

DRAFT FINDING OF NO SIGNIFICANT IMPACT (FNSI)

ARKANSAS ARMY NATIONAL GUARD PROPOSED CONSTRUCTION AND OPERATION OF A MULTIPURPOSE MACHINE GUN RANGE AND AERIAL DOOR GUNNERY MANEUVER LIVE FIRE EXERCISES ROBINSON MANEUVER TRAINING CENTER PULASKI AND FAULKNER COUNTIES, ARKANSAS

1. Introduction

The Arkansas Army National Guard (AR ARNG) prepared an Environmental Assessment (EA) to identify and evaluate potential environmental effects from the proposed construction and operation of a Multipurpose Machine Gun (MPMG) Range and implementation of aerial door gunnery maneuver live fire exercises at the approximately 33,000-acre Camp Joseph T. Robinson Maneuver Training Center (RMTC) in Pulaski and Faulkner Counties, Arkansas. This EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code [USC] 4321 et seq.), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR 651 (*Environmental Analysis of Army Actions, Final Rule*, 29 March 2002). As set forth in 10 USC §10501 and Department of Defense (DoD) Directive 5105.77, *National Guard Bureau (NGB)*, the NGB is a joint activity of the DoD and as such must comply with the NEPA.

2. Description of the Proposed Action and Alternatives

Proposed Action. The Proposed Action entails the construction and operation of a five-lane MPMG Range and implementation of aerial door gunnery maneuver training at RMTC. The proposed modified MPMG Range would include five 1,500-meter lanes for small arms training. The MPMG Range would include two primary components: (1) the physical range footprint, consisting of the firing positions, targetry, support structures, and associated facilities; and (2) the Surface Danger Zone (SDZ), the area where projectiles fired on the range would land based on the types of weapons and ammunition used. Aerial door gunnery maneuver training would not include a physical range footprint as only temporary targets in the impact area would be used; however, a Weapons Danger Zone (WDZ), which is similar to an SDZ, but for projectiles fired from aerial vehicles, would be established.

Construction activities would require approximately 223 acres of ground disturbance to accommodate the MPMG Range footprint and the associated small arms range operations and control area. The proposed MPMG Range footprint is located in an undeveloped area where merchantable timber was previously harvested in 2019. Construction activities would also include the addition of lighting, utility extensions, access and maintenance road development, and overflow parking. No land disturbance or construction activities would be required for aerial door gunnery maneuver training because temporary targets would be used in the existing impact area.

The SDZ and WDZ are mathematically-predicted areas where a projectile will impact upon return to earth, and have specific dimensions so all projectile fragments are contained in this area. SDZ is the terminology used for physical ranges, while WDZ is used for live-fire training activities from aircraft. The SDZ and WDZ are not part of the range design, but are one of the determining factors of range/training location and orientation as they must be contained within the controlled boundaries of a training site. The MPMG Range and aerial door gunnery maneuver training would require an approximately 8,636-acre combined danger zones. No land disturbance would occur in the SDZ or WDZ areas.

The purpose of the Proposed Action is to provide the requisite range and training facilities at RMTC for AR ARNG units to train and test Soldiers on the skills necessary to attain target training, weapons, and gunnery qualifications. The Proposed Action is needed to: (1) address shortfalls in required AR ARNG training

facilities and capabilities in the region, (2) ensure attainment and maintenance of a full readiness posture of AR ARNG combat units, and (3) meet mission training requirements as set forth in the Department of the Army Pamphlets 350-38, *Standards in Weapons Training*, and 385-63, *Range Safety*.

Currently, the AR ARNG can only conduct portions of the required training on-site at the RMTC, and must travel to Fort Chaffee Maneuver Training Center (FCMTC) to meet full training requirements. FCMTC is located in the north-western portion of Arkansas, immediately adjacent to the Oklahoma border. As such, AR ARNG units located in other areas of the state must travel great distances, frequently exceeding 180 miles, which is established as the reasonable travel distance limit in TC 3-20.40, *Training and Qualification – Individual Weapons*. The Proposed Action is also needed to ensure the continued and long-term viability of RMTC as a training center capable of providing the land and resources necessary to support the AR ARNG's and other military users' assigned training missions.

Alternatives Considered. NEPA, CEQ regulations, and 32 CFR Part 651 require all reasonable alternatives to be explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered "reasonable" only if it would enable the AR ARNG to accomplish the primary mission of providing land, facilities, and resources at RMTC and to meet the purpose of and need for the Proposed Action. "Unreasonable" alternatives would not meet the AR ARNG's purpose of and need for the Proposed Action.

The AR ARNG considered but dismissed from further analysis the following unreasonable alternatives: (1) use of another training site; (2) construct and operate a standard-size (10 lane) MPMG Range; and (3) use an alternate location of range footprints within RMTC.

The EA examines two alternatives in-depth, the Preferred Action Alternative, which would carry out the Proposed Action; and the No Action Alternative, which would not carry out the Proposed Action. While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, this alternative is carried forward to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required in CEQ Regulations (40 CFR §1502.14).

3. Environmental Analysis

The potential environmental impacts associated with the Proposed Action are fully described in the EA. The EA identifies the environmental resources that could be affected by the Proposed Action, and determines the significance of the impacts, if any, to each of these resources. Based on the EA's analysis, the AR ARNG determined that the known and potential adverse impacts from the Proposed Action would be less than significant on land use and cover, air quality and climate, noise, soils, water resources, biological resources, cultural resources, environmental justice, infrastructure, and hazardous and toxic materials and wastes. The implementation of Best Management Practices (BMPs), necessary permits, construction site approvals, and minimization measures specified in the EA would further avoid or reduce less-than-significant impacts.

4. Mitigation

Under the Preferred Action Alternative, no significant adverse impacts would be anticipated; therefore, no mitigation measures are required to reduce potentially significant adverse impacts.

5. Regulations

The Proposed Action would not violate NEPA, the CEQ Regulations, 32 CFR Part 651, or other Federal, state, or local environmental regulations.

6. Commitment to Implementation

The NGB and the AR ARNG affirm their commitment to implement this EA in accordance with NEPA. Implementation is dependent on funding, and this project will be a Military Construction funded project. The

AR ARNG and the NGB will ensure that adequate funds are provided to achieve the goals and objectives set forth in this EA.

7. Public Review and Comment

The final EA and draft FNSI were made available for public review and comment for 30 days following publication of a public notice in the local newspaper *Arkansas Democrat Gazette*. Copies of the final EA and draft FNSI were available for public review at the at the William F. Laman Public Library - Main Branch, 2801 Orange Street, North Little Rock, Arkansas 72114; or online at https://arkansas.nationalguard.mil/Public-Affairs-Office/Press_Room.

The public may obtain information on the status and progress of the EA, as well as submit written comments on the EA during the 30-day public review period to: Doug Ernst, AR ARNG Environmental Section Deputy Chief, Building 1301 Box 5, Camp J.T. Robinson, North Little Rock, AR 72199-9600; or via email to douglas.j.ernst.nfg@army.mil.

8. Draft Finding of No Significant Impact

After careful review of the EA, I have concluded that implementation of the Proposed Action would not generate significant controversy or have a significant impact on the quality of the human or natural environment. Per 32 CFR Part 651, the Final EA and draft FNSI will be made available for a 30-day public review and comment period. Once any public comments have been addressed and if a determination is made that the Proposed Action will have no significant impact, the FNSI will be signed and the action will be implemented. This analysis fulfills the requirements of NEPA and the CEQ Regulations. An Environmental Impact Statement will not be prepared, and the NGB is issuing this FNSI.

Date

Anthony Hammett
COL, EN
Chief, ARNG G9