RECORD OF DECISION

As the Deputy Assistant Chief of Staff for Installation Management, I have reviewed the Final Environmental Impact Statement (EIS) for Base Closure and Realignment (BRAC) 2005 and Transformation Actions at Fort Benning, Georgia (GA). The EIS, prepared in compliance with the Council on Environmental Quality's (CEQ) Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) of 1969 (Title 40 of the Code of Federal Regulations [CFR] Parts 1500-1508), and Army NEPA Regulation (32 CFR Part 651), adequately assesses the impacts of implementing BRAC recommendations and Transformation actions at Fort Benning, GA, on the natural and human environment. The EIS and appendices, as well as the Biological Opinion (BO) are hereby incorporated by reference; the Army will proceed as indicated herein.

1.0 Background

On September 8, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended a set of domestic realignment and closure actions. These recommendations were approved by the President on September 15, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission's recommendations, therefore on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990, Public Law 101-510. The BRAC Commission recommendations affect Fort Benning by relocating the Armor School and Center from Fort Knox, Kentucky and by the relocation of other specified organizations and activities to the Installation.

In addition, in 1999, the Secretary of the Army and the Chief of Staff articulated a vision about people, readiness, and Transformation of the U.S. Army (Army) to meet the military demands of the 21st century. In what is termed the Army Modular Force (AMF) initiative, the Army is transitioning from a division-centric design to a standard brigade organization. The reshaping of the domestic military infrastructure also includes provision for the return of units currently based overseas as part of the Global Defense Posture Realignment (GDPR). Finally, discretionary stationing actions (activations, inactivations, realignments, and relocations) authorized by Army Regulation 5-10, Stationing, are interrelated with the Transformation process.

In accordance with 40 CFR Section 1502.4 and the Army NEPA Regulation, the Army has determined that the BRAC, AMF, GDPR, and other stationing actions and development at Fort Benning are all Transformation activities closely related to each other and would be implemented in the same timeframe on Fort Benning. Thus, these Transformation actions have been grouped into one proposed action and their potential environmental effects evaluated.

2.0 Purpose and Need for the Proposed Action

The underlying purpose of the Army's proposed action is to implement Transformation actions (BRAC, GDPR, AMF, and certain other stationing actions) at Fort Benning. The overarching need for the proposed action is to improve the ability of the nation to respond rapidly to military challenges of the 21st century.

3.0 Proposed Action

For the proposed action, the Army would undertake Transformation actions starting in 2007 and continuing through 2013. These actions would include reassigning personnel and providing the facilities, maintenance, infrastructure (including training and mission support), and equipment needed to support: 1) BRAC, 2) GDPR, 3) AMF, and 4) other related stationing activities. Two action alternatives were identified that would fulfill the purpose and need of the proposed action: Alternative A and Alternative B, the Army's preferred alternative. Under either action alternative, the personnel reassignments would remain the same: BRAC-directed actions would add 12,683 personnel; the BRAC-discretionary moves, another 644; the AMF would increase personnel by 671; the GDPR realignments, another 71; and contractor as well as other Installation growth would account for 2,545 more people, for a total gain of 16,614 personnel at Fort Benning. The addition of 2,545 more personnel (identified after publication of the Draft EIS) was analyzed for potential impacts in the Final EIS.

The action alternatives for the proposed Transformation action would all occur within the bounds of Fort Benning and include establishment of administrative, educational, supply/storage, maintenance, barracks, commercial services, community facilities, medical and dental, and recreation facilities. A combination of redevelopment (e.g., renovation), development, and expansion would occur in the four cantonment areas: Main Post, Kelley Hill, Sand Hill, and Harmony Church. Ranges, maneuver areas, and tank trails would be established, operated, and maintained throughout the Installation.

4.0 Proposed Action and Alternatives

The EIS evaluated two action alternatives (Alternatives A and B) and the No Action Alternative in detail. Most of the cantonment and range area development projects are the same under both alternatives, those that differ have an asterisk placed after the project name. Initial planning for Alternative A showed severe impacts to biological resources that could not be adequately mitigated, especially to the federally listed red-cockaded woodpecker (RCW), as well as constraints on mission and training that were undesirable, which led to the development of Alternative B. Alternative B has less impacts to RCW and better supports mission and training needs. Alternative B includes greater acreage to allow for more training flexibility and avoids many sensitive areas.

4.1 Cantonment Area Development Common to Alternatives A and B

Under Alternatives A and B, cantonment-area facility, administrative, medical, housing, and support facility construction would be the same and are listed below.

Cantonment Area Development

Installation Wide

- Infrastructure Support, Increments 1 & 2 (Project Number [PN] 65439 & PN67457)*
- Training Area Roads, Paved and Gravel (PN65554)

Harmony Church

- Brigade Headquarters (HQ) Complex (PN65056)
- Trainee Barracks Complex 1 (PN64370)
- Training Support Brigade Complex
- (Phase 1 & 2) (PN64459 & PN65862)
- Trainee Barracks Complex 3 (PN65041)
- Simulations Training Facility (PN67648)
- Vehicle Maintenance Facility (PN65251)
- Troop Medical/Dental Clinic (PN64080)
- 16th Cavalry (CAV) General Instruction Complex 1 (PN65253)
- Armor Officer Basic Course Headquarters (PN65286)
- Vehicle Maintenance Instruction Facility (PN65438)
- Central Wash Facility (PN48644)
- Army Reserve Center (PN64491)
- Equipment Concentration Site (ESC)/Warehouse (PN65405)
- Recreation Center (PN65246)
- Physical Fitness Center (PN65248)
- 3rd Infantry Division (ID) Brigade Combat Team (Heavy) Complex (PN63799)
- Battle Command Training Center (PN64790)
- Chapel (PN65065)

Kelley Hill

- General Instruction Building Complex
- (Phase 1 & 2) (PN65322 & PN67458)
- DS/GS Vehicle Maintenance Facility (PN64460)

Main Post

- Child Development Center Ages 6 – 10 (PN54931)
- Maintenance & Repair of Maneuver Center HQ (PN65285)
- Special Operations Force (SOF) Battalion Complex (PN65394)
- SOF HQ Building Addition (PN65396)
- SOF Tactical Equipment Shop (PN65397)
- Armor Climate Controlled Storage Facility (PN65061)
- Criminal Investigation Command Group/Brigade Headquarters Building (PN65578)
- Consolidated Troop Medical Clinic (PN65080)
- Medical Treatment Facility (Increments 1 & 2) (PN65081 & PN67461)
- Maneuver Center HQ Building Expansion and Capabilities Development and Integration Directorate (CDI) Facility (PN65284)
- SOF Ranger Support Company Headquarters (PN65395)
- Barracks Complex (PN38134)
- 14th Combat Support Hospital HQ & Maintenance Facility Complex (PN62952)
- Child Development Center Under 6 Years, (PN46676)

Sand Hill

- Trainee Barracks Complex 2 (PN65068)
- Health Clinic – Winder (PN62956)
- Soloman Dental Clinic (PN64368)
- Training Support Center (PN65287)
- Reception Station Complex (PN64462 & PN51256 & PN67419)
- Chapel (PN65249)

*Differs in Alternative B.

4.2 Training Areas and Range Development Common to Alternatives A and B

Training area and range development projects common to both alternatives are listed below and would occur both north and south of U.S. Highway 27/280. Those that differ under Alternative B are indicated with an asterisk and described in Section 4.3.

Training Areas and Range Development

North of U.S. Highway 27/280

- Tank/Fighting Vehicle Stationary Gunnery Range-ST1 (PN65382)
- Fire and Movement Range-FM1 (PN65032)
- Modified Record Fire Range w/LOMAH-MRF2 (PN65044)
- Modified Record Fire Range-MRF4 (PN65046)
- Modified Record Fire Range-MRF6 (PN65048)
- Modified Record Fire Range-MRF3 (PN65045)
- Automated Combat Pistol/Military Police Qualification Course (PN65079)
- Rifle/Machinegun Zero Range-Z1 (PN65035)
- Rifle/Machinegun Zero Range-Z2 (PN65036)
- Rifle/Machinegun Zero Range-Z4 (PN65038)
- Southern Heavy Maneuver Area Infrastructure (PN69743)*
- Tracked Vehicle Drivers Course (PN64797)*
- Northern Heavy Maneuver Area Infrastructure (PN69742)*
- Modified Record Fire Range-MRF5 (PN65047)
- Rifle/Machinegun Zero Range-Z5 (PN65039)
- Combined Arms Collective Training Facility (CACTF), Phase II (PN62207)
- Rifle/Machinegun Zero Range-Z3 (PN65037)
- Stationary Tank Range-ST2 (PN65383)
- Repair Existing Training Area Roads (Phase
- 1 & 2) (PN65557 & PN69379)
- Fire and Movement Range-FM3 (PN65034)
- Multi-Purpose Machine Gun Range-MPMG3 (PN65070)
- Rail Loading Facility Expansion (AP3) (PN62953)
- 19KD One Station Unit Training Area Infrastructure (PN69741)*

South of U.S. Highway 27/280

- Qualification Training Range (PN67012)
- Good Hope Maneuver Area (PN69668)*
- Good Hope Access Road (PN69358)*

*Differs in Alternative B.

4.3 Cantonment Area Development under Alternative B

Under the preferred alternative, all cantonment area construction would be the same as that described above, with the exception of the Harmony Church interchange found under the Installation-wide infrastructure development. Under Alternative B, this interchange would be constructed just south of Eighth Division Road (Alternative A would site the interchange further south).

4.4 Training Areas and Range Development under Alternative B

Alternative B training areas and ranges are the same as Alternative A, with the following exceptions and/or changes:

- The northern heavy maneuver area, under Alternative B, would be established in a different location in existing training areas Q4-7, B1-6, CC1, and DD1-3 and would be called the Good Hope Maneuver Area.

- To access the Good Hope Maneuver Area, tracked vehicles stationed in Harmony Church would need to move from one side of U.S. Highway 27/280 to the other. Existing tank trails would need to be upgraded, new ones constructed, U.S. Highway 27/280 bridged, and Jamestown Road upgraded.
- The vehicle recovery area (found in the tracked vehicle drivers course under Alternative A) would be established adjacent to Harmony Church in training area R1.
- The tracked vehicle drivers course would move from the Alternative A location and be established at R2 in the Harmony Church area.
- The southern heavy maneuver area would be reconfigured to exclude a portion of the training area found under Alternative A and would begin at Hourglass Road.

In total, about 10,740 acres would be disturbed under Alternative A and 19,100 acres for Alternative B.

4.5 No Action Alternative

The No Action Alternative assumes continuance of the missions at Fort Benning as they were being performed in November 2005, when the BRAC Commission recommendations became law. Because the Digital Multi-Purpose Range Complex had already been approved and was under construction, the No Action Alternative included the operational and environmental conditions that were expected once it became operational. Because the BRAC Commission's recommendations now have the force of law, continuation of the 2005 mission without implementing these recommendations is not possible without further Congressional action. The No Action Alternative serves as a baseline alternative against which environmental impacts of the two action alternatives were measured.

5.0 Environmental Consequences

Implementation of the preferred alternative (Alternative B) will result in a variety of impacts at Fort Benning. Most of the effects will be direct impacts, both short- and long-term on the natural and human environment.

5.1 Land Use

Long-term changes in land use would occur under the preferred alternative but would not be inconsistent or conflict with the environmental goals, objectives, or guidelines of existing community comprehensive plans. Implementation of Alternative B would increase the potential for incompatibility with residential areas outside Fort Benning and adjacent to the proposed Good Hope Maneuver Area due to the increase in training activities. Noise, smoke, and lights from training could potentially cause minor incompatibilities with adjacent residential land uses.

5.2 Aesthetics and Visual Resources

No significant adverse impacts from implementation of the preferred alternative would result to aesthetics and visual resources. These changes would be consistent with the military installation features.

5.3 Socioeconomics, including Environmental Justice and Protection of Children

Under the preferred alternative, direct and indirect beneficial effects would be expected to economic development with the influx of more than 16,600 military and civilian personnel, military training students, and other staff. This is an increase of about 2,500 personnel than was indicated in the EIS due to the anticipated growth in both contractor and general garrison personnel. In terms of housing, it is anticipated that there will be a minor negative impact if local housing stock is not able to meet the growth needs. The influx of about 5,000 school-aged children over the 4-year Transformation period will be a challenge to the school system if expansion does not keep pace with this growth. The positive economic gains that will accrue to the local region associated with the Army's action will produce new jobs and higher incomes. This should produce greater tax revenues that need to be carefully managed by local authorities to meet the challenges of new student enrollment. Services such as health care and recreational facilities are sufficient in number to support the increase in demand; therefore, no significant adverse impacts are expected. In addition, low income and minority populations would not be disproportionately impacted, nor would children experience any health or safety risks.

5.4 Transportation

Under the preferred alternative, the additional development and associated traffic volumes would increase traffic congestion and cause additional delays at Fort Benning. There would be significant adverse impacts to transportation resources at the Main Post, Sand Hill, and Kelley Hill due to level of service (LOS) failures at several intersections; moderate adverse impacts would be expected at Harmony Church.

5.5 Utilities

Estimated utility use demand would increase by 46 percent. Overall, implementation of the preferred alternative would result in substantial increased use of utility systems and services (potable water, wastewater, storm water, energy sources, communication, and solid waste) at Fort Benning and in local communities; however, these impacts are not considered significantly adverse because each utility system (including upgrades to improve potable water service to the Installation) has the capacity to meet these increased demands.

5.6 Noise

Noise generated by construction activities would not be significant. Operationally, impacts from Zone III noise levels would expand off of the Installation by 10 acres, continuing incompatibility with one residence. Zone III levels would expand on Post by about 10,700 acres, but would be reduced within the cantonment areas. Exposure to Zone III levels of a sensitive receptor (a portion of the barracks in Sand Hill) would occur.

5.7 Air Quality

Even though Fort Benning will comply with all applicable federal and state air quality regulations, mobile source emissions from construction would increase from 2007 through 2011, causing regional air quality impacts, though at less than significant adverse level. Following construction, emissions due to operations and maintenance are not expected to exceed federal and/or state standards and would have a minor adverse impact on regional air quality due to the small increase in the amount of criteria pollutant annual emissions.

5.8 Hazardous and Toxic Materials and Waste

The quantity of hazardous and toxic materials used, stored, and handled would increase, as would hazardous and toxic wastes; however, existing procedures and regulations would be used to manage storage, use, handling, and disposal requirements. No significant adverse impacts are anticipated.

5.9 Water Resources

As a result of construction activities, significant adverse impacts could occur to water quality and waterways; however, application of existing regulatory requirements (including obtaining and implementing applicable permits), management actions, and facility design would minimize significant adverse impacts. Impacts to jurisdictional wetlands and streambanks are expected; however, adherence to regulatory requirements would reduce significant adverse impacts. Only minor impacts to water resources are anticipated due to operational activities on ranges, training areas, and tank trails, however, because erosion and sedimentation will be monitored on a regular basis and issues addressed to minimize any adverse impacts.

5.10 Geology and Soils

Significant adverse impacts to highly erodible soils, as a result of construction, training operations, and maintenance could occur; however, all required permits would be obtained and followed and all appropriate site-specific management practices and regulatory requirements would be implemented to offset these impacts. As a result, no significant impacts to soils from construction as well as operational use of the training areas and ranges are expected.

5.11 Biological Resources

The preferred alternative would result in potential significant effects to vegetation due to the substantial amount of native habitat being lost, and ecosystem dysfunctions could result within these disturbed areas. This alternative would result in potential significant adverse effects to aquatic and wetland habitats, including streambanks, from construction, demolition, road upgrades, and range projects. There is the potential for significant impacts to fish, wildlife, and other animal species and their associated habitat as well as the Unique Ecological Areas (UEAs) of the Prosperity Church Oak-Hickory Forest and Chattahoochee Backwaters UEAs. As for federally-listed species, portions of the Randall Creek North relict trillium population would be relocated and 32 Red-cockaded Woodpecker (RCW) clusters would be taken as a result of this alternative. The gopher tortoise (a state listed species) could also be significantly affected if impacts are not mitigated.

5.12 Cultural Resources

There are potential adverse impacts to 118 National Register eligible and recommended eligible archaeological sites, 28 architectural resources, and 12 cemeteries under the preferred alternative.

5.13 Safety

Increased safety risks would be introduced due to additional ordnance use, tank training, and heavy vehicle maneuvering under the preferred alternative; however, implementation of safety programs and infrastructure upgrades would minimize adverse ordnance risk, as well as tank and heavy vehicle training safety hazards.

5.14 No Action Alternative

Though not a feasible alternative in light of BRAC-directed actions, the impacts of the No Action Alternative have been evaluated. Under the No Action Alternative, no additional adverse or significant impacts to any resources at Fort Benning would be expected (except traffic where adverse impacts would occur under the No Action Alternative). Therefore, this is the environmentally preferred alternative.

6.0 Mitigation

The EIS determined that implementing Alternative B will result in significant adverse effects to some environmental resources and identified mitigation measures to minimize, avoid, or compensate for such effects. Other resources will incur minor adverse effects, and mitigation also was considered for these. All practicable means to avoid or minimize environmental harm from the selected alternative have been adopted, except as discussed below under transportation. The following list identifies the adopted mitigation measures, and an explanation for the few mitigation measures not adopted is also provided. During the design process, minimization and avoidance will be incorporated to the greatest extent possible. A mitigation and monitoring plan (found in Appendix G of the EIS) will be implemented to ensure that these mitigation measures are implemented, monitored, and their effectiveness measured, with appropriate adjustments made when necessary.

6.1 Land Use. Even though the potential impacts are not expected to be significant, , the public will be notified of the training schedule through the existing Fort Benning installation website: https://www.infantry.army.mil.

6.2 Transportation. The EIS identified and evaluated numerous road improvements to mitigate the significant effects of the preferred alternative. Mitigation measures discussed below have either been implemented/programmed from previous projects, will be implemented as part of the mitigation, or were not adopted due to lack of funding.

Main Post

- Widening a main east-west roadway, Dixie Road which merges into First Division Road, from Michael Street to Lindsay Creek Parkway is adopted mitigation. However, widening Dixie/First Division Road from Jacelin Road to Edwards Road (misidentified as Edmund Road in the EIS) was considered but not adopted as mitigation due to lack of funding.
- The unsignalized intersection at Dixie Road and Ingersoll Street will be signalized. The Army considered adding signals to the intersections of Dixie Road with Jacelin Road and Sightseeing Street; however this is not adopted as a mitigation project due to lack of funding. Installation of a new signal coordination system on Dixie Road from Jacelin Road to First Division Road also was considered, but is not adopted as a mitigation project due to lack of funding.
- Turning lanes from both the eastbound and southbound direction will be constructed on Dixie Road at Ingersoll Street as mitigation. Construction was previously completed by a separate roadway improvement project at Dixie Road and Edwards Street, mitigating traffic concerns at that intersection. Turning lane improvements on Dixie Road at Sightseeing Road were considered but are not adopted as a mitigation project due to lack of funding.
- Optimizing traffic signals on Lumpkin Road at intersections with Vibbert Road and Marne Road was considered but not adopted. Reconfiguring the intersection of Marne and Lumpkin Roads was considered but is not adopted due to lack of funding.

Kelley Hill

- Upgrading the unsignalized intersection at Ivy Road (misidentified as Dixie Road in the EIS) and First Division Road was considered but not adopted due to lack of funding; however widening First Division Road to Ivy Road is adopted as a mitigation project.
- Construction of an overpass for the First Division Road and Lindsay Creek Parkway is adopted as a mitigation project.

Sand Hill

- Installation and coordination of traffic signals at the intersection of 11th Airborne Division Road and 187th Infantry Regiment Street was considered but not adopted as mitigation due to lack of funding.

Harmony Church

- Construction of a new interchange on U.S. Highway 27/280 between First Division and Eighth Division Roads is adopted as mitigation.
- Construction of a heavy armor vehicle-dedicated bridge to provide access to the Good Hope Maneuver Area is necessary to provide access for training, and is also hereby adopted as mitigation for traffic concerns.

In addition to these specific measures, increased use of Travel Demand Management (TDM) measures were considered to minimize traffic congestion at key locations. TDM is a term for transportation strategies designed to maximize the people-moving capability of the transportation system by increasing the number of persons in a vehicle, or by influencing the time of, or need to, travel. TDM measures include, among others, preferential parking for ridesharers, information and marketing to increase awareness of need for ridesharing, flexible work schedules, and telecommuting. Implementing TDM measures is not a mitigation measure adopted as part of this ROD; however, Fort Benning may pursue a TDM program separately to improve traffic flow and air quality.

6.3 Noise*:* Noise impacts are not expected to be significant, and no additional mitigation is required above and beyond Fort Benning's current management actions, which includes a noise complaint process that will assist Fort Benning in responding to public noise complaints in a timely manner. Also, Fort Benning's Installation Operational Noise Management Plan establishes outreach programs to achieve the maximum feasible compatibility between the noise environment and noise-sensitive land uses both on- and off-Post. The plan is meant to inform the community of the surrounding noise environment and suggest compatible land uses for development within these areas. For on-Post sensitive receptors in Zone III, facility siting and standard construction materials would attenuate noise levels. For off-Post communities, Fort Benning will continue to work with local planners to ensure prospective residents in Zone III areas are aware of noise issues. The Housing Managers will also continue to provide noise disclosures to on-Post residents.

6.4 Water Resources. No significant impacts to water resources are expected because the Army will follow all applicable federal, state and local laws and regulations, and Fort Benning also will continue management procedures indicated below. During the design process, avoidance and mitigation will be incorporated to the greatest extent possible. For example, impacts will be minimized by moving tank trails, targets, and roads out of wetlands where practicable, utilizing low-water crossings rather than placement of unconsolidated fill, and use of selective vegetation removal in wetlands/streams, where feasible; and other measures. To construct low-water crossings, the construction contractors may need to divert streams temporarily; the stream diversion channel best management practices (BMPs) (as outlined in the EIS) will be applied to minimize erosion and other water quality impacts.

Regulatory required minimization steps will be required in the construction contract specifications which includes stormwater management measures that reduce the average annual total suspended solids load by 80 percent once the site has been developed. This will be accomplished through conveyance of stormwater through BMPs which in turn would lessen the deposition of sediments into adjacent surface waters. The designers will supply pre-construction drawings illustrating what, when, and where sediment control structures are installed, inspected, and maintained. This will ensure that after construction is complete, there are measures in place to mitigate the new conditions created during construction such as concentrated flows in specific areas.

The preparation and implementation of a Spill Prevention Control and Countermeasures (SPCC) Plan during all construction activities will prevent and/or minimize spill/release from hazardous materials into waterways, per regulatory requirements. The SPCC is just one aspect of the larger Erosion, Sedimentation, and Pollution Control Plan (ESPCP) that will be required for construction to commence. The ESPCP will specifically address the implementation of discharge from control areas for equipment maintenance or repair, waste locations, wash-down locations, and sanitary facility areas. If above ground storage of petroleum, oil, and lubricant (POL) products exceed 1,320 gallons, counting containers 55 gallons or larger, a Georgia-mandated SPCC Plan will also be required. Additionally, SPCC requirements would be implemented during training exercises to avoid/minimize impacts.

The SPCC Plan and erosion control BMPs will also be implemented to avoid impacts to desirable habitat during construction (see soils below for more details). In addition, SPCC requirements will be implemented during training exercises to avoid/minimize impacts. Operation and maintenance requirements will follow those currently in place. Military units are required to use secondary containment for the storage of hazardous materials/wastes and during refueling operations. Also, routine maintenance of the vehicles helps to identify and repair any conditions that might cause leaks. A spill response protocol has been established Post-wide and personnel on the range shall have adequate spill response supplies on hand.

Surface water resources are subject to contamination from soil sedimentation, oil spills, pesticide residue, and untreated sewage bypasses. These potential pollution sources are controlled and

minimized; however, by implementation of SPCC, Installation Spill Contingency Plan (ISCP), and Stormwater Pollution Prevention Plan (SWP3) (General Permit No. 000000) for industrial facilities, ESPCP and Solid Waste Management Plan (SWMP), National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Water Sewer System (MS4), by sewage bypass reduction efforts, and by the related NPDES permit requirements to prevent sewage bypasses under the City of Columbus Water Works (CWW) NPDES permit for their Waste Water Treatment Plant (WWTP) and pretreatment facilities. The SWP3 provides protection for the water sources within the Installation by monitoring storm water discharges and implementing BMPs including inspection of the facilities and maintenance vehicles, awareness of potential circumstances for spills, and selection of smart storage locations.

If avoidance is not feasible/practicable, jurisdictional wetland and stream bank mitigation measures would be implemented with the initiation of clearing activities; streambank buffer zones and wetlands will be marked by the Environmental Management Division (EMD) or their wetlands consultants. To reduce potential sources of sedimentation, logging decks and defined skid trails will be located outside the stream buffer zones. Brush barriers will be used along the edge of the wetlands which will be marked with stakes. Stream buffer zones will be at least 25 feet on each side of the stream. In many areas, the buffer zone will be greater than 25 feet, due to variations in the width of the floodplain. The buffer zones will be marked with red paint and/or stakes. The construction contractors will also use additional erosion control measures as needed. Impacted areas within the stream buffer zone will be cleared for construction of low water crossings; however, the following BMPs shall be used: stream diversion channels, silt fence, vegetation establishment, and others as needed to minimize sedimentation in the streams. Any trees needing removal in wetland areas will be cut to 4-to-8 inch stump height, with no grubbing, disking, or stump/root removal occurring.

Fort Benning is consulting with the USACE Regulatory Office to determine jurisdictional wetland mitigation requirements such as wetlands credits. Following the Section 404 permitting process for projects proposed under this EIS, the specific amount of credits will be identified. On-post Clear Creek restoration site credits will be used, if available. Purchase of additional wetland credits off-post will be necessary.

6.5 Geology and Soils. No significant impacts to geology and soil resources are expected because the Army will follow all applicable federal, state, and local laws and regulations, and Fort Benning also will continue management procedures indicated below.

To minimize soil erosion during construction the state of Georgia requires submission of an ESPCP to Georgia Department of Natural Resources (DNR) copies must also be given to Chief of EMD or designees. A majority of the disturbed areas will be seeded with temporary and permanent grasses to stabilize the area. Disturbed areas will be planted with native and non-native seed approved by EMD to avoid introduction of invasive or unwanted species. Some wetland areas may already contain a cache of viable seed and may not need to be planted. Brush barriers or other barriers will be constructed on the

perimeter of the wetlands to trap sediment. Stone check dams will be constructed at turnouts to reduce sedimentation from tank trails. The construction contractors will submit NPDES permits as required and will make any modifications to the ESPCP.

Other regulatory BMPs to be used during the construction phase to mitigate soil and sedimentation issues would include: buffer zones, dust control (watering, matting) on disturbed areas, streambank stabilization, construction exit, construction road stabilization, stream diversion channel, temporary stream crossing, and storm drain outlet protection. Construction exits will be built in areas where traffic will be leaving the construction site to a major roadway to reduce or eliminate the mud transport from the construction areas. Gravel roads that provide access to the construction sites may not require specified construction exits.

Low-impact methods of vegetation removal in the wetland and stream buffer line of sight areas will be required. The areas to be cleared or selectively cut using low-impact methods will be clearly marked. Georgia Forestry BMPs for water quality, streamside management zones (SMZs), and timber harvesting will be implemented. Forestry BMPs for water quality would include SMZs to prevent movement of soil or other potential pollutants and maintain streambank integrity. Forestry BMPs for timber harvesting will include strategic placement for log decks and skid trails to minimize rutting and soil movement.

6.6 Biological Resources. The Army has completed consultation with the USFWS regarding the likely adverse effects to federally-listed species. Through this consultation, and subsequent signed programmatic Biological Opinion (BO), management actions were identified to ensure that the preferred alternative does not jeopardize the continued existence of the RCW and relict trillium. Further consultation is anticipated as project details are available. Continued adherence to the Integrated Natural Resource Management Plan (INRMP) procedures and prescribed practices and implementation of the plans and monitoring required by the BO (Appendix F of the Final EIS), will minimize significant impacts to vegetation, aquatic habitats, fish, wildlife, other animal species, and state-listed species (with the exception of the Gopher Tortoise).

SPECIAL STATUS SPECIES. As presented in the BO (Appendix F in the Final EIS), the following minimization and mitigation efforts were identified by the U.S. Fish and Wildlife Service (USFWS) under Section 7 as part of the consultation for federally-listed species—RCW and relict trillium. To be proactive, Fort Benning will continue mitigation procedures to protect the gopher tortoise, a state-listed species of concern, as indicated below.

RCW. Per the BO, all tree cavities that will be cut will be screened to prevent RCWs from being present at the time of cutting. In clusters where RCWs can be translocated, all cavities will be screened immediately after RCWs are captured and removed. Cavity trees that are cut will be either destroyed

onsite or collected for educational purposes with appropriate permitting from the USFWS. Active cavity trees will not be cut during the nesting season (April-July).

Clusters which are taken but not physically removed because of insufficient foraging habitat will retain the same level of protection they currently have. Painted bands will not be removed from existing trees and the 1996 Army Guidelines will apply within the existing 200-ft and 50-ft buffers. Standard for Managed Stability (SMS) clusters that contained sufficient suitable and potentially suitable habitat combined are not considered taken at the foraging partition level. Instead, minimization efforts will be conducted to improve the potentially suitable stands so that they become suitable.

Translocation of up to 7 RCW groups will be done because of cavity tree loss. For these groups, Fort Benning will consult with USFWS to determine where those birds will be relocated. If intrapopulation translocation is selected, Fort Benning will ensure that the recipient clusters are in the best condition possible via thinning, hardwood midstory control, and/or cavity installation and maintenance. Fort Benning will work with USFWS to determine if recruitment sites on the Installation are suitable for translocation. If RCWs need to be translocated off Post, they may be used to supplement a smaller population nearby so that as young pine stands on Fort Benning become suitable habitat, that recipient population can in turn become a donor population for the Installation.

With the increase in training activities and the number of new ranges proposed, access to these areas will become challenging. Range Division will schedule access by Fort Benning RCW personnel for activities such as monitoring, cavity maintenance, timber management, and prescribed burning. The Army will install berms in three of the proposed ranges in the Oscar complex (north of U.S. Highway 27/280) to substantially reduce habitat impacts. The remaining ranges either have a natural backstop or impacts to habitat have been determined to be minimal.

Relict Trillium. Plants that cannot be avoided during construction will be relocated to a recipient site on Fort Benning or to a site identified by Georgia DNR to establish or enhance existing populations. As specified in the Biological Assessment, management measures will continue to protect the plant from disturbance by:

- fencing populations from feral swine where necessary;
- prohibiting timber harvesting with 200 ft of the population boundary;
- prohibiting digging, weed control, brush/vegetation removal, and vehicles within the sensitive area with signs posted around each population;
- prohibiting prescribed burning within the boundaries of each population; and
- controlling the feral swine population by trapping or shooting.

Gopher Tortoise. Prior to ground disturbance in areas where gopher tortoise are found, a trained biologist will search for occupied burrows and relocate tortoises to a safe location. Where tortoises are

known to occur in close proximity to construction areas, fencing or other barriers to keep the animals out of harm's way will be installed. Once a range or training area is operational, existing management procedures outlined in Fort Benning's INRMP will be followed to minimize impacts resulting from Transformation activities and associated maintenance. Specifically, INRMP Section 12.9.4.2 discusses gopher tortoise burrow marking procedures and prohibitions against digging and vehicle traffic within 50-ft of the burrows. INRMP section 12.9.5.2 lists the on-going management actions that would continue in gopher tortoise habitat management that restores the longleaf pine system by planting trees, thinning stands, controlling hardwoods, controlling soil erosion, and conducting prescribed burns.

6.7 Cultural Resources. No significant impacts to cultural resources are expected. The mitigation measures for cultural resources consist of avoiding direct effects to the resources through project design or modification, signage, excavation or data recovery, or other appropriate measures. Avoiding direct impacts includes prohibiting ground disturbing activities at the sites and using cut-to-length method of timber harvest in the boundaries of the eligible and potentially eligible sites.

Any and all artifacts found will remain the property of the Army at Fort Benning and, if found, will be immediately turned over to the Environmental Monitors and delivered to Fort Benning's Cultural Resource Manager (CRM) for curation. For Benning will continue to operate under the U.S. Army Alternate Procedures for the implementation of Section 106 of the National Historic Preservation Act. Adverse effects to cultural resources will be identified by the Installation and consultation with stakeholders will proceed as necessary. In addition, construction specifications and site plans will identify areas where ground disturbance and (where applicable) berm placement. The construction contractors will submit a cultural resources management plan that incorporates relevant Standard Operating Procedures from the Installation Integrated Cultural Resource Management Plan; this plan will need to be reviewed and approved by the Fort Benning Chief, EMD or designee and the CRM before any construction begins.

6.8 Safety. No significant impacts to safety are expected, however as part of infrastructure upgrades identified in the EIS and to address concern of some residents near the boundary, Fort Benning is erecting a fence along the northern boundary adjacent to the small arms ranges in the Oscar Complex to limit unlawful entry. Signs are currently posted along all boundaries and will continue to warn the public against trespassing.

6.9 Mitigation Enforcement and Monitoring

The Army and Fort Benning, is ultimately responsible for implementing all mitigation requirements, but will use a combination of staff and existing systems, such as the Environmental Performance Assessment System (EPAS), to track mitigation effectiveness and compliance (refer to Appendix G in the EIS for further detail). . The Army will ensure adequate professional personnel are made available to meet the prescribed measures identified in the EIS. The Army will utilize Environmental Mitigation

Compliance Officers that will ensure mitigation measures are followed, gauge the effectiveness of the mitigations, and inform Fort Benning of any noncompliance or ineffectiveness of these measures. The Environmental Mitigation Compliance Officers will act as liaison between the construction contractors and Fort Benning environmental and range personnel, notifying the Installation of any substantial deviation from plans and coordinating any noncompliance by the contractors with Fort Benning's EMD and the Environmental Attorney, Office of Staff Judge Advocate, or others as requested by EMD, as well as updating the publicly accessible website indicating the mitigation and monitoring status.

During training operations and range maintenance activities, any noncompliance with mitigation requirements or regulations will be coordinated with Chief, EMD and the Chief, Range Division for resolution. Fort Benning is also implementing an Environmental Management System (EMS) to promote a cycle of continuous improvement to meet environmental goals through policy, planning, implementation, checking and corrective actions, and management review.

7.0 Cumulative Impacts

Implementing the preferred alternative will produce cumulative impacts to resources when considered along with other past, present, and reasonably foreseeable future activities both within Fort Benning and the adjacent communities. These potential cumulative impacts are described below.

Land Use. Ongoing and future growth, urbanization, and encroachment in the communities adjacent to and outside of Installation boundaries, is a potentially significant cumulative impact that could result in degradation of the mission-essential training at Fort Benning if left unchecked. The State of Georgia's 3,000-ft planning zone around military installations is recognized in the comprehensive planning documents for Muscogee County/Columbus and Chattahoochee County/Cusseta; however, it remains to be seen how compatibility within this 3,000-ft planning zone will be addressed in the comprehensive plan updates for Talbot and Marion Counties. Development within these counties could be incompatible with the military mission (and introduce adverse impacts).

Aesthetics and Visual Resources. Past and present construction and renovation actions have had minor adverse effects on the existing viewsheds and site character both within and outside of the Installation. On Fort Benning, future projects are expected to be consistent with the aesthetic quality of the surrounding buildings by following existing regulations and guidance provided in the Installation Design Guide. Transformation actions have little incremental impacts; therefore, no significant adverse cumulative impacts are anticipated to these resources.

Socioeconomics. Rapid growth in the region is anticipated from these BRAC 2005 and Transformation actions, expansion of Aflac, and the new Kia plant. These projects would add to the construction spending as well as indirect spending in regional services and would have positive economic effects on employment generation, income, and sales volume. Housing would need to expand in the region to

support these actions and increased demand for schools would need to be met. Both negative and positive cumulative impacts may occur in socioeconomics. No cumulative adverse impacts are anticipated for low-income or minority populations nor is the safety of children anticipated to be put at risk.

Transportation. With implementation of transportation mitigations identified in this Record of Decision, it is not anticipated that there would be significant cumulative impacts to traffic either inside the Installation or in the traffic network adjacent to Post boundaries.

Utilities. When considered with present and reasonably foreseeable actions within the region, impacts to utilities are not expected to be significantly adverse since the systems are expected to meet the increased demands.

Noise. Off Post, there would be a minor expansion of Noise Zone III due to Army anticipated future training activities but this expansion would not be incompatible with land uses nor adversely impact sensitive noise receptors. On Post, noise levels would reduce in size. Therefore, no cumulative impacts are expected.

Air Quality. The impacts of reasonably foreseeable actions could result in increased pollutant emissions into the regional air quality but would not be considered significantly adverse. The additional Fort Benning construction activities would produce increased air emissions, particularly nitrogen oxide (NO_x), particulate matter of less than 10 microns (PM_{10}), and to a lesser extent, $PM_{2.5}$. After construction, Transformation operations will continue into the foreseeable future and involve a modest increase in overall emissions at Fort Benning. Regionally, a substantial source of pollutants is expected from the operation of the Kia plant, which will potentially be regulated as a major source of emissions for volatile organic compounds, NO_x, and hazardous air pollutants. Implementation of the Transformation actions is not expected to result in cumulative impacts.

Hazardous and Toxic Materials and Waste. The implementation of the Transformation action would not result in significant adverse cumulative impacts from hazardous materials, toxic substances, and hazardous waste when impacts are considered with past, present, and/or reasonably foreseeable future actions in the region.

Water Resources. Minor adverse effects to jurisdictional wetlands and to impaired waterways (e.g., Randall Creek and unnamed tributaries of Ochillee Creek, Chattahoochee River, Upatoi Creek, Spring Creek, and Pine Knot Creek) are possible; however, the Transformation action would not result in any significant adverse effects on water resources when impacts are considered with past, present, and future actions. On Post, cumulative adverse effects to wetland areas and waterways would be mitigated through the adherence to requirements of state and federal regulators and existing specified management actions.

Geology and Soils. Impacts to geology, topography, and soils are site-specific and are not affected by development in the region. No significant adverse cumulative impacts to the *geology* or *topography* within or immediately adjacent to Fort Benning are expected. The adverse impacts to *soils,* however, would occur as a result of present and reasonably foreseeable projects and would include soil compaction and disturbed and modified soil layers. The soil disturbance anticipated with the Transformation action, when considering impacts of past, present, and future actions, could result in cumulative adverse impacts to soils; however, adherence to regulatory requirements for on-Post past, present, and future construction projects would minimize impacts.

Biological Resources. The preferred alternative, when considered with past, present, and foreseeable future projects could have cumulative significant adverse impacts to biological resources. This may occur due to projects being located in sensitive habitats, jurisdictional wetlands, or UEAs, and may affect threatened and endangered species. Each new project within the Installation, however, would be subject to review under NEPA, the Endangered Species Act (ESA) (including further consultation with the USFWS, where applicable), and other applicable federal and state requirements which would reduce the adverse impacts on biological resources to the maximum extent practicable.

Cultural Resources. Impacts to cultural resources may occur from past, present, or reasonably foreseeable future actions on Post due to additional ground disturbance from expanded training ranges and/or additional housing, commercial areas, roads, and recreational facilities. These potential effects will be avoided to the greatest extent possible; however, if avoidance is not possible, then the impacts would be minimized or mitigated in accordance with Army Alternative Procedures as well as applicable federal and state laws and regulations.

Safety. No past, present, or reasonably foreseeable future actions would impact safety either on or off Post. On Post, construction would not occur within unexploded ordnance areas and the surface danger zones would be designed not to overlap with personnel support areas. Off Post, the surface danger zones would not extend outside Installation boundaries. No significant adverse cumulative impacts to safety, therefore, would occur.

8.0 Decision

On behalf of the Department of the Army, I have decided to proceed with the preferred alternative (Alternative B) for the BRAC 2005 and Transformation actions at Fort Benning. In terms of training capabilities, Alternative B would meet the purpose and need of the proposed Transformation actions far better than Alternative A by providing the facilities and training capabilities to support the Transformation actions. Under Alternative A, the hydrology and topography in the Northern Maneuver Area would not be optimal to support all of the Armor School's programs of instruction. The addition of the Good Hope Maneuver Area, under Alternative B, better supports Armor School training activities. The terrain in the Good Hope Maneuver Area is more open, level, and less compartmentalized than that of the Northern Maneuver Area.

As presented in the EIS, there are no differences in impacts to resources such as aesthetics and visual, socioeconomics, transportation, utilities, noise, hazardous and toxic materials and waste, utilities, and safety between Alternatives A and B. Alternative A does impact fewer acres, thus disturbing a lesser area of soils (and indirectly producing less fugitive dust that impacts air quality). Biological resources such as vegetation, wildlife, aquatic habitats, and unique ecological areas would also be impacted to a lesser degree; and fewer cultural resources would be affected; however, under Alternative A there would be a greater number of RCWs impacted if it were implemented. While I recognize that overall, Alternative A would introduce fewer environmental impacts for many resources, the impacts to threatened and endangered species would be significantly less under Alternative B. In the BO, the USFWS concurred that the preferred alternative is not likely to jeopardize the continued existence of the RCW and relict trillium. Further, I note that this preferred alternative does not introduce any greater impacts to other resources that cannot be mitigated when compared to Alternative A.

In summary, I have considered the results of the analyses presented in the EIS, Biological Assessment and resulting BO, supporting studies, and the comments provided during formal comment and review periods. In addition, I evaluated our national defense needs, the synergistic relationship between BRAC, AMF, GDPR, and stationing actions, as well as meeting the purpose and need for the BRAC 2005 recommendations to include the creation of the Maneuver Center of Excellence, to guide my decision to select Alternative B as the preferred alternative.

I gave special consideration to the effect of the preferred alternative on all resources and also took into account the fact that the No Action Alternative would not meet the Army's need to implement the BRAC-directed recommendations that are legally required and the other Transformation actions (i.e., BRAC-discretionary reassignments, AMF, GDPR, and other Army stationing actions) that are needed in order for the Army to effectively undertake transformation and meet 21st century military challenges.

I have determined that implementing this preferred alternative reflects a proper balance between initiatives for protection of the environment, appropriate mitigation, and actions to achieve the Army's requirements. My decision to select the preferred alternative is based on my determination that this alternative is the Army's preferable course of action. The No Action Alternative is the environmentally preferred alternative, but it does not meet the purpose and need of the BRAC 2005 and Transformation actions.

Craig E. College

CRAIG E. COLLEGE
Deputy Assistant Chief of Staff
for Installation Management

11/29/07
Date