FINAL

FINDING OF NO SIGNIFICANT IMPACT (FONSI)
AND FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA)

HELICOPTER RAMP EXPANSION PROJECT
AT
MOODY AIR FORCE BASE, GEORGIA

Pursuant to provisions of the National Environmental Policy Act (NEPA), 42 United States Code (U.S.C.) §§ 4321-4270d, implementing Council on Environmental Quality (CEQ) Regulations, 40 Code of Federal Regulations (C.F.R.) §§ 1500-1508, and 32 C.F.R. Part 989, Environmental Impact Analysis Process, the United States Air Force (Air Force) assessed the potential environmental consequences associated with shifting the footprint of the helicopter parking ramp south approximately 100 feet from its original location and relocating an existing 20-foot wide, buried utility corridor to the southern boundary of the new helicopter parking ramp (Proposed Action).

The purpose of the Proposed Action is to accommodate a new design for the HH-60G and HC-130J hangar and the construction of a helicopter parking ramp with enough space for safe utilization during towing and taxiing of helicopters. The Proposed Action is needed because the Moody Air Force Base (AFB) Personnel Recovery (PR) program is experiencing numerous facility shortfalls that currently impair mission effectiveness. There is a shortage of space and insufficient facilities for parking aircraft.

The Supplemental Environmental Assessment (SEA), incorporated by reference into this finding, analyzes the potential environmental consequences of activities associated with the shifting of the helicopter ramp and provides environmental protection measures to avoid or reduce adverse environmental impacts.

The SEA considers all potential impacts of Alternative 1 (Preferred Alternative) and the No-Action Alternative. The SEA also considers cumulative environmental impacts with other projects at Moody AFB, Georgia.

Alternative 1 (Preferred Alternative)

Section 2.3.1 of the SEA provides a detailed description of Alternative 1. This alternative involves shifting the footprint of the helicopter parking ramp south approximately 100 feet from its original location to accommodate the new design for the HH-60G and HC-130J hangar while leaving the current parts storage buildings (#645/655) in place and providing enough ramp space for safe utilization during towing and taxiing of helicopters. Shifting of the helicopter parking ramp to the south will also involve the
relocation and construction of a 20-foot wide, buried utility corridor along the southern boundary of the new helicopter parking ramp footprint.

In the 2016 Final Revised EA, the original design for the HH-60G and HC-130J hangar necessitated demolition of buildings #645/655 and placement of the hangar in that location; however, due to insufficient funds in the hangar project budget, buildings #645/655 will remain in place and the hangar will be shifted south of that building.

The proposed site for the new helicopter ramp and utility corridor currently contains palustrine (inland) forested wetlands. In the 2016 Final Revised EA, it was determined that approximately 5 acres of jurisdictional waters of the U.S. would be impacted from construction of the PR Campus project. The Proposed Action would permanently impact an additional 1.4 acres of palustrine (inland) forested wetlands increasing the total impacts to waters of the U.S. to 6.4 acres.

**No-Action Alternative**

Under the No-Action Alternative, the helicopter parking ramp would not be constructed, and aircraft operations would remain in their current locations. The helicopter parking ramp would not meet facility and design requirements established in the Air Force Manual (AFMAN), Air Force Instruction (AFI), and United Facilities Criteria (UFC) guidance for safe operations. The existing hangar/parking apron would also not meet updated criteria requiring at least 1,000 feet from the centerline of the nearest runway to any facility.

**Summary of Findings**

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, acoustic environment, biological resources, and water resources. No significant adverse cumulative impacts would result from activities associated with Alternative 1 (Preferred Alternative) when considered with past, present, or reasonably foreseeable future projects at Moody AFB. In addition, the SEA concluded that the analyses completed in the 2016 Final Revised EA for the following resources would remain essentially unchanged and thus would not be affected by the Proposed Action: safety, land use, cultural resources, earth resources, infrastructure, solid/hazardous materials and waste, airspace management and use, and socioeconomics/environmental justice.

**Air Quality (SEA Section 3.1.2)**

Based on air emissions modeling and analysis, the Proposed Action would not result in any significant increase in air emissions and no adverse impacts would occur in the years 2020 or 2021.

**Acoustic Environment (SEA Section 3.2.2)**

Under the Proposed Action, no new aircraft, additional personnel, or changes to the nature of operations or usage patterns at Moody AFB would occur. Additional noise modeling was not performed as part of this SEA; however, as a worst-case scenario, the noise contours associated with the PR
Campus project were widened 100 feet southward to reflect the revised location of the new helicopter ramp footprint and utility corridor. Based on the analysis, the potential impacts of aircraft operations noise at noise-sensitive locations near the new helicopter ramp footprint and utility corridor would be similar to baseline conditions and as those described in the 2016 Final Revised EA and thus would not be significant.

Likewise, the southward shift of the new proposed helicopter ramp footprint and construction of the new utility corridor along the southern boundary of the new ramp location would result in reduced distances to the nearest noise-sensitive locations. However, no significant changes to the expected noise levels or associated potential impacts to the nearest noise-sensitive receptors relative to those described in the 2016 Final Revised EA from construction activities are expected.

**Biological Resources (SEA Section 3.3.2)**

An additional approximately 1.4 acres of palustrine (inland) forested wetland habitat would be removed under the Proposed Action. The increased wetland habitat loss associated with the Proposed Action could affect a small number of individuals but would not affect populations of any species, including sensitive species known to occur in or near the PR Campus project area. There would be no significant impacts to state-listed species or protected birds, and wetland removal would not adversely affect federally listed species.

**Water Resources (SEA Section 3.4.2)**

The Proposed Action would increase the area of impervious surface draining into the Cat Creek sub-watershed by approximately 1.0 acres and would also include filling of an additional 1.4 acres of jurisdictional wetlands associated with Beatty Creek. Decreased floodwater storage capacity in the wetlands and increased impervious surface area from the Proposed Action could increase the potential for soil erosion and flooding downstream. However, as analyzed by ASA Engineering & Surveying, the wetland is currently sized to handle the increased runoff volume and decreased detention volume associated with the Proposed Action. With implementation of permit requirements and associated BMPs, there would be no significant adverse impacts to surface waters associated with construction and operation of the Proposed Action.

The implementation of the Proposed Action would result in the permanent loss of 1.4 acres of palustrine (inland) forested wetlands and associated functions (i.e., flood storage, sediment retention, erosion prevention, water quality improvement, and wildlife habitat). With the implementation of permit requirements and compensatory mitigation measures (i.e., procurement of wetland and stream banking credits), the Proposed Action would not threaten or damage hydrologic characteristics, would be compliant with established laws or regulations that have been adopted to protect or manage water resources of the area, and would not cause the permanent loss of wetlands or floodplains.
Public Review

An Early Public Notice was published in the Valdosta Daily Times on August 16, 2019, announcing commencement of the SEA, detailing that the proposed action would take place in a wetland and seeking advanced public comment. No comments were received. A Public Notice was placed in the Valdosta Daily Times on December 27, 2019, announcing the availability of the Draft SEA and Draft FONSI/FONPA for public review and comment. The documents were made available for public review at the South Georgia Regional Library in Valdosta, Georgia, and online at www.moody.af.mil from December 27, 2019 to January 27, 2020. No comments from the public were received on the Draft SEA or Draft FONSI/FONPA.

Finding of No Practicable Alternative

Per Executive Order (EO) 11990, Protection of Wetlands, (24 May 1977) directs agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. Federal agencies are to avoid new construction in wetlands, unless the agency finds there is no practicable alternative to construction in the wetland and the proposed construction incorporates all possible measures to limit harm associated with development in the wetland. Agencies should use economic and environmental data, agency mission statements, and any other pertinent information when deciding whether or not to build in wetlands. EO 11990 directs each agency to provide for early public review of plans for construction in wetlands. In accordance with EO 11990 and 32 C.F.R. Part 989, a Finding of No Practicable Alternative (FONPA) must accompany the Finding of No Significant Impact (FONSI) stating why there are no practicable alternatives to development within or affecting wetland areas.

Similarly, EO 11988, Floodplain Management, (May 24, 1977), requires Federal agencies to avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. If it is found that there is no practicable alternative, the agency must minimize potential harm to the floodplain and circulate a notice explaining why the action is to be located in the floodplain prior to taking action. Finally, new construction in a floodplain must apply accepted flood proofing and flood protection to include elevating structures above the base flood level rather than filling in land. In accordance with EO 11988, a FONPA must accompany the FONSI stating why there are no practicable alternatives to development within or affecting floodplains.

The Proposed Action would result in impacts to both wetlands and floodplains. The below FONPA is therefore presented with the FONSI, pursuant to EO 11990 and EO 11988.

Per 32 C.F.R. § 989.14(g), there is no practicable alternative to disturbance of wetlands within the PR Campus project area. The size and configuration requirements for the helicopter parking ramp preclude any other options in this area. The helicopter parking ramp cannot shift farther east because the existing ramp space in that area would be insufficient to accommodate the parking aircraft and would impact
HC-130J operations and access to the Fuels Barn (building #646). The helicopter parking ramp cannot shift west without resulting in greater impacts to wetlands and waters of the U.S. and further reducing the stormwater capacity of the Beatty Branch watershed. Shifting the ramp north would necessitate demolishing facilities that were recently built and rebuilding them elsewhere. As a result, I find that there is no practicable alternative to implementing Alternative 1 (Preferred Alternative) within the wetlands.

**Finding of No Significant Impact**

Based on my review of the facts and analyses contained in the attached SEA, conducted under the provisions of NEPA, CEQ regulations, and 32 C.F.R. Part 989, I conclude that the Helicopter Ramp Expansion Project would not have a significant environmental impact, either by itself or cumulatively with other projects at Moody AFB. Accordingly, an Environmental Impact Statement is not required. The signing of this Finding of No Significant Impact completes the Environmental Impact Analysis Process.

**KATZER.DEE.J.**

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DEE JAY KATZER, Col, USAF

Chief, Civil Engineer Division (ACC/A4C)

4 May 2020

DATE