

**SUMMARY OF SCENARIO ENVIRONMENTAL IMPACTS [TABS FINAL DRAFT]**

**SCENARIO #** 40 **TITLE:** USA-0046 REALIGN BENNING (DRILL SGT SCHOOL TO JACKSON)

**GENERAL DESCRIPTION:** This recommendation, in conjunction with the Realign Fort Leonard Wood (Drill Sergeant School to Fort Jackson) recommendation, consolidates Drill Sergeant's Training from three locations Fort Benning, Fort Jackson, & Fort Leonard Wood to one location, Fort Jackson and facilitates the activation of Brigade Combat Team (light) at Fort Benning.

Proposal Affects the following Army installations:

1. Ft Jackson gains 112 personnel and 58,000 SF MilCon.
2. Ft Benning gains 3230 personnel and construction of 755,118 SF MilCon.

**ANALYST** COL CRABTREE

**LAST UPDATED: 3/9/05**

Env Resource Area	<i>Gaining Installation Assessment</i> Inst Name: <u>Ft Jackson</u>	Analyst Comments (& data source(s) that drive assessment)
Air Quality	<p>Ft Jackson is currently in NonAttainment area for Ozone.</p> <p>Added operations will require New Source Review permitting and Air Conformity Analysis.</p>	<p>#213,214,219 - NonAttainment for O3 (8hr)</p> <p>#211 No permit or major source thresholds projected to be exceeded based on 1% increase at Ft Jackson.</p> <p>#220 Major operating permit ISR2 - No impact to mission.</p>
Cultural/Archeological/Tribal Resources	<p>92 cultural/archeological/historical properties/sites listed with restrictions on training and digging. 2 historical properties listed. 14 Native American tribes assert an interest in archeological sites. A potential impact may occur as a result of increased time delays and negotiated restrictions. Potential impacts may occur, since resources must be evaluated on a case-by-case basis.</p> <p>Cultural / archeological / tribal resources currently restrict operations. Additional operations may impact these resources and result in further restrictions on training or operations.</p>	<p>#230-232 - 92+ arch resource sites, with training/digging restrictions</p> <p>#233 - 99% surveyed;</p> <p>#234 - 14 tribes assert interest; in formal consultations</p> <p>#235 - 2 historic properties listed</p> <p>#236 - No programmatic agreement ISR2 No impact to mission.</p>
Dr ed g- ing	No impact.	#226, 227, 228 – N/A
Land Use Constraints/ Sensitive Resource Areas	No impact.	<p>#30 - Buildable Acres - 18 acres req'd, with 32,000 acres available (based on size of a Small School)</p> <p>#201,254,256 - No constraints.</p> <p>CERL Study – moderate encroachment projected</p>
Mar ine Ma mm als/ Mar ine	No impact.	#248-253 – No restrictions
Noise	No impact	#239 - No noise zone acreage reported off-installation.

Threatened & Endangered Species/Critical Habitat	<p>TES on installation include Red-cockaded Woodpecker, and Smooth Coneflower, with restrictions on land based training and digging of deliberate fighting positions.</p> <p>Additional operations may further impact threatened / endangered species leading to additional restrictions on training or operations..</p>	<p>#259 - TES include Red-cockaded Woodpecker, and Smooth Coneflower; smooth coneflower restricts land based training on &lt;1% of land.</p> <p>#261- BO for Red Cockaded woodpecker indicates no digging of deliberate fighting positions within 200 ft of species. .</p> <p>#260,262-264 - No candidate species/habitat</p> <p>ISR2 - no impact.</p>
Waste Management	No impact.	#269 No RCRA Subpart X Permit - but none needed.
Water Resources	No impact.	<p>#276,278,279,293 - No restrictions</p> <p>#282 - No industrial ww plant</p> <p>#291 – Has 9 potable water production plants on-installation, and 1 off-installation (public owned) plant.</p> <p>#297,822 – 2 domestic ww treatment plants on installation</p> <p>ISR2 - no impacts</p> <p>IREM shows water infr can support 72,756 more people.</p>
Wetlands	No impact.	<p>#251 – survey 05/1996</p> <p>#257 - 7% of range, 10% of installation has wetlands – restrictions reported (no filling permitted)</p>

## SUBJECT: SUMMARY OF SCENARIO ENVIRONMENTAL IMPACTS (CONTINUED); [TABS FINAL DRAFT]

SCENARIO # 40

Env Resource Area	<b>Gaining Installation Assessment</b> Inst Name: <b>Ft Benning</b>	<b>Analyst Comments</b> (& data source(s) that drive assessment)
Air Quality	<p>Impact Expected. Ft. Benning is projected to be in Non-Attainment for PM2.5.</p> <p>Added operations will require New Source Review permitting and Air Conformity Analysis.</p>	<p>#213, #219 - All NAAQS in Attainment currently, but projected to be NonAtt for PM2.5 (state of GA is contesting). #211 Emissions inventory shows permit limits exceeded for VOC, NOx, CO, PM, &amp; Major source threshold limits exceeded for NOx and PM2.5. However, the State of Georgia exempts emissions from prescribed burning activities. 99.4% of CO, 68.2% of Nox, 94% of PM, 92% of all PM 10 and 60.3% of VOC are attributed to prescribed burning activities. Therefore the emissions reported to the State are under permitted thresholds. #220 Has Major Source permit</p>
Cultural/Archeological/Tribal Resources	<p>1226 archeological sites identified, with restrictions on vehicle traffic and digging. 1617 historic properties. 12 Native American tribes have asserted an interest in archeological sites.</p> <p>Potential impact may occur as a result of increased time delays and negotiated restrictions. Also resources must be evaluated on a case-by-case basis, thereby causing increased delays and costs. Cultural / archeological / tribal resources currently restrict operations. Additional operations may impact these resources and result in further restrictions on training or operations.</p>	<p>#230, 231, 232 - 1226 arch sites listed, with restrictions on vehicle traffic and digging within designated sites. #233 - 90% surveyed #234 – 12 tribes asserted interest in burial/sacred sites; in formal consultation #235 - 1617 historic properties listed #236-No Programmatic Agreement ISR2 shows access to sites is impacting mission.</p>
Dr ed g- ing	No impact.	#226-228 –No restr
Land Use Constraints/ Sensitive Resource Areas	No impact.	<p>#30 - Buildable Acres - 214 req'd; &gt;2500 non-training acres available. #256 – 1 Sensitive Resource Area identified but causes no restrictions CERL Study – moderate encroachment projected</p>
Mar ine Ma mm als/ Mar	No impact.	#248, #249, #250, #252, #253 - No restrictions
Noise	<p>9003 acres of Noise Zone 2 and 1785 acres of Noise Zone 3 extends outside installation boundary, which is moderately encroached by development. Increased noise may result in operational restrictions on the installation. Further evaluation required.</p>	#201, #239 - 9003 acres of Noise Zone 2, and 1785 acres of Zone 3 extends outside installation boundary. IENMP imposes ban on firing .50 Cal or larger from 1100-0600 hours

Threatened & Endangered Species/Critical Habitat	<p>5 TES listed (Bald Eagle, Wood Stork, American Alligator, Relict Trillium, and Red-Cockaded Woodpecker), with restrictions to 0.1% of the installation. Bald Eagle restrictions affect airspace for flight operations 1,000 vertical feet and 1,000 horizontal feet from nest site. Ground training is restricted to no training within 1,500 feet of nest sites. These restrictions are implemented during the nesting period (Dec-May). Relict Trillium area restricted to foot traffic only and no digging allowed. Red-Cockaded Woodpecker restricts vehicle use, maneuver and bivouac, weapons firing, pyrotechnics use, and digging within 200 feet of individual red-cockaded woodpecker cavity trees.</p> <p>Additional operations may further impact threatened / endangered species leading to additional restrictions on training or operations.</p>	<p>#201, 259, 261 - 5 TES listed (Bald Eagle, Wood Stork, American Alligator, Relict Trillium, and Red-Cockaded Woodpecker), with restrictions to 0.1% of the installation. Bald Eagle restrictions affect airspace for flight operations 1,000 vertical feet and 1,000 horizontal feet from nest site. Ground training is restricted to no training within 1,500 feet of nest sites. These restrictions are implemented during the nesting period (Dec-May). Relict Trillium area restricted to foot traffic only and no digging allowed. Red-Cockaded Woodpecker restricts vehicle use, maneuver and bivouac, weapons firing, pyrotechnics use, and digging within 200 feet of individual red-cockaded woodpecker cavity trees.</p> <p>#260 - No critical habitat  #262 - BO restrictions impede expansion  #263 - 1 candidate species (Georgia Rockcress) affects 0.005% of range.</p>
Waste Management	No Impact.	#269 No RCRA Subpart X Permit - but none needed.
Water Resources	<p>Installation currently discharges to an impaired waterway, and increased population and training activity may add to pollutant load. Mitigation measures to limit releases may be required to reduce impacts to water quality and achieve US EPA water quality standards.</p> <p>Water quality issues currently restrict operations. Increases in personnel may further restrict operations and / or require implementation of enhanced mitigation measures.</p>	<p>#276- Not over a recharge zone  #278, 293 - No previous restrictions  #279 - installation discharges to 7 impaired waterways, but is not currently a polluter of impaired waterways,  #291 – Has 5 potable water production plants on-installation  #297 – Installation uses 2 On Military Installation plants for sewage treatment  IREM shows water infr can support 17,009 more people – only 3230 added  ISR2 indicates WQM and WWQM issues adversely impact the mission.</p>
Wetlands	No impacts.	<p>#251 - Wetlands survey completed 1995  #257 – Wetlands restrict 9% of range</p>

**SUBJECT: SUMMARY OF SCENARIO ENVIRONMENTAL IMPACTS (CONTINUED); [TABS FINAL DRAFT]**

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***IMPACTS OF COSTS***

Env Resource Area	Gaining Installation Inst Name: <u>Ft Jackson, Ft Benning</u>	Losing Installation Inst Name: <u>N/A</u>
Environmental Restoration*	None.	N/A.
Waste Management	None.	N/A.

<p><b>Environmental Compliance</b></p>	<p><u>Ft Jackson:</u>                      -Air Conformity Analysis - \$25K-\$75K.                      -New Source Review analysis and permitting - \$100K-\$500K.                      - Conduct Tribal govt to govt consultation - \$500 - \$2K per meeting                      - Develop Programmatic Agreement - \$10K                      -Endangered Species Management (includes monitoring) \$20K-\$2M                      -Re-alignment NEPA (EA) - \$100K.</p> <p><u>Ft Benning:</u>                      -Air Conformity Analysis - \$25K-\$75K                      -New Source Review &amp; Permitting -\$100K-\$500K                      -Conduct Tribal govt to govt consultation - \$50 - \$2K per meeting                      -Develop PA -\$10K                      - Evaluation to determine if archeological/tribal site(s) are significant \$15K-\$40K per site.                      -Mitigation of archeological site by data recovery iaw PA - \$25K-\$500K per site depending on complexity                      - Evaluation to determine if historic buildings/structures are significant - \$1000-\$2000 per building depending on size and location.                      - Mitigation of historic buildings/structures by HABS/HAER recordation iaw PA - \$25K-\$500K per site depending on complexity                      - Noise Analysis and Monitoring - \$5K - \$75K                      -Re-alignment NEPA at gaining base - bde-sized realignment - \$400K (EA)                      -Endangered Species Management (includes monitoring) - \$20K-\$2M                      -ESA Consultation (BA Prep) \$10K-\$100K                      -Install Best Mgt Practices to protect impaired waterways and reduce non-point source runoff from training areas and ranges - \$100K - \$3M.</p>	<p>N/A.</p>
<p><b>COBRA Costs:</b></p>	<p><u>Ft Jackson:</u>                      Air Conformity Analysis - \$50K.                      New Source Review Analysis and permitting - \$100K.                      NEPA (EA) - \$100K.</p> <p><u>Ft Benning:</u>                      Air Conformity Analysis - \$50K.                      New Source Review Analysis and permitting - \$100K.                      Noise Analysis and Monitoring- \$20K                      NEPA (EA) - \$400K.</p>	<p>N/A.</p>

## Environmental Impact

### Fort Jackson

This recommendation moves additional personnel to, and causes moderate new construction on Fort Jackson. Drill Sergeant training is predominantly classroom-based, so field training frequency and the amount of land impacted by field training, is not expected to increase significantly. Fort Jackson is located in a Non-attainment area for Ozone (8-hour). Therefore, an Air Conformity determination and New Source Review and permitting effort will be required. Fort Jackson has 92 archeological sites and 2 historic buildings that currently impose restrictions on training and digging. To preserve these resources, additional training restrictions may be imposed and increased construction delays and costs are possible. Fourteen Native American tribes have asserted interest in archeological sites, so consultations with tribes may be necessary if construction impacts these sites. This Installation has 2 Threatened and Endangered species that cause restrictions on land based training on less than one percent of installation land. Construction and added operations may impact these species and result in further training restrictions. No adverse effects to any other environmental resource areas are expected.

### Fort Benning

This recommendation moves a significant number of additional personnel to Fort Benning, causes significant levels of new construction, while also increasing training frequency, noise levels, and amount of land impacted by training. Fort Benning is located in a Non-attainment area for Ozone (8-hour). Therefore, an Air Conformity determination and New Source Review and permitting effort will be required. Fort Benning has 1,226 archeological sites and 1,617 historic buildings that currently restrict vehicle traffic and digging operations. To preserve these resources, training restrictions may be imposed and increased operational delays and costs are possible. Twelve Native American tribes have asserted interest in archeological sites, so consultations with tribes may be necessary if additional operations impact these sites. Fort Benning, which is experiencing moderate encroachment, has 9,003 acres of Noise Zone 2 and 1,785 acres of Noise Zone 3 that extend outside the installation boundary. Installation Environmental Noise Management Plan imposes a ban on firing from .50 Caliber rounds from 1100-0600. Further analysis will be required to determine the extent of new noise impacts. This Installation has 5 Threatened and Endangered species that cause restrictions on flight operations and training (e.g., foot traffic, digging, weapons firing, pyrotechnics use). Added operations may impact these species and result in further training restrictions. This Installation is discharging to 7 impaired waterways and water quality issues are impacting the Installation mission. Therefore, significant mitigation measures to limit releases may be required to reduce impacts to water quality and achieve US EPA water quality standards. No adverse effects to any other environmental resource areas are expected.