is still being used for its intended purpose as a WWTP Field. To change the functionality of this site location would not be conducive with the Camp Merrill Real Property Master Plan and Area Development Plan. This location is also in proximity of a rotary wing helipad. Therefore, the WWTP Field is eliminated from further consideration.

2.4.2 Closed Landfill 6 Area

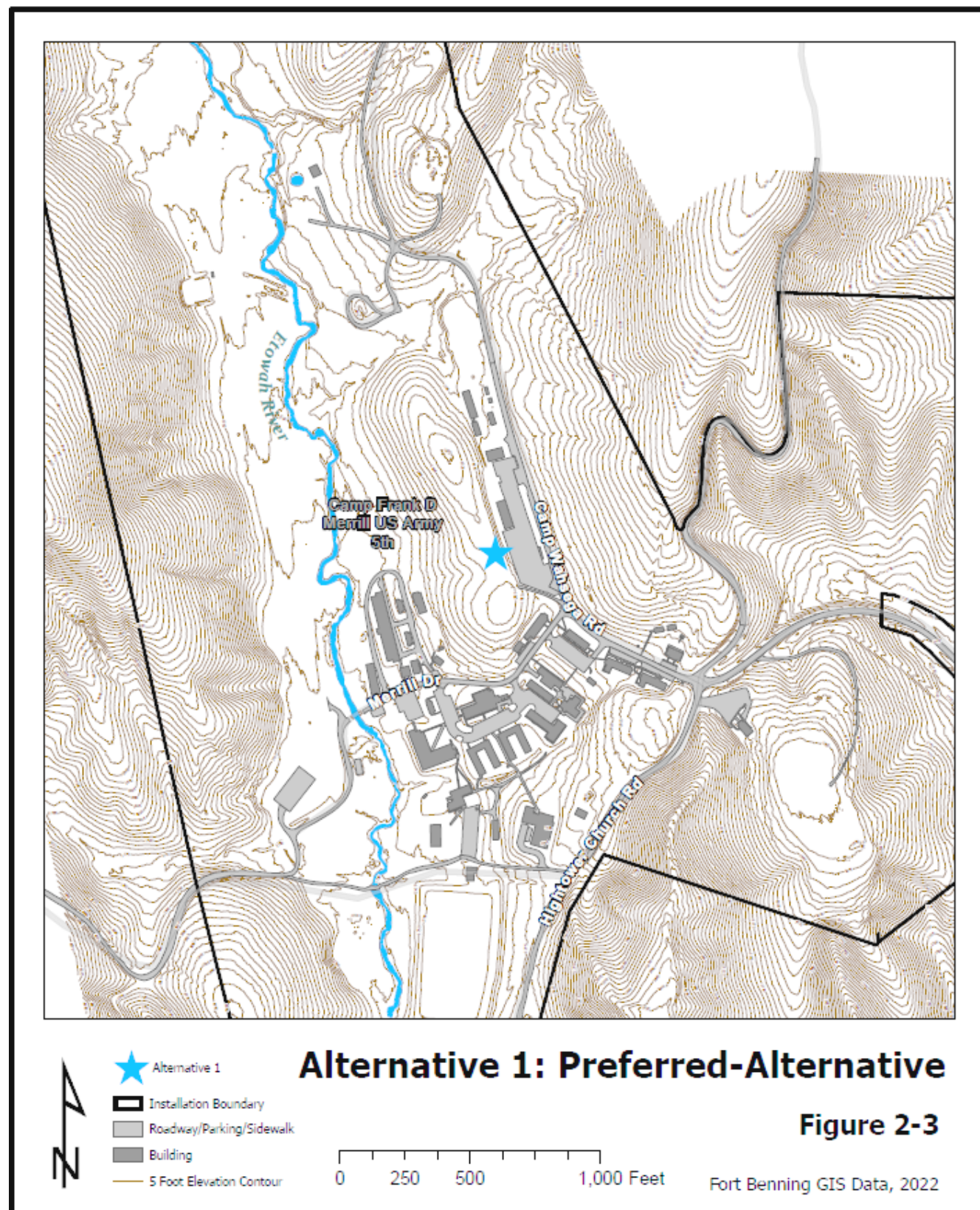
The Closed Landfill 6 Area was considered as an alternative site for the construction of the FirstNet Network communications tower. After further consideration of this alternative, it is determined that the Closed Landfill 6 is still under permit with the Georgia Department of Natural Resources and will not be released until the final clean closure certificate is received. Furthermore, this location is not as secure as the main cantonment area of Camp Merrill. For these reasons, it is determined that the Closed Landfill 6 Area is not a reasonable option and is eliminated from further consideration.

2.4.3 Old Ammunition Holding Area (AHA)

An old ammunition holding area (AHA) was considered as an alternative location for the construction of the Proposed tower but was quickly eliminated from further consideration. Although this site is on the main cantonment area, it conflicts with the Area Development Plan for Camp Merrill as this location is the home for the future barracks construction project (further discussed under past, present, and reasonably foreseeable actions in section 4.0). As such, this site location was eliminated from further consideration.

2.4.4 Water Tower

The existing water tower was considered for emplacing AT&T FirstNet equipment. The water tower is located on high ground on the main cantonment area, and it is also the highest structure on Camp Merrill. After full consideration, it was determined that the Water Tower was not high enough to meet the coverage needs. This is especially true in which the water tower is not high enough to reach the lower valleys in the Chattahoochee National Forest where the ARTB trains. Therefore, the Water Tower was eliminated from further consideration.



3.0 AFFECTED ENVIRONMENTAL, POTENTIAL IMPACTS, AND MITIGATION

3.1 Introduction

Chapter 3 describes the affected environment and potential direct, indirect, and cumulative environmental consequences from the implementation of each alternative carried forward for study. The affected environment describes the current environmental setting and provides a baseline reference for understanding the intensity of any potential impacts or environmental consequences resulting from the Proposed Action.

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. *Direct effects* are those effects 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 still reasonably foreseeable. Cumulative effects are incremental impacts of the Alternatives when considering other past, present, and reasonably foreseeable future actions.

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, and include air, water, soil, terrain, noise, land use, energy, vegetation, wildlife, fish, and birds that may be affected by a proposed project.

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:

- **Negligible:** An environmental impact that could occur, but the effects would be less than minor and possibly undetectable.
- **Minor:** An environmental impact that clearly would not be significant.
- **Moderate:** An environmental impact that is not significant but is readily apparent. Instances include actions where the potential consequence of the Proposed Action requires additional precautionary measures in following standard procedures 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 also 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.

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 implemented project.

3.1.2 Valued Environmental Component (VEC)

The US Army Environmental Command (USAEC) NEPA Analysis Guidance Manual (USAEC, 2007) 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. The 14 Valued Environmental Components (VECs) generally considered by the Army are listed below.

- Air Quality
- Airspace
- Biological Resources
- Cultural Resources
- Energy
- Facilities (Utilities)
- Hazardous and Toxic Materials and Waste
- Land Use
- Noise
- Safety and Security
- Soil and Erosion
- Socioeconomics, Environmental Justice and Health and Safety of Children
- Traffic and Transportation
- Water Resources

3.1.3 VECs Not Carried Forward for Analysis

In accordance with Army NEPA Regulation, any resource or VEC that is not potentially affected with the Proposed Action does not need to be evaluated. Of the 14 VECs considered, ten were dismissed from full analysis due to *non-existent* or only *short-term, negligible* potential adverse effects, as summarized below. These include Noise, Energy, Air Quality (including GHG and Climate Change), Land Use, Safety, Security, Traffic and Transportation, Hazardous and Toxic Materials and Waste, Soils and Erosion, and Socioeconomics, Environmental Justice and Health and Safety of Children.

Noise

Generation of Noise will likely occur during the construction of the FirstNet Tower and compound from construction activities, large construction equipment, and construction vehicles. Potential effects from Noise will be *negligible, short-term* but will terminate upon construction completion. Construction noise may have *negligible short-term* effects to small mammals, reptiles, and birds within in the local area causing them to disperse and leave their nests or interrupt their mating. However, they are expected to eventually return and recolonize the local area after construction completion. Noise effects from generator testing and operation (when the normal source of power

fails) will potentially have *negligible, long-term* effects since the emergency generators have a Federal limit of only 500 operational hours per year. There are no noise sensitive receivers such as schools or children on the Camp Merrill cantonment area. Camp Merrill is used for troop activities and Soldier training, so it is not conducive for a family environment. Family Housing is located several miles away in the Porter Village subdivision.

Air Quality, Green House Gas (GHG), and Climate Change

The Proposed Action may result in *negligible, short-term* localized increase in air emissions during construction and maintenance activities. This will result from construction and work vehicles onsite, and the short-term generation of fugitive dust from minor earth disturbances during the construction. Camp Merrill (Lumpkin County) is currently in attainment for all criteria and hazardous air pollutants. Camp Merrill does not have a Clean Air Act, Air Quality Permit; however, all construction and maintenance activities must adhere to the Federal and State of Georgia Air Quality rules, regulations, and air quality best management practices. All applicable Federal and State air quality protection requirements will be implemented during construction of the FirstNet tower. Since the Proposed Action is expected to have *negligible, short-term* localized increase in air emissions, it is also be expected that potential Green House Gas (GHG) emissions and Climate Change effects resulting from construction and maintenance of the FirstNet tower and compound will also have *negligible* and *short-term* effects.

Soils and Erosion

The National Pollutant Discharge Elimination System (NPDES) Best Management Practices (BMP's) are required for construction projects. In GA, projects one acre or greater require a state approved Erosion Sedimentation Pollution Control Plan (ESPCP) for land disturbing activities to prevent soil erosion or sedimentation of streams. The FirstNet tower compound is expected to be 10,000 SF (or 0.23 acres); however, NPDES BMPs such as silt fencing will be used to minimize sedimentation from leaving the construction site. As such, it is expected that the effects to soils would be *negligible, short-term*, and localized to the Alternative 1 site.

Land Use, Energy, Safety and Security

Land use includes the utilization of land for industrial, residential, recreational, training, or other purposes. Land use within the Cantonment area is planned in accordance with the Camp Merrill Real Property Master Plan and Area Development Plan (ADP). These plans guide the development of Camp Merrill. Camp Merrill is a training facility so the Land Use for troop activities, Soldier training, and support functions would not change. Finally, the existing management plans for Energy, Safety, and Security would remain in effect. Therefore, these VECs are not analyzed further in this EA.

Socioeconomics, Environmental Justice, Health, and Safety of Children

Executive Order (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 Camp Merrill, there would be no effects to minority or low-income

populations. Therefore, there are no effects to environmental justice issues and are not further discussed in this EA.

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. Safety of children would occur, as children and other unauthorized people would be precluded from the Alternate 1 site by fencing or other barriers. Access would be restricted to authorized personnel to minimize risks to human health and safety. The Proposed Action is limited to Camp Merrill and construction areas would be carefully monitored and controlled for only authorized access, (e.g., construction workers, project managers, mitigation monitors, etc.); therefore, it is anticipated that no effects to children would occur.

Potential impacts to Socioeconomics and Environmental Justice effects from dollars spent within the community as a result of the FirstNet Tower construction and future maintenance would be *negligible and have short-term* effects, if any at all. As there are no low income or minority populations within the range of this project no environmental just impacts would occur.

Traffic and Transportation

The primary access road into Camp Merrill is through the Camp Washega Road. The Camp Merrill main cantonment area is designed to accommodate pedestrians. It is anticipated that short-term, localized, *negligible* effects to transportation and traffic flow on Camp Merrill would occur. During the construction phase, there would be a temporary increase in vehicular traffic (construction vehicles and equipment) to haul materials to the project site, but the activity would terminate upon construction completion.

Hazardous and Toxic Materials and Waste (HTMW)

It is expected that the *short-term*, and *long-term* effects to HTMW would be *negligible*. The quantity of hazardous materials such as Petroleum, Oil, and Lubricants (POLs) would increase in support of construction activities and the use of heavy construction equipment. In the *long-term*, the effects would be *negligible* for regular Tower maintenance and generator refueling operations. Fuels needed to power the emergency generator would be stored and handled to minimize the risk of uncontrolled release of hazardous substances. This would be accomplished by following applicable Federal and State laws and regulations and Army policy for hazardous material storage and handling during construction and maintenance activities.

Utilities

Under the Proposed Action, potable water and wastewater would not need to be connected to the new Tower or Compound. Power supply services, however, would be required for the FirstNet Communication Tower and the walk-in utility cabinet. This would slightly increase the demand for power services over the *long-term*, but the effects would be overall *negligible*. The Tower and Compound would be required to adhere to the Army mandate to follow guidelines for energy efficiency per the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED).

In summary, the potential impacts to Air Quality, Noise, Traffic and Transportation, Hazardous and Toxic Materials and Waste, Soils and Erosion are expected to be *negligible, short-term* occurring only during the construction phase and *negligible, long-term* during the maintenance phase. Where applicable, NPDES BMPs for soil erosion prevention will be implemented. These BMPs would also benefit Clean Air Act Air Quality by minimizing fugitive dust, and Biological Resources to protect vegetation, water quality, and habitat.

3.1.4 Analyzing Impacts and Region of Influence

Each VEC has a defined Region of Influence (ROI) to describe the geographic extent or area that potential impacts could occur as a result of the Proposed Action. Unless otherwise stated, the ROI includes the boundaries of Camp Merrill and extends into the Chattahoochee National Forest.

VECs with ROIs that exceed beyond the boundaries of Camp Merrill include Cultural Resources, Biological Resources (Migratory Bird Treaty Act), Aesthetics and Visual Resources, Airspace and Safety. Such differences in the ROI are identified within those sections.

3.1.5 Mitigation Measures

This section discusses mitigation measures as identified by the CEQ. The CEQ regulations recognize five types of mitigation measures; in order of desirability, they include avoiding, minimizing, rectifying, reducing, and compensating. Adherence to Federal and State laws and regulations, as well as Installation management plans, and Army Regulations would either avoid or minimize impacts due to construction, operation, and maintenance activities in the short-and long-term. Mitigation measures are discussed under each individual VEC.

3.2 Biological Resources

3.2.1 Affected Environment

Biological resources include native or naturalized plants and animals and the habitats in which they occur. The Endangered Species Act (ESA) protects only federally listed species. State listed species are protected in the state of Georgia by Georgia's Endangered Wildlife Act. Although state listed species are not protected by the ESA, they are afforded special management attention through the Integrated Natural Resource Management Plan (INRMP 2022). Biological resources discussed in this EA are State protected and Threatened or Endangered Species. Specifically discussed in this EA are Migratory Birds, three mammal species (Bat species), and the Etowah darter potentially impacted by construction and maintenance activities associated with the Proposed Action.

3.2.2 Environmental Consequences

Potential Impacts would be considered significant if substantial loss or degradation of a sensitive habitat, including surface waters that support high concentrations of special status species or migratory birds. Potential impacts would also be considered significant if activities jeopardize the continued existence of listed species or adversely modify designated critical habitats.

Although construction-related activities may disturb local wildlife (mating and nesting) and potentially result in mortality of some reptiles or small mammals, it is not expected to be significant. The proposed 0.23-acre compound is located adjacent to an asphalt road and previous construction of a communication shelter. Wildlife will usually not forage, mate, or nest in areas where construction related activities are occurring; however, these local impacts would be temporary and would terminate upon construction completion. It is expected that wildlife would return upon construction completion.

3.2.3 Migratory Birds

The Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. §703) was first enacted to implement the 1916 convention between the United States and Great Britain for the protection of birds migrating between the U.S. and Canada, offering protection to many bird species. The statute makes it unlawful to pursue, hunt, take, capture, kill or sell birds listed in the statute as “migratory birds,” and does not discriminate between live or dead birds and also grants full protection to any bird parts including feathers, eggs, and nests. The MBTA is the primary law that affirms or implements the nation’s commitment to four international conventions (with Canada, Japan, Mexico, and Russia) for the protection of a shared migratory bird resource.

EO 13186 (Responsibilities of Federal Agencies to Protect Migratory Birds) strengthens the protection of migratory birds and their habitats by directing Federal agencies to take certain actions that implement the MBTA. U.S. Fish and Wildlife Service’s (USFWS) Division of Migratory Bird Management established several initiatives to research collisions of birds with communications towers. In 1999, USFWS established the Communication Tower Working Group, composed of government, industry and academic groups to study and determine tower construction approaches that prevent bird strikes. Various recommendations were developed to reduce the effects on migratory birds. Since that time, studies have been conducted and additional recommendations have been discovered.

According to the USFWS, communication towers may cause direct and indirect mortality through collisions where birds are attracted to tower lights and aggregate in the lighting zone. They circle the tower and collide with the tower, guy wires, and other birds fall to the ground from exhaustion (USFWS 2021). Requests for adjustment of the strobe lights and their sequencing may be considered by the FAA; however, the FAA determines the type and location of tower lights based on aircraft safety and safe navigable airspace.

An updated 2020 list of bird species protected by the Migratory Bird Treaty Act can be found on the USFWS website at the at the following internet address <https://www.fws.gov/media/list-birds-protected-migratory-bird-treaty-act-2020>.

Consultations are partnerships between the USFWS and federal agencies. “In 2006, the USFWS and DoD signed a Memorandum of Understanding (MOU) to outline a collaborative approach to promote migratory bird populations. The MOU identified specific activities where cooperation between the parties will contribute substantially to the conservation of migratory birds and their habitats. In the event a proposed action is anticipated to harm migratory birds, Army natural resources managers will confer with USFWS to develop measures to reduce or eliminate negative

impacts” (INRMP 2022). Migratory bird species are managed and conserved through the INRMP and effects to migratory birds are considered through the NEPA, FB 144R review process.

No Action Alternative:

Under the No Action Alternative, the FirstNet Tower and supporting equipment Proposed in a 100-ft X 100-ft (or 0.23 acre) compound would not be constructed. There would be no effects to Migratory Birds.

Alternative 1:

Direct, short-term, negligible effects may potentially occur from construction equipment and vehicles on site while removing trees during the site preparation process. Potential *negligible* effects may also occur during erection of the tower while utilizing a crane. Bird species and other wildlife may temporarily experience loss of habitat (and abandon eggs) from construction disturbance but would be expected to relocate to suitable habitat elsewhere in the ROI.

Direct, long-term, negligible effects to migratory birds may occur from possible collisions with the tower or antennae and is not likely to adversely effect migratory birds. In accordance with the current USFWS guidance, the tower features incorporating a low-impact design (3-legs with lattice design) and having no guy wires may preclude (or prevent) collision effects to migratory birds (USFWS 2021). In addition, the topography (mountain elevation differences) of the natural landscape coupled with dense forest trees within the Chattahoochee National Forest may also reduce collisions due to the relative height in which birds would fly. That is, many migratory and other birds may fly above the tower. Camp Merrill and the tower will be lower in elevation than the nearby mountain ranges.

Informal consultation (and formal consultation where needed) with the U.S. Fish and Wildlife Service would be initiated by the U.S. Army natural resource managers prior to any construction related activities and implement appropriate mitigation measures, if needed to comply with the Endangered Species Act (ESA) and Migratory Bird Treaty Act.

Mitigation:

No mitigation is proposed.

3.2.4 Special Status Mammal Species

Indiana Bat

The Indiana Bat (*Myotis sodolis*) is a Federally Endangered Species with tiny little mouse-like ears who spends their summers in the eastern United States. They forage, roost, and raise their pups under loose bark or hollows of trees in riparian areas near streams or in forest where there is plenty of sun for warmth (USFWS 2022). Like the Gray Bat, this species also experiences habitat disturbance when in hibernacula (winter dwellings). Once awakened, they use more energy which depletes their fat reserves needed to make it through the winter. The Indiana Bat suffers from White Nose Disease (WND) and their overall number are on the decline. The Indiana Bat spends winters in hibernacula in limestone caves in large colonies. They have a large range but only a few hibernacula sites.

No Action Alternative:

Under the No Action Alternative, the FirstNet Tower and supporting equipment Proposed in a 100-ft X 100-ft (or 0.23 acre) compound would not be constructed. There would be no effects to the Indiana Bat

Alternative 1:

It is expected that *direct* and *indirect* effects to the Indiana Bat would be *negligible* in the *short* and *long term* from the Proposed Action. Alternative 1 is on Camp Merrill main cantonment area where the area is disturbed by daily human activity, previous construction projects, and the landscape is similar to an urban setting with maintained lawns. There are no known limestone caves on Camp Merrill and there are no critical habitats for the Indiana Bat.

Mitigation:

No mitigation is proposed.

Gray Bat

The Gray Bat (*Myotis grisescens*) have been listed as federally endangered since 1967. Their cave habitats have experienced ongoing human disturbance from curiosity to cave explorations and tampering with their environment. In some cases, they have been found in storm sewers. Disturbance within their habitat and the effects on their hibernacula (winter dwellings) wakes them and results in depleting their fat reserves. If disturbed in the summer, it is reported that Gray Bats will drop their little pup thereby causing mortality.

The range of this species includes Georgia but only three summer caves in Georgia are important to these species. Caves have been identified in Chattooga, Walker, and Catoosa Counties. Lumpkin County or Camp Merrill is not one of those locations.

No Action Alternative:

Under the No Action Alternative, the FirstNet Tower and supporting equipment Proposed in a 100-ft X 100-ft (or 0.23 acre) compound would not be constructed. There would be no effects to the Gray Bat.

Alternative 1:

Negligible, short-term effects to the Gray Bat may potentially occur, but is not likely to occur from the FirstNet Tower construction. There are no critical habitats on Camp Merrill for the Gray Bat as their habitat is preferred in three other Georgia counties. For this reason, it is expected that there will only be *negligible indirect* effects in the *long-term*.

Mitigation

No mitigation is proposed.

3.2.5 Etowah Darter

The Etowah River arises out of north Georgia mountains in Lumpkin County and flows through the center of Camp Merrill. This river continues to flow from Camp Merrill to the southwest through Rome, Georgia and draining into the Coosa River basin which ultimately drains into the Mobile Bay, Alabama, and the Gulf of Mexico. The Hydrologic Unit Code (HUC) is HUC 031501040101 (Etowah River Headwaters) and is within the Coosa River Basin.

Many native species of fish reside in the Etowah River system including the Etowah darter (*Etheostoma etowahae*). The Etowah darter is a small fish that is protected under the Federal Endangered Species Act and is endemic to the Etowah River basin. The Etowah darter likes shallow riffle habitat, with large gravel, cobble, and small boulder substrates. It is found in medium and large cool water creeks or small rivers (15-30 m wide) with moderate or high gradients and rocky bottoms.

Stream buffers (or riparian buffers) are areas along streams or rivers where the natural vegetation is preserved to protect water quality, impacts to species, or their critical habitats. The Erosion and Sedimentation Act protects Georgia streams with a minimum buffer of 25 feet; streams supporting trout are given 50-ft buffers. Camp Merrill has a wider stream buffer established of 100-ft.

Trout streams are classified in accordance with the primary and secondary designations. Primary trout streams support a self-sustaining population of Trout. Secondary trout streams support trout throughout the year but have no natural trout reproduction. According to the Georgia Department of Natural Resources (GA DNR) 2020 Integrated 305(b)/303(d) List, the Etowah River from headwaters to Edmunston Creek, Lumpkin County (GAR031501040113) is supporting the fishing use. Trout fish require a certain water temperature, so vegetation and trees are important for shading the stream or river. According to the 2022 INRMP, riparian forests and its shading attributes for the Etowah River are maintained and disturbances are minimized through the FB-144-R process. Proposed actions resulting in adverse effects to the Etowah River are identified and potential adverse impacts are prevented prior to implementation.

Section 305(b) of the CWA requires States to assess and describe the quality of its surface waters every two years in a report called the 305(b) report. Section 303(d) of the CWA requires States to submit to the USEPA a list of all the waters that are not meeting their designated uses and that need to have a Total Maximum Daily Load (TMDL) established for the water body.

The Region of Influence is within the confines of Camp Merrill and the Etowah River. Significant impacts are impacts to the Etowah Darter and its habitat in the Etowah River that could not be easily mitigated to acceptable levels.

No Action Alternative:

Under the No Action Alternative, the FirstNet Tower and supporting equipment Proposed in a 100-ft X 100-ft (or 0.23 acre) compound would not be constructed. There would be no effects to the Etowah darter.

Alternative 1:

During the site preparation process, trees and stumps will be removed. Construction equipment and workers will construct the compound and utilize a portable crane to erect the tower. Ground disturbing activities and large construction equipment would have the potential to dislodge the soil. During rain events, the soil may travel as sedimentation and runoff. Based on an analysis of Figure 3-1, the Etowah River runs from north to south along the east side of Mosby Airfield toward the south end of the property. To prevent soil erosion, damage to endangered species habitat, or sedimentation of the Etowah River, NPDES BMPs and standard construction procedures would be employed (i.e., emplacing silt fences or straw bales) to retain sediment generated by land-disturbing activities within the boundaries of the construction site. Adherence to Federal and State erosion and spill regulations, laws, would also minimize off-site impacts. As such, it is expected that the Proposed Action may have potential *indirect, negligible, short-term* effects to the Etowah darter or the Etowah River.

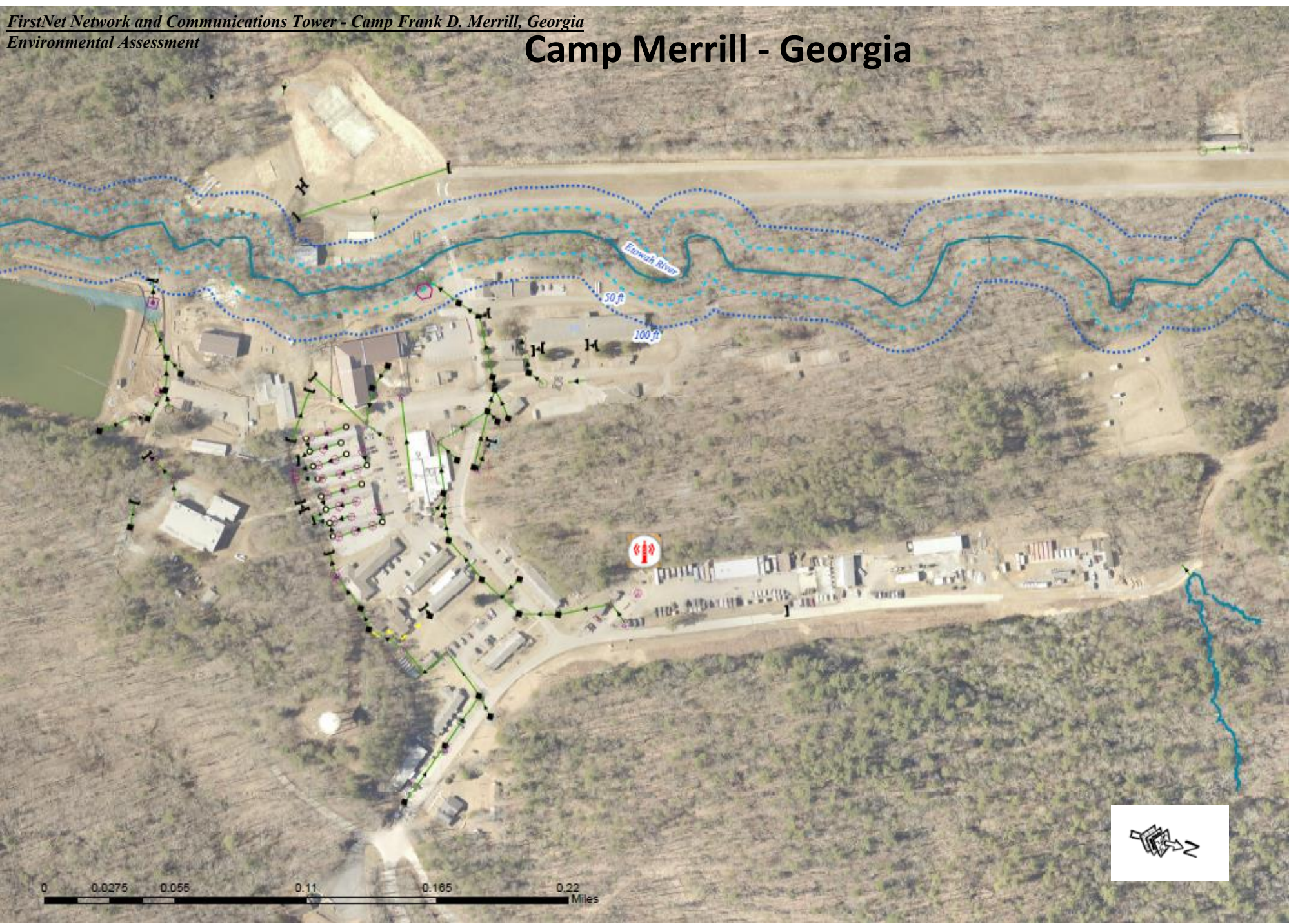
In addition to the NPDES BMPs, Alternative 1 is located well outside the 100-ft buffer as reflected Figure 3-1. No construction or maintenance activities would occur within this 100-ft buffer zone. As such, it's expected that there will be *negligible, long-term* effects.

Mitigation:

No additional mitigation other than NPDES BMPs, compliance with existing regulations, permits, and plans would be required.

Camp Merrill - Georgia

Figure 3-1 Etowah River



Legend

State Waters



Stream_Buffer_50ft



Stream_Buffer_100ft



3.2.6 Other Mammal Species with Threatened Status

Northern Long-eared Bat

The Northern long-eared Bat's (*Myotis septentrionalis*) are Federally Threatened. Their range extends from Maine down to Georgia. During the summer, Northern Long-ear Bats like to roost under bark of deciduous trees by themselves or in a group. Some have been found in buildings or barns. The White Nose Syndrome (an infection) has impacted the Northern Long-eared Bat; in March 2022, the U.S. Fish and Wildlife Service announced a proposal to re-classify the Northern-long eared Bat as endangered under the Endangered Species Act (USFWS 2022). This proposal is due to the declining numbers from the White Nose Syndrome but also habitat degradation.

Since this species likes deciduous trees, and they have been documented in north and west Georgia, it is possible they can be found in Lumpkin County, Georgia.

No Action Alternative:

Under the No Action Alternative, the FirstNet Tower and supporting equipment Proposed in a 100-ft X 100-ft (or 0.23 acre) compound would not be constructed. There would be no hazards to the Northern Long-eared Bat.

Alternative 1:

Indirect, negligible, short-term effects to the Northern Long-eared Bat may occur due to construction disturbance causing them to disperse within the ROI. Although Lumpkin County may be within their range, there are no known critical habitats on Camp Merrill. In addition, Alternative 1 is on Camp Merrill main cantonment area where the area is disturbed by daily human activity, previous construction projects, and the landscape is similar to an urban setting with maintained lawns. For these reasons, it is expected that *long-term* effects would be *negligible*.

Mitigation:

No mitigation proposed.

3.3 Cultural Resources

3.3.1 Affected Environment

Cultural resources are defined in AR 200-1, Environmental Protection and Enhancement, as historic properties as defined by the NHPA, cultural items as defined by NAGPRA, archeological resources as defined by ARPA, sacred sites as defined in EO 13007 (Indian Sacred Sites) to which access is afforded under the American Indian Religious Freedom Act (AIRFA), significant paleontological items as described by 16 USC 431–433 (Antiquities Act of 1906), and collections and associated records as defined in 36 CFR 79 (Curation of Federally Owned and Administered Archeological Collections). The NHPA provides the overarching regulatory framework for cultural resources management; the NAGPRA, ARPA, EO 13007, Antiquities Act, and other cultural resources regulations generally rely on the NHPA to ensure compliance and proper protection and stewardship by Federal agencies.

Cultural resources, as used in NEPA documents, is an inclusive term that encompasses the broad range of resources consisting of the physical evidence of past human activity. The term includes any prehistoric or historic structures, buildings, objects, sites, districts (i.e., a collection of related structures, building, objects, and/or sites), landscapes, natural features, traditional cultural properties, and cemeteries. These terms are defined as:

Archaeological Sites: prehistoric or historic sites where remnants of physical evidence, such as artifacts, features, and ecological evidence of a past culture are present.

- *Buildings and Structures*: structures, buildings, objects, sites, and districts that are over 45 years old. While the Secretary of the Interior (SOI) recommends evaluating resources 50 years or older, the Army has considered historic buildings and structures of 45 years of age or older to allow for unexpected delays in project planning.

- *Cemeteries*: burial locations, formal or informal, of deceased persons from any time period, prehistoric or historic.

- *Native American Sacred Sites and Properties of Traditional and Religious Cultural Importance (PTRCI)*: places associated with the cultural practices or beliefs of a living community that are rooted in that community's history and are important in maintaining the continuing cultural identity of the community. A “sacred site” is a specific, discrete, narrowly delineated location identified by a Tribe or authorized Tribal representative to a Federal agency as sacred by virtue of its established religious significance to, or ceremonial use by, a Native American religion.

There are no known paleontological items in or near any the Preferred Alternative, and no Native American Sacred Sites or PTRCI were identified during background research, therefore, these resources are not addressed further in this EA.

Not all cultural resources are considered significant under applicable cultural resources laws. Cultural resources that are significant must possess sufficient historic integrity to qualify the resource as a historic property, as defined by the NHPA (36 CFR 800.16(I)(1)):

- *Historic Property* means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the SOI. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to any Tribe or Native Hawaiian organization and that meet the NRHP criteria (36 CFR 60.4).

The affected environment for cultural resources includes cultural resources present on Camp Merrill and includes a 1.75-mile radius outside but adjacent to Camp Merrill. A GIS-generated viewshed was created to identify cultural resources potentially located in the tower’s viewshed. The viewshed was calculated with a height of 350 feet to compensate for any potential errors in the digital terrain model.

Management of cultural resources is accomplished through an Integrated Cultural Resources Management Plan (ICRMP). Fort Benning has 14 federally recognized Tribes affiliated with the

Installation and local area. The Army Alternate Procedures for implementing Section 106 of the National Historic Preservation Act (NHPA) has been adopted to improve efficiency in cultural resources management. The Historic Properties Component of these procedures establishes protocols for evaluating the potential effect on historic properties and combining Section 106 consultation with the NEPA process.

Region of Influence

The ROI for cultural resources is the Area of Potential Effects (APE), defined in Section 106 of the NHPA as “the geographic area within which an undertaking may directly or indirectly cause alteration in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking” (36 CFR 800.16(d)). There are two components to the proposed action’s APE: there is an APE for physical effects to the Project Site (i.e., where cultural resources could be physically affected), while the APE for visual effects includes those off-site areas from which the proposed tower may be visible.

Visual effects can affect all types of cultural resources. A recent court case upheld the National Park Service’s contention that visual effects can constitute a direct or indirect effect. This means that if the effect comes from the undertaking at the same time and place with no intervening cause, it is considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable (ACHP 2019).

The 1.75-mile radius or buffer designated as the APE for visual effects is based on a 0.75-mile radius APE that the Federal Communications Commission (FCC) presumes for visual effects resulting from the construction of new towers. Specifically, the APE is “[W]ithin $\frac{3}{4}$ of a mile from the tower site if the proposed Tower is more than 200 but no more than 400 feet in overall height (FCC 2004).” Fort Benning expanded the APE radius an additional mile.

Methodology

Cultural resources specialists meeting the SOI’s Professional Qualification Standards (36 CFR 61) in the discipline of architectural history and archaeology conducted background research and field surveys of the APEs for physical and visual effects. Background research consisted of reviewing Fort Benning’s cultural resource records to identify any resources that would be physically impacted by the construction of the tower, and accessing Georgia’s Natural, Archaeological, and Historic Resources GIS (GNARHGIS) to locate previously identified cultural resources present within the APE for visual effects. Aerial imagery datasets from 1955, 1966, and 1981 and topographic maps from 1965, 1969, and 1971 were studied to identify any potential historic buildings and/or structures in the APE.

No cultural resources are located within the Project Site. The nearest cultural resource is the Mount Zion Baptist Church Cemetery #2 approximately 140 feet to the south. The cemetery is located within Camp Merrill’s fence line, but it is a private property tract. This cemetery has not been

evaluated for NRHP-eligibility, but any visual impacts caused by the construction of the tower to the cemetery are considered an indirect impact and will not cause an adverse effect.

Of three previously identified historic buildings or structures within the visual APE (Figure 3-2) found in GNARHGIS, only one is potentially in the tower's GIS-generated viewshed. The Mount Zion Baptist Church, with associated cemetery, is located immediately south of Camp Merrill's main gate on Camp Wahsega Road. It is a private property tract located within the boundaries of Camp Merrill. This church and cemetery have not been evaluated for NRHP-eligibility, but any effects to the church and cemetery's visual setting are minimized by a vegetative screen of trees and undergrowth. Also, given the distance of the tower from the church, the tower may indirectly affect the church and cemetery's visual setting but will not cause an adverse effect.

A portion of the Appalachian National Scenic Trail (AT), located to the north of the project area, falls within the APE for visual effects (see Figure 3-2). National Park Service (NPS) has found the AT is for inclusion in the NRHP as a historic district (National Parks Conservation Association [NPCA] 2010). Although portions of the AT are within the GIS-generated viewshed, site visits showed that due to vegetation, the tower will not be visible from most of the section of the AT in the APE (including the entire treadway in the APE), and its lights will not be visible in the evening and night from the AT's shelters in the area. The tower will be visible from two viewing points, but given the distance of the tower from these locations and visual obstructions caused by vegetation and terrain, from a NHPA perspective the tower will indirectly affect the AT's visual setting and will not cause an adverse effect.

Thirty-one previously identified archaeological sites are in the APE for visual effect (Table 3-1). In accordance with NHPA and ARPA the locations of archaeological sites are not included on Figure 3-2. Nineteen sites were listed as not eligible for the NRHP and were not assessed further. The NRHP-eligibility of twelve sites is listed as eligible or unknown. Of these only three are in the GIS-generated viewshed (9LU205, 9LU139, and 9LU251). Based on the knowledge gleaned from aerial photographs, any visual effects from the tower will be largely, if not totally obscured by vegetation. Furthermore, the indirect effects to the visual setting of these resources will not adversely affect the characteristics of these sites (the ability to provide meaningful and significant archaeological data) that make them eligible for the NRHP.

Field surveys within the APE for visual effects did not identify any cultural resources not previously identified during background research.

Environmental Assessment

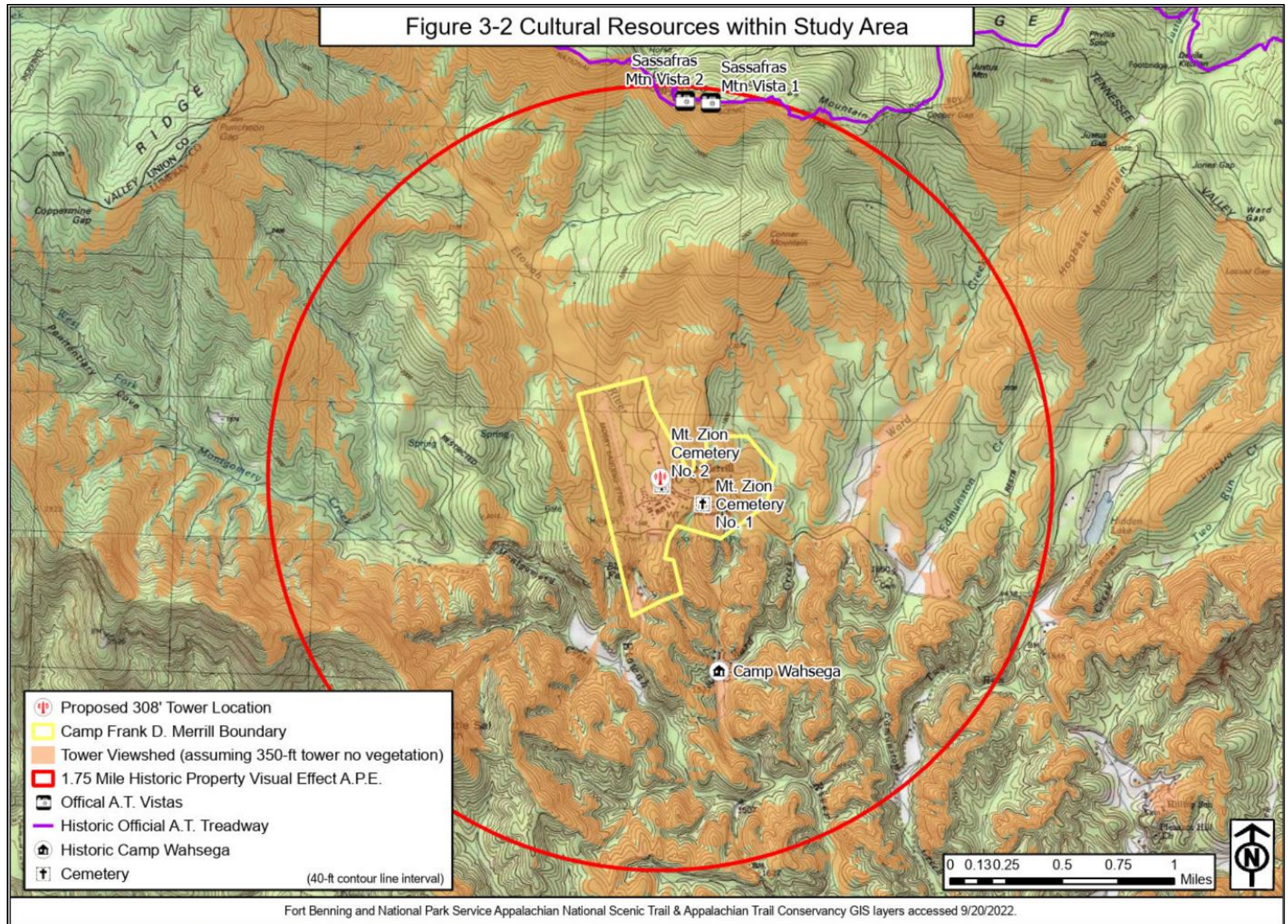


Figure 3-2: Location of previously identified historic buildings/structures (source: GNAHRGIS) and the Appalachian Trail in relationship to the APE for visual effects (Tower Buffer). Note: Camp Wahsega also has an archaeological component (9LU88). In accordance with NHPA and ARPA the locations of archaeological sites are not included on map.

Site Number	NRHP Status	Site Type	Area Description	Visibility
9LU88	Eligible	CCC/WPA Camp Wahsega	Well preserved. Still in use as a 4-H camp.	Not in GIS Viewshed
9LU139	Unknown	Still	Cultivated / Eroded	Not in GIS Viewshed
9LU140	Unknown	Rock Pile	Cultivated / Eroded	Not in GIS Viewshed
9LU156	Unknown	School	Cultivated / Eroded	In GIS Viewshed Vegetative Screen
9LU205	Eligible	Farmstead / lithic isolate	Cultivated / Destroyed	In GIS Viewshed Vegetative Screen
9LU250	Unknown	No Information	Cultivated / Eroded	Not in GIS Viewshed
9LU251	Unknown	No Information	Cultivated / Eroded	In GIS Viewshed Vegetative Screen
9LU272	Unknown	No Information	Cultivated / Eroded	Not in GIS Viewshed
9LU273	Unknown	No Information	Cultivated / Eroded	Not in GIS Viewshed
9LU274	Unknown	No Information	Cultivated / Eroded	Not in GIS Viewshed
9LU275	Unknown	No Information	Cultivated / Eroded	Not in GIS Viewshed
9LU353	Unknown	19th-20th Homestead	Razed	Not in GIS Viewshed
9LU72	Not Eligible	Rock Piles along Etowah River	Undisturbed	In GIS Viewshed Vegetative Screen
9LU50	Not Eligible	Non-Diagnostic lithic isolate	Eroded / Graded	Not Assessed
9LU62	Not Eligible	Morrow Mountain lithic scatter	Cultivated / Destroyed	Not Assessed
9LU63	Not Eligible	Morrow Mountain lithic surface scatter	Cultivated / Eroded	Not Assessed
9LU64	Not Eligible	Lithic scatter	Eroded / Graded	Not Assessed
9LU71	Not Eligible	19th-20th scatter	No information	Not Assessed
9LU83	Not Eligible	Lithic scatter	Eroded and Graded	Not Assessed
9LU154	Not Eligible	Non-Diagnostic lithic isolate	Graded / Destroyed	Not Assessed
9LU168	Not Eligible	Morrow Mountain lithic surface scatter	Cultivated / Destroyed	Not Assessed
9LU203	Not Eligible	Lithic surface scatter	Cultivated	Not Assessed
9LU204	Not Eligible	Lithic surface scatter	Cultivated	Not Assessed
9LU206	Not Eligible	Historic homestead	Destroyed	Not Assessed

Environmental Assessment

9LU215	Not Eligible	Shallow lithic scatter	Redeposited / Graded	Not Assessed
9LU238	Not Eligible	Shallow lithic scatter	Cultivated / Destroyed	Not Assessed
9LU266	Not Eligible	Farmstead / lithic scatter	Graded and Destroyed	Not Assessed
9LU329	Not Eligible	Ceramic / lithic scatter	Graded and Destroyed	Not Assessed
9LU330	Not Eligible	Ceramic / lithic scatter	Cultivated / Destroyed	Not Assessed
9LU359	Not Eligible	Archaic lithic scatter	Undisturbed	Not Assessed
9LU361	Not Eligible	Historic homestead	Destroyed	Not Assessed

Table 3-1: List of previously identified archaeological sites in the APE for visual effects. The sites shaded in gray are sites that are NRHP-eligible or are of unknown status.

3.3.2 Environmental Consequences

A significant effect on cultural resources would occur if it would result in damage, destruction, or demolition to a cultural resource that is eligible or listed on the NRHP (i.e., an historic property), and that cannot be fully mitigated.

No Action Alternative

The FirstNet tower and supporting equipment Proposed in a 100-ft X 100-ft (or 0.23 acre) compound would not be constructed. As such, there would be no impacts to cultural resources.

Alternative 1

Overall, Alternative 1 would result in potential negligible adverse impacts to cultural resources, and “no adverse effect” to historic properties under the NHPA.

Mitigation:

No mitigation is proposed.

3.4 Aesthetic and Visual Resources

3.4.1 Affected Environment

Chattahoochee National Forest

The Chattahoochee-Oconee National Forest is located in north Georgia with a combined total area of 866,468 acres. The Oconee National Forest is 116,232 acres and the Chattahoochee National Forest is 750,145 acres. Land acquisitions for these national forests began in 1911 when the U.S. Forest Service purchased 31,000 acres of land that marked the beginning of the Chattahoochee National Forest. In 1936, the Chattahoochee National Forest was officially established as a separate National Forest. The 750,145 acres within the Chattahoochee National Forest is contained within 19 north Georgia counties of which 57,005 acres are contained in Lumpkin County.

Appalachian National Scenic Trail

The National Forest’s current and historical land management activities include game and fish management activities, and the use and maintenance of campgrounds and public hiking, recreation

trails, and portions of the 2,174-mile Appalachian National Scenic Trail. Congress passed the National Trails System, and the President signed it into law Oct 2, 1968. The Act created two Congressionally designated areas: the Appalachian National Scenic Trail and the Pacific Crest National Scenic Trail (USFS 2022). As such, Congress designated the Appalachian National Scenic Trail (herein after AT) one of the first national scenic trails with the passage of the National Trails System Act in 1968. The AT extends from Springer Mountain in Georgia to Mount Katahdin in Maine. According to the Appalachian Trail Conservancy (ATC), more than three million people visit the trail every year and over 3,000 people attempt to “thru-hike” the entire footpath in a single year (ATC 2021). This trail is managed by the National Park Service, U.S. Forest Service, Appalachian Trail Conservancy, numerous state agencies and thousands of volunteers (NPS 2022).

The Georgia section of the AT extends approximately 76 miles across the Blue Ridge Mountains (and Blue Ridge Ranger District) generally in a northeasterly direction to North Carolina. (GATC 2006). The Blue Ridge District is located in the northern part of Georgia that encompasses the North Georgia Mountains within Dawson, Fannin, Gilmer, Lumpkin, Towns, and Union Counties. The southern terminus of the AT is located at Springer Mountain.

Geography of Camp Merrill and North Georgia Blue Ridge District

The AT descends at times to low valleys, crossing several streams, but mostly follows ridges at elevations around 3000 feet and rises at times to summits over 4000 feet (GATC 2006). The southern terminus of the AT Springer Mountain has an elevation of 3,783 feet. Dense forest trees cover the mountain peaks, hill sides, and lower rolling valleys consisting of northern mixed pine-hardwoods with chestnut, oak, hickory among others in the lower elevations (Peak Visor 2022). Camp Merrill is bordered on all sides by the Chattahoochee National Forest. Directly north of Camp Merrill, at a distance of approximately 1.85 miles is the AT which roughly follows the Union County line.

A significant impact would occur if there were a substantial change in the visual landscape, increased glare or lighting, elevated noise levels, or other factors that diminish the physical value of resources that can’t reasonably be mitigated to acceptable levels.

The affected ROI for Aesthetic and Visual Resources includes the confines of Camp Merrill and extends to the Chattahoochee National Forest and AT from which the proposed tower may potentially be visible.

3.4.2 Environmental Consequences

Visual resources are the natural and man-made features that give an area its visual character which can be difficult to assess because it involves subjectivity. This section discusses visual impacts using two methods as discussed below. These two methods are utilized within this EA analysis to better quantify visual impacts and understand visibility from an observer’s point of view.

BLM Distance Zone Classes

According to a Bureau Land Management Handbook on Visual Resources (BLM 1995), Federal lands are often assigned visual resource inventory classes. These landscapes are often subdivided into three distance zones based on relative visibility from observation points. The three zones are

foreground-middleground, background, and seldom-seen. The foreground- middleground zone are areas that can be seen and are less than 5 miles away. The background zone includes areas beyond 5 miles but less than 15 miles away. This does not include areas in the background that are so far distant that the only thing discernible is the form or outline. Areas that are not visible within the foreground-middleground zone or background zone are in the seldom-seen zone (BLM. 1995). The BLM distance zone classes were used as a means to quantify the visual impacts of FirstNet Tower analyzed in this EA.

Viewshed Analysis

In order to analyze and better understand visibility from an observer's point of view, a computer modeled Viewshed Analysis was conducted using a Geographic Information System (GIS -PRO) and a Digital Elevation Model (DEM). A Viewshed Analysis determines locations visible to an observer. This is accomplished by using a single point (the tower location), the earth surface (digital elevation model or topography), and location of interest (the AT). The GIS is then used to identify which areas are visible from the observation point and which are hidden due to the topography.

For this analysis, the single point was calculated with a height of 350 feet from the earth surface to compensate for any potential errors in the digital terrain model. In Figure 3-3, the orange color reflects areas where an observer of average height would theoretically (not accounting for vegetation or other obstructions) be able to see the tower. Essentially the orange color (where an observer can see the tower) cascades over the mountain peaks and hills between Camp Merrill, north to the AT and west to the AT. The areas without the orange color is the earth surface (or topography) of the lower valleys the observer would not see.

- This Viewshed Analysis does not account for anything on the earth's surface such as the trees. The landscape from Camp Merrill to the AT treadway is largely dominated by trees and vegetation from the Chattahoochee National Forest. The topography transitions from steep mountains to lower rolling valleys. The Proposed FirstNet Tower on Camp Merrill would be located approximately 1.85 miles from the AT.

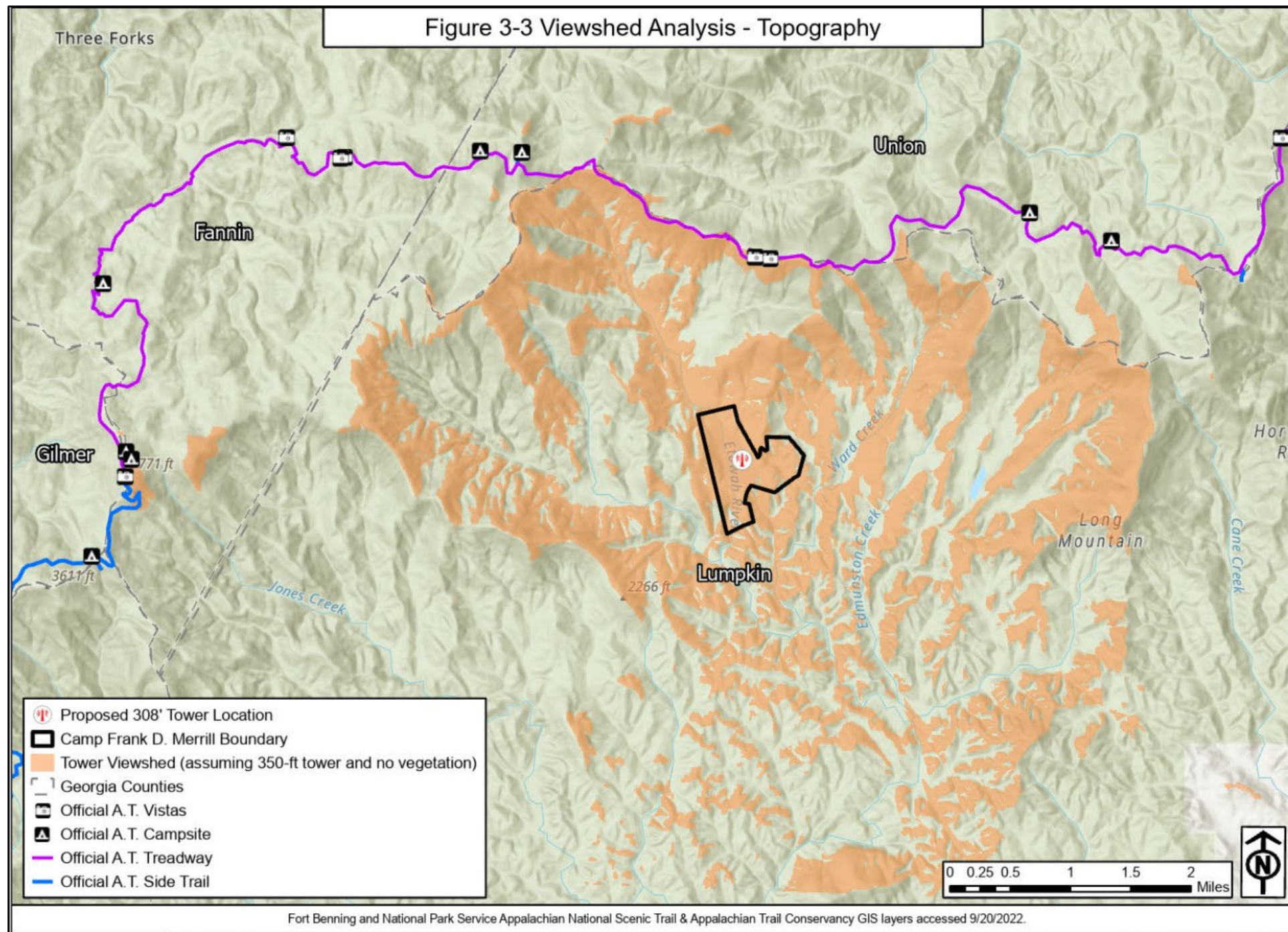


Figure 3-4 (see map below) reflects the Viewshed Analysis, but it also reflects the topography showing the elevation differences between Camp Merrill and the AT. Figure 3-5 reflects the Viewshed Analysis but with vegetation (tree stands and tree canopy) incorporated. When looking at Figure 3-5, the orange color reflects the Viewshed Analysis and green reflects trees and vegetation in the Chattahoochee National Forest.

According to Figure 3-4, Conner Mountain (north of Camp Merrill) and other intermediate mountains dominate the viewshed between the AT and Camp Merrill. Conner Mountain elevation is approximately 2500-ft whereas the elevation of Camp Merrill and height of proposed communication tower is approximately 2,128-ft. The peak elevation of Sassafras Mountain Scenic Vista 1 is 3,000-ft and Scenic Vista 2 is 3,200-ft. In Figure's 3-3, 3-4, and 3-5 the orange coloration stops abruptly and follows along the contours of the AT treadway. The ridge of the AT sits at a higher elevation (in most cases there is over 1,000 feet elevation difference) than Camp Merrill.

The FAA sets the requirements for lighting and determines the type and location of tower lights (see Section 1.3) based on aircraft safety and safe navigable airspace. In consideration of lighting, topography and vegetation, the following can be ascertained from Figure 3-4 and Figure 3-5:

- AT Treadway - Topographic features (mountain peaks and lower valleys), dense forest trees, forest canopy, vegetation, intermediate mountains, and distance from the AT to Camp Merrill are natural features that may camouflage the communication tower from the observer while walking along the AT treadway. During fall and winter leaf-off seasons, the dense tree stands and crisscrossing of the tree branches will break-up the lattice tower even more and camouflage it from the observer view while on the AT treadway. It is expected that the communication tower and lights may be slightly noticeable in daylight hours while walking on the AT during leaf-off season, if at all.
- AT Campsite Shelter locations constructed along the opposite side of the AT from Camp Merrill would not see the proposed FirstNet tower. This is primarily due to the elevation differences between the AT treadway, Campsite Shelters, and Camp Merrill. Elevation differences between Camp Merrill and the AT ridge (north of Camp Merrill) can be 1,000 feet or greater in some locations. It is also expected that the tower lights would not be seen at the Shelter locations at night.
- AT Campsite Shelter in Fannin County and one Scenic Vista on the Gilmer County Line are nearly 5 miles west of the tower compound at an elevation of 3,570-ft. These locations can be seen in Figure 3-4 and in Figure 3-5. The observer may see the tower during the leaf-off season; however, there are several conditions making viewing unlikely. The AT Shelter and Scenic Vista are approximately 1,600 feet higher in elevation than Camp Merrill. The elevation difference along with the distance, tree canopy, dense tree stands, and Bell Mountain (east of the AT Shelter and Scenic Vista) will likely block the observer's view of the tower and lights.

Figure 3-4 Topography around A.T.

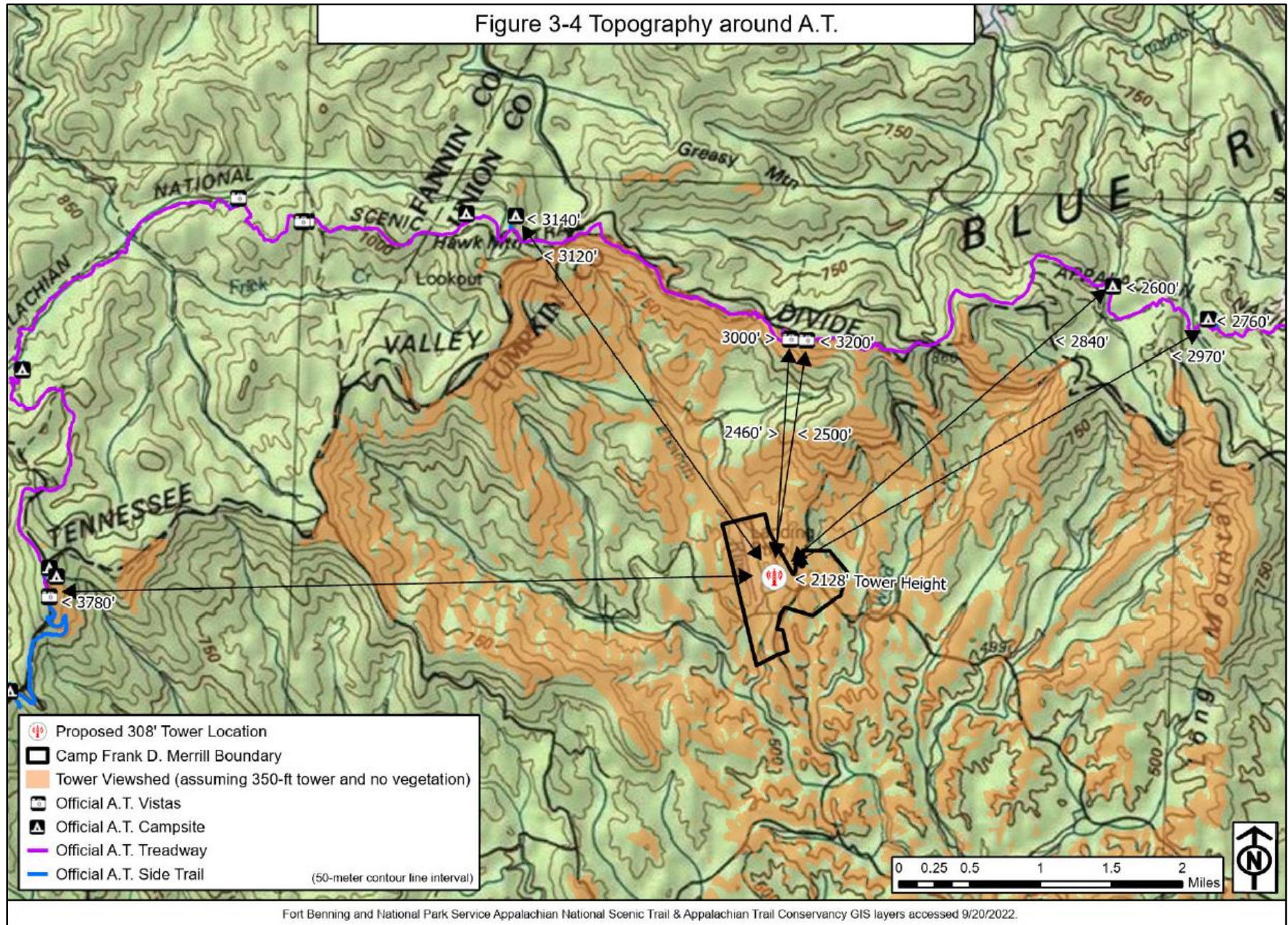
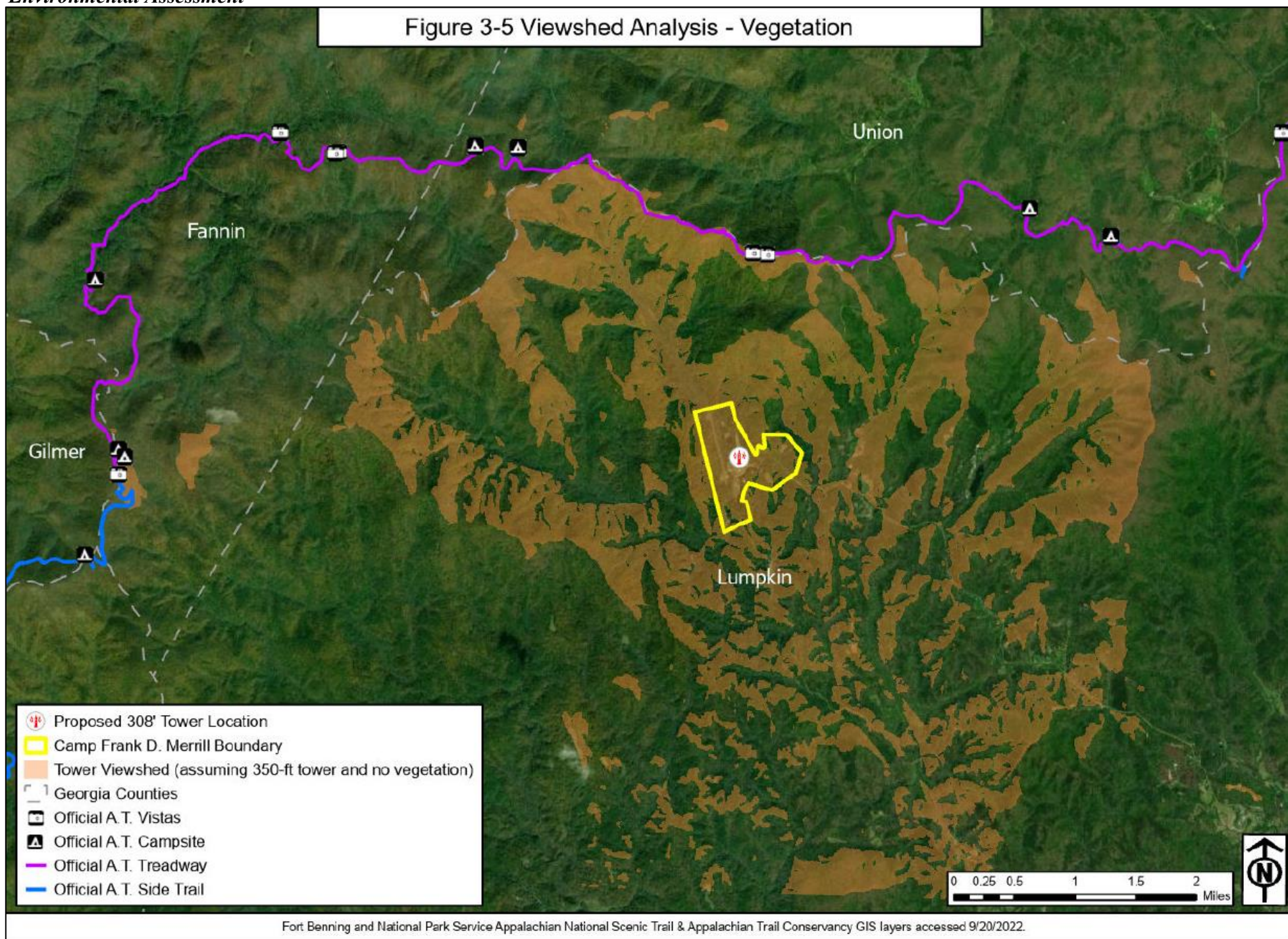


Figure 3-5 Viewshed Analysis - Vegetation



- Two AT Scenic Vistas on Sassafras Mountain are approximately 1.85 miles directly north of the proposed tower location on Camp Merrill. For purposes of this EA, they are identified as Scenic Vista 1 and Scenic Vista 2.

Four pictures below were taken in the direction towards Camp Merrill from each of the AT Sassafras Mountain Scenic Vistas. A camera on a 5-ft tall tripod was used for Photo 3-1a and Photo 3-2a and was centered on the proposed tower location looking towards Camp Merrill. Photos 3-1b and 3-2b are wider angles (for surroundings context) taken behind the camera tripod in the same direction of Camp Merrill to illustrate where an observer might stand at the Scenic Vista for viewing the mountain scenery. At Vista 1 the camera on the tripod was aligned to an azimuth of 186 degrees (compass adjusted for magnetic declination) and 6.8 degrees down angle to center on proposed tower maximum height. At Vista 2 the camera on tripod was aligned to an azimuth of 182 degrees (compass adjusted for magnetic declination) and 5.6 degrees down angle to center on proposed tower maximum height.



Photo 3-1a: Sassafras Mtn Vista 1 Photo: M. Ecks Sept 15, 2022



Photo 3-1b: Sassafras Mtn Vista 1 Photo: S. Chovanec Sept 15, 2022



Photo 3-2a: Sassafras Mtn Vista 2 Photo: M. Ecks Sept 15, 2022



Photo 3-2b: Sassafra Mtn Vista 2 Photo: S. Chovanec Sept 15, 2022

As seen in these pictures, the trees and vegetation will significantly obscure if not entirely block the observers view of the tower and lights during leaf-on seasons. During the winter leaf-off seasons, it is expected that the tree stands and crisscrossing of the tree branches will substantively break up and camouflage the tower from the observers view. The tower lights may still be visible to an observer on the two Scenic Vistas during the winter leaf-off season; however, it is not expected to have a significant adverse effect on the Aesthetic or Visual Resources. If the trees and vegetation, in the direction of Camp Merrill, were cleared on the Sassafra Mountain Scenic Vista 1 or Scenic Vista 2 to create a manicured look, the FirstNet tower and lights will potentially be viewable to observers from these two Scenic Vistas. The tower would not be seen on the horizon as the observer will be looking “down to” a tower in a forested viewshed and not “up to” a tower silhouetted against the sky. The low-impact design with small lattice pieces may further break-up and soften the towers presence to observers in the event trees and vegetation were removed to create a more manicured look at the Scenic Vistas.

No Action Alternative

The FirstNet tower and supporting equipment Proposed in a 100-ft X 100-ft (or 0.23 acre) compound would not be constructed. As such, there would be no impacts to Aesthetics or Visual Resources.

Alternative 1

Given the results in the Viewshed Analysis along with the distance, and current topographic and forest (trees and shrubbery) features, it is expected the Proposed Action would have *indirect, negligible short-term* and *indirect, negligible long-term* effects. In the event the trees and shrubbery at the Sassafra Mountain Scenic Vistas were cleared (trees and shrubbery removed) to create a manicured look, the Proposed Action could potentially have *indirect, short-term, minor adverse* effects and *indirect, long-term, minor adverse* effects to the Aesthetic and Visual Resources.

In addition, the ROI on Camp Merrill Cantonment Area includes a cemetery. Construction of the tower 140 feet north of the cemetery would largely be visible to visitors at the cemetery. The presence of the tower would diminish the overall atmosphere of the cemetery and detract from the experience of visitors to the cemetery. This would cause a *short-term, minor adverse* impact. A vegetative screen planted to the north of the cemetery's fence would largely mitigate the effects to the cemetery's setting.

Mitigation:

Although not required, an optional mitigation for the cemetery would be to plant a vegetative screen consisting of trees and shrubbery immediately north of the cemetery to block the view of the tower.

3.5 Airspace and Safety

3.5.1 Affected Environment

Lumpkin County Airport (also referred to as "Wimpy Airport" in some county maps and documents) is located approximately three miles northwest of Dahlonega, Georgia off Camp Wahsega Road. Wimpy's Airport is open to the public and includes a lighted 3,024-foot asphalt runway that is used by aircraft only during daytime hours. Fuel is onsite and tiedowns for aircraft are available. The airport operational statistics include an average 107 flights per week with 54% local general aviation, 36% transient general aviation, 11% military (AIRNAV.com. 2022). Hartsfield Jackson International Airport in Atlanta is located 75 miles away.

3.5.2 Environmental Consequences

Regulations governing communications infrastructure include Part 17 Construction, Marking, and Lighting of Antenna Structures of the FCC regulations (47 CFR Chapter 1), which prescribes procedures for registration. 47CFR Part 17 requires the Federal Aviation Administration (FAA) to conduct an aeronautical study of the navigation air space to determine appropriate tower marking and lighting requirements to achieve safe air space. Before the FCC authorizes a Tower construction, a FAA determination of "no hazard" may be required. FAA notification is required for any new construction greater than 200 feet above ground level, and near any airport runway. In addition, Towers over 200 feet tall are required by the FAA to have lights, so as to be visible to passing aircraft. These lights are intended for safe aviation conditions around towers.

A significant effect would be airspace impacts to an existing airport by disrupting aircraft flight patterns or compromising safe navigable air space that cannot be reasonably mitigated.

The ROI for Aviation and Safety includes Camp Merrill, approximately 5 miles to Wimpey Airport, and as determined by the FAA that could potentially be affected by the Proposed Action.

No Action Alternative:

The FirstNet tower and supporting equipment Proposed in a 100-ft X 100-ft (or 0.23 acre) compound would not be constructed. As such, there would be no effects to Airspace or Safety.

Alternative 1:

In the short-term, the Proposed Action will have *no effects* to Airspace and Safety. Before construction initiation, AT&T/FirstNet or its Construction Contractor are required to complete tower notifications, submit requests to fulfill FCC licensing requirements, and obtain the FAA aeronautical study of the navigation air space or a “no hazardous” air analysis. *No effects* are expected in the *long-term* as the FCC notification and licensing will be completed. Approaching aircraft will be notified and remain clear of the site.

Mitigation:

No mitigation proposed.

4.0 CUMULATIVE EFFECTS ANALYSIS METHODOLOGY

This sub-section discusses the relevant anticipated cumulative effects of the Proposed Action on those resources affected when considering other actions in the area. Analysis of the proposed Alternative 1 resulted in a finding of *short-term* and *long-term direct* and *indirect negligible effects* Biological Resources. Airspace and Safety resulted in *no effects* in the *short-term* and *long-term*. Aesthetic and Visual Resources resulted in *indirect, short-term, and indirect, long-term, negligible effects* under current vegetation conditions. However, if trees and shrubbery were cleared to create a manicured look on two Scenic Vistas, the Proposed Action could potentially have *indirect, short-term, and indirect long-term, minor adverse effects* to the Aesthetics and Visual Resources. The Aesthetic and Visual Resources for a cemetery resulted in *short-term, minor adverse effects* within the ROI on Camp Merrill Cantonment area. There would be “no adverse effects” to Historic Properties under NHPA and potential *negligible adverse* impacts to Cultural Resources. These VECs will be further analyzed in this section of the EA, and as shown in the analysis below, these *negligible* or *minor* effects do not result in significant adverse cumulative effects when considering past, present, and reasonably foreseeable future activities in the ROI.

The remaining VECs previously discussed in Section 3.1.2 of this EA, would not be affected by the Proposed Action. Impacts to Noise, Energy, Air Quality (including GHG and Climate Change), Land Use, Safety, Security, Utilities, Traffic and Transportation, Hazardous and Toxic Materials and Waste, Soils and Erosion, Socioeconomics, Environmental Justice and Health and Safety of Children are not fully analyzed as the potential for impacts to these resources are considered negligible or nonexistent. As such, there will be no cumulative impacts to these resources and will not be discussed in further detail in this section.

Under the No Action Alternative, the FirstNet Tower and supporting equipment Proposed in a 100-ft X 100-ft (or 0.23 acre) compound would not be constructed. Therefore, there would be no cumulative impacts to any of the VECs presented in this EA under the No Action Alternative.

The CEQ defines cumulative effects as the “impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.” Therefore, the Army considered past, present, and reasonably foreseeable future actions to identify other projects in the ROI that could contribute to cumulative environmental effects.

4.1 Past, Present, and Reasonably Foreseeable Actions

As part of the Master Planning Division RPMP and ADP addendum to the RPMP, the Army provided facilities, infrastructure, and equipment needed to support the 5th ARTB at Camp Merrill. Specific to this EA, the following provides a list and brief description of actions that are proposed for the Camp Merrill area. Various construction activities include:

- Construct new Barracks Building within the old AHA site.
- Construct a new road - Proposed to be built extending from BLDG 37 to the new barracks allowing access for the Fire Department.

- Repurposing the old fire station to possibly a flight operations facility for Ambulance Detachment.
- Relocate existing Planning Bays.
- Construct a new Fire Station - A two Company, two-story Fire Station.

In addition to the Master Planning Division RPMP and ADP addendum to the RPMP actions, the following actions have been completed within the Camp Merrill area after separate NEPA documentation:

- Dining Facility renovation.
- Company Operations Facility (COF).
- Infrastructure project upgrades to the Water Treatment Plant.
- Infrastructure project upgrades to the communications infrastructure. Fiber optic backbone has been upgraded.
- Construction of a communications shelter.
- Construction of a new entry Access Control Point gate.
- Landfill Closure projects.

A Proposed Project in Lumpkin County is discussed below.

- Northeast Georgia Medical Center (NGMC) Lumpkin (June 23, 2022 - 2024): NGMC is part of the Northeast Georgia Health System. There are plans for a future hospital with a 66,000 square foot building. The hospital plans for 16 private inpatient rooms, 10 emergency treatment rooms, 3 operating rooms and one procedural suite to support Orthopedics, Sports Medicine, General Surgery, and other procedures. The hospital campus sits along Georgia 400, just south of Highway 60 intersection.

4.2 Cumulative Effects Analysis

The potential exists for incremental impacts associated with this Proposed Action and No Action alternative to add to cumulative effects of other past, present, and future activities. This section will analyze the potential for cumulative impacts associated with implementation of the Proposed Action as well as the No Action alternative. The threshold criteria for cumulative impacts are the same as those described in the corresponding impact section in this chapter.

Biological Resources

Under the No Action Alternative, the construction project would not occur and there would be no changes to biological resources. As such, significant cumulative impacts to biological resources are not anticipated under the No Action Alternative.

NEPA analysis through the FB 144R process is used to help minimize adverse impacts. Specifically, construction projects are reviewed before project initiation and Biological Resources recommendations are made as part of the planning process. Consultation with the USFWS, when applicable, would potentially reduce the level of impact of each individual project on biological resources to the maximum extent practicable. When combined with the Proposed Action, in conjunction with other past, ongoing, and proposed projects, the cumulative impacts would result

in *indirect* and *direct, short- and long-term minor effects*, but not likely to adversely effect Biological Resources.

Etowah Darter

Under the No Action Alternative, no impacts on water resources would occur because the construction of the proposed FirstNet Tower and Compound including maintenance and repair work would not occur. The Etowah Darter and the Etowah River water quality would remain unchanged under the Proposed Action.

Specific erosion, sedimentation controls and other BMPs would be in place during construction as required by the NPDES construction BMPs and other Federal and state regulations and permitting requirements. Potential for cumulative impacts when considered with past, present, and future actions occurring near the Proposed Action site are not expected to be significant since BMPs would be incorporated into the project to prevent a significant amount of sediments from entering the Etowah River. Therefore, the Proposed Action, in conjunction with other past, ongoing, and proposed projects, would result in *negligible* cumulative impacts on the Etowah darter and Etowah River.

Cultural Resources

Alternative 1 and past, present, and reasonably foreseeable future projects are not anticipated to physically disturb any archaeological resources. Alternative 1 and past, present, and reasonably foreseeable future projects would indirectly, visually effect cemeteries and NRHP-eligible archaeological sites. Resulting potential cumulative impacts from Alternative 1 on cemeteries and NRHP-eligible archeological sites would be *negligible*.

Aesthetics and Visual Resources

Under the No Action Alternative, no impacts to Aesthetics and Visual Resources would occur because none of the construction projects would occur. Aesthetics and Visual Resources would remain unchanged under the Proposed Action.

Fort Benning's Master Planning process manages growth on Camp Merrill which would identify development in areas that would be compatible and consistent with the RPMP and ADP addendum. In the *short-term*, the Proposed Action in conjunction with other past, ongoing, and proposed actions in the region, would result in *direct, minor adverse* cumulative impacts on the region's visual resources. In the *long-term*, the Proposed Action would have *indirect* and *direct, negligible* cumulative impacts on the region's visual resources.

Air Space and Safety

Under the No Action Alternative, no impacts to Airspace and Safety would occur because none of the construction projects would occur. Airspace and Safety would remain unchanged under the Proposed Action.

Fort Benning's Master Planning process manages growth on Camp Merrill which would identify development potentially impacting navigable airspace. If development is proposed as such then a FAA aeronautical study may be required. The Proposed Action, in conjunction with other past, ongoing, and proposed actions in the region, would result in no cumulative impacts on Air Space and Safety.

5.0 CONCLUSION

The analysis contained in this EA indicates that implementation of the Proposed Action would have *indirect, negligible, short-term*, and *long-term* effects, with no adverse effects anticipated to the Etowah darter or the Etowah River from construction activities. A crane and other large construction equipment to erect the FirstNet tower and compound could potentially loosen soils and release sedimentation runoff from the site of the Proposed Action. NPDES BMPs would be implemented during construction to reduce potential impacts.

The analysis indicates that for the most part, implementation of the Proposed Action will potentially have *direct, short-term, negligible* effects and *direct, long-term, negligible* effects with no adverse effects anticipated for Biological Resources. The proposed tower is a Self-supporting lattice design with 3-legs and no guy wires. Low impact tower features such as no guy wires may preclude collision effects to migratory birds.

Overall, Alternative 1 would result in potential *negligible adverse* impacts to cultural resources, and “*no adverse effect*” to historic properties under the NHPA.

The Appalachian National Scenic Trail (AT) and two Sassafras Mountain Scenic Vistas are located north of Camp Merrill. Given the results in the Viewshed Analysis along with the distance, and current topographic and forest (trees and shrubbery) features, it is expected the Proposed Action would have *indirect, negligible short-term* and *indirect, negligible, long-term* effects. In the event the trees and shrubbery at the Sassafras Mountain Scenic Vistas were cleared (trees and shrubbery removed) to create a manicured look, the Proposed Action could potentially have *indirect, short-term, minor adverse* effects and *indirect, long-term, minor adverse* effects to the Aesthetic and Visual Resources.

The ROI on Camp Merrill Cantonment Area includes a cemetery. Construction of the tower 140 feet north of the cemetery would largely be visible to visitors at the cemetery. As an optional mitigation, a vegetative screen planted to the north of the cemetery’s fence would largely mitigate the effects to the cemetery’s setting.

Tower notification and licensing requirements are required before construction of the FirstNet tower can be initiated. A FAA “no hazardous” air analysis study may also be required. As such, there are *no effects* anticipated to Airspace and Safety in the *short-term* or *long-term*. FCC notification would be implemented by AT&T/FirstNet or it’s Construction Contractor before construction initiation.

The No Action Alternative would not meet the purpose and need of a FirstNet Communication Tower for providing priority and pre-emption during routine and emergency situations and enhance interoperability with other local, state, and federal first responders. The EA analysis demonstrated that with adherence to applicable Federal and State environmental laws, regulations, and permitting processes, no significant adverse environmental impacts would result from the Proposed Action as implemented by the Action Alternative. Therefore, preparation of an EIS is not warranted for this action.

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6.1 PERSONS CONSULTED

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7.0 ACRONYMS AND ABBREVIATIONS

ADP	Area Development Plan
AT	Appalachian Trail (National Scenic Appalachian Trail)
ATC	Appalachian Trail Conservancy
BMPs	Best Management Practices
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act
DoD	Department of Defense
DEM	Digital Elevation Model
DPW	Directorate of Public Works
DNR	Department Natural Resources
EA	Environmental Assessment
EIS	Environmental Impact Statement
EMD	Environmental Management Division
EO	Executive Order
EPA	Environmental Protection Agency
EPD	Environmental Protection Division
ESA	Endangered Species Act
ESPCP	Erosion Sedimentation Pollution Control Plan
FAA	Federal Aviation Administration
FCC	Federal Communications Commission
FNSI	Finding of No Significant Impact
GATC	Georgia Appalachian Trail Conservancy
GA	Georgia
GIS	Geographic Information System
ICRMP	Integrated Cultural Resources Management Plan
Kw	Kilowatt
MBTA	Migratory Bird Treaty Act
MCoE	Maneuver Center of Excellence
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
OPORD	Operations Order
RPMP	Real Property Master Plan
RCW	Red-cockaded Woodpecker
ROI	Region of Influence
RTB	Ranger Training Battalion
SHPO	State Historic Preservation Officer
USFWS	U.S. Fish and Wildlife Service
VEC	Valued Environmental Component

8.0 PREPARERS

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APPENDIX A

January 2023

DRAFT
FINDING OF NO SIGNIFICANT IMPACT
FIRSTNET NETWORK AND COMMUNICATIONS TOWER AT
CAMP FRANK D. MERRILL
LUMPKIN COUNTY, GEORGIA

1.0 INTRODUCTION

Fort Benning prepared an Environmental Assessment (EA) to identify and evaluate potential environmental effects associated with the proposed construction of a 308-ft FirstNet communication tower and supporting equipment on Camp Frank D. Merrill (hereinafter Camp Merrill) in Lumpkin County, Georgia. This EA was prepared in accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations at 40 Code of Federal Regulations (CFR) Parts 1500-1508, and the Army NEPA Regulation at 32 CFR Part 651 (Environmental Analysis of Army Actions).

The CEQ's Final Rule: Update to the Regulations Implementing the Procedural Provisions of the NEPA (87 FR 23453) for a Phase 1 rulemaking (hereinafter CEQ's 2020 NEPA Updates) went into effect September 14, 2020. Since that time, a Memorandum from the Assistant Secretary of the Army dated May 19, 2022, titled Implementation of Council on Environmental Quality Revisions (hereinafter Army's 2022 NEPA Updates) was released to implement the new requirements of the 2020 CEQ update for NEPA analysis conducted after May 2022. As such, this EA has been prepared in accordance with the CEQ's 2020 NEPA Updates and the Army's 2022 NEPA Updates. The Final EA includes analysis and findings concerning the proposed 308-ft FirstNet tower and supporting equipment potential construction and operational impacts, including mitigation measures to reduce any potential impacts to less than significant. The Final EA is incorporated by reference.

2.0 PURPOSE AND NEED

The purpose of the Proposed Action is to provide capable and reliable First Responder Network Authority (FirstNet) broadband wireless network. This would be accomplished by constructing a proposed communications tower and supporting equipment to increase the coverage area both on and off Camp Merrill.

FirstNet is not a commercial network; it's a public safety platform allowing first responders to share information more quickly and provide redundant communication systems in emergency, natural disasters, and times when the grid may be down. It will provide public safety coverage and capacity with preemption for first responders such as fire, police, and security. It would also enhance mutual aid interoperability with surrounding communities during critical incidents. Camp Merrill maintains contact with Fort Benning First Responders but also has a mutual aid agreement with the City of Dahlonega. Additionally, the Land Mobile Radio (LMR) antenna is proposed to

be connected to the communications tower to improve the LMR two-way radio capabilities linking training areas both on and off Camp Merrill and within the Chattahoochee National Forest.

If the Proposed Action were not implemented, the communication tower would not be constructed thereby reducing the broadband coverage area that is needed for the mountainous region of the Chattahoochee National Forest. In addition, the LMR two-way radio system would not be attached to increase coverage in the Chattahoochee National Forest in which training is conducted several days at a time.

3.0 DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action is to construct, operate, and maintain a FirstNet Network and a communications tower on Camp Merrill that will integrate with the rest of the AT&T FirstNet system. The Proposed Action would include compliance with all applicable federal and state laws and regulations and Army requirements.

The tower is proposed to be a Self-supporting lattice tower with a full height of 308-ft. Tower height breakdown includes the tower at 300-ft, medium intensity strobe lights installed at 300-ft, antenna protrusion at 305-ft, and a lightning rod up to its highest point of 308-ft. The FirstNet tower is proposed to be contained in a 100-ft X 100-ft (10,000 SF or 0.23 acres) compound with security fencing around the perimeter. The components within the tower compound will consist of one 6'-8" X 6'-8" pre-fabricated walk-in cabinet and a 20kW Diesel powered emergency generator mounted on a prefabricated elevated helical foundation.

The lights will be medium intensity, dual obstruction strobe lights that will be red at night and white during the day. The Federal Aviation Administration sets the requirements for lighting (FAA Advisory Circular 70/7460-1 L Change 2, med-dual system – Chapters 4, 8, (M-Duel) and 12) and determines the type and location of tower lights based on aircraft safety and safe navigable airspace.

A contractor for AT&T will construct the proposed FirstNet tower; however, AT&T will provide the operations and maintenance and the FirstNet broadband services over a 25-year contract. Upon construction completion, the tower will be transferred to U.S. Army ownership by way of a DD Form DD 1354, Transfer and Acceptance of DoD Real Property. The Army will lease the land under the tower and related equipment to FirstNet broadband services and the Army will contract with FirstNet for operation and maintenance.

4.0 DESCRIPTION OF THE ALTERNATIVES

Army and NEPA regulations require the development and consideration of the Proposed Action and reasonable alternatives. Reasonable alternatives meet the Purpose and Need and provide options for implementing the Proposed Action, specifically the location on Camp Merrill. Screening criteria are used to narrow down alternatives for further analysis. Any alternatives that failed to meet the following criteria were not reasonable and were eliminated from further analysis. Alternatives to construct the Proposed FirstNet Network communications tower are required to:

- Be conducive with the Real Property Master Plan (RPMP) and Area Development Plan (ADP) addendum for Camp Merrill.
- Not interfere with mission-essential training and be compatible with necessary functions within the cantonment area;
- Have a stable land surface free of underground utilities and other infrastructure;
- Be located on high ground for optimum coverage in all areas in which the 5th RTB trains. Training is conducted on Camp Merrill, Mount Yonah, and in the mountains and the lower valleys of the Chattahoochee National Forest;
- Be accessible for tower and generator maintenance and generator refueling;
- Accommodate 100-ft X 100-ft compound (0.23 acres) with security fencing and/or barriers to prevent unauthorized access to the location;
- Be free from pedestrian traffic and vehicular traffic; and,
- Avoid excessive costs for construction, operations, and maintenance.

One Alternative was determined to be reasonable:

Alternative 1 is considered to be the best option and the Army's preferred alternative. This location is proposed to be on Camp Merrill's main cantonment area on 0.23 acres and will require minimal site improvements such as spreading gravel as needed and the removal of approximately 14 trees. A new, Army owned communications shelter was recently constructed as part of the ADP addendum to the Camp Merrill RPMP and is located adjacent to the Alternative 1. Two new parking spaces and an existing asphalt road (leads to Camp Wahsega Road) was repaved as part of a previous project and can be utilized to access the tower compound for construction and maintenance activities. Power service is available adjacent to the compound. This location is conducive with the RPMP and ADP, and it does not interfere with training or mission requirements. Alternative 1 would meet the Purpose and Need for the Proposed Action and is considered reasonable according to the screening criteria.

The No Action Alternative serves as a baseline for assessing the potential impacts of the Proposed Action Alternative even though it would not meet the purpose and need.

5.0 ANTICIPATED ENVIRONMENTAL EFFECTS

No significant adverse effects, or significant cumulative effects are anticipated to any Valued Environmental Component (VECs) analyzed in the EA for the Action Alternative. Alternative 1 analysis indicates potential *negligible and minor, adverse* effects may occur to VECs.

Overall, Alternative 1 would result in potential negligible adverse impacts to cultural resources, and "no adverse effect" to historic properties under the NHPA.

Direct, short-term, and long-term, negligible effects to migratory birds may potentially occur from possible collisions with the tower or antennae. Tower features incorporating a low-impact design (3-legs with lattice design) and no guy wires may preclude (or prevent) collision effects to migratory birds. The geography (mountain elevation differences) of the natural landscape coupled with dense forest trees within the Chattahoochee National Forest may reduce collisions due to the relative height in which birds would fly. That is, many migratory and other birds may fly above

the tower as Camp Merrill and the tower will be lower in elevation than the nearby mountain ranges.

Potentially, there may be *negligible, short-term and negligible, long-term* effects to the Indiana Bat and the Gray Bat. Potential *short-term, negligible*, effects may occur to the Northern Long-eared Bat. Alternative 1 is not likely to adversely effect these Bat Species. Finally, it is expected that the Proposed Action may have *indirect, short-term negligible* effects to the Etowah darter and the Etowah River with *no long-term* effects.

Lumpkin County Airport (also referred to as "Wimpy Airport" in some county maps and documents) is located approximately three miles northwest of Dahlonega, Georgia off Camp Wahsega Road. *No effects* are expected in the *short-term* or *long-term* to Airspace and Safety. Tower notification and licensing requirements are required before construction initiation. A "no hazardous" Air Analysis study may also be required as determined by the Federal Aviation Administration.

The Region of Influence on Camp Merrill Cantonment Area includes a cemetery with potential *short-term, minor adverse* effects to Aesthetic and Visual Resources due to a thinning vegetative screen north of the cemetery fence.

A Viewshed Analysis of effects to Aesthetics and Visual Resources was conducted to determine any potential adverse effects of FirstNet tower construction on the Appalachian National Scenic Trail (AT) viewshed and three Scenic Vistas. Given the results in the Viewshed Analysis along with the distance, and current topographic and forest (trees and shrubbery) features, it is expected the Proposed Action would have *indirect, negligible short-term and negligible long-term* effects. In the event the trees and shrubbery at the Sassafras Mountain Scenic Vistas were cleared (trees and shrubbery removed) to create a manicured look, the Proposed Action could potentially have *indirect, short-term, minor adverse effect* and *indirect, long-term, minor adverse effect* to the Aesthetic and Visual Resources.

- AT Treadway -Topographic features including dense forest trees, forest canopy, intermediate mountains, and distance from the AT to Camp Merrill are features that may likely camouflage the tower from the observer while walking along the AT treadway. During fall and winter leaf-off seasons, the dense tree stands and crisscrossing of the tree branches will break-up the lattice tower even more and camouflage it from the observer view while on the AT treadway.
- The AT Campsite Shelter locations constructed along the opposite side of the AT from Camp Merrill would not see the proposed FirstNet tower. This is primarily due to the elevation differences and dense forest trees between the AT treadway, Campsite Shelters, and Camp Merrill. It is also expected that the tower lights would not be seen at the Shelter locations at night.
- One AT Shelter in Fannin County and a Scenic Vista on Gilmer County border are nearly 5 miles west of the tower compound. The observer may see the tower during the leaf-off

season; however, there are several conditions making viewing unlikely. The distance, elevation differences over 1,600 feet, dense forest trees, and Bell Mountain (located east of the AT Shelter and Scenic Vista) will likely block the observer's view of the tower and lights.

- Two AT Scenic Vistas on Sassafras Mountain approximately 1.85 miles north of the proposed tower. Trees and vegetation will significantly obscure if not entirely block the observers view of the tower and lights during leaf-on seasons. During the winter leaf-off seasons, it is expected that the tree stands and crisscrossing of the tree branches will substantively break up and camouflage the tower from the observers view. The tower lights may still be visible to an observer on the two Scenic Vistas during the winter leaf-off season; however, it is not expected to have a significant adverse effect on the Aesthetic or Visual Resources. If the trees and vegetation, in the direction of Camp Merrill, were cleared on the Sassafras Mountain Scenic Vista 1 or Scenic Vista 2 to create a manicured look, the FirstNet tower and lights will potentially be viewable to observers from these two Scenic Vistas. The tower would not be seen on the horizon as the observer will be looking "down to" a tower in a forested viewshed and not "up to" a tower silhouetted against the sky. The low-impact design with small lattice pieces may further break-up and soften the towers presence to observers in the event trees and vegetation were removed to create a more manicured look at the Scenic Vistas.

6.0 MITIGATION

For the Proposed Alternative 1, adhering to applicable Federal and State environmental laws, regulations, and permitting processes would minimize potential adverse environmental impacts. No other mitigation is proposed.

7.0 PUBLIC AVAILABILITY

The Final EA and this Draft FNSI were made available to the public for a 30-day public comment period from **February 23 through March 24, 2023**. An announcement that these documents are available was published via a Notice of Availability (NOA) in The Columbus Ledger-Enquirer, The Dahlonega Nugget, North Georgia News, The News Observer, and Times Courier in accordance with the Army NEPA Regulation. These documents are also available at several local libraries (See Distribution List at Appendix C) and are posted on the Fort Benning iSportsman website at <https://ftbenning.isportsman.net/news.aspx>. The NOA of the Final EA has been mailed to all agencies/individuals/organizations on the Camp Merrill NEPA distribution (mailing) list for the Proposed Action, as identified in **Appendix C** of the Final EA. As part of Fort Benning's ongoing, established process and dialogue with the Federally recognized Native American Tribes affiliated with Fort Benning and Camp Merrill area respectively, the Army has notified each Tribe of the project and document links for their review and comment.

Written public comments should be addressed to:

- **Mr. Ted Williams; NEPA Program Manager; AMIM-BEP-E; 6650 Meloy Drive; Building 6, Room 309-B; Fort Benning, Georgia 31905; or email comments to theodore.t.williams.civ@army.mil.**

For further information or to request a copy of the documents, please contact Mr. Ted Williams, Environmental Management Division, at (706) 545-5337 between 9 a.m. and 4 p.m. ET.

8.0 CONCLUSION

Based on this EA, it is concluded that the Army's preferred Alternative 1 would meet the purpose and need of a FirstNet Network and communication tower for providing priority and pre-emption during routine and emergency situations and enhance interoperability with other local, State, and Federal first responders.

Pursuant to NEPA, CEQ, and Army NEPA regulations, the implementation of Alternative 1 would not generate significant controversy or have a significant impact on the quality of the human or natural environment. As such, a "Finding of No Significant Impact" is warranted for this Proposed Action and will not require the preparation on an Environmental Impact Statement.

**FINDING OF NO SIGNIFICANT IMPACT
REVIEWED AND APPROVED BY:**

Date

Colin P. Mahle
Colonel, U.S. Army
Garrison Commander

APPENDIX B

FirstNet - Camp Merrill

GNL06381 NSB

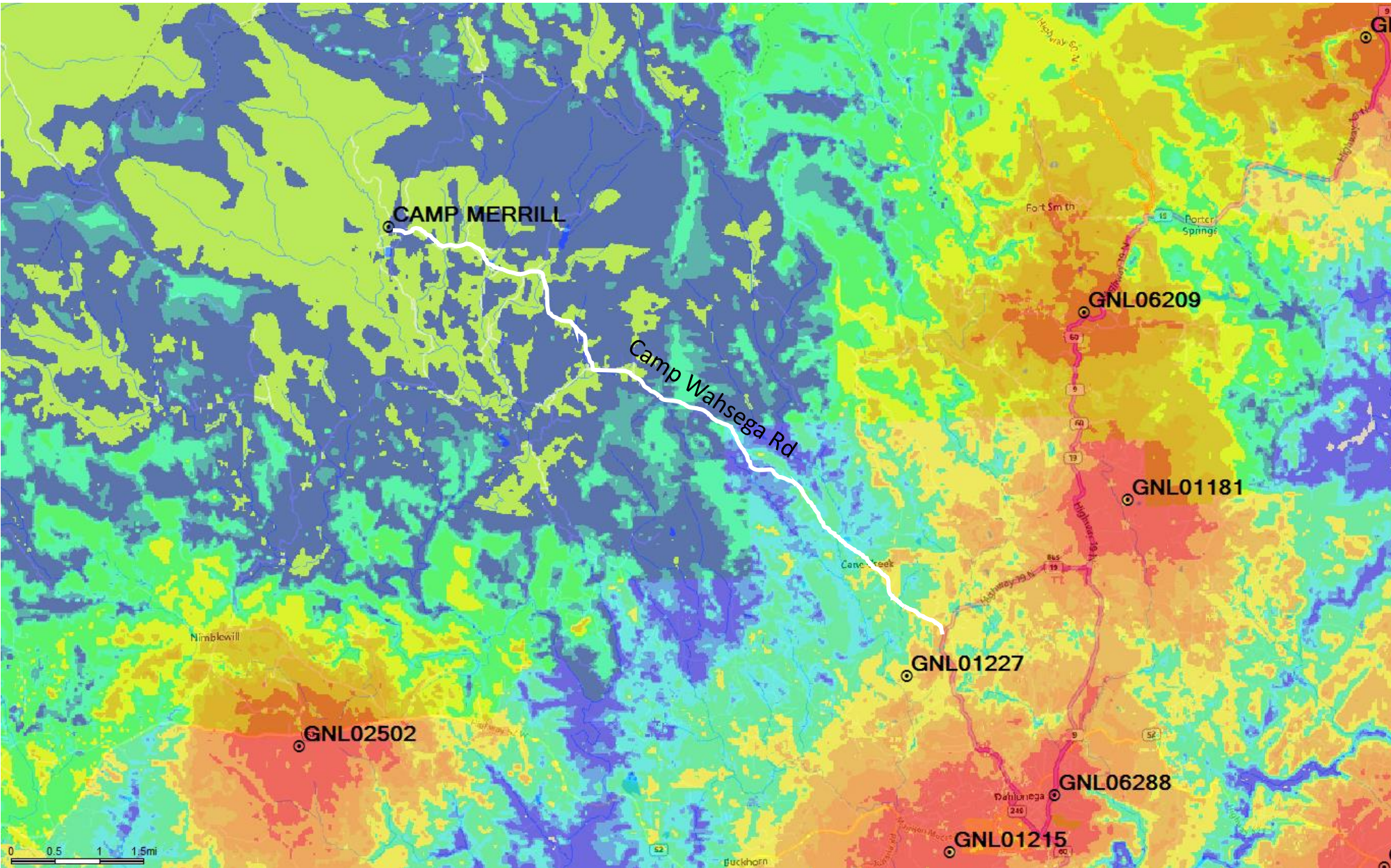
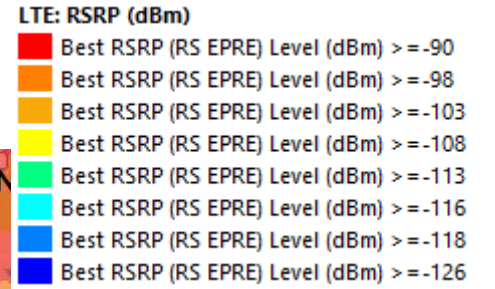
AT&T RAN

11/17/2021

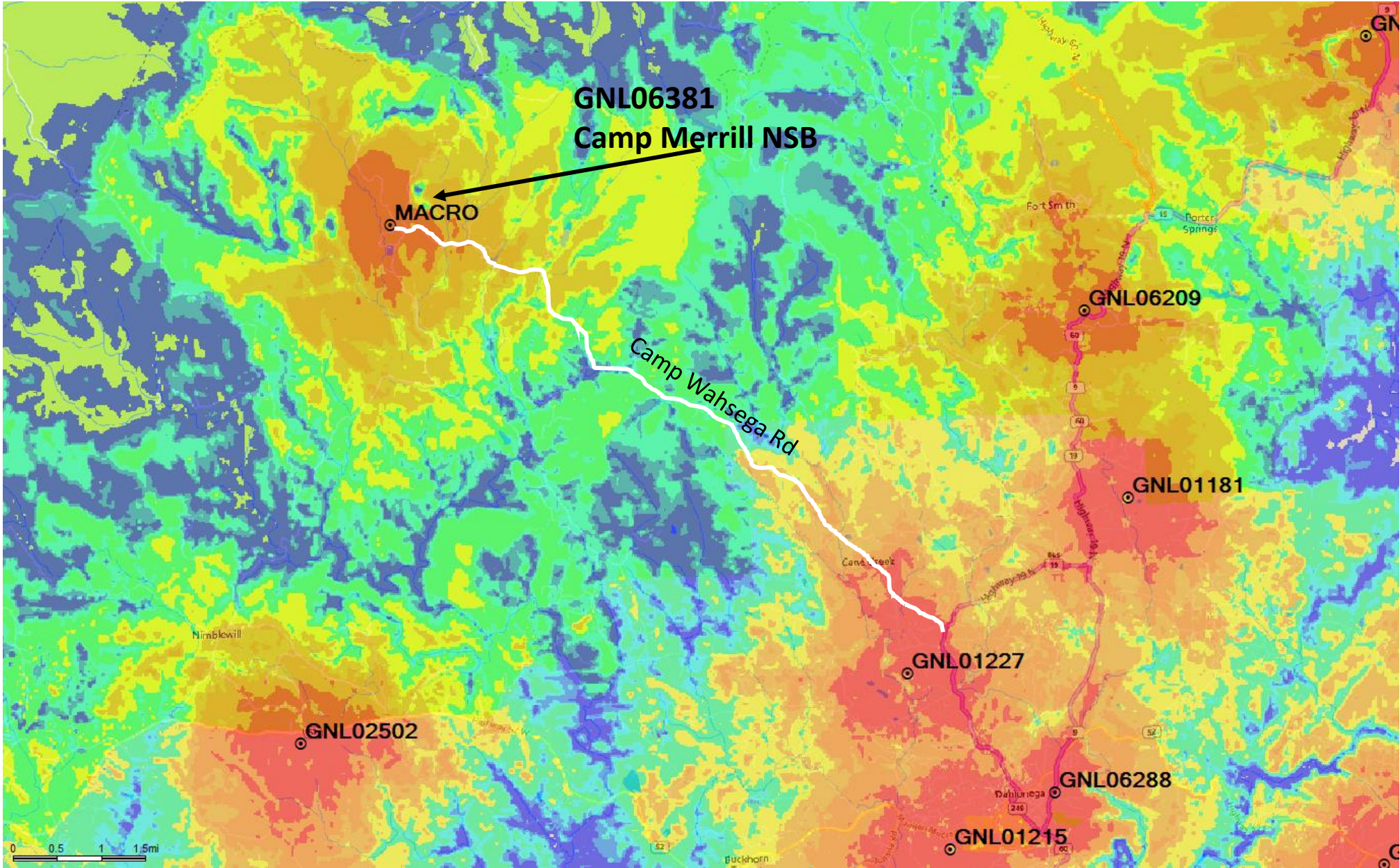
FirstNet

- In order for AT&T to provide reliable and robust FirstNet services on Camp Merrill, AT&T proposes to construct and operate a new macro cell site wireless telecommunication tower locations. The AT&T FirstNet network project will consist of the deployment of a new site to cover Camp Merrill. It will be located on 198 Merrill Drive, Dahlonega, GA. The location selected is in the center of the base giving optimal FirstNet footprint within the camp.

Existing AT&T Coverage

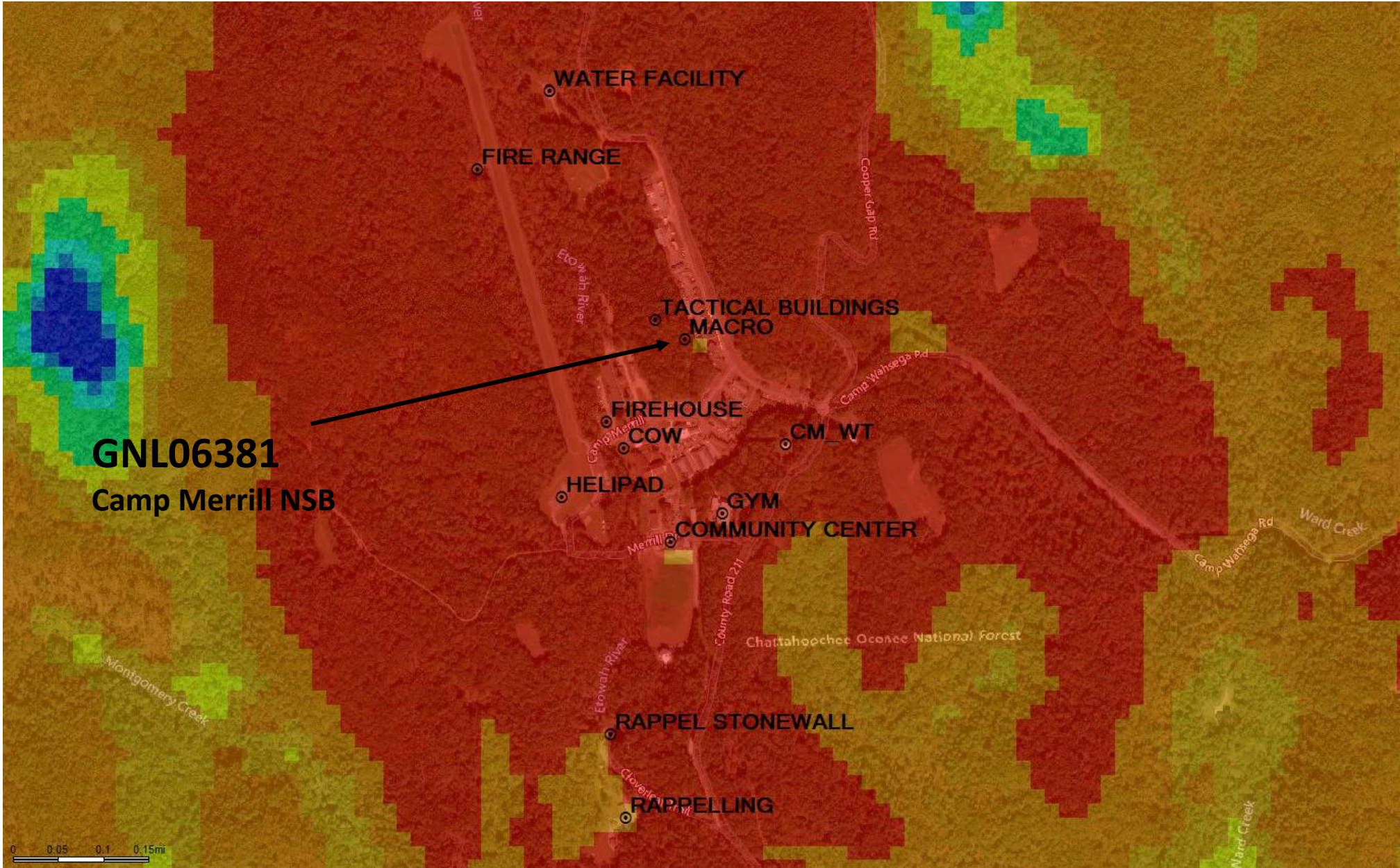


Proposed AT&T Coverage – GNL06381



- LTE: RSRP (dBm)
- Best RSRP (RS EPRE) Level (dBm) ≥ -90
 - Best RSRP (RS EPRE) Level (dBm) ≥ -98
 - Best RSRP (RS EPRE) Level (dBm) ≥ -103
 - Best RSRP (RS EPRE) Level (dBm) ≥ -108
 - Best RSRP (RS EPRE) Level (dBm) ≥ -113
 - Best RSRP (RS EPRE) Level (dBm) ≥ -116
 - Best RSRP (RS EPRE) Level (dBm) ≥ -118
 - Best RSRP (RS EPRE) Level (dBm) ≥ -126

Zoom View of AT&T Coverage



- LTE: RSRP (dBm)
- Best RSRP (RS EPRE) Level (dBm) ≥ -90
 - Best RSRP (RS EPRE) Level (dBm) ≥ -98
 - Best RSRP (RS EPRE) Level (dBm) ≥ -103
 - Best RSRP (RS EPRE) Level (dBm) ≥ -108
 - Best RSRP (RS EPRE) Level (dBm) ≥ -113
 - Best RSRP (RS EPRE) Level (dBm) ≥ -116
 - Best RSRP (RS EPRE) Level (dBm) ≥ -118
 - Best RSRP (RS EPRE) Level (dBm) ≥ -126

34.629061
-84.104062

APPENDIX C

DISTRIBUTION LIST

I. ELECTED AND APPOINTED GOVERNMENT OFFICIALS

Brian P. Kemp Office of the Governor 206 Washington Street, 111 State Capitol Atlanta, Georgia 30334	Rep. Jon Burns Georgia House of Representatives 332 State Capitol Atlanta, Georgia 30334	Steve Gooch State Senator, District 51 421-F State Capitol Atlanta, Georgia 30334
Rep. Andrew Clyde 210 Washington St. NW Suite 202 Gainesville, Georgia 30501	Sen. Jon Ossoff United States Senate 455 Russell Senate Office Building Washington, DC 20510	Sen. Raphael G. Warnock United States Senate 388 Russell Senate Office Building Washington DC 20510

II. LOCAL and REGIONAL ADMINISTRATORS, FEDERAL AGENCIES, or COMMISSIONS WITH REGULATORY INTEREST IN FORT BENNING AND CAMP FRANK D. MERRILL

John Doresky, Supervisory Biologist U.S. Fish & Wildlife Service, West Georgia Sub Office P.O. Box 52560 Fort Benning, Georgia 31905	Bob Martin, Vice Chair Georgia Soil and Water Conservation Commission, Region 5 4310 Lexington Road Athens, Georgia 30605	Ms. Jennifer Dixon, Division Director Historic Preservation Division Georgia Department of Community Affairs 60 Executive Park South, NE Atlanta, Georgia 30329
Richard E. Dunn, Director GADNR-EPD 2 Martin Luther King Jr. Drive Suite 1456 East Tower Atlanta, Georgia 30334	James A. Capp, Branch Chief GADNR, Watershed Protection 2 Martin Luther King Jr. Drive Suite 1152 East Tower Atlanta, Georgia 30334	Jeff Cown, Director GADNR, State Parks & Historic Sites 2600 Hwy 155, SW Stockbridge, Georgia 30281
Rusty Garrison, Director GADNR, Wildlife Resources 2067 U.S. Hwy 278 SE Social Circle, Georgia 30025	US Forest Service Forest Supervisors Office 2042 Highway 515 West Blairsville, Georgia 30512	Jerome Bennett US Forest Service 1755 Cleveland Highway Gainesville, Georgia 30501

Environmental Assessment

James Wettstaed, Archeologist US Forest Service Blue Ridge Ranger District Office 2042 Highway 515 West Blairsville, Georgia 30512	US Forest Service Blue Ridge Ranger District Office 1755 Cleveland Highway Gainesville, Georgia 30501	Ken Arney, Regional Forester USDA Forest Service, Southern Region 1720 Peachtree Road, NW Atlanta, Georgia 30309
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Denise Nelson National Park Service Appalachian Trail Environmental Protection Specialist P.O. Box 50 Harpers Ferry, WV 25425	Wendy Janssen National Park Service Appalachian Trail Superintendent P.O. Box 50 Harpers Ferry, WV 25425	Ben West National Park Service South Atlantic Gulf Region 2 Program Manager, Planning and Compliance 100 Alabama St SW Ste 1924 Bldg. Atlanta Georgia 30303
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Steven Wright National Park Service South Atlantic Gulf Region 2 100 Alabama St SW Ste 1924 Bldg. Atlanta Georgia 30303

III. CITIZEN ADVISORY GROUPS and LOCAL INTEREST GROUPS OR PERSONS

Appalachian Trail Conservancy(ATC) (GA, NC, & TN Regional Office Southeast Regional Director 160A Zillicoa Street Ashville, NC 28801	Georgia Appalachian Trail Club (GATC) 3480 Waters Cove Way Alpharetta, Ga 30022	Upper Etowah River Alliance 180 McClure Street Canton, Georgia 30114
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Andres Villegas Georgia Forestry Association P.O. Box 1217 Forsyth, Georgia 31029-1217	Gina Webber, Interim Chapter Director Sierra Club, Georgia Chapter 743 E. College Avenue, Suite B Decatur, Georgia 30030	Andrew Edelman, President, The Wildlife Society, Georgia Chapter 425 Barlow Place, Suite 200 Bethesda, MD 20814
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Tori Walburn, President Georgia Women Flyfishers 828 Burton Ridge Drive Loganville, Georgia 30052	Georgia Audubon 4055 Roswell Road NE Atlanta, Georgia 30342	Kevin McKinstry, Chair Georgia Wildlife Federation 11600 Hazelbrand Road Covington, Georgia 30014
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Environmental Assessment

Jerry Adams, President Georgia Bass Federation 3810 Birchwood Court Cumming, Georgia	Deron Davis, State Director The Nature Conservancy in Georgia 100 Peachtree St NW, Suite 2250 Atlanta, Georgia 30303	Mark McDonald, President and CEO The Georgia Trust for Historic Preservation 1516 Peachtree Street NW Atlanta, Georgia 30309
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President, The Wildlife Society, University of Georgia, Student Chapter Warnell School of Forestry and Natural Resources, University of Georgia 180 E. Green St Athens, Georgia 30602		Jamie Rappaport Clark, President and CEO Defenders of Wildlife National HQ 1130 17th Street NW Washington, DC 20036
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DJ Gerken, Director Southern Environmental Law Center Ten 10th Street NW, Suite 1050 Atlanta, Georgia 30309	Katherine Moore, President The Georgia Conservancy 230 Peachtree Street NW, Suite 1250 Atlanta, Georgia 30303	Josh Hall, President Georgia Trappers Association 9969 GA Hwy 102 W 1251 Wynnton Mitchell, Georgia 30820
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Robert E. Patterson, Chattahoochee County Historical Association P.O. Box 116 Richland, Georgia 31825	Lumpkin County Historical Society P.O. Box 894 Dahlonega, Georgia 30533	Al Hoyle (Ellijay - Gilmer) Office of Mayor 197 N. Main Street Ellijay, Georgia 30540 OR 107 Oak Street East Ellijay, Georgia 30540
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Jim Conley (Blairsville - Union) Office of Mayor Blairsville City Hall 62 Blue Ridge Street Blairsville, Georgia 30512	Joanne Taylor (Dahlonega-Lumpkin) Office of Mayor Dahlonega City Hall 465 Riley Road Dahlonega, Georgia 30533	Rhonda Haight (Blue Ridge City-Fannin) Office of Mayor Blue Ridge City Hall 480 West First Street Blue Ridge, Georgia 30513
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Blue Ridge City - Fannin County Chamber of Commerce 152 Orvin Lance Drive Suite A Blue Ridge, Georgia 30513	Dahlonega - Lumpkin County Chamber of Commerce 342 Courthouse Hill, Suite E Dahlonega, Georgia 30533	Blairsville - Union County Chamber of Commerce 129 Union County Recreation Road Blairsville, Georgia 30514
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Gilmer County Chamber of Commerce 696 1st Avenue East Ellijay, Georgia 30540	Union County Commissioner 114 Courthouse Street, #3 Blairsville, Georgia 30512	Robb Nichols Dahlonega-Lumpkin County Chamber & Visitors Bureau 13 South Park Street Dahlonega, Georgia 30533
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IV. TRIBAL

Mr. Bryant J. Celestine Tribal Historic Preservation Officer Alabama-Coushatta Tribe of Texas 571 State Park Road 56 Livingston, TX 77351	Tribal Historic Preservation Officer Alabama-Quassarte Tribal Town P.O. Box 187; 2122 Hwy 27 Wetumka, OK 74883 Wetumka, OK 74883	Ms. Elizabeth Toombs Special Projects Manager Cherokee Nation P.O. Box 948 Tahlequah, OK 74465-0948
Ms. Karen Brunso Tribal Historic Preservation Officer Chickasaw Nation P.O. Box 1548 Ada, OK 74820-1548	Mr. Russell Townsend Tribal Historic Preservation Officer Eastern Band of Cherokee Indians P.O. Box 455 Cherokee, NC 28719	Mr. David Cook Tribal Historic Preservation Officer Kialegee Tribal Town P.O. Box 332 Wetumka, OK 74883
Mr. Kenneth H. Carleton Tribal Historic Preservation Officer Mississippi Band of Choctaw Indians P.O. Box 6257 Choctaw, MS 39350	Mr. Turner Hunt Tribal Historic Preservation Officer The Muscogee (Creek) Nation P.O. Box 580 Okmulgee, OK 74447	Mr. Larry Haikey Tribal Historic Preservation Officer Poarch Band of Creek Indians 5811 Jack Springs Rd Atmore, AL 36502
Mr. Ben Yahola Tribal Historic Preservation Officer The Seminole Nation of Oklahoma 12555 Ns 3540 Road Seminole, OK 74868	Dr. Paul Backhouse Tribal Historic Preservation Officer Seminole Tribe of Florida 30290 Josie Billie HWY, PMB 1004 Clewiston, FL 33440	Mr. David Frank Tribal Historic Preservation Officer Thlopthlocco Tribal Town P.O. Box 188 Okemah, OK 74859
Ms. Whitney Warrior Tribal Historic Preservation Officer United Keetoowah Band of Cherokee Indians P.O. Box 746 Tahlequah, OK 74465	Mr. Kristian Poncho Tribal Historic Preservation Officer Coushatta Tribe of Louisiana PO Box 818 Elton, Louisiana 70532	

V. FORT BENNING and OTHER ARMY OFFICIALS

IMCOM Attn: Public Affairs Office 2405 Gunshed Rd Ft. Sam Houston, Texas 78234	HQ US Army TRADOC 661 Sheppard Pl Fort Eustis, Virginia 23604	Office of the Staff Judge Advocate 6450 Way St, Bldg. 2839 Fort Benning, GA 31905
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MCoE Commanding General 1 Karker St Building 4, Suite 6300 Fort Benning, Georgia 31905	Garrison Commander 1 Karker St Building 4, Suite 5900 Fort Benning, Georgia 31905	Fort Benning Public Affairs Office 1 Karker St, McGinnis-Wickham Hall, Suite W-141 Fort Benning, Georgia 31905
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VI. LOCAL MEDIA and LIBRARIES

Columbus Public Library 3000 Macon Road Columbus, Georgia 31906	Milton E. Long Library 6529 Eckel Avenue, Bldg. 2783 Fort Benning, Georgia 31905	Cusseta-Chattahoochee Public Library 262 Broad Street Cusseta, Georgia 31805
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Lumpkin County Library 56 Mechanicsville Road Dahlonega, Georgia 30533	Gilmer County Library 268 Calvin Jackson Dr. Ellijay, Georgia 30540	Union County Public Library 303 Hunt Martin St. Blairsville, Georgia 30512
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Camp Merrill Museum CAMP FRANK D. MERRILL 1 Camp Merrill Drive Dahlonega, Georgia 30533	Fannin County Public Library 400 West Main Street., Ste 104 Blue Ridge, Georgia 30513	Columbus Ledger Enquirer P.O. Box 711 Columbus, Georgia 31902
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North Georgia News 266 Cleveland Street P.O. Box 2029 Blairsville, Georgia 30514	The News Observer P.O. Box 989 5748 Appalachian Hwy Blue Ridge, Georgia 30513	The Dahlonega Nugget 1074 Morrison Pkwy W Dahlonega, Georgia 30533 OR P.O. Box 36, Dahlonega, Georgia 30533
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Times Courier 47 River Street P.O. Box 1076 Ellijay, Georgia 30540
