

**FINAL  
FINDING OF NO SIGNIFICANT IMPACT  
ENVIRONMENTAL ASSESSMENT FOR DEVELOPMENT OF ADDITIONAL HLZS  
MOODY AIR FORCE BASE, GEORGIA**

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Pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended, the President's Council on Environmental Quality (CEQ) Regulations Implementing NEPA (Title 40 Code of Federal Regulations [CFR] Parts 1500–1508), with the January 9, 2023, version of CEQ regulations being used, the *National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change* (40 CFR Parts 1500–1508), 88 Federal Register (FR) 1196; and the Air Force NEPA regulations at 32 CFR Part 989, Environmental Impact Analysis Process (EIAP) which implements NEPA and CEQ regulations, the United States Department of the Air Force (DAF) assessed the potential environmental consequences associated with the establishment of three proposed off-base helicopter landing zones (HLZs) located on private parcels in Brooks and Lowndes counties in Georgia. The action would support the 347th Rescue Group's (347 RQG) personnel recovery (PR) training. Activities would involve helicopter landings, ground troop training, and flyovers by helicopters. The proposed land areas for the HLZs are privately owned and would be utilized by the DAF under lease agreements with the respective owners. The DAF is aware of the November 12, 2024, decision in *Marin Audubon Society v. Federal 19 Aviation Administration*, No. 23-1067 (D.C. Cir. November 12, 2024). To the extent that a court may conclude that the CEQ regulations implementing NEPA are not judicially enforceable or 21 binding on this agency action, the DAF has nonetheless elected to follow those regulations at 40 22 CFR Parts 1500–1508, in addition to the DAF's procedures and regulations implementing NEPA 23 at 32 CFR 989, to meet the agency's obligations under NEPA, 42 U.S.C §§ 4321 et seq.

The purpose of the Proposed Action is to address scheduling conflicts and increase range space by leasing land for the development of three HLZs within Moody Air Force Base (AFB) airspace. The Proposed Action is needed to alleviate recurring scheduling conflicts and provide more realistic, and varied, training areas for 347 RQG and 23d Wing aircraft. The limited number of current HLZ training areas leads to deficits in training proficiency and currency, which drives up the man-hour costs when distant alternate training areas are required.

The Environmental Assessment (EA), incorporated by reference into this finding, analyzes the potential environmental consequences of activities associated with establishment of the new HLZs, 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.

**PUBLIC AND TRIBAL REVIEW AND COMMENT**

The NEPA process is designed to involve the public in the federal decision-making process. Formal notification and opportunities for public participation were provided during the preparation of this EA. The DAF also conducted formal and informal coordination and consultation with government agencies and planners.

The Draft EA and the Draft Finding of No Significant Impact (FONSI) were provided to federal state, and local officials, and federally-recognized American Indian Tribes, as identified in Appendix A of the EA. The Draft EA and the Draft FONSI were made available for public review during 30-day comment periods at the Willis L. Miller Library in Valdosta, Georgia, and the Brooks County Public Library in Quitman, Georgia. All substantial and relevant

## DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action is to lease three parcels of land for the development of HLZs near Moody AFB. The DAF intends to use these parcels primarily for daily HH-60 helicopter PR and aircrew training. Table 1 provides the details of each property. Each HLZ is privately owned and would be leased by the DAF from the owner.

**Table 1: Proposed HLZ Details**

HLZ Name	County	Size (acres)	Location (Latitude / Longitude)	Parcel Number	Current Primary Land Use
HLZ-1	Brooks	2.3	30°56'1.05"N, 83°27'18.5"W	119 0006	Undeveloped
HLZ-2	Lowndes	2.0	30°48'45.7"N, 83°26'32.5"W	0016 001	Undeveloped
HLZ-3	Lowndes	2.5	30°48'39.5"N, 83°26'06.8"W	0016 001	Undeveloped

The 347 RQG would utilize these HLZs for PR training activities. Routing to a particular HLZ is mission-dependent and variable from one mission to the next. Typical PR training missions include day-to-day training and more elaborate monthly events such as opposing forces training.

### *Day-to-Day Training:*

Day-to-day training involves typical flight training operations associated with tactical and remote training and fulfills the basic PR training requirements.

### *Helicopter Operations:*

There would be between two and six sorties per week at specific HLZs based on existing weather and mission needs. There are two HH-60s per sortie; sometimes, the craft would split up, each going to different HLZs to practice. Night operations make up about 50 percent of total sorties, with approximately 20 percent occurring after 10:00 PM. Training is not typically conducted after midnight because the Moody AFB tower closes at 1:00 AM, and the aircraft need time to return to base. There is typically no flying on weekends or holidays.

### *Opposing Forces Training:*

Training activities with simulated opposing forces would include two ground vehicles and approximately ten personnel at each HLZ. Personnel set up perimeters around the HLZ as “opposing forces” while one or two personnel act as “survivors”. To provide more realistic training, personnel utilize training munitions, including rifle and carbine rounds, smoke cartridges, chemical light sticks, and ground burst simulators to create a realistic combat experience. All remnants (casings, trash, etc.) are collected at the end of the training session. No rounds are fired from aircraft because shell casings cannot be collected effectively.

Training activities may also include towable, or inflatable, full-sized mock-ups of threats, as well as portable low-power radar emitters, infrared/ultraviolet threat emitters, eye-safe laser spotting, and other visual threat representation equipment. For realism and other simulated operational requirements, the threat setup areas would generally be on or within one mile of the exercise area on the side of roads, rights of way, or other approved areas.

## **NO ACTION ALTERNATIVE**

Under the No-Action Alternative, the DAF would not enter into agreements with the property owners to lease the proposed parcels. The DAF would continue to experience scheduling conflicts and lack of space in current HLZ areas. Training proficiency and currency would continue to be lost, increasing man-hour costs over time. As a result, the No Action Alternative would not meet the purpose and need of the Proposed Action.

## **SUMMARY OF FINDINGS**

The DAF has concluded that the Proposed Action would have no significant adverse effects on the following resources: Noise, Air Quality, Water Resources, Safety and Occupational Health, Biological and Natural Resources, Socioeconomics, and Environmental Justice. 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.

Under the Proposed Action, there would be no ground disturbance or construction activities, only aircraft operations and noninvasive ground training. When implementing the Proposed Action, the DAF would implement the special considerations identified in Section 2.2 of the EA, which would serve to minimize potential impacts. Such considerations include the avoidance of wood stork rookeries and bald eagle nests, landowner/resident coordination and notification, and avoiding residences by one lateral mile to minimize safety and noise impacts. The main impact driver for most resource areas is noise from aircraft operations and munitions use. Special considerations identified in Section 2.2 as part of the Proposed Action would minimize noise impacts to an insignificant level and, therefore, minimize impacts on land use, socioeconomics, and biological resources. Based on the scope of the Proposed Action and accounting for the special considerations identified in Section 2.2, issues with minimal or no impacts were identified through a preliminary screening process. The following issues were not carried forward for detailed analyses in the EA: Hazardous Materials/Waste, Cultural Resources (the DAF consulted with the Georgia State Historic Preservation Office), Earth Resources, Utilities, Airspace, and Land Use. The rationale for dismissal of these resource areas is provided in Section 1.5.1 of the EA.

**Noise** – Noise is the largest impact driver associated with the Proposed Action. Overall, training noise associated with the proposed HLZs would be expected to annoy certain nearby residents. However, no impacts other than annoyance would be expected to occur, and nearby residences would be notified prior to scheduling opposing force training activities. No large quantities of land would experience noise greater than 65 decibels (dB) Day-Night Level (DNL), nor would any residences or noise-sensitive areas be exposed to greater than 75 dB DNL or at risk of hearing damage. Therefore, no significant noise impacts have been identified.

**Air Quality** – Air pollutant emissions, including carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), particulate matter less than or equal to 10 micrometers (PM<sub>10</sub>), particulate matter less than or equal to 2.5 micrometers (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), volatile organic carbons (VOCs), and carbon dioxide (CO<sub>2</sub>) would be associated with HH-60 aircraft operations. Occasional training would include two ground vehicles and the use of munitions by ground forces. The ground vehicles would travel between Moody AFB and the HLZs. None of the estimated annual net

emissions associated with this action are above the insignificance indicators, indicating no significant impact on air quality. Therefore, the action would not cause or contribute to an exceedance of one or more National Ambient Air Quality Standards. Greenhouse gases would be released through the operation of helicopters and vehicles. However, the quantity would be trivial relative to the GHG emissions projected at the state and U.S. level. Therefore, only negligible, long-term impacts from greenhouse gases are anticipated.

**Water Resources** – Potential impacts on water resources are based on water availability, quality, and use. No surface waters are present at the properties; however, waterways and wetlands can be found near the HLZs. Personnel and vehicles would avoid adjacent wetlands or waterways during proposed training activities. As a result, the DAF has not identified any potential for direct or indirect impacts on water resources resulting from the Proposed Action. Potential impacts related to flood hazards can be significant if such actions are proposed in areas with high probabilities of flooding; however, impacts can be mitigated through the use of design features to minimize the effects of flooding. The entirety of HLZ-1 is located within a designated 100-year floodplain. However, the proposed action does not require ground modifications or surface construction. Therefore, no impacts to floodplains or hydrology are expected. An impact to wetlands would be significant if it reduced wetland function and/or required Clean Water Act (CWA § 404) permitting.

**Safety and Occupational Health** – There are inherent safety risks associated with the use of explosives, mid-air aircraft or bird collisions, and ground transportation. Hazard mitigation procedures include prohibiting the use of pyrotechnics during high-risk fire days (i.e., extremely dry conditions or in days with high winds), establishing and maintaining positive two-way communication between pilots and personnel on the ground prior to any airdrops, and practicing safe driving habits in accordance with DAF Instruction 91-207, *The Traffic Safety Program*.

**Biological/Natural Resources** – Wildlife could be startled by training munitions, aircraft operations, and overflights. Startle effects would, in most cases, be expected to be temporary, and individuals would resume normal behaviors after training events were completed. Wildlife would likely habituate to noise to at least some degree. Wood stork and bald eagle nesting locations would be avoided. Impacts to vegetation on the HLZs would be minimal because there would be no ground disturbance or construction activities.

**Socioeconomic Resources/Environmental Justice** – Noise and loss of productivity on the proposed lands are the main drivers associated with socioeconomic and environmental justice impacts. No significant noise or land use impacts have been identified. As a result, there would be no significant adverse impacts to socioeconomic resources or disproportionate impacts to environmental justice areas of concern under the Proposed Action.

## **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.

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BEN M. RUDOLPHI, Colonel, USAF  
Commander, 23d Wing

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