



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

June 27, 2011

Fort Benning Public Affairs Office
c/o Monica Manganaro
6460 Way Avenue, Building 2838
Fort Benning, GA 31905

Subject: DEIS Training Land Expansion at Fort Benning, Georgia and Alabama

Dear COL. Thomas D. Macdonald:

Pursuant to Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the Draft Environmental Impact Statement for the proposed action of the Army to acquire additional training land. The EPA is responsible for reviewing and commenting on major federal actions significantly affecting the quality of the human environment.

The purpose of the Proposed Action is to reduce the Army's training land shortfall identified in the Fort Benning Land Use Requirement Study (LURS), allow the Maneuver Center of Excellence (MCoE) to more effectively meet its training mission by relocating the capability to continue the Army Reconnaissance Course (ARC) to newly acquired lands, and allow tenant units to meet their training requirements at their home station. This DEIS considered various alternatives to meet the identified purpose and need for action. The DEIS analyzes the potential environmental impacts of six alternatives which include the No Action Alternative, under which the Army would not acquire additional training land, and the following five acquisition alternatives:

- Alternative 1 – Acquisition of approximately 75,800 acres southeast and south of Fort Benning within Marion, Webster and Stewart counties, GA.
- Alternative 2 – Acquisition of approximately 81,300 acres to the west of Fort Benning within Russell County, AL.
- Alternative 3 (Preferred Alternative) – Acquisition of approximately 82,800 acres to the south of Fort Benning within Stewart County, GA.
- Alternative 4 – Acquisition of approximately 80,900 acres to the south of Fort Benning in Stewart County, GA, and lands to the west of Fort Benning in Russell County, AL.
- Alternative 5 – Acquisition of approximately 81,600 acres to the south of Fort Benning in Stewart County, GA, and lands to the north of Fort Benning in Harris and Talbot counties, GA.

EPA agrees with the Army that as a result of the Proposed Action, significant impacts could occur involving land use (Alternatives 1, 2 and 3) through the conversion of potential prime farmlands and farmlands of statewide importance into military training lands; noise due to the potential for live-fire activities (Alternatives 1 through 5); cultural resources due to the potential

unavoidable disturbances (Alternatives 1 through 5); socioeconomics from disproportionate and adverse effects to minority and low income populations (Alternatives 1 through 5) and from loss of property tax revenues (Alternatives 1, 3, 4 and 5); and traffic and transportation due to permanent roadway closures (Alternatives 1 through 5).

EPA clearly understands the purpose and need for the proposed action; however it is unclear how alternative 3 was selected as the preferred alternative. Alternative 3 is composed of two sites (Stewart West and Stewart Central), and located in Stewart County, Georgia, due south of the current base. Both sites contain 4,593 acres of wetlands and 284 linear miles of streams.

EPA has the following concerns:

1. The FEIS should discuss how the Army selected the tracts of land comprised in the alternatives. The DEIS did not explain how the eight parcels were identified and delineated and if there were other lands that were evaluated but rejected. It is also not clear how the five combinations of the eight tracts were derived.
2. The DEIS presents virtually no rationale as to why alternative 3 (A3) was selected as the Preferred Alternative. While the DEIS states that any alternative could meet the purpose and need, A3 is the largest site, has the most linear miles of streams and the second most acreage of wetlands. We note that Alternative 2 has much less wetland acreage (1,601 acres) and fewer stream miles (254). While the DEIS outlines various activities that will be conducted in the expansion area, there is no estimate of the extent of potential direct, indirect and cumulative impacts to aquatic resources in any alternative. Thus it is not possible to see how the different characteristics of each alternative would best match the design of training facilities/activities and thus avoid/minimize the impacts to the streams and wetlands. So while one site may have more wetlands or streams, it may be better suited for certain training facility designs that would minimize the impacts.
3. EPA recommends an additional table or matrix to illustrate the decision making process. As a minimum, this table should include all alternatives and screening criteria used to rate each alternative. This should help to illustrate how the decision was made to select the Army's Preferred Alternative that meets the screening criteria with the least impacts to the environment.
4. As Army training areas and activities are identified in the future, additional environmental studies would be necessary to assess the environmental impacts.

Wetlands/Floodplains:

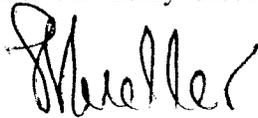
There is essentially no description of an approach for compensatory mitigation for any aquatic impacts on the expansion lands. The Wetlands Regulatory Section has raised numerous issues with the mitigation for aquatic resource impacts on the current facility. In some cases that mitigation has not complied with the 2008 Mitigation Rule.

Overall the DEIS provides insufficient information on which to conduct an analysis under the Clean Water Act Section 404(b)(1) Guidelines. Per the 404(b)(1) Guidelines, the Wetlands and Marine Regulatory Section will need to review all proposed Section 404 permit activities on any expansion land. Also, acquired property improvements may require further NEPA analysis in the future.

The figures for wetland acreage for each alternative in tables 3.7-5 and 3.7-7 do not agree. The figures cited above in paragraph 2 are from table 3.7-5

In summary, EPA has environmental concerns regarding this project, as proposed, and rates this draft EIS as "EC-2" (*i.e.*, environmental concerns with additional information requested in the final EIS). Our primary concern relates to the selection criteria used in alternative selection and environmental impacts from future actions to the wetlands of the acquired lands.

Thank you for the opportunity to review and comment on this draft EIS. We look forward to working with you to adequately address these remaining concerns. If you wish to discuss EPA's comments, please contact me at 404-562-9611 or Mr. Larry Gissentanna of my staff at 404-562-8248 (gissentanna.larry@epa.gov)



Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

Enclosures: EPA Rating System Description

U.S. ENVIRONMENTAL PROTECTION AGENCY ENVIRONMENTAL IMPACT STATEMENT (EIS) RATING SYSTEM CRITERIA

EPA has developed a set of criteria for rating Draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft.

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

- LO (Lack of Objections): The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.
- EC (Environmental Concerns): The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.
- EO (Environmental Objections): The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental objections can include situations:
 1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
 2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
 3. Where there is a violation of an EPA policy declaration;
 4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
 5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.
- EU (Environmentally Unsatisfactory): The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:
 1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
 2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
 3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

- 1 (Adequate): The Draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.
- 2 (Insufficient Information): The Draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the Draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the Final EIS.
- 3 (Inadequate): The Draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the Draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the Draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised Draft EIS.