

Draft
FINDING OF NO SIGNIFICANT IMPACT (FONSI) AND
FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA)
SOUTHWEST LAND PURCHASE PROPERTY
MOODY AIR FORCE BASE, GEORGIA

Pursuant to provisions of the National Environmental Policy Act (NEPA), 42 United States Code (U.S.C.) 4321 to 4370h; Council on Environmental Quality (CEQ) Regulations, 40 Code of Federal Regulations (CFR) 1500-1508; and 32 CFR Part 989, Environmental Impact Analysis Process, the U.S. Air Force prepared the attached environmental assessment (EA) to address the potential environmental consequences associated with purchasing privately-owned land located immediately adjacent to the southwestern boundary of Moody Air Force Base (AFB) to facilitate multiple projects to allow the removal of three airfield waivers issued by Headquarters Air Combat Command (ACC) for violating airfield obstruction clearance requirements.

Purpose and Need

The purpose of the action is to acquire land adjacent to Moody AFB, Georgia, to facilitate multiple projects that will allow the removal of three airfield waivers issued by Headquarters ACC for violating airfield obstruction clearance requirements. The need for the action is a result of a waiver review conducted by Headquarters ACC that determined that a permanent waiver was not appropriate at Moody AFB for Unified Facilities Criteria (UFC) 3-260-01 *Airfield and Heliport Planning and Design* violations, and temporary waivers were granted by ACC until the airfield obstruction issues are resolved.

Description of Proposed Action and Alternatives

The **Proposed Action** involves the purchase of two parcels of privately-owned land totaling 106.10 acres located immediately adjacent to the southwestern boundary of the base. The proposed land purchase will facilitate multiple projects to allow the removal of three airfield waivers issued by Headquarters ACC for violating airfield obstruction clearance requirements. Activities that would occur include relocation of the installation perimeter fence line and the airfield security fence; realignment of Burma Road; clearing of trees; and continued monitoring of remedial actions.

Alternative 1. Under this alternative, 106.10 acres of privately-owned land located immediately adjacent to the southwestern boundary of the base would be purchased and several projects would be implemented to eliminate existing airfield waivers. This alternative would be initiated if the project is implemented after Environmental Restoration Program (ERP) Site LF-01 is closed (estimated to occur on or before the year 2020). This alternative would minimize impacts to wetlands (approximately 1.75 acres), remove the waivers for the graded portion of the Clear Zone violation, and provide adequate radius for weapons trailers, which are a primary user of the road. This alternative is only a practicable alternative after ERP Site LF-01 is closed. Approximately 1,300 linear feet (LF) of existing perimeter fencing would be removed and 1,400 LF of new fencing would be installed to secure the installation. Approximately 850 LF of existing airfield security fencing would be removed and 1,000 LF of new fencing would be installed to secure the graded portion of the southern Clear Zone. Approximately 3,100 LF of new pavement would be installed to realign Burma Road and the bicycle/jogging path to be outside of the graded portion of the Clear Zone. Approximately 99,000 square feet (SF) of pavement would be installed to realign Burma Road and the bicycle/jogging path. After Burma Road has been realigned, approximately 2,100 LF of the old Burma Road and 1,600 LF of an associated paved bicycle/jogging path that passes through the graded portion of the Clear Zone would be removed. Approximately 63,200 SF of pavement would be removed. Approximately 12 acres of trees would be cleared to ensure Moody AFB airfield clearance criteria are maintained; clearing of trees would involve cutting the trees and leaving the stumps.

Alternative 2. Under this alternative, 106.10 acres of privately-owned land located immediately adjacent to the southwestern boundary of the base would be purchased and several projects would be implemented to eliminate existing airfield waivers. This alternative would be initiated if the project is implemented before ERP Site LF-01 is closed. This alternative would remove the waivers for the graded portion of the Clear Zone violation and provide adequate radius for weapons trailers; however, because the Burma Road realignment would be routed around the active ERP Site, additional wetlands (approximately 6.10 acres) would be impacted. Approximately 1,300 LF of existing perimeter fencing would be removed and 1,500 LF of new fencing would be installed to secure the installation. Approximately 1,600 LF of existing airfield security fencing would be removed and 3,100 LF of new fencing would be installed to secure the graded portion of the southern Clear Zone. Approximately 3,400 LF of new pavement would be installed to realign Burma Road and the bicycle/jogging path to be outside of the graded portion of the Clear Zone and to avoid ERP Site LF-01. Approximately 108,800 SF of pavement would be installed to realign Burma Road and the bicycle/jogging path. After Burma Road has been realigned, approximately 2,100 LF of the old Burma Road and 1,600 LF of an associated paved bicycle/jogging path that passes through the graded portion of the Clear Zone would be removed. Approximately 63,200 SF of pavement would be removed. Approximately 20 acres of trees would be cleared to ensure Moody AFB airfield clearance criteria are maintained; clearing of trees would involve cutting the trees and leaving the stumps. Tree removal activities would be conducted with care (i.e., use of directional tree cutting) so that falling trees do not come in contact with remediation infrastructure.

Under the **No-Action Alternative** the Air Force would not purchase the property and would continue to operate in accordance with temporary airfield waivers.

Summary of Environmental Impacts

The analyses of the affected environment and environmental consequences of implementing proposed activities to eliminate airfield waivers presented in the EA concluded that construction activities will occur within a designated wetland area; therefore, impacts to wetlands will occur regardless of the alternative action. Because wetlands are present within the project area, there is no practicable alternative to implementing the road realignment away from wetlands. This FONSI includes a FONPA because there is no practicable alternative to avoid these impacts.

Due to the presence of wetlands at the project site, work will require permitting under Section 404 of the Clean Water Act (CWA). Measures identified as part of the Section 404 permit will be implemented to minimize impacts to jurisdictional waters and purchase of mitigation credits will occur to offset the loss of wetlands.

Management practices required by the National Pollutant Discharge Elimination System (NPDES) General Permit and Georgia NPDES and Lowndes County Land Disturbance Permit, and associated Stormwater Pollution Prevention Plan (SWPPP) will be implemented during ground-disturbing activities. The NPDES General Permit, together with the required SWPPP, outlines construction site management practices designed to protect the quality of the surface water, ground water, and natural environment through which they flow. Therefore, no significant impacts to geology and soils or water resources are anticipated.

ERP site LF-01 will be closed to residential standards without Land Use Controls. If ERP Site LF-01 is closed prior to initiating construction activities, any remediation infrastructure within the project area would be removed. If ERP Site LF-01 is still active, realignment of Burma Road would avoid contact with remediation infrastructure. Additionally, the Burma Road realignment would not involve excavation to the depth of impacted groundwater in the area; therefore, no significant impact to ERP Site LF-01 would occur.

Construction activities will result in short-term air quality impacts. However, emissions associated with construction activities will not hinder maintenance of the National Ambient Air Quality Standards.

Loss of approximately 12 acres of hardwood/pine woodland and approximately 1 acre of maintained open grass habitat would not result in a significant impact given the wide expanse of these habitats on the southern portion of Moody AFB. Any areas of temporary disturbance that would not be paved or landscaped would be revegetated with the approved seed mix provided in the Moody AFB Integrated Natural Resources Management Plan. Therefore, no significant impacts to vegetation are anticipated.

Wildlife species temporarily displaced during construction activities will likely return to the area and establish population levels similar to pre-construction levels; therefore, potential effects of construction activities on wildlife will not be significant.

The Air Force has completed informal consultation procedures, as advised under Section 7 of the federal Endangered Species Act, to address potential impacts to federally protected species that may occur at the project site. The U.S. Fish and Wildlife Service, in response to the Air Force Section 7 consultation, concurred with the determination that the proposed activity may affect but is not likely to adversely affect listed species. Although the federally threatened and state threatened eastern indigo snake (*Drymarchon couperi*) and the federal candidate and state threatened gopher tortoise (*Gopherus polyphemus*) are present on Moody AFB, these species have not been identified within the project area. Surveys for threatened and endangered species with the potential to occur, based on habitat requirements, were conducted in support of this EA and identified no listed species. No impacts to resident federally listed threatened and endangered species are anticipated because no listed species have been identified on the property.

Incidental takes of migratory birds may occur if construction activities coincide with the nesting season. The Air Force will make every effort to minimize potential effects; however, the incidental take of migratory birds is exempt from permitting requirements and would not be considered a significant impact on migratory bird populations because of the small area of disturbance within the regional Grand Bay-Banks Lake watershed habitat.

Jurisdictional wetlands (1.75 acres) have been identified within the project area for the Burma Road realignment. To the maximum extent possible, impacts to wetlands will be avoided. The 1.75 acres of wetland identified along the path of the realigned road are in an area that cannot be avoided. Measures identified as part of the Section 404 permit will be implemented in order to reduce potential impacts to jurisdictional waters and wetlands, including purchase of mitigation credits to offset the loss of wetlands. Therefore, no significant impacts to sensitive habitats are anticipated.

The Air Force has completed consultation procedures, as advised, under 54 U.S.C 306108 (commonly known as Section 106 of the National Historic Preservation Act), to address potential impacts to historic buildings and properties that may occur at the project site. No historic buildings, historic structures, or archaeological resources, eligible for listing on the National Register of Historic Places have been identified in the project area. The Georgia State Historic Preservation Office, in response to the Air Force, concurred with the determination that no historic properties would be affected by this Proposed Action. Based on consultation with representatives of Native American groups, no traditional cultural resources, sacred sites, or traditional use areas have been identified in the vicinity of the project area.

Cumulative Impacts

The EA considered cumulative impacts that could result from the incremental impact of proposed construction activities when added to other past, present, or reasonably foreseeable future actions. The Air Force intends to install a natural gas line within the same utility alignment as the existing electrical and sewer alignment that runs through the graded portion of the Clear Zone (along the existing Burma Road). Because the location of the project is remote, no off-base developments have been identified in the vicinity of the project that could contribute to cumulative impacts. Construction activities associated with installing a new natural gas line would generally be expected to result in some increased noise, increased air emissions, potential for erosion, and generation of small amounts of hazardous materials and wastes. Construction activities generally would be expected to result in short-term job creation and materials

procurement. These types of short-term, construction-related effects would occur regardless of project location and are not constraints to development. In the absence of unique constraints, the potential for environmental effects of a construction project smaller in scope than those analyzed as the Proposed Action in this EA would be expected to result in less than significant environmental effects.

Mitigations

The EA concluded that no significant impacts to the environment will result from proposed construction activities with implementation of measures identified as part of the NPDES General Permit, Georgia NPDES and Lowndes County Land Disturbance Permit, and Section 404 permit. Avoidance and minimization measures will be implemented, as well as measures identified as part of the CWA Section 404 permit for disturbance within wetlands, including purchase of mitigation credits to offset the loss of wetlands.

Conclusion

Based on the provisions set forth in the Proposed Action, proposed construction activities to eliminate temporary airfield waivers were found to comply with the criteria or standards of environmental quality and coordinated with the appropriate federal, state, and local agencies. The attached EA and a draft of this FONSI/FONPA were made available to the public on **Date, 2016** for a 30-day review period.

Findings

Finding of No Practicable Alternative. Due to the presence of wetlands at the project site, work will require permitting under Section 404 of the CWA. Additionally, a NPDES General Permit and Georgia NPDES and Lowndes County Land Disturbance Permit will also be obtained. Measures identified as part of these permits will be implemented to minimize impacts to jurisdictional waters and wetlands. Because wetlands are present, there is no practicable alternative to implementing road realignment activities outside of the wetlands. Pursuant to Executive Order 11990 and the authority delegated by Secretary of the Air Force Order 791.11, and taking the above information into account, I find that there is no practicable alternative to this action and that the proposed actions include all practicable measures to minimize harm to the environment. This decision has been made after taking into account all submitted information, and considering a full range of practical alternatives that meet project requirements and are within the legal authority of the U.S. Air Force.

Finding of No Significant Impact. After review of the EA prepared in accordance with the requirements of NEPA; CEQ regulations; and 32 CFR Part 989, *Environmental Impact Analysis Process*, and which is hereby incorporated by reference, I have determined that the proposed activities to eliminate airfield waivers will not have a significant impact on the quality of the human or natural environment. Accordingly, an Environmental Impact Statement will not be prepared. This decision has been made after taking into account all submitted information, and considering a full range of practical alternatives that meet project requirements and are within the legal authority of the U.S. Air Force. The signing of this FONSI/FONPA completes the environmental impact analysis process.

JENNIFER L. KILBOURN, Colonel, USAF
Chief, Civil Engineer Division (ACC/A4C)

Date

Attachment:
Environmental Assessment for Southwest Land Purchase Property