FINDING OF NO SIGNIFICANT IMPACT ENVIRONMENTAL ASSESSMENT FOR 820TH BASE DEFENSE GROUP DEVELOPMENT PLAN AT MOODY AIR FORCE BASE, GEORGIA

Pursuant to provisions of the National Environmental Policy Act (NEPA), 42 United States Code (USC) 4321 to 4370, implementing Council on Environmental Quality (CEQ) Regulations, Title 40 Code of Federal Regulations (CFR) §1500-1508, and 32 CFR Part 989, Environmental Impact Analysis Process, the U.S. Air Force (Air Force) assessed the potential environmental consequences associated with the development or redevelopment of several facilities for the creation of an 820 Base Defense Group (820 BDG) campus at Moody Air Force Base (AFB), Georgia. The proposed developments would occur within approximately 36 acres of Moody AFB. Of the 36 acres, 20% is cleared undeveloped area, with the remaining 80% consisting of forested area.

Purpose and Need (EA §§ 1.2, pages 1-3 to 1-4)

The purpose of the Proposed Action is to consolidate the mission activities of the 820 BDG into a single campus at Moody AFB in order to improve the man-hour efficiency, provide updated facilities for enhanced communications between squadrons, and support specialized squadron operations for the 820 BDG. The Environmental Assessment (EA), incorporated by reference into this finding, analyzes the potential environmental consequences of activities associated with the development of the new campus and provides environmental protection measures to avoid or reduce adverse environmental impacts. The EA considers all potential impacts of the Proposed Action and the No Action Alternative. The EA also considers cumulative environmental impacts with other projects at Moody AFB.

DESCRIPTION OF THE PROPOSED ACTION AND ALTERNTATIVES

The proposed action is to develop or redevelop several facilities for the creation of an 820 BDG campus at Moody AFB. Construction would involve selective clearing and grading for new roads, parking, and building foundations. Facilities construction projects include the development of a running track and fitness area, grenade range, and stormwater management system, as well as four squadron buildings, one armory, four warehouses, and associated subsurface infrastructure. Updates to the existing campus would also involve the demolition and renovation of several facilities currently used by the 820 BDG. Of the 36 acres, 20% is cleared undeveloped area, with the remaining 80% consisting of forested area.

Alternative 1 – Develop All Proposed Facilities and Infrastructure

Construction (EA §§ 2.1.1, page 2-1 to 2-2)

Construction of new facilities account for a majority of the proposed campus area. The proposed facilities include nine new Pre-Engineered Metal Building (PEMB) system which would be utilized for each building, which ensures short construction timelines and cost-efficiency across all facilities. Four 14,617 square foot (sf) squadron buildings would be installed to house the daily operations of the 820 BDG squadrons. One 6,751 sf armory would be constructed to alleviate the insufficient storage, lighting, and security issues in the existing Building 932 armory. As well as the construction of four PEMB warehouses

Area Development (EA §§ 2.1.1, page 2-2 to 2-3)

The area of development would utilize approximately 36 acres, mostly within the boundaries of the currently developed areas. Of the 36 acres, 20% is cleared undeveloped area, with the remaining 80% consisting of forested area. The development would include clearing and grading for new roads, parking, and infrastructure, as well as grading and fill for building pads for the construction of new buildings. Proposed building pads would be raised as to avoid potential flooding from wetland areas during storm events.

Demolition (EA §§ 2.1.1, page 2-3)

The campus development area would involve the demolition, renovation, and construction of several facilities currently used by the 820 BDG. Buildings 1531, 1532, and 1500 are scheduled for demolition. These buildings currently occupy the proposed footprint for the proposed medical storage warehouse, supply warehouse, and supply warehouse access road. Buildings 1530 and 1505/1506 are currently adequate for use by the 820 BDG but are considered for renovation to better meet mission requirements.

Alternative 2 – Minimum Development of Proposed Facilities

The proposed action under Alternative 2 would not develop all facilities proposed in Alternative 1. The air shop warehouse would remain in Building 721. Buildings 1505, 1506, and 1530 would not be renovated as proposed. Buildings 1531, 1532, and 1500 would not be demolished as proposed. Development of all other facilities would occur as proposed in Alternative 1.

No-Action Alternative (EA §§ 2.4.3 page 2-8)

Under the No-Action Alternative, the Air Force would not develop any of the proposed facilities. No new construction or remodeling would occur, and facilities scheduled for demolition would remain in place. The 820 BDG would continue to use repurposed facilities scattered throughout the base. Facility requirements would be met, but man-hour efficiency would remain hindered due to communication and coordination issues. As a result, the No Action Alternative would not meet the purpose and need of the Proposed Action.

Alternatives Considered but Not Carried Forward for Detailed Analysis

Site Developments East of Current Campus (EA §§ 2.5.1 page 2-8)

Under this proposed action, the 820 BDG campus would be developed east of the current BDG facilities. Construction in this location would involve minimum tree removal and preserve the current grenade range. Development under this proposed action would include all proposed facilities and infrastructure. The campus developments would be sited on several acres of existing training area. Therefore, this alternative did not meet selection standards for the proposed action and was disqualified from further analysis.

ENVIRONMENTAL CONSEQUENCES

The Air Force has concluded that no significant adverse effects would result to the following resources as a result of the Proposed Action: air quality, greenhouse gases, biological resources, cultural resources, geology and earth resources, land use and coastal zone resources, noise, public health and safety, transportation, and water resources. No significant adverse cumulative impacts would result from activities associated with the Proposed Action when considered with

past, present, or reasonably foreseeable future projects at Moody AFB. In addition, the EA concluded that the Proposed Action would not affect environmental justice, socioeconomics, public services and utilities, and recreation opportunities.

Land Use (EA §§ 4.2, pages 4-1 to 4-2)

Alternative 1:

A majority of the proposed development area is located in an area of maintenance and industrial use. The proposed developments would have a minor change to the existing land use for the potentially affected areas. There would be no adverse impacts to land use designations from this alternative. The current 14.7-acre area designated for Aircraft Operations and Maintenance consists of undeveloped pine forest, which neither adds nor detracts from land use properties.

Alternative 2:

Impacts due to the proposed developments under Alternative 2 would be the same as those described in Alternative 1.

No action Alternative:

There would be no land use impacts beyond the scope of normal conditions and influences within the land use Region of Influence (ROI). The Proposed Action would not be implemented, and the existing land use designations at Moody AFB would remain unchanged.

Noise (EA §§ 4.3, pages 4-2 to 4-3)

Alternative 1:

A temporary increase in noise levels associated with haul truck operations (i.e., removing debris and/or bringing in fill) would occur along Georgia State Route 125 where residences are within 50-feet of the roadway. The frequency with which residences experience these noise levels would increase through implementation of Alternative 1. While the frequency of increased noise would occur, haul truck operations would be short-term and only last for the duration of construction; therefore, impacts would not be significant. Long-term operations associated with the Alternative 1 would not result in an increase in noise levels above existing conditions. Further, aircraft operations are the dominate noise source within the area and would continue to be under this alternative. Therefore, impacts associated with long-term operations of the proposed 820 BDG campus would not be significant.

Alternative 2:

Implementation of Alternative 2 would result in partial development of the 820 BDG campus with fewer facilities than those outlined in Alternative 1. Construction noise levels would be reduced by approximately 1 decibel (dB). Demolition and haul truck noise levels would remain as described for Alternative 1. Operational noise levels would also remain as described for Alternative 1. Thus, noise impacts through implementation under Alternative 2 would not be significant.

No action Alternative:

Under the No Action Alternative, the proposed 820 BDG campus development plan would not be implemented and there would be no increase in proposed development or operational noise levels

when compared to existing conditions. Therefore, there would be no noise impacts resulting from selection of the No Action Alternative.

Air Quality (EA §§ 4.4, pages 4-4 to 4-7)

Alternative 1:

The estimated annual net emissions associated with implementation of Alternative 1 are less than the insignificance indicators, indicating no significant impact to air quality. Therefore, the action will not cause or contribute to an exceedance on one or more National Ambient Air Quality Standards (NAAQSs). If all the development, demolition, and construction activities were to occur during the same calendar year, the estimated annual net emissions associated with implementation of Alternative 1 would remain less than the insignificance indicators.

Alternative 2:

The proposed action for Alternative 2 is identical to that for Alternative 1 except that Building 1500, would not be demolished, no remodeling of existing buildings would be completed, and one of the new buildings would not be constructed. The estimated annual net emissions associated with implementation of Alternative 2 are less than the insignificance indicators, indicating no significant impact to air quality. Therefore, the action will not cause or contribute to an exceedance on one or more NAAQSs. Like that of Alternative 1, if all the development, demolition, and construction activities were to occur during the same calendar year, the estimated annual net emissions associated with implementation of Alternative 2 would remain less than the insignificance indicators.

No action Alternative:

Under the No-Action Alternative, air quality within the project area would remain unchanged because the proposed action would not be implemented.

Water Resources (EA §§ 4.5, pages 4-8 to 4-9)

Alternative 1:

The Proposed Action would not result in direct impacts to surface waters and no significant impacts to groundwater resources. Potential indirect impacts to surface waters from proposed construction activities could result in additional sediment loads being transported to surface waters in the vicinity of proposed construction. The implementation of best management practices (BMPs) would minimize indirect impacts, and no significant adverse impacts to surface waters and groundwater resources would be anticipated.

Alternative 2:

Direct impacts to surface water under Alternative 2 would be only minimally reduced from impacts. Impacts to groundwater under Alternative 2 would be only minimally reduced from impacts described under Alternative 1. The required stormwater impact mitigation measures would be developed as described in Alternative 1. Construction procedures and compliance with state and federal requirements would be unchanged from Alternative 1. Thus, impacts through implementation under Alternative 2 would not be significant.

No action Alternative:

Implementation of the no action alternatives would have no interaction with surface waters and groundwater resources, therefore, no adverse impacts to surface waters and groundwater resources. Existing surface water and groundwater resources would be maintained in their current state, and no special mitigation measures would be required.

Hazardous Materials/Waste (EA §§ 4.6, pages 4-10 to 4-16)

<u>Alternative 1:</u>

Proposed developments under Alternative 1 would result in negligible short-term and long-term direct impacts to solid waste generation and hazardous materials/waste, and short-term negligible impacts to toxic materials storage/handling. Impacts would mainly be a result of increases of waste generated during construction and renovation activities, with some negligible long-term impacts from additional solid waste/hazardous materials. Thus, no significant environmental impacts from implementation of the proposed actions/alternatives are anticipated.

<u>Alternative 2:</u>

Under Alternative 2, there would be no deviations from the hazardous materials or waste management procedures. Impacts from hazardous materials or waste would be similar to impacts described under Alternative 1. There would be a loss in beneficial impacts from the removal of existing asbestos/lead based paint seen in Alternative 1, but no significant adverse impacts would be seen under this alternative. Thus, potential exposure to soil and groundwater within the LF-04 boundary would be reduced in comparison Alternative 1. Additionally, Alternative 2 would generate solid wastes in lower quantities than seen in Alternative 1. Thus, the overall impacts under Alternative 2 would be similar to those seen under Alternative 1.

No action Alternative:

Under the No Action Alternative, the Proposed Action as described in Alternatives 1 and 2 would not be implemented. Baseline conditions for hazardous materials, hazardous wastes, asbestos and lead based paint, Environmental Restoration Program sites, and solid wastes, would remain unchanged. Therefore, no significant impacts would occur under the No Action Alternative.

Infrastructure (EA §§ 4.7, pages 4-16 to 4-17)

Alternative 1:

The Proposed Action under Alternative 1 would require new utility lines for water, sanitary sewer, electrical, natural gas, and communications. New utilities would connect to existing tie-in points wherever possible. Where surface disturbance to install new utility lines would not be required, the existing utility infrastructure would be maintained. Therefore, no long-term or significant impacts on utility and transportation infrastructure are anticipated.

Alternative 2:

Under Alternative 2 utility usage would be similar to impacts described under Alternative 1, with transportation impacts only minimally reduced from impacts described under Alternative 1. As a result, no long-term or significant impacts on utility and transportation infrastructure are anticipated.

No action Alternative:

The No Action Alternative would not result in any additional utility or transportation impacts beyond the scope of normal conditions and influences within the ROI.

Biological/Natural Resources (EA §§ 4.8, pages 4-17 to 4-20)

<u>Alternative 1:</u>

The Proposed Action under Alternative 1 would require work within approximately 4.7 acres of developed, improved, or maintained areas. Therefore, impacts to vegetation and the associated wildlife resulting from parts of the Proposed Action located within developed or maintained areas are generally considered minor. The remaining approximately 15.7 acres of the proposed development area would affect forested and pine plantation habitat and, therefore, would have a greater potential to impact biological resources. While any habitat loss could adversely affect individuals, the amount of impacted forest habitat is relatively small compared with similar habitat available in the vicinity, and several of the affected sites occur in areas near current human activity. Overall, population-level effects to any species are not expected. Thus, no impacts are anticipated to wildlife or endangered, threatened, and sensitive species under Alternative 1.

Alternative 2:

Impacts to biological and natural resources under Alternative 2 would be only minimally reduced as those described in Alternative 1. As most of these facilities would have been constructed in developed areas, no significant differences from impacts described for Alternative 1 would be expected.

No action Alternative:

Under the No Action Alternative, there would be no interaction with biological resources and, therefore, no adverse impacts to vegetation or wildlife. Existing habitats and wildlife species distribution would be maintained in their current states, and no special mitigation measures would be required.

Cultural Resources (EA §§ 4.9, pages 4-20 to 4-21)

<u>Alternative 1:</u>

The area of the Proposed Action has been surveyed for archaeological and structural resources and does not contain any archaeological sites, historic structures, historic districts, cemeteries, sacred sites, TCPs, or other resources identified as eligible for listing on the Natural Heritage Program. The prehistoric isolated find is considered not eligible for listing in the Natural Heritage Program and, as such, planned renovation, demolition, and construction activities would not result in adverse effects to cultural resources. Proposed Action would result in a finding of no adverse effect to cultural resources regarding eligible resources under Section 106 of the NHPA.

Alternative 2:

The developments under Alternative 2 would not intersect with identified Natural Heritage Program-eligible resources, therefore no significant impacts to cultural resources would not be anticipated under Alternative 2.

No action Alternative:

Under the No Action Alternative, the Proposed Action would not be implemented and, as a result, impacts to cultural resources would not be anticipated.

Earth Resources (EA §§ 4.10, pages 4-21 to 4-22)

<u>Alternative 1:</u>

Under Alternative 1, most of the activity would occur on Stilson loamy sand soils. A small amount of new paved areas along the western side of the development boundary would occur on Tifton-Urban land soils. With the utilization of flood control and proper drainage measures, there are no major limitations that would preclude these soil types from development. Significant topographic changes due to limited grading for project facilities and infrastructure are not expected. Ground disturbance due to grading, road construction, and facility construction activities could result in soil erosion within the project area. However, the use of permit required BMPs would reduce any potential impacts from erosion during these activities. Thus, the Air Force has identified no significant adverse impacts under the Proposed Action.

Alternative 2:

The development footprint under Alternative 2 would be slightly smaller than that of Alternative 1. Therefore, impacts to geology, soil resources, and topography from proposed activities would be decreased in comparison Alternative 1.

No action Alternative:

Under the No Action Alternative, the Proposed Action would not be implemented and, as a result, would not result in any additional impacts to earth resources within the proposed development area.

PREFERRED ALTERNATIVE

The Preferred Alternative is to implement the Proposed Action.

FINDING OF NO SIGNIFICANT IMPACT

Based on my review of the facts and analyses contained in the attached EA, conducted under the provisions of NEPA, CEQ Regulations, and 32 CFR Part 989, I conclude that the Preferred Alternative (the Proposed Action) cumulatively with other projects at Moody AFB would not result in significant environmental impacts. Accordingly, an Environmental Impact Statement is not required. The signing of this Finding of No Significant Impact completes the environmental impact analysis process.

Date

RUSSELL P. COOK, Colonel, USAF Commander, 23d Wing

Attachment:

1. Draft Environmental Assessment for 820th Base Defense Group Development Plan, Moody Air Force Base, Georgia