RECORD OF DECISION

As the Executive Director, Installation Management Command, I have reviewed the Final Environmental Impact Statement (EIS) for the Maneuver Center of Excellence (MCOE) 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 MCOE actions at Fort Benning, GA, on the natural and human environment. The following documents are incorporated by reference: the Final Environmental Impact Statement for the Maneuver Center of Excellence (Actions at Fort Benning, Georgia, June 2009 and appendices; the U.S. Fish and Wildlife Service Final Biological Opinion on the U.S. Army Maneuver Center of Excellence at Fort Benning, Georgia, May 2009 (BO); Final Biological Assessment for Proposed Maneuver Center of Excellence Actions at Fort Benning, GA, October 2008; Final Addendum to the Final Biological Assessment for Proposed Maneuver Center of Excellence Actions at Fort Benning, GA, March 2009; and Addendum 2 to the Biological Assessment for Proposed Maneuver Center of Excellence Actions at Fort Benning, Georgia, May 2009. The Army will proceed as indicated herein.

1.0 Background

In 2007, the Army completed the Final EIS for the BRAC 2005 and Transformation Actions at Fort Benning, Georgia, (BRAC/Transformation EIS) and subsequent Record of Decision (ROD). Since the announcement of the 2005 BRAC/Transformation EIS ROD, some projects that were reasonably foreseeable in FY14 have now been funded, programmed, and planned, and new projects have been identified. In addition, some of the projects, originally identified for implementation in the FY08 to FY13 timeframe, have changed in location, size, and timing and these changes are substantial enough to require a re-evaluation. None of these project changes, however, impact the ability of Fort Benning to complete the BRAC-directed actions by September 2011.

During the same timeframe as the BRAC and Transformation actions were being evaluated, the Army announced its decision to increase its overall size while continuing to restructure its forces in accordance with modular Transformation decisions. The permanent increase in the Army end strength, which is being implemented in accordance with Congressional authorizations, allows the Army to realign its force structure (e.g., modular forces) to a force that is capable of meeting national security and defense requirements; implementing Quadrennial Defense Review (QDR) recommendations; sustaining unit equipment and training readiness; and easing the deployment burden on its Soldiers and Families.

Through increased numbers and unit reconfigurations, the Army's operational (e.g., combat) readiness is enhanced by giving Soldiers more time to train and maintain their equipment, allowing Soldiers and their Families to spend more time together at home station between deployments, and ensuring the nation has greater capability to respond to increased threats (such as terrorism) both here and abroad. The impacts of this growth were analyzed in the Programmatic EIS (PEIS) for Army Growth and Force Structure Realignment, and the Army's ROD was announced in the Federal Register in January 2008. For Fort Benning, this growth is expressed by an increase in students training at the Armor and Infantry Schools, Basic Officers Leaders Course, Officer Candidate School, and Army Airborne School.

2.0 Purpose and Need for the Proposed Action

The purpose of the Proposed Action is to accommodate newly identified requirements for Armor School training and establishment of the MCOE, re-evaluate projects that have moved or substantially changed from those evaluated in the BRAC/Transformation EIS, and accommodate the decisions taken by the Army for growth. The overarching need for the Proposed Action is to provide sufficient operational facilities, training areas (including ranges and maneuver areas), and infrastructure to accommodate the consolidated Armor and Infantry mission of the MCOE and the increased military personnel and students due to Army Growth. The Army plans to meet this need by minimizing land use incompatibilities and balancing the military readiness mission with a sustained natural environment.

3.0 Proposed Action

Under the Proposed Action, the Army would construct, operate, and maintain additional facilities and training areas (including ranges and maneuver areas) in support of the purpose and need. Construction would be within the Georgia boundaries of Fort Benning; none would be implemented within the Alabama portion of the Installation. The proposed community services, personnel support, classroom, barracks, and dining facilities would be constructed primarily in three of the four cantonment areas: Main Post, Sand Hill, and Harmony Church. As with the BRAC/Transformation EIS, the range areas are discussed in terms of North and South Ranges, with U.S. Highway 27/280 acting as the dividing line between the two sections.

4.0 Proposed Action and Alternatives

Two action alternatives were identified that would fulfill the purpose and need of the Proposed Action: Alternative A (the Army's preferred alternative) and Alternative B. The Army has identified Alternative A as its preferred alternative because it best meets the purpose and need of the Proposed Action. Alternative B would also meet the purpose and need, however, it is not the preferred option because maneuver training would require more travel time between the motor pools and the training areas for heavy tracked and wheeled vehicles. Maneuver training would not be located in proximity to the

majority of operational facilities, and the Alternative B 19D/K One Station Unit Training (OSUT) southern training area would be smaller than Alternative A and present constraints to meeting Armor School OSUT training requirements. Alternative B would also result in greater impacts to the Red-cockaded Woodpecker (RCW), a federally listed protected species and other environmental resources. Alternative A includes actions to avoid or minimize impacts, set forth in the BO (including the RPA, minimization measures, and terms and conditions), and is described further in section 5.11 of this ROD.

4.1 No Action Alternative

Because the BRAC/Transformation actions were previously approved, they are included in the No Action Alternative. The No Action Alternative, therefore, includes FY09 through FY13 BRAC/Transformation projects and 2008 baseline conditions that were found when the MCOE Notice of Intent was announced in the *Federal Register.*

4.2 Cantonment Area Development Common to Alternatives A and B

Under Alternatives A and B, facility construction for cantonment-area, administrative, medical, educational, maintenance, unaccompanied personnel housing, community facilities, operational facilities, and support facility would be primarily the same and are listed below.

Cantonment Area Development

Installation Wide

- Construct Training Area Roads Paved (PN65554)
- Infrastructure Support, Increment 2 (PN67457) (Includes Security Fence and Dixie Road Expansion from Michael Street to Sightseeing Road)
- Repair Existing Training Area Roads, Phase 1 (PN65557)

Harmony Church

- Troop Store - AAFES (NAF) (PN71065)
- DS/GS Vehicle Maintenance Facility (PN64460)
- Shop 1 Maintenance Facility (PN65322)
- Recreation Centers HC and SH (PN65246)
- Physical Fitness Center, Harmony Church (PN65248)
- Rail Loading Facility Expansion (PN62953)

Main Post

- Hospital Replacement (PN70235)
- Warrior In Transition Complex (PN69999)
- Water Treatment Plant Upgrade And Expansion (71473)
- Dining Facility To Support AST Training (PN69151)
- Maneuver Battle Lab (PN65250)
- Dental Clinic Addition (Bernheim Site) (PN71620)
- Unit Maintenance Facility (PN69406)*

Sand Hill

- Trainee Complex Upgrade (PN69147)
- Blood Donor Center (PN64481)
- Classrooms With Battalion Dining Facilities (PN70027)
- Classrooms With Battalion Dining Facilities (PN70026)
- Training Barracks Complex, Phase 1 (PN72322)
- Classrooms & Dual Battalion Dining Facilities (PN69150)

- Training Barracks Complex, Phase 2 (PN72324)
- Training Dining and Classroom Facilities. Ph 2 (PN72456)
- Training Dining and Classroom Facilities. Ph 2 (PN72457)
- Training Barracks Complex, Phase 3 (PN69745)
- Chapel (PN65249)

* Included in Alternative B only.

4.3 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.

Training Areas and Range Development

North of U.S. Highway 27/280

- Vehicle Recovery Course (GMD) (PN72017)
- Basic 10M – 25M Firing Range (Z1) (PN65035)
- Basic 10M – 25M Firing Range (Z5) (PN65039)
- Basic 10M – 25M Firing Range (Z2) (65036)
- Modified Record Fire 7 – 5.56mm: M855 Ball (65049)
- Modified Record Fire 1 – 5.56mm: M855 Ball (PN65043)
- Hasting Range Upgrade (PN64551)*
- Fire and Movement 2 – 5.56mm: M855 Ball (PN65033)
- 19D/K One Station Unit Training (Heavy Mounted/Dismounted Training in TA-L1, O12-14 and portions of O15 (Heavy Mounted Training in O14, O15, and L1-5) (PN69741) *
- Northern Training Area Infrastructure (Heavy Mounted Training in TA-O1,O3,O11,O14, and O15) (PN69742) *
- Southern Training Area Infrastructure (69743)
- Fire and Movement 3 – 5.56mm: M855 Ball (PN65034)
- Stationary Tank Range (ST2) (PN65383)
- Drivers Training Course (Access Road) (PN64797)

South of U.S. Highway 27/280

- Anti-Armor Tracking And Live Fire Complex 1 (PN65078)
- Range Access Road—Good Hope Maneuver Training Area (PN69358)
- Good Hope Training Area Infrastructure (PN69668)

*Differs in location in Alternative B.

4.4 Cantonment Area Development under Alternative B

Under Alternative B, all cantonment area construction would be the same as that described above, with the exception of one project in the Main Cantonment area, Unit Maintenance Facility (PN69406).

4.5 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 19 D/K One Station Unit Training (Heavy Mounted/Dismounted Training (PN69741) would moved south of U.S. Highway 27/280 to TA-Q1, Q2, Q3, and Q5, from TA-L1, O12-14 and portions of O15, and O14, O15, and L1-5, north of U.S. Highway 27/280.
- The Northern Training Area maneuver training (PN69742) under Alternative B, would move to TA-L1, L2, and L3, north of U.S. Highway 27/280, which is used for existing maneuver training in Alternative A
- Multipurpose Machine Gun Range 1-7.62mm and .50Cal (PN68733), located in the range area south of U.S. Highway 27/280, would be included in Alternative B only.
- Multipurpose Machine Gun Range 2-7.62mm and .50Cal (PN65070), located in the range area south of U.S. Highway 27/280, would be included in Alternative B only.
- Automated Combat Pistol Qualification Course (PN65079), located in the range area south of U.S. Highway 27/280, would be included in Alternative B only.
- The Hastings Range Upgrade (PN 64551) would be sited north of Hastings Range rather than within the existing Hastings Range footprint as in Alternative A and would be referred to as the Multi-purpose Training Range - 25mm, 120mm, 7.62mm, 5.56mm & .50 Caliber (Cal).

In total, about 10,045 acres would be disturbed under Alternative A and 24,596 acres under Alternative B.

5.0 Environmental Consequences

Implementation of the preferred alternative (Alternative A) 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

Primary changes in off-post land use would be anticipated to occur as a result of increased demand for residential land use, commercial and public services. Under Alternative A, there would be incompatible land uses on-Post due to noise levels associated with range operations, which would result in significant impacts. In addition, the Scout Leaders Course field training would be relocated to a location yet to be identified, outside of current Fort Benning boundaries. Alternative A may increase encroachment pressures on the Installation, however, the Joint Land Use Study (JLUS) initiatives, noise management

planning, and cooperative efforts with the community could reduce the likelihood that encroachment would occur if the recommendations provided in these plans are adopted by the adjacent communities. Fort Benning would continue to work with counties and communities surrounding the Installation as they plan for future growth and in the development and implementation of a JLUS. Incompatible land use on-post would occur in the family housing area due to an expansion of Zone III noise levels. Incompatible noise levels would be due to increased use of large caliber weapons.

5.2 Aesthetics and Visual Resources

No significant adverse impacts from implementation of the preferred alternative would result to aesthetics and visual resources. Visual compatibility of the new structures would be maintained through design and consistency with existing structures.

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, but not significant. 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. It is not expected that the planned future physical capacity of local schools would be surpassed, but funding and timing of the increased capacity remains a concern. Minor negative effects on services such as health care, fire, and law enforcement would be anticipated. No significant adverse impacts are expected to recreational facilities. No disproportionate or adverse impacts are expected to low-income or minority populations; therefore, impacts would not be considered significant for environmental justice issues. There would be no adverse environmental or health impacts to children.

5.4 Transportation

The level of service at the 30 key intersections evaluated for the No Action Alternative and the Action Alternatives would not significantly differ. No additional significant impacts would be expected in Alterative A beyond those analyzed in the BRAC/Transformation EIS.

5.5 Utilities

Implementation of the preferred alternative would result in the need to connect and distribute supporting utility systems to multiple facilities and building sites in the cantonment areas including: potable water, sanitary sewer, storm drainage, electrical, information systems, and solid waste disposal. Additional

utilities would be provided for projects that would require increased capacity; otherwise existing systems are expected to have adequate capacity for these changes. The additional amount of solid waste generated as a result of the new MCOE would result in a substantial increase from current levels. The current and long-term solid waste management contract would need to be renegotiated to ensure that adequate service is provided. No impacts to other utilities would occur because the provider is able to accommodate an increase in demand with the improvements proposed. No impacts to utilities would occur under the Alternative A.

5.6 Noise

Noise generated on-Post by small-caliber weapons would not be significant under preferred Alternative A. Zone III noise levels from small-caliber weapons would slightly increase from baseline conditions; there would be no new sensitive receptors in the Zone III area and there would be no significant impacts when compared to baseline conditions for noise generated by small caliber weapons.

When compared to baseline conditions for noise generated by large-caliber weapons, Zone III noise contours would expand and new sensitive receptors would be exposed under all alternatives. On-Post Zone III noise levels from large caliber weapons would increase. Approximately 96 family housing buildings adjacent to Dixie Road would be in Zone III. The family housing on Post has been privatized via the Residential Communities Initiative (RCI). Fort Benning is working with the RCI program representatives to determine the most feasible options to mitigate noise, which will be analyzed in a separate NEPA document when more information and options are identified.

Zone III off-Post noise contours in Marion created by larger caliber weapons would expand by approximately 150 acres compared to baseline. This Zone III contour expansion would not have significant impacts because there would be no increase in the number of sensitive noise receptors exposed. Fort Benning will work with previously unexposed or infrequently exposed residents on noise mitigation strategies. Although this ROD reassesses noise impacts in the FEIS the overall conclusion is that Zone III large-caliber noise contours will significantly affect new sensitive noise receptors on-Post unless mitigated. Fort Benning will continue to work with the public on its operational noise management program to reduce the impact of operational noise on the surrounding community

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 2009 through 2013, causing regional air quality impacts, though at less than significant adverse level. The US Environmental Protection Agency (USEPA) may designate Muscogee County, which includes a portion of Fort Benning, as non attainment for ozone. There would be no significant impacts to regional air quality.

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 followed to manage storage, use, handling, and disposal requirements. No significant adverse impacts are anticipated.

5.9 Water Resources

Alternative A would result in potential significant adverse effects to water resources, such as, aquatic habitats, jurisdictional wetlands and streams, and streambanks. The affected water resources would not necessarily be eliminated, but their functions and values would be degraded by direct or incidental filling, vegetation removal, alteration of hydrology, and inputs of sediment and pollutants. Avoidance and mitigation measures would reduce the extent and severity of the adverse impacts. Sedimentation and erosion, which could degrade natural features and processes of water resources, will be significantly reduced and not considered significant with the application of mitigation measures.

5.10 Geology and Soils

No significant impacts to geologic or topographic conditions would be expected under Alternative A.

Alternative A would result in a short-term increase in construction vehicles and activity and a long-term increase in training and maintenance vehicles operating within the ranges in training areas. No significant impacts would be expected if applicable federal and state laws and regulations and already-established Installation policies and guidelines, such as erosion control, Best Management Practices (BMPs), and spill control measures were implemented.

5.11 Biological Resources

Implementation of the preferred Alternative A would result in potential significant effects to vegetation, wildlife, fish, aquatic habitat, special status species, and the Prosperity Church Oak-Hickory Forest Unique Ecological Area (UEA) due to the substantial amount of native habitat that would be lost, and disruption of ecosystem function in the disturbed areas. Migratory birds and waterfowl in wetlands would be similarly disturbed. The gopher tortoise (a state listed species) could also be significantly affected if impacts are not mitigated. One Federally-listed species, the RCW, would experience significant impacts. Portions of the Randall Creek North relict trillium population would be removed.

Fort Benning continued formal consultation with USFWS after the release of the Draft EIS (DEIS). A concerted effort was made by the Army to further reduce environmental impacts of Alternative A even after completion of the Draft EIS (DEIS), with development of project changes and reductions in limits of disturbances. The changes that have occurred in Alternative A projects have substantially reduced the impacts to the RCW and most other resource categories when compared to Alternative B. In May 2009, the USFWS Final BO stated a jeopardy opinion was warranted for impacts associated with the RCW; however, USFWS in coordination with the Army provided an RPA that, if implemented, will avoid jeopardizing the RCW under Alternative A.

Fort Benning will implement the RPA and other terms of the BO, which will reduce the impacts to the RCW and will likely not jeopardize the existence of the RCW. Impacts of Alternative A would still be significant because of the magnitude of the impact and its delays with long-term goals to recover the species on Fort Benning. The proposed avoidance, minimization, and conservation measures that would lessen adverse effects on the RCW are detailed in the BA, its addenda, and the BO.

The RPA addressed those impacts associated with direct habitat loss and training over time and has four mandatory components, all of which must be fully implemented to remove the determination of likelihood of jeopardy to the species by the USFWS. The four components of the RPA are as follows:

1. Remove the machine gun range in the A17 and A20 impact areas (MPMG2) (PN65070)
2. Manage 36 additional active clusters in the A20 impact area that are not currently counted toward recovery
3. Migrate the field training aspects of the Scout Leader Course (Army Reconnaissance Course), a MCOE-related heavy mechanized training mechanized training course, from the Southern Maneuver Training Area to training areas located off the FY09 Fort Benning Installation boundary within five years from the training start date of the Scout Leaders Course.
4. Rescope projects to avoid impacts.

Under Alternative A with implementation of the BO, including the RPA, 57 active clusters would be taken in the form of destruction or degradation of habitat, 17 active clusters would be taken in the form of short-term disturbance, and 7 active clusters would be taken in the form of long-term disturbance.

5.12 Cultural Resources

Under Alternative A, the areas that would be affected by ground-disturbing activities and alterations of Main Post cantonment are substantial and the affect on cultural and historic resources would be potentially significant and adverse. The estimated disturbance associated with Alternative A has the potential to affect 107 National Register eligible and recommended eligible archaeological sites, 11 historic architectural resources - most within the Main Post Historic District, and 8 cemeteries. Due to

progress in project designs since the FEIS was published, this ROD contains updated information regarding cultural resources impacts.

5.13 Safety

There would be no significant impacts to safety. Under Alternative A, safety procedures would not differ from baseline conditions. There would be 1,797 acres of additional Surface Danger Zones, however, all of these zones are on-Post and there would be no safety impacts to off-Post communities.

5.14 No Action Alternative

The No Action Alternative includes FY09 through FY13 BRAC/Transformation projects. The No Action Alternative would have significant impacts on transportation, noise, soils, vegetation, special status species (RCW), UEAs, fish and wildlife, and cultural resources.

5.15 Alternative B

Alternative B would have significant impacts to land use, noise, water, soils, biological resources, and cultural resources. Impacts to these resources would be greater under Alternative B than Alternative A. Alternative B would be similar to Alternative A for other resources, with no significant impacts on aesthetics and visual resources, socioeconomics, transportation, utilities, air quality, hazardous and toxic materials, and safety.

6.0 Cumulative Impacts

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

A reasonably foreseeable future action is the relocation of the Scout Leaders Course field training to a site outside of Fort Benning current boundaries. This action could include moving this training to another military installation or acquisition of additional land for Fort Benning; however, it is too early to determine the level of cumulative impacts for this relocation action. This would be evaluated in future NEPA documentation.

Land Use. The ongoing on-Post cantonment area development from other past, present, and future actions, in combination with the Proposed Action, would result in potential cumulative impacts in terms

of land use intensity and density and interactive impacts in terms of land use functionality. The real property master planning process will be used to ensure that this growth continues to occur in an orderly fashion to avoid land use incompatibilities. Given the plans to resolve the incompatible land use on-Post due to expansion of noise Zone III into family housing, no significant cumulative on-Post land use impacts are expected.

Ongoing and future growth and urbanization in the communities adjacent to the Installation boundaries may result in potentially significant cumulative impacts and 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, additional land use controls are lacking. The implementation of ACUB initiatives and JLUS recommendations are key in ensuring there are no significant encroachment issues. Because the ACUB and JLUS programs are not mandatory, there could be the potential for minor cumulative adverse impacts.

Socioeconomics. Modest growth in the region and other economic growth actions in the area would be anticipated. This would result in increased jobs and expenditures in the region. Housing would need to expand in the overall region and increased demands for public services such as schools, hospitals, and police/fire departments would need to be met. Impacts could potentially be significant (but not adverse), as the socioeconomic growth, occurs within the region.

Transportation. With implementation of the transportation mitigations as analyzed in the BRAC/Transformation EIS (Appendix B) in the MCOE No Action Alternative, it is not anticipated that there would be significant cumulative impacts.

Noise. Growth in the areas surrounding Fort Benning would potentially increase incompatible land uses within noise zones and there is a potential for significant cumulative impacts. However, continued implementation of ACUB and JLUS initiatives would offset these impacts. It is not possible to foresee if the degree that impacts would be offset, but it is reasonable to assume that there would be successes with these programs given the progress to date.

Air Quality. Increasing economic development and urbanization would increase air emissions within the region. Cumulative impacts would potentially reach significant levels, particularly as these incremental impacts from the Proposed Action relate to attainment of the NAAQS.

Biological Resources. Cumulative impacts to vegetation, wetlands, wildlife, special status species, and UEAs may occur due to the aggregate of additional disturbance from increased human population, supplemental training ranges, additional housing, commercial areas, roads, and recreational facilities in the region from projects in the past, present, and foreseeable future. These impacts would be reduced by

the implementation of Alternative A due to the reduction of the overall amount of total area disturbed when compared to Alternative B. Disturbance and clearing of the longleaf pine ecosystem may impact sensitive plant species and reduce available habitat for sensitive wildlife such as RCW and gopher tortoise. Implementation of ACUB initiatives could potentially offset some but not all of the impacts for biological resources, including special status species. The future move of Scout Leaders Course field training to a site outside of Fort Benning current boundaries would reduce impacts to RCWs.

Water Resources. Cumulative impacts to aquatic habitats and wetlands may occur due to the aggregate of additional habitat disturbance from increased human population, supplemental training ranges, additional housing, commercial areas, roads, and recreational facilities in the region from projects in the past, present, and foreseeable future.

7.0 Mitigation

The EIS identifies mitigation to minimize, avoid, or compensate for adverse effects to environmental resources. All practicable means to avoid or minimize environmental harm from the selected alternative have been adopted. During the design process, minimization and avoidance will be incorporated to the greatest extent possible. A mitigation and monitoring plan will be implemented to ensure that these mitigation measures are implemented, monitored, and their effectiveness measured, with appropriate adjustments made when necessary. The following sections provide a summary of the adopted mitigations, which are more fully described in the EIS.

7.1 Land Use. Mitigations would include the continued implementation of existing noise management and compatible land use programs, which would lessen impacts. The mitigation for the potential land use incompatibilities that could result from MCOE heavy maneuver training activities in the Good Hope Maneuver Area would be the same as those established in the BRAC/Transformation EIS. The ongoing development in the Oscar Range Complex with small arm ranges included in Alternative A also would contribute to incompatibilities with existing rural residential land use along Chattsworth Road/Columbus-Muscogee panhandle area. The public will be notified of the training schedule through a website under construction and should be available for access by the end of the summer of 2009.

7.2 Transportation. The mitigation measures outlined in the BRAC/Transformation EIS would be sufficient to accommodate the traffic generated from Alternatives A (preferred alternative). No further mitigation would be necessary as a result of implementing Alternative A.

7.3 Noise. For on- and off-Post sensitive receptors in Zone II, facility siting and design standards for noise reduction could attenuate noise levels. Fort Benning recommends that land use planners, real

estate brokers, developers, and residential property owners include noise disclosures in real estate documents to potential buyers and renters to address noise in Zones II and III.

On-Post, Fort Benning is working with the Residential Communities Initiative (RCI) program representatives to determine the most feasible options to mitigate significant noise impacts in family housing. Mitigation measures that could minimize noise impacts include, but are not limited to, retrofitting residences with noise-attenuating materials, demolishing and rebuilding residences in other locations, or changing the type of training that occurs adjacent to this housing area. As appropriate, Fort Benning will prepare separate NEPA documentation regarding feasible options to mitigate significant adverse noise impacts to family housing.

Off-Post, while significant impacts are anticipated, continued use of the noise complaint process would assist Fort Benning in responding to noise complaints in a timely manner. Fort Benning also plans on posting training information on a new website at: https://www.infantry.army.mil. While this website is still under construction, it will be accessible to the general public in the late summer of 2009. In addition, Fort Benning's noise management program includes 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.

7.4 **Air Quality**. While no mitigation measures (outside existing regulations, permits, and plans) are required, either action alternative would result in a small amount of new emissions sources which may require modification of Fort Benning's Title V permit; however, it is not anticipated that these emissions would exceed any of the established permit limits. These emissions can be managed in accordance with Fort Benning's Title V permit regulations, the Georgia Air Rule requirements, and dust control requirements that are part of any construction project's Erosion and Sediment Control Plan.

7.5 **Water Resources.** Alternative A would result in potential significant impact to water resources. The Army will follow all applicable federal, state and local laws and regulations. During the design process, avoidance and mitigation will be incorporated to the greatest extent possible. Application of existing management actions, facility design, and construction practices would minimize impacts. Use of water crossings, where needed, will be incorporated into the design process. Mitigation for impacts to wetlands would be incorporated into the design process by reducing stream crossings and placing trails, roads, and targets out of wetland areas, where possible. Unavoidable impacts to wetlands would be compensated by Fort Benning purchasing compensatory mitigation credits or by working with the US Army Corps of Engineers, Savannah District, Regulatory Division via the wetlands permitting process to establish other appropriate mitigation efforts. Once operational, monitoring to identify erosion or sedimentation issues on the ranges, training areas, and tank trails, would occur to ensure no significant impacts. Specific mitigation plans for impacts occurring from projects addressed in the EIS will be tailored to those impacts during the federal and state permitting process.

7.6 **Geology and Soils**. Potential impacts during construction would be mitigated through implementation of an Erosion, Sedimentation, and Pollution Control Plan (ESPCP) in accordance with the Manual for Erosion and Sediment Control in Georgia. Best Management Practices (BMPs) for the ESPCP could include erosion control matting, channel stabilization, silt fencing, brush barriers, construction exits, temporary and permanent seeding, and application of mulch. Construction vehicles have the potential to leak or spill petroleum, oil and lubricants (POL) onto the soil, resulting in soil contamination concerns. Contractors will be required to conform to practices to minimize POL spills which could include secondary containment of vehicles and stored POL products and hazardous materials. In addition, facilities involved in the use and storage of hazardous materials would be designed to meet the spill prevention, control, and countermeasure (SPCC) requirements under Army Regulation 200-1.

As part of the required National Pollutant Discharge Elimination System (NPDES) permits, an ESPCP would be developed for each specific construction area with the potential to disturb more than 1 acre of land and would describe appropriate site-specific BMPs that would be used to minimize impacts from increased runoff and soil erosion during site construction. Site-specific BMPs would be developed based on proper design, run-off calculation, slope factors, soil type, topography, construction activities involved, and proximity to water bodies.

7.7 **Biological Resources**. Impacts to Biological Resources would be mitigated by: adherence to the Integrated Natural Resource Management Plan, permit requirements, and applicable federal, state, and local laws and regulations; siting and designing projects to avoid adverse impacts; and implementing BMPs. Mitigation measures for adverse impacts to resources such as vegetation, fish and wildlife, and UEA, may include avoidance, minimization, repair, rehabilitation, restoration, reduction, and/or conservation.

Special Status Species. For state-listed species, continued adherence to Fort Benning's management plans and practices, relocation where needed, as well as monitoring would minimize adverse effects. All avoidance, conservation, and minimization identified in the Biological Assessment and Biological Opinion will be implemented for Alternative A to reduce effects on federally-listed species.

7.8 **Cultural Resources**. Mitigation measures to reduce impacts to historic properties include avoidance and documentation. Impacts to archaeological resources that are eligible or potentially eligible for inclusion on the National Register of Historic Places (NRHP) would be protected by avoidance through design; the use of signs and education of Soldiers; excavation/data recovery of historic properties in accordance with Fort Benning's Historic Properties Component (HPC) in the event that disturbance cannot be avoided, and; other mitigation measures as may be developed via Fort Benning's procedures as outlined in the Integrated Cultural Resources Management Plan and.

Mitigation measures for architectural sites and historic districts eligible or potentially eligible for inclusion on the NRHP consist of: minimizing adverse effects to the structures through the design process; conducting appropriate documentation prior to renovation or demolition; and using compatible styles and maintaining appropriate landscaping in accordance with Fort Benning's Historic District Tree Management Plan. Mitigation measures for cemeteries include fencing, flagging, and avoidance, if possible. If avoidance is not possible, the resources would need to be examined for historic significance and then removed in accordance with federal and state laws and regulations. Consultation with the SHPO, federally-recognized American Indian Tribes, and interested parties to develop measures and implementation of mitigation would be conducted in accordance with Fort Benning's HPC Standard operation procedures (SOPs). With the implementation of mitigation measures as mentioned above, the impacts would be reduced and would not be significant.

7.9 **Mitigation Enforcement and Monitoring.** The Army 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. Fort Benning's Environmental Mitigation Compliance Officers will monitor mitigation measures, 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 Environmental Management Division (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's Environmental Management System (EMS) will ensure continuous improvement to meet environmental goals through policy, planning, implementation, checking and corrective actions, and management review.

8.0 Decision

On behalf of the Department of the Army, I have decided to proceed with the preferred alternative (Alternative A) for the MCOE actions at Fort Benning. Alternative A would meet the purpose and need of the proposed MCOE actions. Adverse impacts under Alternative B would be substantially larger than Alternative A impacts for several environmental resource categories primarily due to the major difference in the amount of land disturbance under this alternative.

As presented in the EIS, there are no substantial 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 impacts substantially fewer acres, thus disturbing fewer water resources and erodible soils (and indirectly producing less fugitive dust that impacts air quality). Biological resources such as vegetation, fish and wildlife, special status species, and UEAs would also be impacted to a lesser degree; and fewer cultural resources would be affected.

Since the draft EIS was announced in the *Federal Register* on December 12, 2008, changes have occurred to preferred Alternative A, primarily in response to the formal consultation process with the U.S. Fish and Wildlife Service. These changes are reflected and evaluated in the final EIS. Among these changes, and pursuant to the Biological Opinion, the Army would mitigate aspects of Alternative A by relocating field training associated with the Scout Leaders Course (Army Reconnaissance Course) off the current Fort Benning boundary to a site yet to be determined. This relocation would take place within 5 years from the start of Scout Leaders training. To achieve this relocation action, there could be a potential need to acquire land.The Army recognizes that the move of the Scout Leaders Course field activities would require compliance with NEPA to evaluate the potential impacts of that action.

In summary, I have considered the results of the analyses presented in the EIS, BA, BO, and supporting studies, and the comments provided during formal comment and review periods. In addition, I evaluated our national defense needs, Fort Benning mission requirements, as well as meeting the purpose and need for the MCOE actions, to guide my decision to select Alternative A for implementation.

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 MCOE actions for the Army to effectively undertake transformation and meet 21st century military challenges. Although the No Action Alternative would be the environmentally preferred alternative, it does not meet the purpose and need of the proposed action. Of the two action alternatives, Alternative A is the environmentally preferred alternative.

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.

Mr. John Nerger
Executive Director, IMCOM

4 August 2009
Date