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

DRAFT PROGRAMMATIC ENVIRONMENTAL ASSESSMENT (PEA) FOR DEAAG PROPERTIES AT KELLY FIELD ANNEX- JOINT BASE SAN ANTONIO-LACKLAND, TEXAS

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 § 989, Environmental Impact Analysis Process, the United States (US) Air Force (Air Force) prepared the attached Draft Programmatic Environmental Assessment (PEA) to address the potential environmental consequences associated with acquiring a 345-acre site in the area adjacent to the Joint Base San Antonio-Lackland (JBSA-Lackland), Kelly Field Annex Growdon Entry Control Point for multiple planned construction, demolition, infrastructure, and natural infrastructure projects.

Agency

802nd Civil Engineering Squadron (CES), JBSA-Lackland, Texas

Purpose and Need

The purpose of the Proposed Action is to address existing operational constraints and would ensure the capability of JBSA-Lackland to provide a full range of future mission and personnel needs through the implementation of the “Go West” Plan. JBSA-Lackland has proposed the acquisition of eleven parcels of land in the area adjacent to the Growdon Entry Control Point. Mission critical components of the “Go West” Plan include moving airfield operations west of the flight line, including the relocation and expansion of the Munitions Storage Area (MSA). The final siting and design of facilities under the “Go West” Plan is dependent upon and would occur following the proposed land acquisition. Therefore, this PEA analyzes the relocation of facilities programmatically by making assumptions about the disturbance areas, maximum building footprints, personnel, operations, etc. Any future growth of the airfield mission activities would be analyzed separately.

The Proposed Action is needed to meet current and future mission requirements and national security objectives associated with JBSA. This involves increasing the capacity, efficiency, and effectiveness of JBSA by enhancing the Base’s ability to expand.

Description of Proposed Action

The Proposed Action would include the acquisition of 11 parcels totaling 345 acres of city and privately owned land located adjacent to the JBSA Growdon Entry Control Point in order to provide a future location to implement the “Go West” Plan and its components including relocating leaseback facilities from the PSA to the west side of the flight line and the development a new MSA, in order to meet mission critical needs. Initial actions must be taken in order to secure the opportunity to implement the “Go West” Plan. Mission critical components of the “Go West” Plan include moving airfield operations west of the flight line, including the relocation and expansion of the MSA. The final siting and design of facilities under the “Go West” Plan is dependent upon and would occur following the proposed land acquisition. Therefore, the Draft PEA analyzes the relocation of facilities programmatically by making assumptions about the disturbance areas, maximum building footprints, personnel, operations, etc. Any future growth of the airfield mission activities will need to be analyzed separately.

No-Action Alternative

Under the No-Action Alternative, JBSA-Lackland would not acquire the 345-acre parcel, a new the “Go West” Plan would not be implemented, the leaseback facilities would remain on at PSA and MSA would not be constructed. Therefore, the improvements to economic development, mission safety, efficiency, and effectiveness would not be achieved.

In addition to the No Action Alternative, two action alternatives, Alternative 1 and Alternative 2 meet requirements for the proposed developments. These alternatives are described below.

Alternative 1

Development under the Proposed Action Alternative would involve the acquisition of privately owned and CoSA-owned lands located northwest of the Growdon Gate. Alternative 1 would include the acquisition of all eleven parcels equaling 345 acres. The land acquired would be used to implement the components of the "Go West" Plan. This includes moving facilities located on the PSA to the west side of the flight line and the development of a new MSA, in order to meet mission critical needs.

Alternative 2

Development under Alternative 2 would not include the acquisition of the CoSA Vehicle Impound Facility, totaling 21.85 acres. CoSA may not be willing to transfer this property given that the relocation of the Vehicle Impound Facility would require CoSA to acquire new land and relocate all facilities and personnel. This may be too difficult and costly for CoSA. As described above in the Proposed Action Alternative, the land acquired would be used to implement the components of the "Go West" Plan. This includes moving facilities located on the PSA to the west side of the flight line. However, Parcel B5 would not be acquired and the proposed location of the MSA would have to be located elsewhere on the acquired property. This would reduce the overall size of property available for expansion, impacting the property boundary and connecting roads. It would also impact base efficiency and resilience, base safety, and would not move the MSA outside of the floodplain.

Summary of Findings for The Proposed Action

Noise Environment

Implementation of the Proposed Action would have a negligible impact on noise. There would be a short-term temporary increase in noise levels during the implementation of individual construction and demolition activities; however, given the location of the project area located in close proximity to an active airfield, these temporary increases in noise would be negligible and would not affect sensitive receptors in the surrounding vicinity.

Operationally, the project area is currently undeveloped or otherwise used for industrial activities (e.g., City of San Antonio Impound Lot). The operation of new land uses within this area would introduce new sources of noise. However, the noise levels would be similar to existing industrial noise and would not substantially contribute to increases in noise given the located of the project area near the airfield.

Air Quality

Implementation of the Proposed Action would have a negligible impact on air quality. There would be a short-term temporary increase in air emissions during the implementation of individual construction and demolition activities; however, emissions would be expected to remain below de minimis thresholds.

Additionally, given that the Proposed Action is intended to facilitate a relocation of facilities, it is anticipated that operational air emissions would remain similar to existing conditions. Expansion of existing facilities would be considered in future environmental impact analyses, as necessary. This would include an analysis of potential air quality impacts.

Water Resources

Implementation of the Proposed Action could result in indirect impacts to water quality during construction. However, with the implementation of standard construction Best Management Practices (BMPs), the implementation of the Proposed Action would not result in impacts to water quality.

Operationally, potential stormwater impacts would be considered as individual projects are proposed and developed. Each project would consider impervious surfaces and the potential impact on drainage. Stormwater and other drainage facilities would be constructed as necessary. Therefore, the potential for individual projects to contribute to cumulative impacts on water resources would be minimal.

Safety and Occupational Health

Implementation of the Proposed Action would have a beneficial effect on safety and a negligible impact on transportation. As previously described, the current MSA facility does not allow for multiple explosive operations due to only having one operating location, which impedes mission capabilities and efficiency. There is currently no adequate storage area for missiles and missile containers. The transportation of live munitions from the Chapman Training Annex to JBSA-Lackland is completed on 9.2 miles on public roads. This current route exposes civilians to hazardous explosives and violates the cardinal rule of explosives safety, which is to expose the minimum number of people to the minimum amount of ammunition and explosives for the minimum amount of time. The relocation of the MSA would eliminate the potential hazards and safety issues of transporting munitions on public roads and storing them within high use areas. No significant adverse cumulative impacts to safety and occupational health are expected.

Hazardous Materials and Waste

The Proposed Action would require the management of minimal amounts of potential hazardous materials, including Asbestos Containing Materials (ACM) and Lead Based Paint (LBP) present in buildings that are to be demolished under the implementation of the “Go West” Plan. Management of these materials would occur under the existing JBSA-Lackland Asbestos plan, JBSA-Lacklands management programs compliance with the Hazardous Waste Management Plan. These plans ensure that procedures for managing hazardous waste are in accordance with federal, state, and local regulations; therefore, no cumulative impacts to hazardous disposal or storage is expected. Hazardous wastes are not expected to be generated as a result of the Proposed Action. Therefore, the Proposed Action would not contribute to cumulative effects to hazardous materials and wastes in or around JBSA-Lackland. No significant adverse cumulative impacts to hazardous materials and wastes, contaminated sites, and toxic substances are expected.

Biological and Natural Resources

The Proposed Action would not be anticipated to affect vegetation, wildlife, or special status species. The project area is disturbed and, in some case, developed and does not provide high quality native habitat. The riparian area by Leon Creek would not be affected by the implementation of the Proposed Action. Therefore, the Proposed Action would not contribute to cumulative impacts to biological and natural resources.

Cultural Resources

There would be no significant incremental adverse cumulative effects on cultural resources. There are no projects located in areas where known archaeological sites or historical properties are present. Since there are no known eligible archaeological resources or historic properties within the Area of Potential Effect (APE), the Proposed Action would not contribute to any cumulative effects trends for these resources in the area. Inadvertent discovery of cultural resources would trigger standard operating procedures detailed in JBSA-Lackland’s Integrated Cultural Resource Management Plan (ICRMP) so as not to disturb the integrity of the resources. The Proposed Action would not facilitate access to previously remote sites or contribute to their disturbance.

Earth Resources

The Proposed Action would have no effect on topography or geology and negligible impacts to soils. There would be no significant incremental adverse cumulative effects on earth generated. These impacts would last only as long as the duration of construction and would be managed through use resources from the acquisition of land. Future construction and demolition

activities occurring under the “Go West” Plan, would result in a short-term increase in soil disturbance and dust generated. These impacts would last only as long as the duration of construction and would be managed through use of BMPs associated with a site specific Stormwater Pollution Prevention Plan (SWPPP). Contractors should take care to implement BMPs. However, there would be no significant impacts to the soil, geology, and topography of the Subject Property.

Socioeconomic Resources and Environmental Justice

The Proposed Action would not negatively impact the local population, housing, or education. However, all of the future development projects under the “Go West” Plan would involve the purchase of goods and services and short-term employment during construction. No minority, low-income, or other populations would be disproportionately impacted as a result of the cumulative impact of these projects. Overall, there is expected to be a minor incremental beneficial cumulative effect on the local economy.

Cumulative Impacts

The Proposed Action would result in insignificant adverse effects on air quality, surface waters, stormwater, transportation safety, solid waste, hazardous/toxic materials, vegetation, architectural resources, and soils. Additionally, there would be no incremental adverse cumulative effects on floodplains or wetlands, groundwater, wildlife, threatened or endangered species, archaeology, geology, topography, or environmental justice when compared to past, present, and foreseeable future due to the small magnitude and/or short, temporary duration of effects from other relevant actions in the project area from the implementation of the Proposed Action or any of the action alternatives. This is in part due to the avoidance of the resources from implementation of the Proposed Action or any of the action alternatives in this PEA.

Mitigation

The PEA analysis concluded that the Proposed Action and Alternatives would not result in significant environmental impacts; therefore, no mitigation measures are required. Best Management Practices are described and recommended in the PEA where applicable.

Finding of No Significant Impact

After review of the PEA prepared in accordance with the requirements of NEPA; CEQ regulations; and 32 CFR § 989, Environmental Impact Analysis Process, and which is hereby incorporated by reference, I conclude that the Proposed Action will not have a significant direct, indirect, or cumulative 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 considering all submitted information, including a review of agency comments submitted during the 30-day public comment period, and considering a full range of practical alternatives that meet project requirements and are within the legal authority of the United States Air Force.

Finding of No Practicable Alternative:

Pursuant to Executive Orders (EOs) 11988, 11990, and 13690, and taking the above information into account, I find that there is no practicable alternative to this action and that the Proposed Action includes all practicable measures to minimize harm to identified floodplains and wetlands environments. No impacts to jurisdictional wetlands are anticipated to result from implementation of the Proposed Action, and floodplain impacts would be minimized to the maximum extent feasible (i.e., HDD drilling, with no proposed structures or alteration of topography within the floodplain). This finding fulfills both the requirements of the referenced EOs and 32 CFR 989.14 requirements for a FONPA.

_____

Birj Patel, Maj, USAF
HQ AETC/A4P

Date_____

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DRAFT

PROGRAMMATIC ENVIRONMENTAL ASSESSMENT FOR DEAAG PROPERTIES AT KELLY FIELD ANNEX-JOINT BASE SAN ANTONIO, LACKLAND, TEXAS

Prepared for:

U.S. Air Force
Joint Base San Antonio
Lackland, Texas

Contract: FA301620D0015
Delivery Order: FA301622F0352

July 2023

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ACRONYMS AND ABBREVIATIONS

µg/m^3	micrograms per cubic meter
ACHP's	Advisor Council on Historic Preservation's
AGE	aerospace ground equipment
AFB	Air Force Base
AF	Air Force
AFPD	Air Force Policy Directive
AICUZ	Air Installation Compatible Use Zone
APE	Area of Potential Effect
AQCR	Air Quality Control Region
AT/FP	Anti-Terrorism/Force Protection
ATR	Automatic Traffic Recorder device
B-Course	Basic Course
BMPs	best management practices
BMT	Air Force Basic Military Training
BRAC	Base Realignment and Closure
CAAA	Clean Air Act Amendments of 1990
CDF	cargo deployment function
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CH_4	methane
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COCs	Chemicals of Concern
CoSA	City of San Antonio
dB	decibel
dBA	"A-weighted" decibel
DEAAG	Defense Economic Adjustment Assistance Grant
DNL	Day-Night Average Sound Level
DoD	Department of Defense
EA	Environmental Assessment
ECP	Entry Control Point
EIAP	Environmental Impact Analysis Process
EIS	Environmental Impact Statement
EO	Executive Order
ESQD	Explosive Safety Quantity Distance
FEMA	Federal Emergency Management Association
FONPA	Finding of No Practicable Alternative
FONSI	Finding of No Significant Impact
GHG	greenhouse gas
GWP	global warming potential

HFC	hydrofluorocarbon
IPUG	F-16 Instructor Pilot Upgrade
ISWMP	Integrated Solid Waste Management Plan
JBSA-Lackland	Joint Base San Antonio-Lackland
LRS	Logistic Readiness Squadron
MSA	Munitions Storage Area
nitrous oxide	N_2O
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NPS	National Parks Service
NRCS	U.S. Department of Agriculture Natural Resources Conservation Service
NWI	National Wetlands Inventory
O_3	ozone
OSHA	Occupational Safety and Health Administration
Pb	lead
PFC	perfluorocarbon
PCLs	Protective Concentration Levels
PEIS	Programmatic Environmental Impact Statement
$PM_{2.5}$	particulate matter equal to or less than 2.5 micrometers in aerodynamic diameter
PM_{10}	particulate matter equal to or less than 10 micrometers in aerodynamic diameter
ppb	parts per billion
PSA	Port of San Antonio
ft^2	square foot
ROI	Region of Influence
SHPO	Texas State Historic Preservation Officer
SIP	state implementation plan
sf	square foot
SF_6	sulfur hexafluoride
SO_2	sulfur dioxide
SOC	Senior Officer Course
SO_x	sulfur oxides
SPCC	Spill Prevention, Control and Countermeasures Plan
SPL	sound pressure level
TAC	Texas Administrative Code
TCEQ	Texas Commission on Environmental Quality
TCP	Traditional Cultural Properties
TRRP	Texas Risk Reduction Program

TXDOT	Texas Department of Transportation
USACE	U.S. Army Corps of Engineers
USAF	U.S. Air Force
USCB	U.S. Census Bureau
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VCC	Visitor Control Center
VMF	Vehicle Maintenance Facility
VOC	volatile organic compound

1.0 PURPOSE AND NEED FOR THE ACTION

1.1 INTRODUCTION

Joint Base San Antonio-Lackland (JBSA-Lackland) has proposed the acquisition of eleven parcels of land in the area adjacent to the Growdon Entry Control Point. The proposed land acquisition would address existing operational constraints and would ensure the capability of JBSA-Lackland to provide a full range of future mission and personnel needs through the implementation of the "Go West" Plan. Mission critical components of the "Go West" Plan include moving airfield operations west of the flight line, including the relocation and expansion of the Munitions Storage Area (MSA). The final siting and design of facilities under the "Go West" Plan is dependent upon and would occur following the proposed land acquisition. Therefore, this EA analyzes the relocation of facilities programmatically by making assumptions about the disturbance areas, maximum building footprints, personnel, operations, etc. Any future growth of the airfield mission activities would be analyzed separately.

The National Environmental Policy Act (NEPA) requires environmental review of any major federal action being proposed for undertaking, including actions involving federal funding or permitting. The proposed activities addressed in this document constitute a federal action and, therefore, must be assessed in accordance with NEPA. The Council on Environmental Quality (CEQ) was established under NEPA, Title 42 U.S. Code (USC) §4321, et seq., to implement and oversee federal policy in this process. In 1978, the CEQ issued regulations implementing the NEPA process under CEQ's *Regulations Implementing NEPA* (Title 40 Code of Federal Regulations [CFR] Parts 1500-1508). (The recently updated May 20, 2022 version of CEQ's *NEPA Regulations Implementing NEPA* are being used, 40 CFR Parts 1500-1508.)

The CEQ regulations require that the federal agency considering an action evaluate or assess the potential consequences of the action or alternatives to the action, which may result in the need for an EA or Environmental Impact Statement (EIS). Under Title 40 of the CFR:

- An EA must briefly provide sufficient evidence and analysis to determine whether a Finding of No Significant Impact (FONSI) or an EIS should be prepared.
- An EA must facilitate the preparation of an EIS if required.

If the execution of any of the Proposed Actions would involve action in a floodplain under Executive Order (EO) 11988, Floodplain Management, a Finding of No Practicable Alternative (FONPA) would be prepared in conjunction with the FONSI.

1.2 PROJECT LOCATION AND BACKGROUND

JBSA-Lackland is a joint base military installation encompassing 8,800 acres, situated in Bexar County, Texas, approximately 10 miles southwest of downtown San Antonio (**Figure 1-1**). JBSA-Lackland consists of more than 24,000 active-duty members, 10,000 civilians, and 11,000 contractors and their families. JBSA-Lackland is divided into four districts: the Kelly Field Annex, Lackland East, Lackland West, and the Chapman Training Annex. JBSA-Lackland is the primary

location for the U.S. Air Force (USAF) Basic Military Training (BMT) and is home to more than 120 organizations.

JBSA-Lackland has identified 345 acres located adjacent to the installation and the northwest corner of Kelly Field Annex to acquire and develop through a Defense Economic Adjustment Assistance Grant (DEAAG). The City of San Antonio (CoSA) would apply for the DEAAG through the State of Texas and convey funding to JBSA-Lackland for the proposed land acquisition. Of the 345 acres comprising the project area, 251 acres is owned by CoSA and 94 acres is owned by private individuals (**Table 2-1** and **Figure 2-2**). The land that would be acquired would be used in the implementation of JBSA-Lackland's "Go West" Plan.

The primary purpose of the proposed land acquisition north of the JBSA-Lackland Main Base is to address existing encroachment and safety issues while also accommodating future land use planning needs as part of the "Go West" Plan.

The 1995 Base Realignment and Closure (BRAC) requirements realigned half of Kelly Air Force Base (AFB) to JBSA-Lackland and transferred the remainder to Port of San Antonio (PSA). Many units hosted by Kelly AFB were not moved by BRAC and remained on PSA as government-maintained facilities referred to as "leaseback" facilities. More USAF missions have been moved into PSA leaseback facilities due to the fact that JBSA-Lackland has outgrown its existing buildings and infrastructure.

The USAF maintains a substantial presence at the PSA. The USAF occupies 39 buildings with over 2 million square feet (sf) of space. The USAF is unable to move missions onto JBSA-Lackland proper because of the lack of suitable Anti-Terrorism/Force Protection (AT/FP) compliant buildings/facilities and because of a shortage of land for new construction. Ongoing maintenance and operation of the PSA leaseback facilities is costly and inefficient.

Additionally, JBSA-Lackland is home to the 149th Fighter Wing (149 FW), an F-16 flight training unit that includes a support group with a worldwide mobility commitment. The 149 FW's federal mission is to produce the world's finest F-16 pilots. The 149 FW produces over 50 students a year, totaling over 4,300 flying hours per year. The 149 FW has four courses, the Basic Course (B-Course) which includes active duty and reserve USAF pilots, the Transition Course (TX), the Senior Officer Course (SOC), and the F-16 Instructor Pilot Upgrade (IPUG).

The B-Course syllabus requirements include the employment of various types of live munitions and training exercises. In order to accommodate the training and mission of the 149 FW B-course, a proper MSA is required and the current MSA at JBSA-Lackland does not meet mission and safety requirements.

Figure 1-1
Location of Joint Base San Antonio-Lackland
Joint Base San Antonio-Lackland San Antonio, Texas

Environmental Assessment
DEAAG Properties
Joint Base San Antonio-Lackland, Texas

LIBERTYJV

Project ID: FA301622F0352

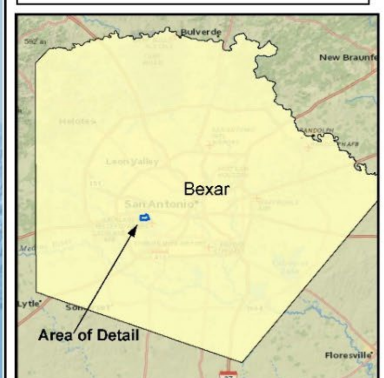
Legend

Bexar County

State

N

0 4.5 9 18 27 36 Miles



1.3 PURPOSE AND NEED FOR THE ACTION

The purpose of the proposed land acquisition of the DEAAG properties is for the implementation of the "Go West" Plan and its components, including the moveout and relocation of facilities at the PSA and the development of a new MSA. The land acquisition would address existing deficiencies and would increase capacity for future growth of the airfield mission activities. The land acquisition would increase JBSA-Lackland's cost effectiveness, it would increase the resiliency of base operations, and it would increase national defense strategy. Additionally, the land acquisition and implementation of the "Go West" Plan would free up several facilities JBSA-Lackland currently utilizes on PSA property. This would provide CoSA with more space for commercial operations.

The primary purpose of the proposed land acquisition is to facilitate the implementation of the "Go West" Plan, which calls for move-out from leasebacks with PSA and relocation of the facilities on PSA property to the west side of the flight line. This would consolidate JBSA-Lackland functions and would allow the necessary space for future development of new aircraft ramp space, hangars, warehouses, and other facilities. The USAF currently occupies 39 buildings with over 2 million sf of space at PSA. The ongoing maintenance and operations of the PSA leaseback facilities is costly and inefficient. The proposed acquisition and relocation of facilities would increase efficiency, safety, resiliency, and cost effectiveness. Additionally, it would increase the capacity for future growth of the airfield mission activities, which could include the expansion of taxiway and ramp space, allowing for transient hangar/mobility processing and Logistic Readiness Squadron (LRS) function. However, any future growth of the airfield mission activities would need to be analyzed separately pursuant to the requirements of NEPA.

The "Go West" Plan would facilitate the relocation and expansion of the MSA. The current MSA at JBSA-Lackland does not have room for expansions to meet mission requirements and has a 10,000-sf deficit in available space. The administration facility provides just 1,200 sf for 22 full-time personnel with no room for expansion. There is no dedicated trailer/equipment storage and no maintenance facility, which creates safety and compliance issues. The current MSA facility does not allow for multiple explosive operations due to only having one operating location, this impedes mission capabilities and efficiency. There is currently no adequate storage area for missiles and missile containers. Additionally, the current MSA is within the 100-year floodplain and previous flooding incidents have resulted in major loss and damage. Moving the MSA out of the 100-year floodplain is likely to reduce the potential for future loss and damage due to flooding.

The proposed relocation of the MSA is needed to meet mission safety and efficiency. The Chapman Training Annex is located directly west of the Subject Properties and is not directly attached to JBSA-Lackland main facilities. Therefore, the transportation of live munitions from the Chapman Training Annex to JBSA-Lackland is completed on 9.2 miles on public roads. This current route exposes civilians to hazardous explosives and violates the cardinal rule of explosives safety, which is to expose the minimum number of people to the minimum amount of ammunition and explosives for the minimum amount of time. In order to have the MSA meet safety and efficiency it must be far enough from highly trafficked or public facilities as to not be a potential health and safety hazard. The existing MSA location encroachment area is impacted by four high

use areas. There is currently no ability to relocate the explosives site within the existing MSA boundaries.

The relocation of the MSA would eliminate the potential hazards and safety issues of transporting munitions on public roads and storing them within high use areas. By relocating the MSA to the Subject Properties, all transportation of munition would remain within the JBSA-Lackland property boundaries and would be less likely to impact high use areas. Therefore, to meet mission requirements and increase safety, the current MSA should be relocated.

1.4 REGULATORY FRAMEWORK

The relevant policies, laws, and regulations applicable to this EA are summarized below.

- NEPA (42 USC §102[2][c]), which requires that all agencies of the federal government prepare a detailed statement for major federal actions significantly affecting the quality of the human environment. The detailed statement must disclose the environmental impact of the proposed action, any adverse environmental effects that cannot be avoided, alternatives to the proposed action, statements assessing the environmental impact of the action and alternatives. These statements are commonly referred to as EIS and EA.
- CEQ's *Regulations for Implementing NEPA* (40 CFR Parts 1500-1508), which implement the requirements of NEPA.
- USAF's Environmental Impact Analysis Process (EIAP) (32 CFR Part 989), which guides the USAF's implementation of NEPA.
- EO 11988, Floodplain Management (24 May 1977)
- EO 11990, Protection of Wetlands (24 May 1977)
- EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (11 February 1994)
- EO 13690, Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input (30 January 2015)
- EO 13990, Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis (20 January 2021)
- EO 14008, Tackling the Climate Crisis at Home and Abroad (27 January 2021)
- EO 14057, Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability (13 December 2021)
- EO 14096, Revitalizing our Nation's Commitment to Environmental Justice for All
- EO 13186, Responsibilities of Federal Agencies to Protect Migratory Birds (10 January 2001)
- Clean Water Act, 33 USC §§1251-1387
- Clean Air Act, as amended, 42 USC §§7401-7671q, including 1990 General Conformity Rule
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 7 USC §136 et seq., which outlines the use and distribution of plant regulators and defoliants
- Migratory Bird Treaty Act of 1918, 16 USC §§703-712 et seq.
- Bald and Golden Eagle Protection Act, 16 USC §§668-668d
- Endangered Species Act of 1973, as amended (7 USC §136; 16 USC §1531 et seq.)

- Magnuson-Stevens Fishery Conservation and Management Act of 1976, as amended (16 USC §§1801 et seq.)
- National Historic Preservation Act (NHPA) (54 USC §300101 et seq.)
- Resource Conservation and Recovery Act, 42 USC §§6901-6992k
- 40 CFR Parts 264, Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities
- 40 CFR Parts 270, United States Environmental Protection Agency (USEPA) Administered Permit Programs: the Hazardous Waste Permit Program
- Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC §§9601-9675

1.5 DECISIONS TO BE MADE

The decision to be made is the selection of an alternative for JBSA-Lackland to support the acquisition of land, allowing for the relocation and development of facilities to the west side of the flight line. This EA evaluates the potential environmental consequences of implementing the proposed action as described in **Section 2.1**.

Based on the analyses conducted in support of this EA, the USAF would make one of three decisions regarding the proposed action:

1. Choose the alternative action that best meets the purpose of and need for this project and sign a FONSI/FONPA allowing implementation of the selected alternative;
2. Initiate preparation of an EIS if it is determined that significant impacts would occur as a result of implementation of the action alternatives; or
3. Decide not to move forward with the project or alternatives. Under the no-action alternative the proposed action would not be implemented. As required by NEPA and its implementing regulations established by CEQ, preparation of an environmental document must precede final decisions regarding a federal action and be available to inform decision-makers of the potential environmental impacts. JBSA-Lackland can also defer a decision and not pick any of the alternatives, in which case a FONSI/FONPA would not be signed.

1.6 COOPERATING AGENCY AND INTERGOVERNMENTAL COORDINATION/CONSULTATION

1.6.1 Interagency and Intergovernmental Coordination and Consultation

Federal, state, and local agencies with jurisdiction that could be affected by the Proposed Action were notified during the development of this EA. Scoping letters were distributed to relevant federal, state, and local agencies on 10 April 2023 notifying them of the Proposed Action and requesting input on the scope of the EA. Copies of all correspondence with federal, state, and local agencies are included in **Appendix A**.

1.6.2 Public and Agency Review of Draft EA

Publication of the Notice of Availability (NOA) for the Draft EA and FONSI/FONPA will initiate a 30-day public review period. JBSA-Lackland will send the Draft EA to relevant federal, state, local agencies, and federally recognized tribes. Agencies will be given an opportunity to provide comments on the sufficiency of the environmental impact analysis provided in the Draft EA. At the closing of the public review period, applicable comments from the general public and interagency and intergovernmental coordination and consultation will be incorporated into the analysis of potential environmental impacts performed as part of the EA, where applicable, and included in **Appendix A** of the Final EA.

1.6.3 Government to Government Consultations

The NHPA and its implementing regulations at 36 CFR Part 800, require an agency to consult with federally recognized tribes who may have properties of cultural and religious significance affected by the project. To comply with legal mandates, federally recognized tribes that are affiliated historically with the JBSA-Lackland geographic region will be invited to consult on all proposed undertakings that have a potential to affect properties of cultural, historical, or religious significance to the tribes. The tribal coordination process is distinct from NEPA consultation or the Interagency/Intergovernmental Coordination for Environmental Planning processes and requires separate notification of all relevant tribes. The timelines for tribal consultation are also distinct from those of intergovernmental consultations. The JBSA-Lackland point-of-contact for Native American tribes is the Tribal Liaison Office for Native American matters. The JBSA-Lackland point-of-contact for consultation with the Tribal Historic Preservation Officer and the Advisory Council on Historic Preservation is the Cultural Resources Manager.

The Native American tribal governments that will be consulted with regarding this action are listed below:

- Comanche Nation, Oklahoma
- Mescalero Apache and Affiliated Tribes
- Tonkawa Tribe of Oklahoma

1.6.4 Other Agency Consultations

As part of this EA, and per the requirements of Section 106 of the NHPA and implementing regulations (36 CFR Part 800), and Section 7 of the Endangered Species Act and implementing regulations, findings of effect and request for concurrences will be transmitted to the Texas State Historic Preservation Officer (SHPO) and the U.S. Fish and Wildlife Service (USFWS).

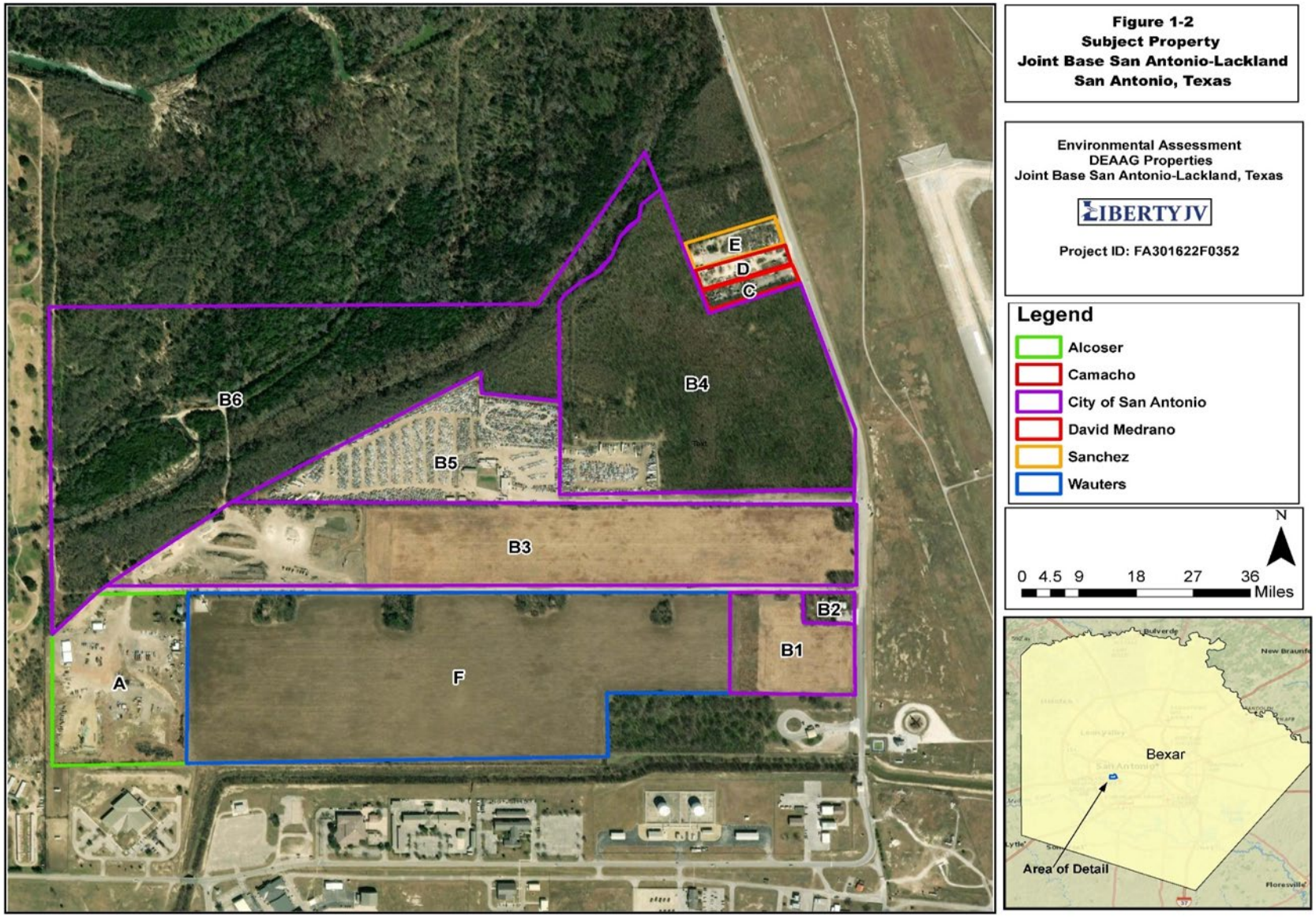
2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

This section describes Proposed Action and its alternatives. In addition, CEQ's Regulations for Implementing NEPA (40 CFR Parts 1500-1508) specify that an EA must include a No-Action Alternative against which potential impacts can be compared. The No-Action Alternative provides the baseline against which the environmental impacts of implementing the alternatives can be compared.

The NEPA and the CEQ regulations mandate the consideration of reasonable action alternatives to accomplish the proposed action. "Reasonable alternatives" are those that also could meet the purpose of and need for the proposed action. Per the requirements of 32 CFR Part 989, selection standards are used to help determine feasibility of each action alternative, including potential facilities requirements and the extent to which each action alternative would fulfill the purpose and need for the Proposed Action. This section outlines the selection standards that were used by the USAF to develop and analyze these alternatives.

2.1 PROPOSED ACTION

JBSA-Lackland and the USAF propose to acquire 11 parcels totaling 345 acres of city and privately owned land in order to provide a future location to implement the "Go West" Plan and its components including relocating leaseback facilities from the PSA to the west side of the flight line and the development a new MSA, in order to meet mission critical needs. Initial activities must be taken in order to secure the opportunity to implement the "Go West" Plan. The project boundary, as well as the existing parcel boundaries are shown in **Figure 2-1** and **Figure 2-2**. A description of each of the eleven parcels is described in **Table 2-1** below. It is possible that fewer than eleven parcels might be pursued depending on the development scenario adopted by the USAF and proposed by CoSA in the DEAAG grant application.


E
D
C
B6
B4
B5
B3
B2
B1
F
A
Figure 1-2
Subject Property
Joint Base San Antonio-Lackland
San Antonio, Texas
Environmental Assessment
DEAAG Properties
Joint Base San Antonio-Lackland, Texas
LIBERTYJV
Project ID: FA301622F0352
Legend
Alcoser
Camacho
City of San Antonio
David Medrano
Sanchez
Wauters
N
0 4.5 9 18 27 36
Miles
Bexar
Area of Detail

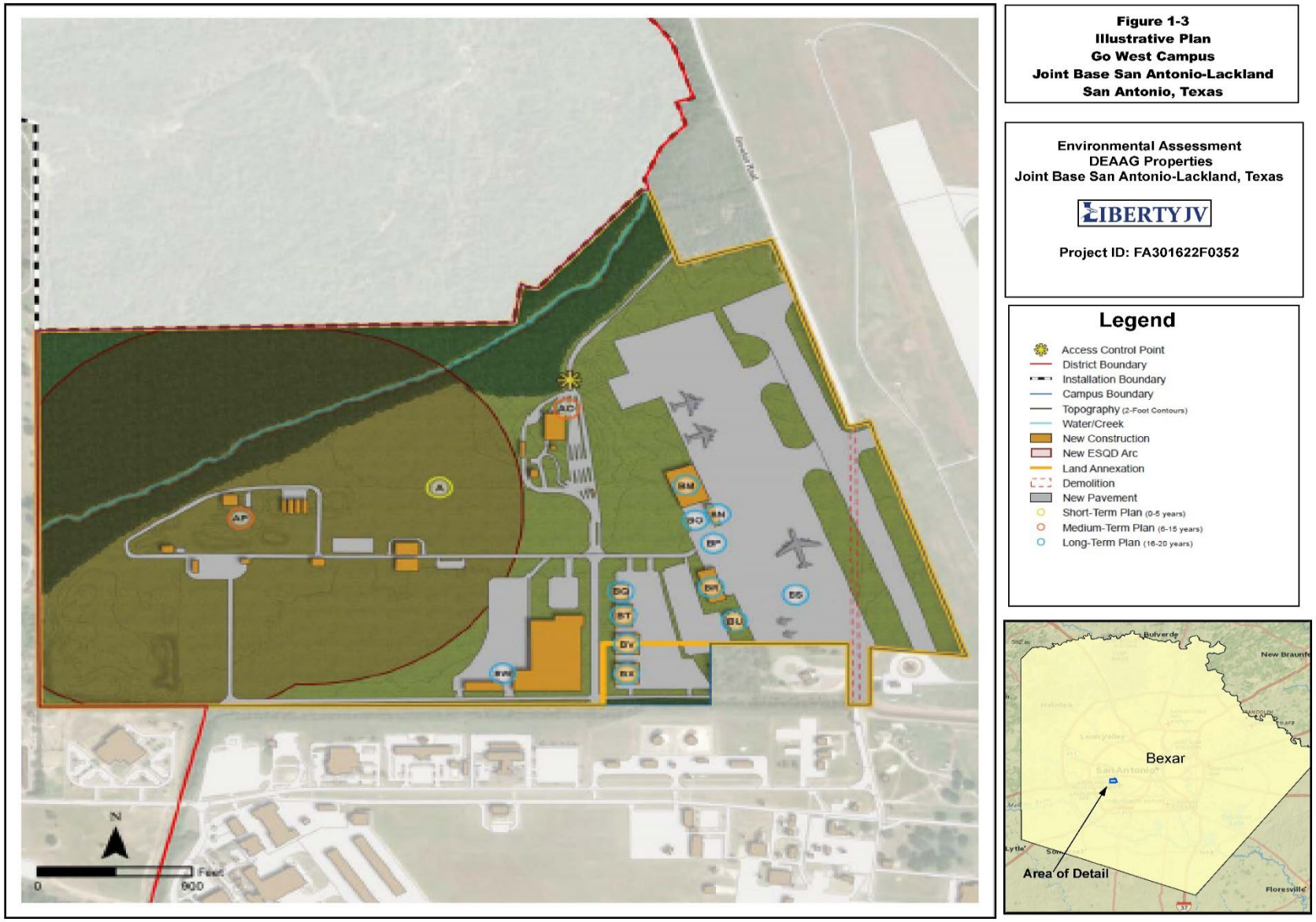


Figure 1-3
Illustrative Plan
Go West Campus
Joint Base San Antonio-Lackland
San Antonio, Texas
Environmental Assessment
DEAAG Properties
Joint Base San Antonio-Lackland, Texas
LIBERTYJV
Project ID: FA301622F0352
Legend
Access Control Point
District Boundary
Installation Boundary
Campus Boundary
Topography (2-Foot Contours)
Water/Creek
New Construction
New ESQD Arc
Land Annexation
Demolition
New Pavement
Short-Term Plan (0-5 years)
Medium-Term Plan (6-15 years)
Long-Term Plan (16-20 years)
Bexar
Area of Detail
N
0
900
Feet

Table 2-1: Description of Subject Properties

PARCLE DESIGNATION	ADDRESS	SIZE (ACRES)	OWNER	CURRENT PRIMARY LAND USE
A	5554 Morey Rd, San Antonio, Bexar County, Texas	18.81	Cristoval Alcoser/ Alcoser Trucking/ Badeco Inc	Mixed use and residential use.
B_1	4908 Morey Rd, San Antonio, Bexar County, Texas	8.18	City of San Antonio	Undeveloped.
B_2	4802 Morey Rd, San Antonio, Bexar County, Texas	1.49	City of San Antonio	Undeveloped.
B_3	3625 Growdon Rd, San Antonio, Bexar County, Texas	43.43	City of San Antonio	Material Stockpile area. Undeveloped land.
B_4	N Acme Rd, San Antonio, Bexar County, Texas	51.67	City of San Antonio	Undeveloped.
B_5	3625 Growdon Rd, San Antonio, Bexar County, Texas	21.85	City of San Antonio Vehicle Impound Facility	Salvage yard.
B_6	Growdon Rd, San Antonio, Bexar County, Texas	247.87	City of San Antonio	Undeveloped.
C	3119 Growdon Rd, San Antonio, Bexar County, Texas	1.00	David Medrano	Salvage Yard. Construction materials storage.
D	3119 Growdon Rd, San Antonio, Bexar County, Texas	2.00	Juan Antonio Camacho	Salvage Yard. Construction materials storage.
E	3119 Growdon Rd, San Antonio, Bexar County, Texas	1.99	Leticia & Feliciano Sanchez	Salvage Yard.
F	5524 Morey Rd, San	69.72	Lorraine Anges Wauters	Agriculture.

PARCLE DESIGNATION	ADDRESS	SIZE (ACRES)	OWNER	CURRENT PRIMARY LAND USE
	Antonio, Bexar County, Texas			

2.1.1 DEAAG Land Acquisition

The land acquired by JBSA-Lackland through the DEAAG would be used to accommodate the expansion planning needs and components of the "Go West" Plan. The "Go West" Plan has been broken up into three plans based on potential completion times: A Short-Term Plan (0-5 years), Medium-Term Plan (6-15 years), and a Long-Term Plan (16-20 years) (**Figure 1-3**). The "Go West" Plan includes relocating the airfield operations from the PSA property to the west side of the flight line and relocating administrative and warehouse space from the PSA to JBSA-Lackland property. As well the relocation and development of a new MSA. The acquisition of land is a part of the near-term actions described in the "Go West" Plan. Ultimately, the proposed land acquisition would also increase the capacity for future growth and efficiency of airfield mission activities. However, any future growth of the airfield mission activities would be analyzed separately pursuant to the requirement of NEPA.

2.1.2 Relocation of Facilities

The "Go West" Plan includes the relocation of airfield operations, administrative facilities, and warehouse space from the PSA property to the west side of the flight line within the acquired parcels. Relocating airfield operations from the PSA property to the west of the flight line would allow for the development of new hangars, aircraft ramp space, base operations, and warehouses. This includes constructing transient hangar/mobility processing and parking apron, aerospace ground equipment (AGE) facility and storage yard, a cargo deployment function (CDF) yard, an 802 Logistics Readiness Squadron (LRS) vehicle storage area and service rack, an 802 LRS warehouse and 802 LRS Vehicle Maintenance Facility (VMF), a new 802 LRS administration/office facility, a passenger/air freight terminal, a parking apron for additional aircraft, a new base operations facility, and a new taxiway. The new facilities would require new internal circulation roads that provide access to individual facilities and parking areas, as well as property fencing, and a new access control point. Additionally, the relocation would require the development of new alternate electric power and communication sources. The proposed development would allow JBSA-Lackland to move out from leasebacks and consolidate functions to the west side. The relocation of facilities would take place under the Long-Term Plan, being completed within 16 to 20 years following the proposed land acquisition.

The "Go West" Plan includes the relocation and expansion of the MSA. A new MSA would include several new buildings and facilities, including an administration and training building, holding area, trailer maintenance facilities, loading docks, missile inspection, magazine storage, and a drive through operating location. The new MSA would be located within Parcel B_3 and a parcel B_5. The relocation of the MSA would take place under the Medium-Term Plan, being completed within 6-15 years following the acquisition of land.

Apart from the MSA, none of the other facility relocation and expansion projects are sited and designed. The MSA will first go through a siting request before detailed designs are available. There is a conceptual siting plan, but detailed designs have not yet been prepared for each of the facilities. All final siting and design work would be completed following the acquisition of the property. These facilities will be developed during the Long-Range Plan and would be completed over a period of 16 to 20 years following the acquisition of land.

Table 2-2: Description of Proposed Facilities

PROPOSED BUILDING	SQUARE FOOTAGE
802 LRS Administration / Office Facility	14,186
802 LRS VMF	17,197
802 LRS Vehicle Storage Area and Service Rack	1,984
802 LRS Warehouse	133,515
AGE Facility	11,900
AGE Storage Yard	Unknown
Base Operations Facility	12,000
Cargo Deployment Function Yard	Unknown
MSA for 149 FW	Unknown
Parking Apron for Additional Aircraft	Unknown
Passenger/Air Freight Terminal with Secure Parking and Flight Kitchen	64,107
Transient Hangar / Mobility Processing and Parking Apron	Unknown

2.2 Selection Standards

CEQ regulations mandate the consideration of reasonable action alternatives to accomplish the proposed action. “Reasonable alternatives” are those that could also be utilized to meet the purpose of and need for the Proposed Action. Per the requirements of 32 CFR Part 989, selection standards are used to help determine the feasibility of each action alternative, including the extent to which each action alternative would meet the potential facilities requirements and fulfill the purpose and need for the Proposed Action. This section outlines the selection standards that were used by the USAF and supported component missions to develop and analyze these alternatives.

In order to meet the requirements of the MSA specifically, the new location would require:

- Maximize use of property;
- Allow for economic growth;
- Increase base resiliency and efficiency;
- Provide an increased level of security;

- Allow for future expansion and development; and
- Not to be located within the floodplain.

2.3 SCREENING OF ACTION ALTERNATIVES

Alternatives for the proposed DEAAG land acquisition were developed using the criteria described above to identify suitable development alternatives.

Alternative 1: Proposed Action. JBSA-Lackland and the USAF propose to acquire 11 parcels totaling 345 acres of city and privately owned land in order to provide a future location to implement the "Go West" Plan and its components including relocating leaseback facilities from the PSA to the west side of the flight line and the development a new MSA, in order to meet mission critical needs. Initial activities must be taken in order to secure the opportunity and to implement the "Go West" Plan. It is possible that fewer than eleven parcels might be pursued depending on the development scenario adopted by the USAF and proposed by CoSA in the DEAAG grant application.

Alternative 2. Development under the Alternative 2 would consolidate functions to the west side of the flight line, not including the 21.85-acre parcel utilized by the CoSA vehicle impound facility (Parcel B_5). Therefore, the CoSA Vehicle impound facility located on Parcel B_5 (**Table 2-1** and **Figure 2-2**) would be preserved. Under this alternative the MSA would not be able to be relocated to the proposed location under the medium-term plan of the "Go West" Plan.

The selection standards described in **Section 2.2** were applied to these alternatives to determine which alternative(s) could meet facility development requirements and would fulfill the purpose and need for the action. **Table 2-1** provides a comparison of the alternatives to the selection standards

Table 2-3: Selection Standards

Action Alternatives	Selection Standards					
	Maximize Property Use	Efficiency And Resilience	Increased Safety	Floodplain	Economic Growth	Potential Expansion
Alternative 1: Proposed Action	Yes	Yes	Yes	Yes	Yes	Yes
Alternative 1	No	No	Yes	No	Yes	No
No-Action Alternative	No	No	No	No	No	No

2.4 DETAILED DESCRIPTION OF THE ALTERNATIVES

JBSA-Lackland has identified two action alternative, Alternative 1 and Alternative 2 that may meet requirements for the proposed developments, as well as a No-Action Alternative. The following sections provide descriptions of the alternatives and the No-Action Alternative.

2.4.1 Alternative 1: Proposed Action Alternative

Development under the Proposed Action Alternative would involve the acquisition of privately owned and CoSA-owned lands located northwest of the Growdon Gate. Alternative 1 would include the acquisition of all eleven parcels equaling 345 acres. The land acquired would be used to implement the components of the "Go West" Plan. This includes moving facilities located on the PSA to the west side of the flight line and the development of a new MSA, in order to meet mission critical needs.

2.4.2 Alternative 2

Development under Alternative 2 would not include the acquisition of the CoSA Vehicle Impound Facility, totaling 21.85 acres. CoSA may not be willing to transfer this property given that the relocation of the Vehicle Impound Facility would require CoSA to acquire new land and relocate all facilities and personnel. This may be too difficult and costly for CoSA. As described above in the Proposed Action Alternative, the land acquired would be used to implement the components of the "Go West" Plan. This includes moving facilities located on the PSA to the west side of the flight line. However, Parcel B_5 would not be acquired and the proposed location of the MSA would have to be located elsewhere on the acquired property. This would reduce the overall size of property available for expansion, impacting the property boundary and connecting roads. It would also impact base efficiency and resilience, base safety, and would not move the MSA outside of the floodplain.

2.4.3 No-Action Alternative

Under the No-Action Alternative JBSA-Lackland would not acquire the 345-acre parcel, a new the "Go West" Plan would not be implemented, the leaseback facilities would remain on at PSA and MSA would not be constructed. Therefore, the improvements to economic development, mission safety, efficiency, and effectiveness would not be achieved.

2.5 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD FOR DETAILED ANALYSIS

The previously proposed “Go West” Plan included three independent components:

1) Constructing a new entry control point and connecting road;
2) Relocating airfield operations from the PSA property to the west side of the runway; and
3) Relocating administrative and warehouse space from the PSA to JBSA-Lackland Property.

A new entry control gate is no longer being proposed at this time. This component was previously evaluated in the Growdon Gate/Road Relocation and Property Acquisition EA that was completed in 2012.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1 SCOPE OF THE ANALYSIS

This chapter describes the affected environment, environmental consequences, and cumulative effects for implementation of the Proposed Action and its alternatives, including the No-Action Alternative.

This information will be used to identify the anticipated environmental impacts associated with implementation of the Proposed Action. Descriptions of the project elements and environmental resources provide the basis for analysis of potential effects on the environment from the Proposed Action and No-Action Alternative. Site-specific information presented in this section is derived from on-site evaluation and information obtained from JBSA-Lackland personnel, historical reports, and available public information resources. General and relevant background information regarding JBSA-Lackland is also provided in multiple basewide management plans.

Proposed Actions with identified impacts, however minor, are detailed in the sections below.

3.2 NOISE

Noise is defined as sound that is undesirable and is annoying to people due to interference with ordinary daily activities, such as communication or sleep. A person's reaction to noise varies according to the duration, type, and characteristics of the source, distance between the source and receiver, receiver's sensitivity, background noise level and time of day.

Sound is a series of vibrations (energy) transmitted through a medium that are perceived by a receiver. Sound varies in intensity and frequency. It is measured by accounting for the energy level represented by the amplitude (volume) and frequency (pitch) of those vibrations and comparing that to a baseline standard. Sound pressure level (SPL) described in decibels (dB) is used to quantify sound intensity. It is a measure of the maximum sound pressure at a given instant and known distance. The dB is a logarithmic unit that expresses the ratio of the SPL to a standard reference level. When using decibels to depict airborne SPLs, 0 dB is the threshold of human hearing, and exponential increases occur every 10 dB. An event that generates 60 dB of sound is 10 times louder than one that generates 50 dB of sound.
The Day-Night Average Sound Level (DNL) is one of the most common ways to describe ambient noise exposure over an extended period. DNL is the metric recognized by the U.S. government for measuring noise and its impacts on humans (USAF 2010). It describes a receiver's cumulative noise exposure from all events occurring during a 24-hour period; events occurring between 10:00 p.m. and 7:00 a.m. are increased by 10 dB to account for greater nighttime sensitivity to noise events. The SPL represented by a given decibel value is usually adjusted to make it more relevant to sound that the human ear hears especially well; for example, an "A-weighted" decibel (dBA) is derived from emphasizing mid-range frequencies to which the human ear responds especially well and de-emphasizing the lower and higher range frequencies.

Federal and local governments have established noise guidelines and regulations for the purpose of protecting citizens from potential hearing damage and from various other adverse physiological,

psychological, and social effects associated with noise. The potential for hearing loss arises from direct exposure to noise on a regular, continuing long-term basis to levels of approximately 75 dBA DNL. Hearing loss is not expected in people exposed to 75 dBA DNL or less for 8 hours per day, as long as noise exposure over the remaining 16 hours per day is low enough to not substantially contribute to the 24-hour average (USEPA 1974).

Building construction and demolition work can cause an increase in sound well above the ambient level. **Table 3-1** lists noise levels associated with the types of construction equipment expected to be utilized during site preparation, construction, and finishing work associated with the Proposed Action. As shown in **Table 3-1**, the construction equipment produces peak SPLs ranging from 75-85 dBA at 50 feet from the source which decreases by 6 dBA with every doubling of the distance from the source. It should also be noted that this table includes the level generated but does not account for the ability of sound to be reflected or absorbed by nearby objects, which could further reduce noise levels.

Table 3-1: Construction Equipment Peak Sound Pressure Levels

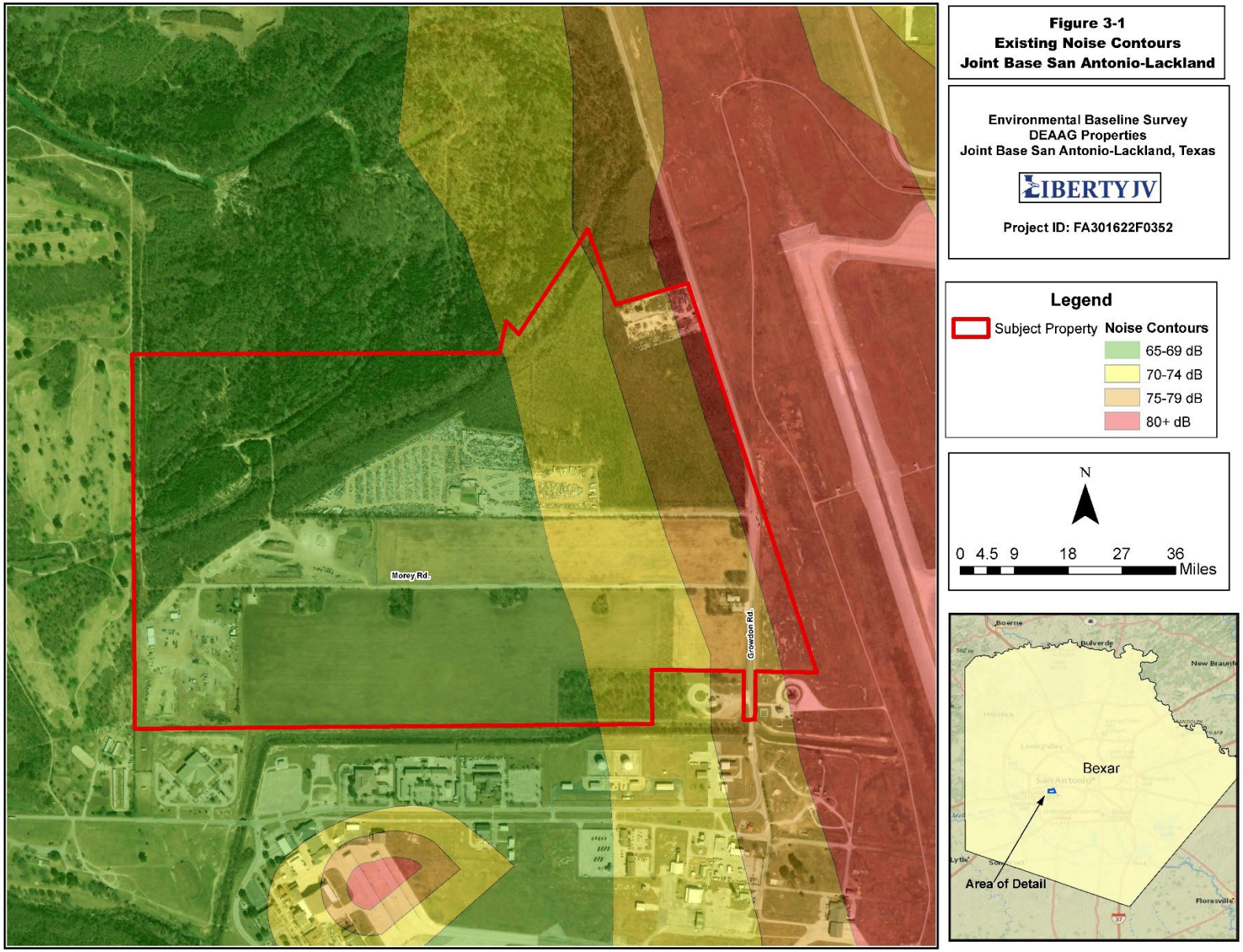
Equipment	Generated Noise dBA[1]				
	50 feet	100 feet	200 feet	400 feet	800 feet
Backhoe	78	72	66	60	54
Compactor	83	77	71	65	59
Crane	81	75	69	63	57
Dump Truck	76	70	64	58	52
Excavator	81	75	69	63	57
Front-End Loader	79	73	67	61	55
Grader	85	79	73	67	61
Paver	77	71	65	59	53
Pickup Truck	75	69	63	57	51
Roller	80	74	68	62	56
Scraper	84	78	72	66	60

Notes: [1]Noise is from a single source, dBA is “A-weighted” decibel
Source: U.S. Department of Transportation (USDOT) 2006

To assist the surrounding communities in land use decisions, the Department of Defense (DoD) uses noise contours to illustrate the exposure to noise associated with aviation activities. Below is a general definition of these zones (Bexar County 2011):

- Noise Zone I: This area, considered to have minimal noise exposure, includes areas in which DNL is less than 65 dBA and is acceptable for all types of land uses.

- Noise Zone II: This area is considered to have significant noise exposure and is normally unacceptable for noise-sensitive land uses. It consists of an area where the DNL is between 65 and 75 dBA.
- Noise Zone III: This is an area around the source of noise in which the DNL is greater than 75 dBA. This zone is considered an area of severe noise exposure and is deemed unacceptable for noise sensitive activities.


Morey Rd.
Growdon Rd.
Figure 3-1
Existing Noise Contours
Joint Base San Antonio-Lackland
Environmental Baseline Survey
DEAAG Properties
Joint Base San Antonio-Lackland, Texas
LIBERTYJV
Project ID: FA301622F0352
Legend
Subject Property
Noise Contours
65-69 dB
70-74 dB
75-79 dB
80+ dB
N
0 4.5 9 18 27 36
Miles
Bexar
Area of Detail

3.2.1 Affected Environment

3.2.1.1 Existing Conditions

The military noise environment generally consists of three types of noise: transportation noise from aircraft and vehicles, noise from firing at small-arms ranges, and impulsive noise from large-caliber weapons firing and demolition operations. Noise associated with activities at JBSA-Lackland is characteristic of that associated with most USAF installations with a flying mission. Since JBSA-Lackland is primarily a training base, most operations are conducted during daylight hours and on weekdays.

The project area is located along the northern boundary of Kelly Annex, where the primary source of noise is military aircraft operations (USAF 2010).

JBSA-Lackland controls and schedules missions to keep noise levels low, especially at night, and aircraft maintenance engine run-up locations have been established in areas to minimize noise for the surrounding areas. The USAF engages in a program of extensive local community outreach to facilitate land use planning to foster the establishment of compatible uses in the vicinity of its installations. The Air Installation Compatible Use Zone (AICUZ) program at JBSA-Lackland is an ongoing process. The AICUZ program provides guidance to air bases and local communities in planning land uses compatible with airfield operations by describing existing aircraft noise and flight safety zones on and near USAF installations.

Transportation noise in the area is from vehicle use on Growdon Road and consists of passenger vehicles, delivery and fuel trucks, and military vehicles. Passenger vehicles make up the majority of the vehicles present on the base and the surrounding local roadways.

The 345-acre subject property that would be acquired under the Proposed Action is subject to noise levels ranging from 65-69 dBA DNL to 80+ dBA DNL. Of the 345 acres, 292 acres of land are considered to be in Noise Zone II, and 53 acres are considered to be Noise Zone III. **Figure 3-1** shows the existing noise contours and their relationship to the project site.

A noise-sensitive receptor is commonly defined as the occupants of any facility where a state of quietness is a basis for use such as a residence, hospital, or church. Potential noise-sensitive receptors in the vicinity of the proposed project area include the Gateway Hills Golf Course, Camargo Park, Stillman Park, Stacey High School, Lackland Elementary School, Wilford Hall Medical Center, and various residences. The closest potential residential noise-sensitive receptor to the construction activities that would occur as a result of the Proposed Action are the various residences located 0.6 miles north of the project area.

These residences are currently located within the 65-69 dBA DNL aircraft noise contour and are also situated approximately 60 feet from the U.S. Highway 90 access road, and approximately 200 feet from U.S. Highway 90, where traffic noise is elevated. According to Texas Department of Transportation (TXDOT), approximately 65,800 vehicles travel daily along U.S. Highway 90 at the north end of the project area near Callaghan Road (TXDOT 2022). The closest non-residential potential noise-sensitive receptor, Gateway Hills Golf Course, is located directly west of the proposed project site and is within the 65-69 dBA DNL noise contour.

3.2.2 Environmental Consequences

The following factors were considered in evaluating potential noise impacts: (1) the degree to which noise levels generated by construction activities were higher than the ambient noise levels; (2) the degree to which there is annoyance and/or interference with activity because of the alternative; and (3) the proximity of potential noise-sensitive receptors to the noise source.

Noise naturally dissipates by atmospheric attenuation as it travels through the air. Factors that can affect the amount of attenuation are ground surface, foliage, topography, and humidity. Assuming that noise from the construction equipment radiates equally in all directions, the sound intensity would diminish inversely as the square of the distance from the source. Therefore, in a free field (no reflections of sound), the SPL decreases 6 dBA with every doubling of the distance from the source (USEPA 1977). Impacts from noise would be considered significant if the alternative resulted in noise levels at potential noise-sensitive receptors which exceed the baseline noise contours.

3.2.2.1.1 Alternative 1: Proposed Action

The noise associated with the operation of machinery on construction sites is typically short-term, intermittent, and highly localized.

It is anticipated that the construction vehicles and equipment that would be used during demolition, site preparation, construction, and finishing work would be similar to those presented in **Table 3-1**. Construction equipment expected to be used within the project area would produce peak SPLs ranging from 75 to 85 dBA at 50 feet from the source. The SPL decreases 6 dBA with every doubling of distance from the source (USEPA 1977). It should also be noted that **Table 3-1** includes the SPL generated at various distances from the source but does not account for the ability of sound to be reflected/absorbed by nearby objects, which could further reduce noise levels. Additionally, interior noise levels within buildings are generally reduced by 20 dBA, depending on the type of walls and windows (U.S. Navy 2005).

USAF and civilian workers employed at the buildings located approximately 300 feet from the project area would experience temporary increases in peak noise levels because of construction activities; however, these increases in noise levels would be short-term, lasting only as long as the duration of construction activities. It is anticipated that peak noise levels inside these buildings would be between 44 and 51 dBA. It should also be noted that these buildings are located within the 65-69 dBA DNL aircraft noise contour; therefore, average baseline noise levels within the buildings are already between 45-49 dB.

Areas adjacent to proposed construction activities would temporarily experience peak outside noise levels similar to those noted in **Table 3-1**. The closest potential residential noise-sensitive receptors are located 0.6 miles north of the project area. These residences are separated from the project area by U.S. Highway 90.

Due to the distance from the project area, peak outside noise levels from construction activities would be approximately 45 dBA at the nearest residences. These residences are already located within the 65-69 dBA DNL noise contours from the active runway and are therefore exposed to higher average noise levels on a daily basis. Sound levels within the residences would be even

lower due to the sound transmission loss through building walls and windows. As previously described, noise levels within buildings are generally reduced by 20 dBA, depending on the type of walls and windows (U.S. Navy 2005). Therefore, interior noise levels would be well below the levels which cause annoyance and/or hearing loss.

The Gateway Hills Golf Course, located within the 65-69 dBA DNL noise contour, is also a potential noise-sensitive receptor adjacent to the project area. Visitors to the golf course would experience peak construction noise levels around 61 dBA. The noise level is below the baseline range of 65-69 dBA; therefore, construction noise levels would not cause any adverse impacts. The noise would last only as long as construction was occurring in the area, and the noise would return to normal levels as construction activities moved away from the site. This site is considered a recreational area and therefore is not a site of permanent residents. Visitors to these sites are intermittent and would only be exposed to elevated noise levels during their visit to the sites. To reduce noise exposure to visitors, signage could be posted at each site during construction in the area, warning of elevated noise levels. Peak noise levels at potential noise-sensitive receptors would not be expected to exceed baseline conditions as a result of the Proposed Action.

The implementation of best management practices (BMPs) would help ensure noise levels are limited as much as possible during construction. Noise-generating heavy equipment would be equipped with the manufacturer's standard noise control devices (i.e., mufflers, baffling, and/or engine enclosures). All equipment would be properly maintained to ensure that no additional noise from worn or improperly maintained equipment parts is generated. Construction activities would occur between 7:00 a.m. and 7:00 pm and would be conducted according to the Occupational Safety and Health Administration (OSHA) regulations 29 CFR §1910.95 and 29 CFR §1926.52. Occupational exposure to the noise from heavy equipment could be reduced by requiring workers to wear appropriate hearing protection. Hearing protective devices such as ear plugs or earmuffs would be worn at all locations where workers may be exposed to high noise levels.

The relocation of facilities associated with the Proposed Action would involve the development of new aircraft ramp space and hangars within the project area. With the operation of these facilities, the eastern part of the project area would be within the 70-74 dBA DNL noise contour due to airplane taxiing noise. This is approximately the noise contour this part of the project area is currently located within, due to noise from the PSA flight line (**Figure 3-1**). Thus, the operation of these facilities would not be expected to result in noise levels that would be significantly higher than baseline conditions. Other future growth of the airfield mission activities would be analyzed separately pursuant to the requirement of NEPA.

3.2.2.1.2 Alternative 2

The amount of noise generated during construction under this alternative would be slightly less than that described for the Proposed Action since construction would not occur at the City of San Antonio Impound Lot. As a result, noise levels would be slightly lower in the northern part of project area during construction. However, operational noise levels – including industrial noise from the City of San Antonio Impound Lot – would remain similar. As with the Proposed Action, peak noise levels at potential noise-sensitive receptors would not be expected to exceed baseline conditions.

3.2.2.1.3 No-Action Alternative

Under the No-Action Alternative, noise within the project area and the surrounding vicinity would remain unchanged because no actions would be taken.

3.3 AIR QUALITY

3.3.1.1 Standards and Regulations:

The USEPA has established primary and secondary National Ambient Air Quality Standards (NAAQS) under the Clean Air Act Amendments of 1990 (CAAA). The CAAA also set emission limits for certain air pollutants from specific sources, set new source performance standards based on best demonstrated technologies, and established national emission standards for hazardous air pollutants.

The CAAA specifies two sets of standards – primary and secondary – for each regulated air pollutant. Primary standards define levels of air quality necessary to protect public health, including the health of sensitive populations such as people with asthma, children, and the elderly. Secondary standards define levels of air quality necessary to protect against decreased visibility and damage to animals, crops, vegetation, and buildings. Federal air quality standards are currently established for six pollutants (known as criteria pollutants), including carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), sulfur oxides (SO_x, commonly measured as sulfur dioxide [SO_2]), lead (Pb), particulate matter equal to or less than 10 micrometers in aerodynamic diameter (PM_{10}), and particulate matter equal to or less than 2.5 micrometers in aerodynamic diameter ($PM_{2.5}$). Although O_3 is considered a criteria pollutant and is measurable in the atmosphere, it is often not considered as a pollutant when reporting emissions from specific sources, because O_3 is not typically emitted directly from most emissions sources. Ozone is formed in the atmosphere from its precursors – nitrogen oxides (NO_x) and volatile organic compounds (VOCs) – that are directly emitted from various sources. Thus, emissions of NO_x and VOCs are commonly reported instead of O_3.

The NAAQS for the six criteria pollutants are shown in **Table 3-1**. Units of measure for the standards shown in this table are parts per million (ppm) by volume, parts per billion (ppb) by volume, and micrograms per cubic meter of air ($\mu g/m^3$).

The USEPA classifies the air quality within an Air Quality Control Region (AQCR) according to whether the region meets federal primary and secondary air quality standards. An AQCR or portion of an AQCR may be classified as attainment, nonattainment, or unclassified with regard to the air quality standards for each of the criteria pollutants. "Attainment" describes a condition in which standards for one or more of the six pollutants are being met in an area. The area is considered an attainment area for only those criteria pollutants for which the NAAQS are being met. "Nonattainment" describes a condition in which standards for one or more of the six pollutants are not being met in an area. "Unclassified" indicates that air quality in the area cannot be classified and the area is treated as attainment. An area may have all three classifications for different criteria pollutants.

Table 3-2: National Ambient Air Quality Standards

Pollutant		Primary/ Secondary	Averaging Time	Level	Form
Carbon Monoxide (CO)		Primary	8 hours	9 ppm	Not to be exceeded more than once per year
			1 hour	35 ppm	
Lead (Pb)		Primary and Secondary	Rolling 3-month average	0.15 µg/m^3[(a)]	Not to be exceeded
Nitrogen Dioxide (NO_2)		Primary	1 hour	100 ppb	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
		Primary and Secondary	1 year	53 ppb[(b)]	Annual mean
Ozone (O_3)		Primary and Secondary	8 hours	0.070 ppm[(c)]	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years
Particle Pollution (PM)	$PM_{2.5}$	Primary	1 year	12.0 µg/m^3	Annual mean, averaged over 3 years
		Secondary	1 year	15.0 µg/m^3	Annual mean, averaged over 3 years
		Primary and Secondary	24 hours	35 µg/m^3	98th percentile, averaged over 3 years
	PM_{10}	Primary and Secondary	24 hours	150 µg/m^3	Not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide (SO_2)		Primary	1 hour	75 ppb[(d)]	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
		Secondary	3 hours	0.5 ppm	Not to be exceeded more than once per year

Notes:

(a): In areas designated nonattainment for the Pb standards prior to the promulgation of the current (2008) standards, and for which implementation plans to attain or maintain the current (2008) standards have not been submitted and approved, the previous standards (1.5 µg/m^3 as a calendar quarter average) also remain in effect.

(b) The level of the annual NO_2 standard is 0.053 ppm. It is shown here in terms of ppb for the purposes of clearer comparison to the 1-hour standard level.

(c) Final rule signed October 1, 2015, and effective December 28, 2015. The previous (2008) O_3 standards are not revoked and remain in effect for designated areas. Additionally, some areas may have certain continuing implementation obligations under the prior revoked 1-hour (1979) and 8-hour (1997) O_3 standards.

(d) The previous SO_2 standards (0.14 ppm 24-hour and 0.03 ppm annual) will additionally remain in effect in certain areas: (1) any area for which it is not yet 1 year since the effective date of designation under the current (2010) standards; and (2) any area for which an implementation plan providing for attainment of the current (2010) standard has not been submitted and approved and which is designated nonattainment under the previous SO_2 standards or is not meeting the requirements of a state implementation plan (SIP) call under the previous SO_2 standards (40 CFR §50.4[3]). A state implementation plan (SIP) call is an USEPA action requiring a state to resubmit all or part of its State Implementation Plan to demonstrate attainment of the required NAAQS.

Source: USEPA 2022

The CAAA requires federal actions to conform to any applicable state implementation plan (SIP). USEPA has promulgated regulations implementing this requirement (USEPA 2003a, 2003b). A SIP must be developed to achieve the NAAQS in nonattainment areas (i.e., areas not currently attaining the NAAQS for any pollutant) or to maintain attainment of the NAAQS in maintenance areas (i.e., areas that were nonattainment areas but are currently attaining that NAAQS). General Conformity refers to federal actions other than those conducted according to specified transportation plans. Therefore, the General Conformity rule applies only to non-transportation actions in nonattainment or maintenance areas. Such actions must perform a determination of conformity with the SIP if the emissions resulting from the action exceed applicability thresholds specified for each pollutant and classification of nonattainment. Both direct emissions from the action itself and indirect emissions that may occur at a different time or place but are an anticipated consequence of the action must be considered. The Transportation Conformity Rule applies to transportation plans, programs, and projects which are developed, funded, or approved by the Federal Highway Administration or Federal Transit Administration. The Proposed Action would not be developed, funded, or approved by either of these organizations; therefore, the Transportation Conformity Rule does not apply to this project.

A number of actions are exempted from the requirements of General Conformity including:

- Actions that do not have emissions increases.
- Actions with an emissions increase that is clearly *de minimis* (21 actions are listed; primarily actions that are administrative, legal, or routine in nature including routine movement of mobile assets, material, and personnel as well as routine maintenance and repair).
- Actions that are not reasonably foreseeable or that respond to natural disasters or emergencies.
- Actions that have been approved under specified Federal programs.

If an action triggers the applicability thresholds and is not exempt from the requirements, the Federal agency must demonstrate and document that the direct and indirect emissions would conform to the SIP. It must be demonstrated that the proposed action will not:

- Cause or contribute to a new violation of the NAAQS.
- Interfere with the SIP.
- Increase the frequency or severity of existing violations.
- Delay attainment or any required progress toward that attainment.

The determination generally involves emission estimation and air quality modeling for the entire nonattainment or maintenance area (usually a multi-county area). If the initial conformity determination demonstrates that the proposed action does not conform to the SIP, measures must be established and committed to mitigate the projected air quality impacts. A timeline for implementation of these measures may be specified; however, enforcement measures must also be established to ensure that they are implemented as required.

3.3.1.2 Greenhouse Gases

The six primary greenhouse gases (GHGs) include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6), The emissions of each GHG are calculated separately and then converted to CO_2 equivalents (CO_2e) on the basis of their global warming potential (GWP), the universal unit of measurement expressed in terms of one unit of CO_2. GWP is used to evaluate the release of different GHGs against a common basic measure of how much a given mass of greenhouse gas is estimated to contribute to climate change. It is a relative scale which compares the gas in question to that of the same mass of CO_2 (which defined as having a GWP of 1).

For purposes of this EA, only three of the six primary GHGs have been considered for analysis because GHG emissions associated with the Proposed Action are expected to be limited to CO_2, CH_4, and N_2O. These three GHGs represent the majority of CO_2e associated with construction and operational activities. The other three GHGs were not considered in the potential emissions from the Proposed Action as they are presumed to either not be emitted or be emitted in negligible amounts. HFCs are most used in refrigeration and air conditioning systems, and PFCs and SF_6 are predominantly emitted from various industrial processes including aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting, none of which are part of the Proposed Action.

Direct emissions of CO_2, CH_4, and N_2O occur naturally in the atmosphere, but human activities have increased global GHG atmospheric concentrations. In 2021, total U.S. GHG emissions were 6,347.7 million metric tons of CO_2e. U.S. total GHG emissions increased from 2020 to 2021 by 6.8 percent (after accounting for sequestrations from the land sector). This increase was largely driven by an increase in CO_2 emissions from fossil fuel combustion (USEPA 2023).

3.3.2 Affected Environment

JBSA-Lackland is located within the Metropolitan San Antonio Interstate AQCR 217, which consists of the counties of Atascosa, Bandera, Bexar, Comal, Dimmitt, Edwards, Frio, Gillespie, Gonzales, Guadalupe, Karnes, Kendall, Kerr, Kimble, Kinney, La Salle, Mason, Maverick, Medina, Real, Uvalde, Val Verde, Wilson, and Zavala. The San Antonio Metropolitan Statistical Area (Bexar, Comal, Guadalupe, and Wilson Counties) is designated as a moderate

nonattainment area for O_3 with an attainment deadline of September 24, 2024. Therefore, the base is subject to the General Conformity regulations (40 CPR Parts 6, 51 and 93). This requires a conformity demonstration for each pollutant where the total direct and indirect emissions from a Federal action exceeds the corresponding *de minimis* level.

Potential new emissions from the Proposed Action would occur primarily from construction activities at JBSA-Lackland and would include activities such as grading, excavation, filling, and equipment operation. Thus, emissions would be localized within the project area and the surrounding vicinity. For this reason, the analysis in this EA will address potential impacts within the San Antonio Metropolitan Statistical Area, instead of the entire AQCR that covers a large geographical area.

3.3.3 Environmental Consequences

The following factors were considered in evaluating air quality: (1) the short- and long-term air emissions generated from road construction and demolition; and building construction and demolition; (2) the type of emissions generated; and (3) the potential for emissions to result in ambient air concentrations that exceed one of the NAAQS or SIP requirements. A conformity analysis is not required if the emissions of NO_x and VOC are emitted in quantities less than the corresponding *de minimis* level. For purposes of analysis, impacts to air quality would be considered significant if emissions from the alternatives would be considered regionally significant by the USEPA.

3.3.3.1.1 Alternative 1: Proposed Action

Fugitive dust and construction-related air emissions would result from the use of heavy equipment. Specific air quality impacts would include fugitive dust emissions generated during ground clearing and grading activities and combustion emissions associated with construction-related vehicles and heavy construction equipment.

Combustion emissions associated with construction would be short-term in nature and similar to emissions from other construction activities on the installation in the past. The emission of minor amounts of air pollution would be unavoidable; however, the impacts associated with the Proposed Action would have little impact when compared to the overall San Antonio Metropolitan Statistical Area emissions.

GHG emissions would also occur during construction. Any emission of GHGs represents an incremental increase in global GHG concentration; however, the construction activities associated with the Proposed Action would be expected to result in a limited amount of emissions that would not contribute significantly to climate change. Activities under the Proposed Action are not subject to the requirements of the USEPA National Greenhouse Gas Reporting Rule.

The General Conformity rule is set forth in 40 CFR Part 51 Subpart W – Determining Conformity of General Federal Action to State and Federal Implementation Plans. According to 40 CFR §51.853(b), Federal actions require a conformity determination for each pollutant where the total of direct and indirect emissions in a nonattainment or maintenance area caused by a Federal action would equal or exceed any of the rates in paragraphs 40 CFR §51.853(b)1 or 2.

The Proposed Action is located in Bexar County, which is currently designated moderate nonattainment area for O_3. All other criteria pollutants are in attainment (Texas Commission on Environmental Quality [TCEQ] 2023b). Emissions associated with the Proposed Action would be consistent with normal construction activities and would not be expected to exceed the General Conformity *de minimis* thresholds.

BMPs to minimize air quality impacts associated with fugitive dust and combustion emissions would include watering the disturbed area of the construction, covering dirt and aggregate trucks and/or piles, prevention of dirt carryover to paved roads, the use of erosion barriers and wind breaks, and the use of low sulfur and bio-diesel fuel in construction/transport vehicles.

Since operations are being relocated in the Proposed Action, operational air emissions would not be expected to change substantially when compared to current existing air emissions. The potential expansion and addition of more operations that may have greater impact on air quality would be re-examined in the future pursuant to NEPA, as required.

3.3.3.1.2 Alternative 2

The impacts to air quality under this alternative would be expected to be slightly less than those described for the Proposed Action. Without acquiring the City of San Antonio Impound Lot land, construction would not occur within this area, and construction-related dust and criteria pollutant emissions would be slightly reduced. Little impact to local air quality would be expected from this alternative.

3.3.3.1.3 No-Action Alternative

Under the No-Action Alternative, air quality within the project area would remain unchanged because no actions would be taken.

3.4 WATER RESOURCES

3.4.1 Affected Environment

3.4.1.1 Surface Waters and Water Quality

JBSA-Lackland is located within the San Antonio River Basin. Surface water on the installation includes Leon Creek, Medina Creek, Long Hollow Creek, various ponds and water hazards developed for training. As shown in **Figure 3-1**, Leon Creek is located within the project area. Leon Creek is designated by the USFWS National Wetlands Inventory (NWI) as a lower perennial riverine waterbody with an unconsolidated bottom and permanent flooding or water flow (R2UBH) (USFWS 2023c). Based on review of topographic mapping, Leon Creek flows south and continues approximately 19 miles into Medina River, which flows an additional 9 miles southeast before its confluence with the San Antonio River. Along the southern boundary of the 345 acres proposed for acquisition, there is also a drainage ditch designated by the USFWS NWI as an intermittent streambed waterbody that has a temporary water flow and has been excavated (R4SBAx) (USFWS 2023c). This drainage ditch flows directly into Leon Creek.

In 2006, TCEQ assessments indicated that low dissolved oxygen concentrations in Lower Leon Creek were not optimal for aquatic life. Through more collections of dissolved oxygen samples, the impairment of the aquatic life use for the creek was removed from the state's list of impaired waters in 2016 (TCEQ 2023a). The 2022 Texas Integrated Report listed Lower Leon Creek as an impaired waterway due to polychlorinated biphenyls in edible tissue and bacteria in water (a concern with recreational usage). A Total Maximum Daily Load for this waterway is underway, scheduled, or will be scheduled (TCEQ 2022).

3.4.1.2 Floodplains

Federal agencies are required, under EO 11988, Floodplain Management, to provide leadership and take action to reduce the risk of flood loss; minimize the impacts of floods on human safety, health, and welfare; and restore and preserve the natural and beneficial values of floodplains when acquiring, managing, or disposing of Federal lands. As depicted in **Figure 3-1**, the Federal Emergency Management Association (FEMA) has designated a portion of the project area as being located within the 100-year floodplain of Leon Creek. Approximately 85 of the 345 acres are located in the 100-year floodplain. None of the project area is located within the 500-year floodplain (FEMA 2023). Floodplain maps are undergoing updates in Bexar County and all of Texas based on new 100-year and 500-year storm definitions. These future updates could potentially change the overall acres impacted within the project area.

3.4.1.3 Wetlands

A Waters of the U.S. and wetlands survey was conducted in May 2011 for the *Growdon Gate/Road Relocation and Property Acquisition Environmental Assessment* in accordance with the U.S. Army Corps of Engineers (USACE) Wetland Delineation Manual (Environmental Laboratory 1987) and the Regional Supplement to the USACE Wetland Delineation Manual: Great Plains Region (Version 2.0) (USACE 2010). According to this manual, an area is identified as a wetland only if it meets all three wetlands parameters: hydric soils, hydrophytic vegetation, and wetlands hydrology. Field surveys consisted of identifying the vegetation, soils, and hydrology of potential wetland areas. Atypical weather for the region resulted in an ongoing drought making the wetland delineation difficult to conduct. The drought caused soils, which may normally be saturated, to be dry and vegetation that would normally be growing and/or in bloom to be dormant.

During the May 2012 field survey, five potential wetlands were located and delineated within the "Go West" Plan project area, locating on a straight line south from Callaghan Road. Together, these wetlands totaled approximately 0.2 acres (GMI 2011b).

3.4.1.4 Stormwater

JBSA-Lackland operates under the Multi-Sector General Permit TXR050000 for storm water discharges related to industrial activities and maintains a Texas Pollutant Discharge Elimination System (TPDES) Municipal Separate Storm Sewer System General Permit (Permit No. TXR040068). In accordance with these permits, JBSA-Lackland has implemented and maintains a Storm Water Management Program for implementing control measures and BMPs related to stormwater (EQM and Tetra Tech 2020).

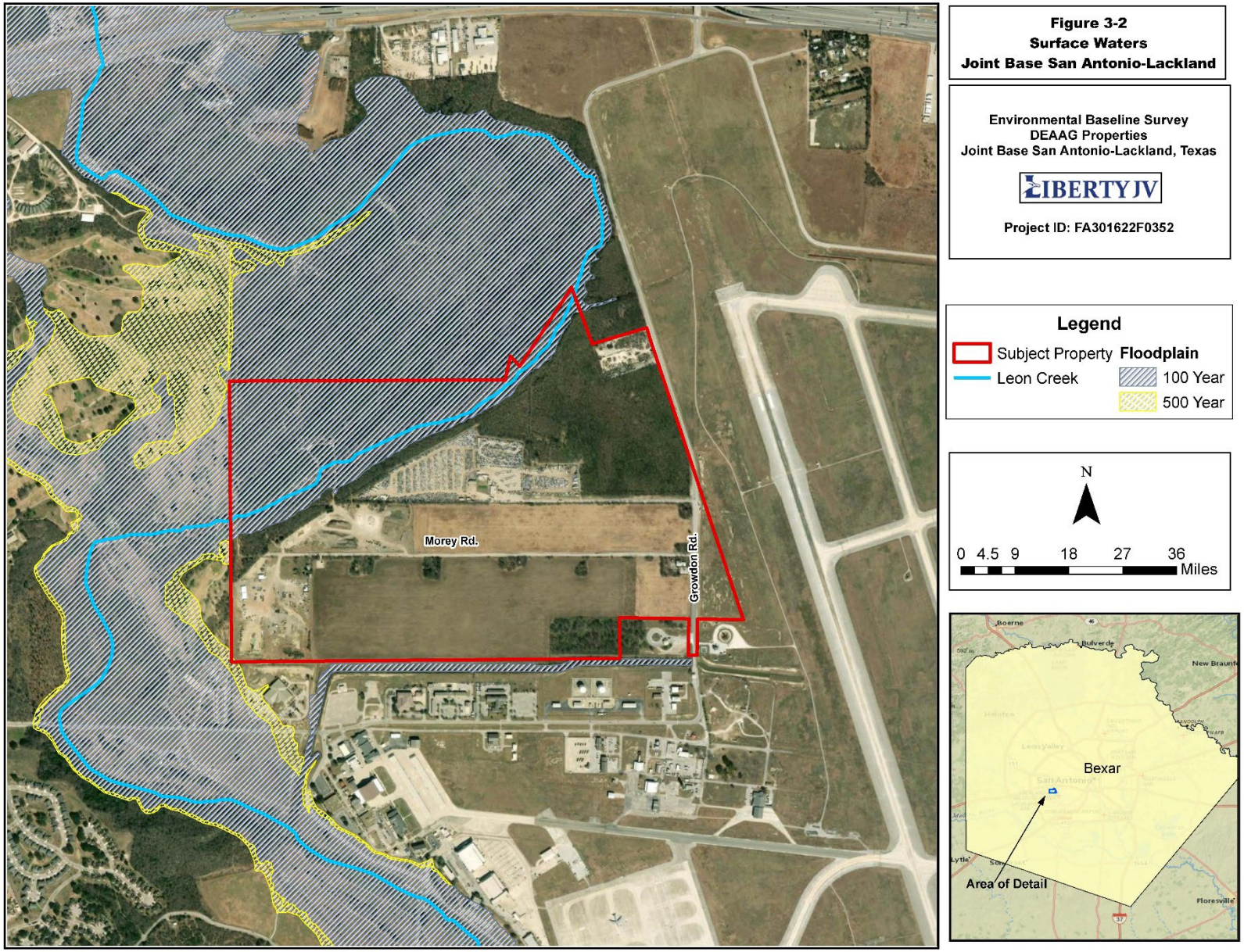
The majority of storm water runoff on JBSA-Lackland is drained through a series of channels consisting of natural drainages, open man-made ditches, and underground storm drainages to various permitted outfall locations, such as Leon Creek, Indian Creek, and Medio Creek. In the project area, Leon Creek serves as the main discharge location for the man-made ditch located on the southern boundary of the 345-acre acquisition area, as discussed in **Section 3.4.1.1**. Based on review of aerial photography, the remainder of the project area is drained by overland sheet flow and a few minor roadside ditches. Permitted outfalls into Leon Creek are monitored in accordance with TCEQ reporting requirements.

3.4.1.5 Groundwater and Groundwater Supply

A shallow alluvial aquifer in San Antonio, located between 5 and 15 feet below ground surface (bgs), contains groundwater not suitable for use as a potable water source due to poor water quality. Low-permeable Del Rio clay separates this aquifer from the underlying Edwards Aquifer (USAF 2010). The primary source of water for JBSA-Lackland and the San Antonio, Texas area is groundwater from the Edwards Aquifer. Water from the aquifer is primarily used for municipal, irrigation, and recreational purposes (Texas Water Development Board [TWDB] 2023a). This aquifer, composed primarily of limestone, collects groundwater runoff in an underground reservoir that consists of contributing, recharge, transition, and artesian zones stretching across 13 counties in south central Texas. JBSA-Lackland is not located within a recharge zone, but it is in the artesian zone of the Edwards Aquifer. Within the artesian zone, groundwater flows generally southeast and up to the surface at natural discharge points (e.g., Comal, Barton, or San Marcos Springs) or is manually pumped out through municipal or private wells. The median annual recharge rate of the Edwards Aquifer between 1934 and 2021 was 547,000 acre-feet/year with a median well withdrawal of 330,800 acre-feet/year (EAA 2021a, 2021b). Historical monthly average of depth to groundwater in Bexar County is about 668 feet above mean sea level (EAA 2023), indicating a shallow groundwater at JBSA-Lackland. Currently, there are three active groundwater wells in the project area owned by the San Antonio Police Vehicle Storage, Van De Walle & Sons, and a private landowner. These wells are drilled to 1,000 feet bgs, 1,587 feet bgs, and 1,400 feet bgs respectively. Well records obtained from TWDB indicate that the Van De Walle & Sons well was drilled in 1950, and at the time of installation, ground water levels were approximately 44 feet bgs (TWDB 2023b).

Due to its highly permeable nature, the Edwards Aquifer is considered susceptible to contamination through its recharge zone. Review of historical aerial photography of the proposed acquisition area indicates that a quarry existed within the site boundaries (Raba-Kistner 2011). Due to the possible historic use of the area as a quarry with unknown reclamation activities, it is possible that buried wastes may exist within the subject property lines, and therefore, there may be resulting impacts to groundwater quality. If wastes are present, further evaluation may be required to determine possible impacts to shallow groundwater. Other potential shallow groundwater impacts may exist where stored vehicles have leaked fluid into the soil, at a privately operated facility in the project area. Finally, a portion of the project area appears to have been used as a stockpiled material storage area, which includes river sediments dredged from the San Antonio River. In July 2011, Weston Solutions, Inc. conducted a Phase II Environmental Baseline Survey within the project area and encountered lead and arsenic above Texas Risk Reduction Program (TRRP) critical residential Protective Concentration Levels (PCLs) in groundwater

located within fill material. It was further recommended that further evaluation may be required to determine the extent of impacts to shallow groundwater (USAF 2011).


Morey Rd.
Growdon Rd.
Figure 3-2
Surface Waters
Joint Base San Antonio-Lackland
Environmental Baseline Survey
DEAAG Properties
Joint Base San Antonio-Lackland, Texas
LIBERTY JV
Project ID: FA301622F0352
Legend
Subject Property
Floodplain
Leon Creek
100 Year
500 Year
N
0 4.5 9 18 27 36
Miles
Bexar
Area of Detail

3.4.2 Environmental Consequences

Significant impacts to water resources resulting from the alternatives would potentially occur if project activities: (1) reduce water availability or supply of water to existing users; (2) adversely affect water quality or endanger public health by creating or worsening adverse health hazard conditions; or (3) violate established laws or regulations that have been adopted to protect or manage water resources of an area.

3.4.2.1 Surface Waters and Water Quality

3.4.2.1.1 Alternative 1: Proposed Action

All activities related to the acquisition of properties and relocation of facilities would be located outside of the banks of Leon Creek. Therefore, the Proposed Action would have no direct impacts on Leon Creek. However, during construction and excavation activities, exposed soils could create the temporary potential for erosion and increased sediment runoff into Leon Creek. Additionally, since construction would occur on the newly acquired properties in the project area, there would be an overall increase in impervious cover. Storm water runoff from the new facilities would drain to Leon Creek via overland sheet flow. Runoff from the additional impervious cover would be discharged to Leon Creek via newly constructed storm sewers, as needed. The total amount of impervious cover on the project area would increase under the Proposed Action. The increase in impervious cover would result in a total increase in storm water runoff; however, this increase is minor and could be accommodated by existing storm sewer infrastructure and drainage ditches. If not able to be accommodated, construction activities would take this into account and new infrastructure would be created to accommodate this runoff.

Additionally, excavation and construction could temporarily increase the potential for erosion and sedimentation runoff into Leon Creek directly or via storm water ditches. Increased erosion and sedimentation could result in impacts to the water quality of Lower Leon Creek. As specific new projects are proposed for construction, the contractor would need to acquire a TPDES construction general permit (CGP) for excavation and construction activities. Coverage under this permit requires the submittal of a Notice of Intent (NOI) for projects over 5 acres in size, development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), and incorporation of BMPs within the SWPPP for sediment control during excavation and construction activities. The implemented BMPs would serve to minimize impacts to water quality.

3.4.2.1.2 Alternative 2

Activities under this alternative could potentially have less impact on surface waters and water quality than the Proposed Action since there would be less construction due to the lack of construction on the City of San Antonio Impound Lot. Less construction could cause less potential for erosion and sedimentation runoff and a smaller increase in imperious cover. As described for the Proposed Action, the incorporation of BMPs within the SWPPP for sediment control during excavation and construction activities would serve to minimize impacts to water quality.

3.4.2.1.3 No-Action Alternative

Under the No-Action Alternative, surface waters and water quality within the project area would remain unchanged because no actions would be taken.

3.4.2.2 Floodplains

3.4.2.2.1 Alternative 1: Proposed Action

As discussed in **Section 3.4.1.2** and depicted in **Figure 3-1**, approximately 85 acres of the Proposed Action would be located within the 100-year floodplain (FEMA 2023).

Section 60.3(d)(3) of the National Flood Insurance Program requires that communities prohibit encroachments, fill, new development, substantial improvements, and other development within the adopted regulatory floodway unless it has been demonstrated through an engineering analysis using hydraulic modeling techniques that the proposed project would not result in any increase in flood levels within the community of the base flood (100-year) discharge. No major alterations to drainage patterns or flood carrying capacities of water courses would occur as part of the Proposed Action. The Proposed Action would comply with any stipulated permit condition, including engineering analysis or No-Net Rise Certification (as required).

In accordance with permitting requirements and to minimize the potential for increased sediment loading of drainage areas and downstream surface waterbodies, a SWPPP would be developed for the construction of the Proposed Action. The SWPPP would include the implementation of appropriate BMPs, such as silt fencing and rock filter dams, during construction activities. Additionally, any FEMA stipulated permit conditions would be followed during Proposed Action activities.

3.4.2.2.2 Alternative 2

The impacts to floodplains would be similar for this alternative as those described under the Proposed Action. Since no major alterations to drainage patterns or flood carrying capacities of water courses would occur for this alternative either, this alternative is not expected to greatly impact floodplains.

3.4.2.2.3 No-Action Alternative

Under the No-Action Alternative, floodplains within the project area would remain unchanged because no actions would be taken.

3.4.2.3 Wetlands

3.4.2.3.1 Proposed Action

During the 2011 field survey, five potential wetlands were located and delineated within this project area. However, these wetlands were located in the western portion of the project area, north of Leon Creek, where construction is not currently proposed. The increase in impervious area from the Proposed Action would increase water runoff into Leon Creek. The increased flow

in Leon Creek would indirectly affect the wetlands associated with the riparian habitat along Leon Creek; however, the increase in impervious area is minor relative to the overall drainage area; therefore, the effect on the wetlands would be minor. With potential expansion of facilities and activities in the future, impact to wetlands may have to be re-examined, but this will be analyzed separately pursuant to the requirements of NEPA.

3.4.2.3.2 Alternative 2

The impacts to wetlands from this alternative will be similar to those described in the Proposed Action section with this alternative. The City of San Antonio Impound Lot would not be developed and, as such, there would be slightly less impervious cover than with the Proposed Action. Effects on wetlands would remain minor.

3.4.2.3.3 No-Action Alternative

Under the No-Action Alternative, wetlands within the project area would remain unchanged because no actions would be taken.

3.4.2.4 Stormwater

3.4.2.4.1 Alternative 1: Proposed Action

Short-term increases in soil erosion and sediment loadings in storm water runoff would be expected during the Proposed Action. These short-term impacts would be covered under the TPDES CGP permit for large projects (greater than 5 acres) obtained from the TCEQ. The CGP authorizes storm water discharges from large and small construction-related activities where those discharges have a potential to enter surface waters or storm drain systems. Coverage under this permit requires the submittal of a NOI, development, and implementation of a SWPPP, and incorporation of BMPs within the SWPPP for sediment control during excavation and construction activities. A SWPPP would be developed following the requirements of the TPDES General Permit (TXR150000) relating to storm water discharges associated with construction activities. Utilities would need to be developed in the project area to support the relocation of facilities. As individual projects are designed, they will also include the design of utility extensions with enough capacity to accommodate the updated facilities.

Runoff from the additional impervious cover of the relocated facilities would be discharged to Leon Creek via newly constructed storm sewers that would be designed to handle standard runoff from paved areas. The total amount of impervious cover on the project site would increase under the Proposed Action and would result in an increase in storm water runoff. However, this increase is minor and is expected to be accommodated by new or existing storm sewer infrastructure and drainage ditches.

3.4.2.4.2 Alternative 2

Impacts on stormwater from this alternative would not differ significantly from impacts from the Proposed Action. Even if the City of San Antonio Impound Lot is not developed, utility extensions

would still be designed to accommodate stormwater increases from relocated facilities in other portions of the project area. The increase of stormwater runoff would still be expected to be minor.

3.4.2.4.3 No-Action Alternative

Under the No-Action Alternative, stormwater within the project area would remain unchanged because no actions would be taken.

3.4.2.5 Groundwater and Groundwater Supply

3.4.2.5.1 Proposed Action

While the shallow alluvial aquifer is located between 5 and 15 feet bgs, and potable groundwater at the project location is estimated to be shallow (approximately 44 feet bgs), excavation activities related to the construction of new facilities are not anticipated to reach greater than a depth of 5 feet bgs. Demolition waste materials would be properly inspected and disposed of, so that groundwater would not be impacted. The Proposed Action would not reduce water availability or supply of water to existing users, nor would it adversely affect groundwater quality. Construction activities associated with the Proposed Action would not be expected to create adverse health hazard conditions that would endanger public health. Additionally, the Proposed Action would comply with all applicable laws and regulations that have been adopted to protect or manage water resources in the area. Groundwater is not likely to be encountered or impacted by the Proposed Action.

3.4.2.5.2 Alternative 2

The potential impacts to groundwater as a result of this alternative would be similar to those described for the Proposed Action. Groundwater is not likely to be encountered or impacted under this alternative.

3.4.2.5.3 No-Action Alternative

Under the No-Action Alternative, groundwater within the project area would remain unchanged because no actions would be taken.

3.5 SAFETY AND OCCUPATIONAL HEALTH

3.5.1 Affected Environment

Safety issues are those that directly affect the protection of human life and property, and principally involve aviation, munitions, and fire prevention. Personnel and civilian contractors on JBSA-Lackland are protected by observing Air Force Instructions (AFIs) and OSHA standards.

A safe environment is one in which there is little to no potential for serious bodily injury or illness, death, or property damage, or the potential risk has been reduced to the maximum extent possible. Safety addresses the well-being, safety, and health of members of the public, contractors, and JBSA-Lackland personnel during project implementation, including demolition and construction, and also during subsequent operations and maintenance.

Safety and accident hazards can often be identified and reduced or eliminated. Necessary elements for an accident-prone situation include the presence of the hazard itself, together with the exposed and susceptible population. The degree of exposure depends primarily on the proximity of the hazard to the population. Hazardous activities can include construction, demolition, transportation, maintenance and repair activities, the creation of noisy environments, and certain military activities. The proper operation, maintenance, and repair of vehicles and equipment carry important safety implications. Any facility or human-use area with potential explosive or other rapid oxidation process creates unsafe environments for nearby populations. Extremely noisy environments can also mask verbal or mechanical warning signals such as sirens, bells, or horns. This analysis addresses the safety implications from construction, demolition, renovation, and transportation activities associated with the Proposed Action.

3.5.1.1 Construction/Renovation Safety

Occupational safety and health involve the protection of human life and property. Civilian construction contractors would follow safety procedures and OSHA requirements. Any work on installation also would abide by JBSA-Lackland's health and safety requirements, as applicable.

3.5.1.2 Transportation Safety

Traffic refers to the movement of vehicles and other means of transportation along and adjacent to roadways. Transportation facilities that serve JBSA-Lackland and the surrounding areas include roadways, public transit, and pedestrian and bicycle networks. This transportation analysis also includes discussion of parking at JBSA-Lackland. The project area includes road segments in the public roadway network, access points (gates) to the base, and the internal roadway system of the base.

JBSA-Lackland has four primary entry control points and one commercial gate (Growdon Gate). The Visitor Control Center (VCC) is located at Luke East Gate, the Entry Control Point (ECP) with the highest traffic volumes into the base. This gate is followed in volume by the Luke Gateway Gate, Valley Hill Gate, and the Security Hill Gate. In previous years, two gates located on either side of Military Drive at Selfridge Avenue also served as ECPs, though both have closed indefinitely.

The project area is located approximately 7 miles southwest of downtown San Antonio, within Bexar County, Texas. The county is traversed by several U.S. Highways, including U.S. Highway 87, U.S. Highway 90, U.S. Highway 181, and U.S. Highway 281. East-west routes near JBSA-Lackland include Interstate 35, Interstate 37, Interstate 10, and Interstate 410. The Growdon Entry Control Gate is the main commercial gate for Kelly Field Annex and it is located at the end of Growdon Road, which runs along the eastern side of the project area.

A Traffic Study was completed in 2022 for JBSA-Lackland. An Automatic Traffic Recorder device (ATR) was attached to each lane to collect data on total volumes, vehicle types, and speeds during a 24-hour period. At the time of the traffic study the Growdon Gate had 3,581 inbound vehicles and 2,038 outbound vehicles within the 24-hour period.

3.5.2 Environmental Consequences

The Proposed Action and its alternatives were evaluated individually to determine impacts to safety and occupational health. Given that the specific location and timing of construction and demolition activities is currently unknown, construction, demolition, and renovation activities are evaluated programmatically. The Proposed Action were analyzed as a whole due to the similarities in their respective development categories.

3.5.2.1 Construction/Renovation Safety

3.5.2.1.1 Alternative 1: Proposed Action

Under the Proposed Action a temporary potential impact to construction and renovation safety would occur. No initial impacts related to construction and renovation safety would be anticipated as a result of land acquisition. However, the “Go West” Plan includes the demolitions of existing structures located on the 345 acres, as well as the construction of new roads, buildings, and natural resource infrastructure projects. The demolitions and construction of facilities would require the use of construction equipment which if used incorrectly could increase safety mishaps. Additionally, there would be the ongoing presence of civilian construction contractors, increasing the potential harm to health and well-being of workers. The construction and renovation proposed under the “Go West” Plan would occur over the span of 20 years, therefore the impacts would be long-term, but negligible for the reasons described below.

During construction, demolition, and renovation of the Proposed Action under the “Go West” Plan, construction safety would be an inherent priority. Contractors and heavy equipment operators would be required to adhere to all applicable safety regulations and guidelines. No indirect impacts are expected. Additionally, all new facilities constructed under the “Go West” Plan would meet OSHA Standards and compatible with the applicable DoD, USAF, and JBSA-Lackland design standards.

3.5.2.1.2 Alternative 2

The impacts to construction and renovation safety under this alternative would be potentially less than those described in the Proposed Action. No impacts related to construction and renovation safety are anticipated due to the land acquisition. However, under this alternative, no demolition or construction would occur at the City of San Antonio Impound Lot located on and the proposed location of the MSA would have to be located elsewhere on the acquired property. The construction and renovation proposed under this alternative would occur over the same amount of time as described in the Proposed Action above, spanning 20 years, therefore the impacts would be long-term, but negligible.

3.5.2.1.3 No-Action Alternative

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

3.5.2.2 Transportation Safety

3.5.2.2.1 Alternative 1: Proposed Action

Under the Proposed Action, permanent impacts to surface roads, traffic patterns, and traffic volumes would occur. The proposed Action would remove civilians' ability to access roads currently located within the project area. This includes Growdon Road and Morey Road, which would be utilized by civilians to reach the City of San Antonio Impound Lot, a towing and impound lot, The Alcoser Trucking Company, and Badeco, Inc. During the proposed renovation and construction projects under the Proposed Action would temporarily increase in ingress and egress of construction vehicles and equipment within the project area. This could potentially cause a short-term increase in traffic safety. Upon completion of the construction and renovation projects proposed under the Proposed Action would cause a decrease civilian traffic in the area to almost zero, this could potentially have a positive impact on traffic safety. There are no long-term or significant impacts on transportation safety are anticipated from the Proposed Action. Long-term impacts are anticipated from the rerouting and redeveloping of surface roads.

3.5.2.2.2 Alternative 2

Permanent impacts to surface roads within the project area would occur under Alternative 2. The acquisition of the Subject property would remove civilians' ability to use some roads freely within the project area, including Morey Road Portions of Growdon Road heading south towards JBSA-Lackland and West towards the Gateway Hills Golf course would still remain accessible in order to allow civilians access to the Vehicle Impound Facility. Additionally, the amount of traffic in the area may be reduced due to the relocation business currently located on the project area Roads developed under the "Go West" Plan would need to be developed in a way as to not remove the ability to get to the City of San Antonio Impound Lot by workers, tow trucks, and civilians. Temporary minor impacts would be expected for transportation through the Growdon Gate during construction of the "Go West" Plan. Parking and transportation changes as a result of the Proposed Action would follow base procedures for coordination. There are no long-term or significant impacts on transportation safety are anticipated from the Proposed Action. Long-term impacts are anticipated from the rerouting and redeveloping of surface roads.

3.5.2.2.3 No-Action Alternative

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

3.6 HAZARDOUS MATERIALS/WASTE

3.6.1 Affected Environment

3.6.1.1 Solid Waste

Solid wastes as defined by the USEPA and Texas regulations (Texas Administrative Code [TAC], Title 30, Chapter 335, Subchapter A, Part 335.1[138]) as garbage, rubbish, refuse, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from

industrial, municipal, commercial, mining, and agricultural operations and from community and institutional activities. The rules establish requirements for the collection, transport, storage, separation, processing, recycling, and disposal of solid wastes.

An Integrated Solid Waste Management Plan (ISWMP) was completed for JBSA-Lackland in 2020. The ISWMP states that nonhazardous solid waste at JBSA-Lackland is collected and disposed of by a private contractor. Solid, non-hazardous waste generated by JBSA-Lackland is taken and disposed of at a private landfill serving the San Antonio Area, the Covel Gardens Landfill.

The Region of Influence (ROI) for solid debris and hazardous materials and wastes is defined as on- and off-base areas where hazardous materials would be utilized and hazardous wastes would be generated, as well as affected off-base areas, such as landfills were wastes would be disposed of.

3.6.1.2 Hazardous Materials and Waste

Hazardous materials refer to substances defined as hazardous by the Comprehensive Environmental Response, Compensation, and Liability Act or the Solid Waste Disposal Act. In general, hazardous materials include substances that, because of their quantity concentration or physical, chemical, or infectious characteristics may present substantial danger to public health or the environment when released into the environment. OSHA is responsible for enforcement and implementation of Federal laws and regulations pertaining to worker health and safety under 29 CFR Part 1910. OSHA also includes the regulation of hazardous materials in the workplace and ensures appropriate training in their handling.

Hazardous wastes are regulated under the Resource Conservation and Recovery Act and are defined as any solid, liquid, contained gaseous, or semisolid waste or any combination of wastes that either exhibit one or more of the hazardous characteristics of ignitability, corrosivity, toxicity, or reactivity or are listed as a hazardous waste under 40 CFR Part 261. The State of Texas has adopted Federal regulations for any solid waste that has been defined as hazardous waste. These regulations are promulgated by TCEQ.

Hazardous materials on the Subject Property are stored and handled in accordance with OSHA regulations, 29 CFR §1910.1200(e) through (h), *Hazard Communication*. In general, hazardous materials include substances that, because of their quantity, concentration, or physical, chemical, or infectious characteristics may present substantial danger to public health or welfare or to the environment when released or otherwise improperly managed. Construction and operation of the proposed action would require use of hazardous materials under the action alternatives.

Air Force Policy Directive (AFPD) 32-70 establishes the policy that the USAF is committed to

- Cleaning up environmental damage resulting from its past activities;
- Meeting all environmental standards applicable to its present operations;
- Planning its future activities to minimize environmental impacts;
- Responsibly managing the irreplaceable natural and cultural resources it holds in public trust; and
- Eliminating pollution from its activities wherever possible.

AFI 32-7044, *Storage Tank Compliance*, implements AFPD 32-70 and identifies compliance requirements for underground storage tanks (USTs), aboveground storage tanks (ASTs), and associated piping that store petroleum products and hazardous substances. Evaluation of hazardous materials and hazardous wastes focuses on USTs and ASTs as well as the storage, transport, and use of pesticides, fuels, oils, and lubricants. Evaluation might also extend to generation, storage, transportation, and disposal of hazardous wastes when such activity occurs. In addition to being a threat to humans, the improper release of hazardous materials and hazardous wastes can threaten the health and well-being of wildlife species, botanical habitats, soil systems, and water resources. In the event of release of hazardous materials or hazardous wastes, the extent of contamination varies based on type of soil, topography, weather conditions, and water resources.

AFI 32-7086, *Hazardous Materials Management*, establishes procedures and standards that govern management of hazardous materials throughout the USAF. It applies to all USAF personnel who authorize, procure, issue, use, or dispose of hazardous materials, and to those who manage, monitor, or track any of those activities.

The use of hazardous materials during the implementation of the Proposed Action is expected to be limited to construction vehicle maintenance and construction activities. These materials would be required to be properly contained, manifested, and managed according to all Federal, state, and local regulations, as well as AFI and DoD Directives. Authorization from the JBSA-Lackland 802 Civil Engineering Squadron would be required prior to the use of hazardous materials. Additionally, authorization would be required prior to the demolitions of existing buildings and the construction of new buildings. JBSA-Lackland has a Spill Prevention, Control and Countermeasures (SPCC) Plan in place that establishes procedures, methods, equipment, and other criteria to prevent and respond to discharges of oil products and hazardous substances on JBSA-Lackland and associated property.

Hazardous waste is generated at JBSA-Lackland from aircraft, vehicle, building, and equipment maintenance; spent hazardous materials; and spills. USAF waste management operations at JBSA-Lackland Main base are registered with the USEPA under identification number TX4571524129 (USAF 2007b).

The CoSA maintains an Emergency Management-Basic Plan which includes a section on hazardous mitigation and hazardous materials spills response, in order to provide guidance for emergency operations on CoSA-Owned Properties. This plan assists CoSA agencies on how to respond in the event of an emergency (CoSA 2021). The properties owned by private individuals are not likely to have developed and/or maintained a plan regarding hazardous materials handling, storage, and safety.

3.6.1.2.1 Asbestos

Proposed activities may affect asbestos in existing structures. Asbestos is a naturally occurring mineral that is a very effective heat and sound insulator. Consequently, it was used in many buildings as a fire and noise retardant. Friable (brittle) asbestos becomes hazardous when fibers become airborne and are inhaled. Asbestos has been linked to several diseases, including lung cancer, and has not been used in construction materials since 1989.

An assessment for Asbestos Containing Materials (ACM) was conducted in July 2011 for the Phase II EBS. Buildings located on the Subject Property were tested for ACM at Parcels A, B_2, B_3, B_4, and F. Samples taken show ACMs are present at seven structures located on both COSA and private property, were found to contain ACM totaling approximately 4,134 sf (Weston Solutions Inc. 2012). Prior to demolition of any buildings, an ACM survey must be prepared in coordination with the base Asbestos Program Officer. The identified ACM must be abated prior to renovation/demolitions of structures.

3.6.1.2.2 Lead-Based Paint

Proposed activities may affect lead in existing structures. Lead was used as an additive and pigment in paints for many years prior to 1978; therefore, older structures on the base that have multiple layers of older paint are potential sources of lead. Exposure to lead is usually through inhalation during renovation and demolition activities or through ingestion of paint chips or lead-contaminated drinking water. Lead has been associated with central nervous system disorders, particularly among children and other sensitive populations.

Buildings located on the Subject Property were included in an assessment for lead-based paint (LBP) conducted in July 2011 for a Phase II EBS. Based off the samples taken in 2011 Structures containing LBP were present on Parcels A, B3, B5, and F (Weston Solutions Inc. 2012). These structures were still present at the time of the VSI. The JBSA-Lackland LBP Management and Operations Plan requires an LBP survey be conducted prior to demolition of any buildings. The identified LBP must be abated prior to renovation/demolitions of structures containing LBP.

3.6.1.2.3 Pesticides/Herbicides

Several parcels within the Subject Property owned by private landowners and CoSA have had a history of agricultural use. The review of online databases, property records, the Phase I EBS and Phase II EBS, and interviews indicated historical usage of pesticides within a portion of the Subject Property. Parcel G is currently used for agricultural purposes and based on soil samples taken in 2011, pesticides were present within the soil (Weston Solutions, Inc 2012).

Additionally, due to its historical and current use, it is possible, that pesticides are currently in use and present on Parcel F. Soil samples collected on parcel F in 2011, had concentrations of pesticides (dieldrin and toxaphene) above the Texas Risk Reduction Program (TRRP) critical residential Protective Concentration Levels (PCLs). In addition to exceeding the residential PCLs, the reported concentrations at one sample location on parcel F also exceed the TRRP critical commercial/industrial PCLs (Weston Solutions, Inc 2012).

3.6.1.2.4 Other Chemicals of Concern

Several parcels within the Subject Property have had a history of ASTs, vehicles storage, and other equipment that uses oil and petroleum-based products. Evidence of spills from ASTs, vehicles, and vehicle maintenance activities were noted during surveys completed during the Phase I and Phase II EBS reports. Soil samples taken at time of completion of the Phase II EBS report indicated that Chemicals of Concerns (COCs) were reported on Parcels A, B_4, and B_5.

However, the concentrations were below TRRP critical residential PCLs or were within the range of Lackland AFB soil background concentrations.

3.6.2 Environmental Consequences

3.6.2.1 Solid Waste

3.6.2.1.1 Alternative 1: Proposed Action

It is anticipated that the demolition and future construction under the Proposed Action would generate minimal solid waste, and that any solid waste generated during demolition and construction would be appropriately recycled or disposed at an appropriately permitted disposal facility. Construction and demolition wastes would be managed in accordance with the base Integrated *Solid Waste Management Plan*. Additionally, scrap metals generated during construction and demolition activities would be recycled through the base Qualified Recycling Program, as much as possible.

The solid waste generated during the Proposed Action would consist of materials such as solid pieces of concrete and asphalt, metals, and lumber. Solid wastes generated during demolition and construction would be disposed of in accordance with all Federal, state, and local laws. Depending on the construction debris materials, solid waste may be diverted from a landfill through recycling or reuse. Nonhazardous solid wastes that cannot be recycled would be collected and transported to the Covel County Landfill for disposal.

The Covel Gardens Landfill is a Type I Municipal Solid Waste Landfill managed by Waste Management that opened in 1992. The permitted capacity of the landfill is 124.1 million cubic yards with a remaining capacity is 110.5million cubic yards, it processes approximately 1.3 million tons annually, and operates under TCEQ Permit No. 2093B (Waste Management 2022).

3.6.2.1.2 Alternative 2

The impact on solid waste with this alternative would be similar to the impact discussed for the Proposed Action. However, the overall amount of solid waste produced would be potentially less as a result of not removing buildings within the City of San Antonio Impound Lot.

3.6.2.1.3 No-Action Alternative

Under the No-Action Alternative, solid waste within the project area would remain unchanged because no actions would be taken.

3.6.2.2 Hazardous Materials and Waste

3.6.2.2.1 Alternative 1: Proposed Action

Asbestos Containing Materials and Lead-Based Paint

The Proposed Action includes the acquisition of land would include parcels that have historically had buildings with ACM and LBP. Based upon the Phase II EBS completed in 2012, structures containing ACM are present on Parcels A, B_2, B_3, B_4, and F and structures containing LBP are present on Parcels A, B_2, B_3, B_4, B_5, and F. The Proposed Action may require the demolition of

structures containing with ACM and LBP on Parcels A, B_2, B_3, B_4, and F during the implementation of the Short-Term (0-5 years from acquisition), Medium-Term (6-15 years from acquisition), and the Long-Term (16-20 Years from acquisition) plans. If the USAF decides to demolish and/or renovate these structures the waste generated from the demolition would be handled, accumulated, and disposed of in accordance with all Federal, state, and local regulations. It is expected that the ACM and LBP found within the existing buildings that could be potentially demolished under the Proposed Action would be of minimal quantity.

Under the Proposed Action, any hazardous substances, including ACM and LBP for demolition of existing structures would be collected, stored and/or disposed of properly in accordance with existing Federal, state, and local regulations. Implementation of these waste management requirements would avoid any adverse impacts resulting from exposure to ACM and LBP. Additionally, given that ACM and LBP would not be employed in new construction, there would be an overall beneficial impact from the removal of existing ACM and LBP from the project area.

If the USAF decides to demolish or renovate the structures containing LBP Federal, state, and local regulations will need to be adhered to and a separate NEPA document would be required. Proper disposal of any resulting lead-containing wastes would also be conducted in accordance with Federal regulations, including the Toxic Substances Control Act and the Occupational Safety and Health Act. Further, these wastes would be accompanied by a waste manifest and disposed of at an approved facility. Implementation of these waste management requirements would mitigate any adverse impacts resulting from LBP and this material would not be employed in new construction. Consequently, there would be beneficial impacts from the removal of existing LBP from the Project Area.

Pesticides/Herbicides

Soils tested at the time of the Phase II EBS, in 2012 found the presence of pesticides on parcels F and G and the analyses indicated that pesticides (dieldrin and toxaphene) were reported in subsurface soil samples collected on parcel F at concentrations above the TRRP critical residential PCLs. Additional soil assessments are not required for the proposed acquisition. Under the Proposed Action potential construction and soil disturbance could occur on Parcels F and G during the Long-Term Plan (16-20 Years from acquisition). If the soils at Parcels F and G are to be disturbed for future development under the Proposed Action, then those actions would be evaluated pursuant to the requirements of NEPA, as necessary.

Prior to construction proposed under the Proposed Action, additional soil assessment activities may need to be conducted to determine the extent of contamination, as well as if the contamination concentrations are protective of human health.

Chemicals of Concern

At the time of the Phase II EBS in 2012 several parcels were found to have evidence of surface spills from ASTs, containers, vehicles, and equipment that possess petroleum products. Soil samples take on Parcels A, B_4, and B_5 had concentrations of COCs. The PCLs found in the subsurface soil samples may need to be further evaluated in order to close out the site under TRRP, as determined appropriate.

3.6.2.2.2 Alternative 2

Asbestos Containing Materials and Lead Based Paint

The impacts to hazardous waste under this alternative would be expected to be slightly less than those described for the Proposed Action. Under Alternative 2, the buildings containing ACM on Parcel B_4 and the buildings containing LBP on Parcels B_4 and B_5 would remain. Therefore, reducing the overall potential impacts associated with the renovation and demolition of structures containing ACM and LBP.

Pesticides/Herbicides

The impacts to hazardous waste under this alternative would not be different than those described in the Proposed Action. No pesticides or herbicides are known to be present on Parcels B_4 and B_5.

Other Chemicals of Concerns.

The impacts to hazardous waste under this alternative would not be different than those described in the Proposed Action.

3.6.2.2.3 No-Action Alternative

Under the No-Action Alternative, hazardous waste within the project area would remain unchanged because no actions would be taken.

3.7 BIOLOGICAL/NATURAL RESOURCES

Biological resources include plant and animal species and the habitats in which they occur. For this analysis, biological resources are divided into the following categories: vegetation, wildlife, and endangered, threatened, and sensitive species. Vegetation and wildlife refer to the plant and animal species, both native and introduced, which characterize the region. Endangered, threatened, and sensitive species are plant and animal species in need of protection to ensure that the species do not decline to extinction.

3.7.1 Affected Environment

3.7.1.1 Vegetation

Bexar County is located in a physiographic transition zone of the Balcones Canyon Lands, which includes portions of three physiographic regions: the Edwards Plateau, the Blackland Prairie, and the Rio Grande Plain (also known as the South Texas Coastal Plain). The Edwards Plateau is north and west; the Blackland Prairie is east and southeast; and the Rio Grande Plain is south and southwest of Bexar County. This subregion is comprised of a landscape dissected by numerous high gradient streams in steep-sided canyons that flow south and southeast to the Gulf of Mexico (Riskind and Diamond 1988).

A field survey for the *Growdon Gate/Road Relocation and Property Acquisition Environmental Assessment* was conducted in May 2011 by walking a 100-foot belt transect (50 feet on each side of the route centerline) and documenting the habitat types encountered, any species observed, and evidence of wildlife species use (e.g., scat). This survey overlapped with the current proposed

action area. During this field survey, five habitat types were characterized by their associated vegetation communities. These habitat types are detailed in **Table 3-3**. Due to disturbance in the area, no high-quality habitat was observed, and invasive species were found in all habitat types (GMI 2011a).

Table 3-3: Habitat Types and Common Flora of the Project Area

Habitat Type Observed	Associated Common Vegetation
Grassland/Pasture	Bermuda grass (*Cynodon dactylon*), silver bluestem (*Bothriochloa laguroides*), silverleaf nightshade (*Solanum elaeagnifolium*), clover species (*Trifolium* sp.), oldfield threeawn (*Aristida oligantha*), and thistle species (*Cirsium* sp.)
Mesquite Woodlands	Honey mesquite *(Prosopis glandulosa),* hackberry (*Celtis laevigata),* silver bluestem*,* Texas prickly pear *(Opuntia engelmannii)*, and silverleaf nightshade
Riparian	Cedar elm *(Ulmus crassifolia),* black willow *(Salix nigra),* hackberry*,* chinaberry *(Melia azedarach),* pecan *(Carya illinoensis),* Canada wildrye *(Elymus candensis),* poison ivy *(Rhus radicans),* greenbrier *(Smilax* sp.), and giant ragweed *(Ambrosia trifida)*
Highly Disturbed and Naturalized	Cottonwood *(Populus* sp.), cedar elm*,* Chinese tallow *(Triadica sebifera),* black willows *(Salix nigra),* boxelder *(Acer negundo),* hackberry*,* black walnut *(Juglans nigra),* pecan*,* blackberry *(Rubus* sp.), greenbriar, poison ivy*,* giant ragweed*,* grape (*Vitis* sp.), and honeysuckle (*Lonicera* sp.)
Urban	Bermuda grass*,* Johnson grass *(Sorghum halepense),* crabgrass species *(Digitaria* sp.), dandelion species *(Taraxacum* sp.), henbit *(Lamium amplexicaule),* ornamental trees and shrubs (i.e., landscaping)

3.7.1.2 Wildlife

JBSA-Lackland has a limited ability to support fish and wildlife species due to development and mission requirements for vegetation management, and most species found there are adapted to surviving in urban landscapes (USAF 2020).

The wildlife associated with each of the vegetation communities is described below. Photographs depicting these habitats, as well as a map of the proposed Growdon Road and associated communities are contained in the *Biological Assessment/Evaluation for Road and Gate Construction at Lackland Air Force Base, Texas* prepared in June 2011 (GMI 2011a).

The grassland/pasture habitat contains a variety of grasses and forbs and provides good foraging areas for western kingbird (*Tyrannus verticalis*), scissor-tailed flycatcher (*Tyrannus forficatus*), and barn swallow (*Hirundo rustica*) (GMI 2011a).

The mesquite woodlands habitat is not a diverse plant community and consists mostly of mesquite trees and shrubs. Common wildlife occurring in this habitat type including mourning dove (*Zenaida macroura*), white-winged dove (*Zenaida asiatica*), northern mockingbird (*Mimus polyglottos*),

northern cardinal (*Cardinalis cardinalis*), common raccoon (*Procyon lotor*), coyote (*Canis latrans*), eastern cottontail (*Sylvilagus floridanus*), white-tailed deer (*Odocoileus virginianus*), and Texas spiny lizard (*Sceloporus olivaceus*) (GMI 2011a).

Riparian habitat area associated with Leon Creek is located on the northern and western edge of the project area. A wide variety of wildlife use this habitat type including toad and frog species, mourning dove, white-winged dove, northern cardinal, northern mockingbird, Carolina chickadee (*Poecile carolinensis*), tufted titmouse (*Baeolophus bicolor*), common raccoon, Virginia opossum (Didelphis virginiana), nine-banded armadillo (Dasypus novemcinctus), coyote, white-tailed deer, and feral hog (*Sus scrofa*). Many fish species are likely to occur in Leon Creek including bluegill *(Lepomis macrochirus),* long-eared sunfish *(Lepomis megalotis),* channel catfish *(Ictalurus punctatus),* and largemouth bass *(Micropterus salmoides).* Red-eared sliders *(Trachemys scripta elegans)* and spiny softshell turtles *(Apalone spinifera guadalupensis)* also inhabit these waters (GMI 2011a).

JBSA-Lackland is located within the Central Migratory Flyway of North America. The flyway is bounded by the Mississippi River to the east and the Rocky Mountains to the west. Migratory species typically use this flyway to travel from wintering grounds in the south to summering grounds in the north, though migratory patterns vary by species. Neotropical migratory birds use riparian corridors/floodplains for foraging and resting during spring and fall migration and would be expected to be present in the Leon Creek riparian corridor. A neotropical migratory bird survey was conducted along a narrow riparian forested area along Leon Creek in 1995. Of the 106 bird species detected, 59 were neotropical migratory birds. Swifts (family Apodidae), swallows (family Hirundinidae), and flycatchers (Family Tyrannidae) were the most common neotropical birds. Warbler diversity was fairly high (14 species), but abundance was low (U.S. Army Corps of Engineers 1995).

Highly disturbed and naturalized habitat within the project site contains a mixture of mature native and introduced trees, grasses, and other vegetation. This habitat includes old quarries, landfills, and road improvement areas that have been allowed to naturalize. This habitat hosts many wildlife species including northern cardinal, tufted titmouse, golden-fronted woodpecker (*Melanerpes aurifrons*), white-tailed deer, eastern fox squirrel (*Sciurus niger*), and common raccoon. The tall cottonwoods provide excellent perches and potential nesting habitat for barred owl (*Strix varia*), red-tailed hawk (*Buteo jamaicensis*) and red-shouldered hawk (*Buteo lineatus*) (GMI 2011a).

Urban habitat on the project site includes homesteads, roads, impound lots, and gravel and dirt piles. The mixture of native and ornamental plants within this habitat hosts bird species such as white-winged dove, mourning dove, great-tailed grackle (*Quiscalus mexicanus*), house sparrow (*Passer domesticus*), and northern mockingbird. This community is not likely to support many wildlife species (GMI 2011a).

3.7.1.3 Endangered, Threatened, and Sensitive Species

The project site is located in Bexar County, Texas. The habitat requirements of protected species potentially occurring in Bexar County were compared to habitats observed in the project area to determine the potential presence/absence of the protected species. Habitat suitability for Federal

species listed as threatened, endangered, or candidate species under the Endangered Species Act; protected by the Bald and Golden Eagle Protection Act (BGEPA); and state-listed threatened or endangered species is provided in this section (**Table 3-4**).

Many karst species are federally listed as threatened or endangered for the County. Karst habitat primarily occurs north and northwest of San Antonio and is not known to occur in the project area (USAF 2020); therefore, the nine karst species that are federally listed or state-listed threatened or endangered species in Bexar County are not discussed here. There are also 95 other species within Bexar County identified as only a Species of Greatest Conservation Need (SGCN) by the State that are not discussed here (TPWD 2023). Critical habitat is not designated in the project area for any of the potentially occurring federally listed species (USFWS 2023b). Only a few federally or state listed species have any potential to occur within the project area, and none have been documented at JBSA-Lackland (USAF 2020).

Some federally listed or state-listed species may use the riparian area along or in Leon Creek. Tricolored bats (*Perimyotis subflavus*) and white-nosed coati (*Nasua narica*) may use riparian habitat along Leon Creek or other habitat within the project site for foraging. Whooping crane (*Grus americana*), white-faced ibis (*Plegadis chihi*), and wood storks (*Mycteria americana*) may use the riparian habitat along Leon Creek during migration if water levels are suitable for foraging. However, no observations of the whooping crane have been documented for the South Texas Brushlands (Arvin 2007). Cagle's map turtles (*Graptemys caglei*) may reside within Leon Creek.

The Central Flyway is a critical migration corridor for the monarch butterfly (*Danaus plexippus*), currently a candidate species for listing (Howard and Davis 2009). Central Texas is a significant segment of the monarch migration path, as it is where the monarch Central Flyway converges with Coastal Flyways to form one single migration path to their wintering grounds in Mexico. Once abundant in their range across North America, monarch populations have undergone significant declines in recent decades (USAF 2022). Suitable habitat may exist within the project area for monarchs if milkweed is present.

Bald eagles (*Haliaeetus leucocephalus*) often utilize lake and riparian areas for foraging. In the South Texas brushlands province, the bald eagle is a scarce to occasional visitor during winter and is not known to breed in the area (Arvin 2007).

Table 3-4: Endangered, Threatened, or Sensitive Species found in Bexar County, TX[1]

Common Name *Scientific Name*	Federal Status	State Status	Habitat	Species Presence in Project Area
Mammals				
White-Nosed Coati *Nasua narica*	None	Threatened, SGCN	Woodlands, riparian corridors, and canyons	Potential
Tricolored Bat *Perimyotis subflavus*	Proposed Endangered	SGCN	Forests, woodlands, riparian areas, and caves	Potential
Black Bear *Ursus americanus*	None	Threatened, SGCN	Generalist, varied habitats	Unlikely

Common Name *Scientific Name*	Federal Status	State Status	Habitat	Species Presence in Project Area
Birds				
Red Knot* *Calidris canutus rufa*	Threatened	Threatened, SGCN	Elevated and sparsely vegetated ridges or slopes adjacent to wetlands and lake edges for breeding	Unlikely
Piping Plover* *Charadrius melodus*	Threatened	Threatened, SGCN	Sandy beaches and sparsely vegetated shores of lakes, ponds, and rivers for breeding	Limited habitat
Whooping Crane *Grus americana*	Endangered	Endangered, SGCN	Small ponds, marshes, and flooded grain fields	Potential during migration
Bald Eagle *Haliaeetus leucocephalus*	BGEPA	SGCN	Found primarily near rivers and large lakes	Unlikely
Wood Stork *Mycteria americana*	None in Texas	Threatened, SGCN	Nests in bald cypress (*Taxodium distichum*) or red mangrove (*Rhizophora mangle*); forages in prairie ponds, flooded pastures or fields, or ditches	Potential during migration
White-Faced Ibis *Plegadis chihi*	None	Threatened	Freshwater marshes, sloughs, and irrigated rice fields	Potential during migration
Golden-Cheeked Warbler *Setophaga chrysoparia*	Endangered	Endangered, SGCN	Mixed Ashe juniper (*Juniperus asheii*) /deciduous woodlands	Unlikely
Amphibians				
Cascade Caverns Salamander *Eurycea latitans*	Under Review	Threatened, SGCN	Springs, streams, and caves with rocky or cobble beds	Unlikely
San Marcos Salamander *Eurycea nana*	Threatened	Threatened, SGCN	Endemic to San Marcos Springs and nearby surface and subterranean aquatic habitat	Unlikely
Texas Salamander *Eurycea neotenes*	Under Review	Threatened, SGCN	Springs, streams, and caves with rocky or cobble beds	Unlikely
Texas Blind Salamander *Eurycea rathbuni*	Endangered	Endangered, SGCN	Edwards aquifer artesian and recharge zone in vicinity of San Marcos	Unlikely

Common Name *Scientific Name*	Federal Status	State Status	Habitat	Species Presence in Project Area
Reptiles				
Texas Tortoise *Gopherus berlandieri*	None	Threatened, SGCN	Open scrub woods, arid brush, grass-cactus association	Unlikely
Cagle's Map Turtle *Graptemys caglei*	None	Threatened, SGCN	Shallow water with swift to moderate flow and gravel or cobble bottoms, nests on gently sloping sand banks within 30 feet of water edge	Potential
Texas Horned Lizard *Phrynosoma cornutum*	None	Threatened, SGCN	Open habitats with sparse vegetation including grass, prairie, cactus, scattered brush, or scrubby trees	Unlikely
Fish				
Fountain Darter *Etheostoma fonticola*	Endangered	Endangered, SGCN	Spring-fed San Marcos and Comal rivers in dense beds of aquatic plants	Unlikely
Widemouth Blindcat *Satan eurystomus*	Under Review	Threatened, SGCN	Artesian wells in the San Antonio Pool of the Edwards Aquifer	Unlikely
Toothless Blindcat *Trogloglanis pattersoni*	Under Review	Threatened, SGCN	Artesian wells in the San Antonio Pool of the Edwards Aquifer	Unlikely
Insects				
Comal Springs Riffle Beetle *Heterelmis comalensis*	Endangered	Endangered, SGCN	Springs, associated, streams, and underground spaces inside of or adjacent to springs or seeps	Unlikely
Comal Springs Dryopid Beetle *Stygoparnus comalensis*	Endangered	Endangered, SGCN	Springs, associated, streams, and underground spaces inside of or adjacent to springs or seeps	Unlikely
Monarch Butterfly *Danaus plexippus*	Candidate	None	Breeding areas are patches of milkweed	Potential if milkweed present
Crustaceans				
Peck's Cave Amphipod	Endangered	Endangered, SGCN	Springs, associated, streams, and underground spaces	Unlikely

Common Name *Scientific Name*	Federal Status	State Status	Habitat	Species Presence in Project Area
Stygobromus (=Stygonectes) pecki			inside of or adjacent to springs or seeps	
Mollusks				
False Spike *Fusconaia mitchelli*	Proposed Endangered	Threatened, SGCN	Small streams to medium-sized rivers in riffles and runs with flowing water	Unlikely
Plants				
Black Lace Cactus *Echinocereus reichenbachii* var. *albertii*	Endangered	Endangered, SGCN	Grasslands, thorn shrublands, mesquite woodlands on sandy, somewhat saline soils on coastal prairie	Unlikely
Bracted Twistflower[2] *Streptanthus bracteatus*	Proposed Threatened	SGCN	Shallow, well-drained gravelly clays and clay loams over limestone in oak juniper woodlands and associated openings	Unlikely
Texas Wild-Rice *Zizania texana*	Endangered	Endangered, SGCN	Spring-fed river, in clear, cool, swift water mostly less than 1 meter deep, with coarse sandy soils	Unlikely

Notes:
BGEPA = Bald and Golden Eagle Protection Act
SGCN = Species of Greatest Conservation Need in Texas
*Only a concern if wind energy projects are considered
[1]Listed karst/cave species were not included as karst formations are not present in the project area.
[2]Proposed critical habitat for this species occurs within the county but not within JBSA-Lackland
Sources: GMI 2011a, TPWD 2023, USFWS 2023a, USFWS 2023b, NatureServe 2023

3.7.2 Environmental Consequences

Impacts to biological resources would be considered significant if the Proposed Action or No-Action Alternative would result in:

- An adverse effect to any Federal, state, or locally regulated or regionally sensitive species or valuable natural resource (sensitive plant/wildlife community)
- An adverse effect to endangered, threatened or candidate species or if it adversely modified or destroyed their critical habitat under the Endangered Species Act
- Adverse effects on birds protected by the Migratory Bird Treaty Act

3.7.2.1 Vegetation

3.7.2.1.1 Alternative 1: Proposed Action

Under the Proposed Action, habitat identified in the 2011 survey as grassland/pasture, urban, and mesquite woodlands would be replaced by the relocation of existing operations. None of these habitats were considered high-quality in the 2011 survey due to previous disturbance in the area. Riparian vegetation along Leon Creek would not be impacted by the Proposed Action. The disturbance of moderate to poor quality vegetation would not pose an adverse impact on vegetation in the project area. Standard construction BMPs (e.g., rock filter dams/silt fences, drip pans under construction vehicles, hazardous waste/spill response plan, daily collection of human trash, portable toilets) would be used to protect adjacent habitat from degradation and contamination. The Proposed Action would not be expected to adversely affect vegetation communities within or adjacent to the project area.

During the 2011 field survey of the project area, invasive plant species were observed in every habitat type; therefore, the Proposed Action is unlikely to introduce any invasive species to areas where they do not presently exist.

3.7.2.1.2 Alternative 2

The impact on vegetation with this alternative would be similar to the impact discussed for the Proposed Action. The only difference would be less of an impact to urban habitat in the Impound Lot. This alternative would not be expected to adversely affect vegetation communities within this action area.

3.7.2.1.3 No-Action Alternative

Under the No-Action Alternative, vegetation within the project area would remain unchanged because no actions would be taken.

3.7.2.2 Wildlife

3.7.2.2.1 Alternative 1: Proposed Action

The wildlife inhabiting the project area would be disturbed by the noise and activity (e.g., initial startle and avoidance of area adjacent to the activity) that would occur during the Proposed Action. Following construction completion, the noise and activity levels would be slightly higher than pre-construction conditions because of vehicular traffic noise and general urban noise. Vehicular traffic noise may impact local wildlife, but the impacts would not result in the loss of a regional wildlife population. The area impacted by the action is small, and impact on wildlife would be short-term. Note also that wildlife in the project area is already exposed to average aircraft noise levels of 65 to 79 dBA DNL (**Figure 3-2**); therefore, it is likely that wildlife in the area are acclimated to increased noise levels.

The riparian habitat within the project area provides breeding, foraging, and resting habitat for migratory birds. Construction activities associated with the Proposed Action would be located

outside of the riparian habitat along Leon Creek and would not be expected to result in destruction of breeding nests; however, the noise and disturbance from construction could cause nesting birds to abandon their nests. To mitigate the potential loss of migratory bird nests during construction, clearing of all areas associated with the Proposed Action would be scheduled during the non-breeding season for most migratory birds (August through January). In addition, all standard construction BMPs (e.g., rock filter dams/ silt fences, drip pans under construction vehicles, hazardous waste/spill response plan, daily collection of human trash, portable toilets) would be used to protect adjacent habitat from degradation and contamination. Overall, with the recommended BMPs, the Proposed Action would not be expected to adversely affect the population of any occurring species.

3.7.2.2.2 Alternative 2

The impacts to wildlife from this alternative would be similar to those impacts from the Proposed Action. The only difference would be less of an impact to urban habitat in the City of San Antonio Impound Lot. Urban habitat is not found to support many wildlife species. This alternative would not be expected to adversely affect wildlife within this action area.

3.7.2.2.3 No-Action Alternative

Under the No-Action Alternative, no impacts to wildlife within the project area would occur because no actions would be taken.

3.7.2.3 Endangered, Threatened, and Sensitive Species

3.7.2.3.1 Alternative 1: Proposed Action

There is the possibility of white-nosed coati and tricolored bats occurring in the area for foraging. However, this possibility is quite low due to disturbance on site, high noise levels, and lack of habitat connectivity. While there is the possibility of white-nosed coati and tricolored bats to be present in the project area for foraging, they would be expected to be in the vicinity of the riparian area. The individual projects described for the Proposed Action would construction outside of the riparian areas within the project area so there would not be any expected impact to these species. Further, there is a possibility that Cagle's map turtles may live within the project area but due to the lack of impact on riparian areas, this species is not expected to be impacted by the Proposed Action either.

If milkweed is present within the project area, monarch butterflies could be impacted by construction activities associated with the Proposed Action. However, monarchs are currently a federal candidate species with no state status in Texas, and milkweed may not be present on site due to previous site disturbance.

The habitat survey conducted in May 2011 identified migratory habitat for the federally endangered whooping crane, state-listed wood stork and white-faced ibis. Although limited suitable foraging habitat is present, no individuals were observed during the surveys. The limited area of suitable habitat present for the listed migratory birds would not provide sufficient forage

for these species for a long period of time and therefore these species, if they occur, would remain in the area for only a short time.

Wood stork are common in the region, and the loss of a small area of potential foraging habitat in the Leon Creek floodplain would be a minor impact to the wood stork. If present, whooping crane, wood stork, and white-faced ibis are not likely to be adversely affected by the Proposed Action due to the BMPs related to migratory bird species discussed in **Section 3.7.2.2.1**.

No critical habitat for any federally listed species was identified on the project site, and neither construction activities nor operational activities associated with the Proposed Action would be expected to impact any critical habitat within the county.

3.7.2.3.2 Alternative 2

The impact from this alternative would not differ from the impacts from the Proposed Action. None of the listed species would be expected to be in the urban area of the City of San Antonio Impound Lot. Therefore, the preservation of this lot would not change the impacts to endangered, threatened, and sensitive species. The alternative, with recommended BMPs, would not be expected to adversely affect the population of any occurring species.

3.7.2.3.3 No-Action Alternative

Under the No-Action Alternative, sensitive species within the project area would remain unchanged because no actions would be taken.

3.8 CULTURAL RESOURCES

This discussion of cultural resources includes prehistoric and historic archaeological sites; historic buildings, structures, and districts; and physical entities and human-made or natural features important to a culture, a subculture, or a community for traditional, religious, or other reasons. Cultural resources can be divided into three major categories:

- Archaeological resources (prehistoric and historic) are locations where human activity measurably altered the earth or left deposits of physical remains.
- Architectural resources include standing buildings, structures, landscapes, and other built-environment resources of historic or aesthetic significance.
- Traditional Cultural Properties (TCPs) may include archaeological resources, structures, neighborhoods, prominent topographic features, habitat, plants, animals, and minerals that Native Americans or other groups consider essential for the preservation of traditional culture.

It is USAF policy to identify sites sacred or important to Native Americans early in the planning process through consultation with federally recognized Tribes. The consultation process assists the USAF in identifying potential TCPs on the Area of Potential Effect that are not currently known. Consultation letters were sent to federally recognized Native American Tribes. Accordingly, there will be no significant impacts on any TCPs.

Significant cultural resources are those that have been listed on the National Register of Historic Places (NRHP) or determined to be eligible for listing. To be eligible for the NRHP, properties must be 50 years old and have national, state, or local significance in American history, architecture, archaeology, engineering, or culture. They must possess sufficient integrity of location, design, setting, materials, workmanship, feeling, and association to convey their historical significance, and meet at least one of four criteria (National Park Service [NPS] 2022):

- Associated with events that have made a significant contribution to the broad patterns of our history (Criterion A);
- Associated with the lives of persons significant in our past (Criterion B);
- Embody distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction (Criterion C); and/or
- Have yielded or be likely to yield information important in prehistory or history (Criterion D)

Properties that are less than 50 years old can be considered eligible for the NRHP under Criterion Consideration G if they possess exceptional historical importance. Those properties must also retain historic integrity and meet at least one of the four NRHP Criteria for Evaluation (Criterion A, B, C, or D). The term “Historic Property” refers to National Historic Landmarks, NRHP-listed, and NRHP-eligible cultural resources.

Additionally, Section 106 of the NHPA requires all Federal agencies to seek to avoid, minimize, or mitigate adverse effects to historic properties (36 CFR §800.1[a]). For cultural resource analysis, the Area of Potential Effect (APE) is used as the ROI. APE is defined as the “geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist,” (36 CFR §800.16[d]) and thereby diminish their historic integrity.

3.8.1 Affected Environment

Cultural resources listed in the NRHP or eligible for listing in the NRHP are “historic properties” as defined by the NHPA. The list was established under the NHPA and is administered by the National Park Service on behalf of the Secretary of the Interior. The NRHP includes properties on public and private land. Properties can be determined eligible for listing in the NRHP by the Secretary of the Interior or by a Federal agency official with concurrence from the applicable State Historic Preservation Officer. A NRHP-eligible property has the same protections as a property listed in the NRHP. The historic properties include archaeological and architectural resources.

3.8.1.1 Archaeological Resources

An archeological survey was completed of the project area 2011 by Geo Marine, Inc. This survey included a pedestrian walkover of the proposed APE at systemic intervals. A total of 39 shovel tests were excavated where there was a potential for buried deposits. A review of the previous surveys of the Area of Potential Effect resulted in the recording of one archeological site, site 41BX1886. However, this site is located outside of the current Subject Property. Additionally, according to data obtained from the Texas Historical Commission, there are no prehistoric

resources within the Subject Property (EDR 2022). Therefore, excavation and grading activities associated with the Proposed Action would have no effect on archeological resources.

3.8.1.2 Architectural Resources

According to data obtained from the Texas Historical Commission, there are no historical structures within a mile of the Subject Property (EDR 2022). There are also no structures that are eligible for listing in the NRHP near the Subject Properties (NPS 2020).

There are no buildings within the Subject Property that are eligible for inclusion on the National Register of Historic Places. Since no eligible historic properties are present within the Subject Property, the proposed action would have no effect on historical resources.

3.8.2 Environmental Consequences

3.8.2.1 Archaeological Resources

3.8.2.1.1 Alternative 1: Proposed Action

The Proposed Action would have no direct effect on archaeological resources. No projects are proposed in any areas where known archaeological resources are present. If any unanticipated discoveries of archaeological materials are made, work would be temporarily halted, and the procedures outlined in the Integrated Cultural Resource Management Plan (ICRMP) and *Cultural Discoveries* Standard Operating Procedure would be followed. The Proposed Action would have no indirect effects on archaeological resources because it would not facilitate access to previously remote sites and thus contribute to their disturbance and would not impact the setting of any significant archaeological sites. If an unexpected discovery consists of Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony, all ground-disturbing activities must stop, and the Cultural Resources Manager (CRM), Security Forces, Air Force Office of Special Investigations (AFOSI), and the State Archaeologist must be contacted prior to resumption of ground-disturbing activities. Additionally, the Advisor Council on Historic Preservation's (ACHP's) "Policy Statement Regarding Treatment of Burial Sites, Human Remains, and Funerary Objects" must be followed.

3.8.2.1.2 Alternative 2

The impacts to archeological resources under this alternative would be similar to those described for the Proposed Action. Therefore, this alternative is not expected to impact archaeological resources.

3.8.2.1.3 No-Action Alternative

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

3.8.2.2 Architectural Resources

3.8.2.2.1 Alternative 1: Proposed Action

The Proposed Action would have no direct effect on historic buildings and structures. There are no known NRHP-listed or NRHP-eligible historic buildings or structures located within or near the APE. SHPO concurrence to support this determination is forthcoming.

3.8.2.2.2 Alternative 2

The impacts to architectural resources would be similar for this alternative as those described under the Proposed Action. Therefore, this alternative is not expected to impact architectural resources.

3.8.2.2.3 No-Action Alternative

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

3.9 EARTH RESOURCES

3.9.1 Affected Environment

3.9.1.1 Geology

The Subject Properties are located within the ancestral flood plain of the San Antonio River / Leon Creek watershed system. The geologic age identification of the project area is categorized as Stratified Sequence. Rock units in the Subject Property formed in the Mesozoic era of the early Cretaceous age (EDR 2022). Shallow upper Oligocene and the lower Miocene formations overly the Navarro Group. These include the surficial Quaternary alluvium and the underlying Navarro clay. Groundwater most commonly found in the lower clayey gravel and basal gravel units immediately overlying the Navarro clay (Weston Solutions Inc. 2012).

3.9.1.2 Soils

The U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) is responsible for collecting, storing, maintaining, and distributing soil survey information for privately owned lands in the U.S. (NRCS 2022). The soils underlying project area were identified and assessed using the Soil Survey Geographic database (NRCS, 2023). **Table 3-5** and **Figure 3-3** depicts the soil properties found adjacent to the Subject Properties.

The soil types underlying the 345-acre project area vary, with the prominent soil type present being Lewisville silty clay. Other soils within the Subject Properties consist of Sunev clay loam, pits and quarries, and loire clay loam.

The Lewisville silty clay is a well-drained soil with a slope of zero to 1 percent and it has a moderately high to high capacity to transmit water. Other soil units in the subject area include Sunev clay loam and pits and quarries. Sunev clay loam is a well-drained soil that has a three to five percent slope, with a parent material of loamy alluvium composed of clay loam and clay and has a moderately high to high capacity to transmit water. Pits and quarries can have a 1 to 90

percent slope (NRCS 2022). Some soils in the vicinity of the project area have been significantly altered over time from anthropogenic causes and activities.

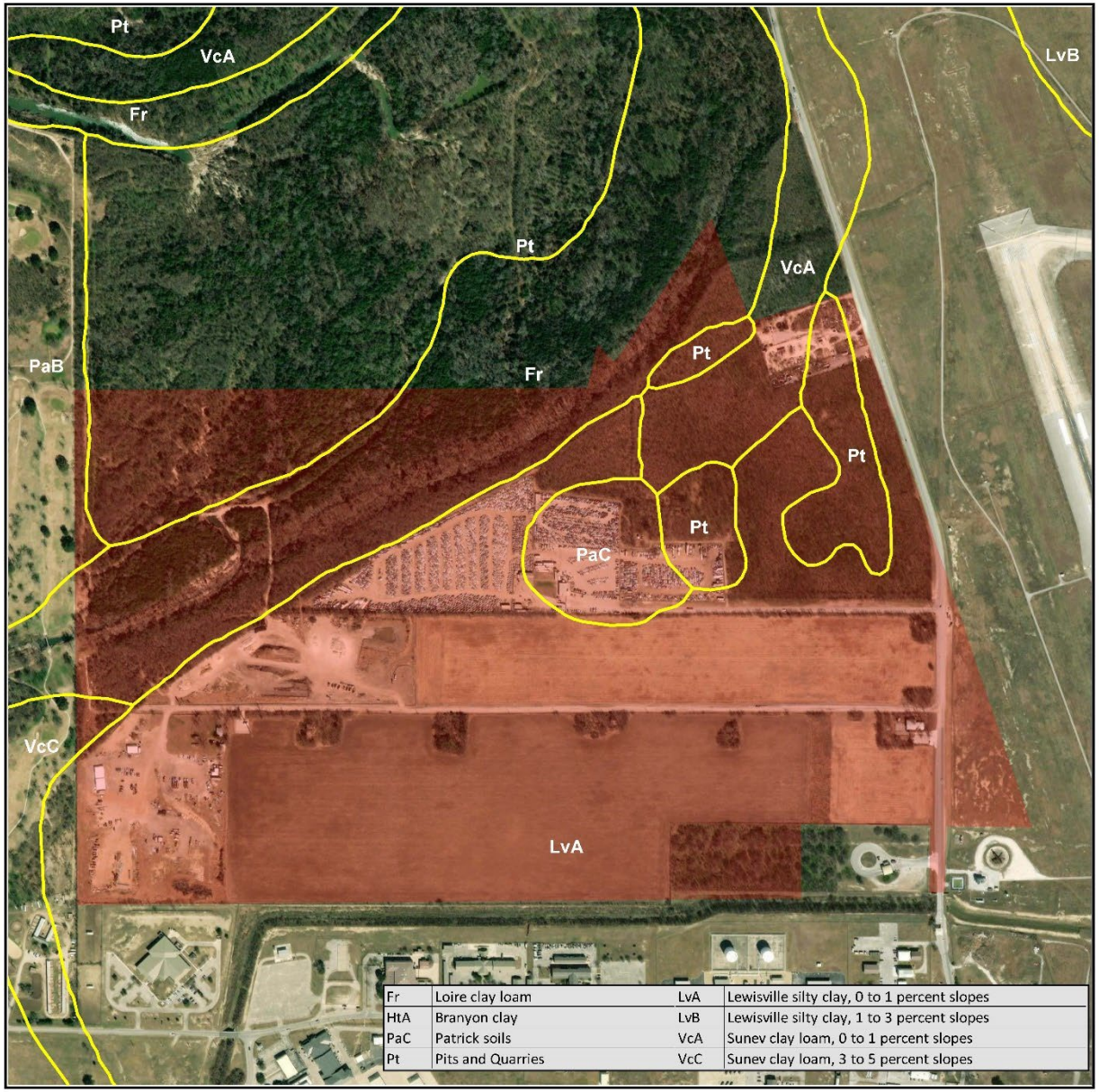


Figure 3-3
Soil Units
Joint Base San Antonio-Lackland

Environmental Assessment
DEAAG Properties
Joint Base San Antonio-Lackland, Texas

LIBERTY JV

Project ID: FA301622F0352

Legend

Soil Unit

Subject Property

N

0 4.5 9 18 27 36 Miles

Table 3-5: Soil Properties

Property	Soil Component	Soil Surface Texture	Soil Drainage Class
A	Lewisville	Silty Clay	Well drained soil with a slope of 0 to 1 percent. Moderately high to high capacity to transmit water.
B1	Lewisville	Silty Clay	Well drained soil with a slope of 0 to 1 percent. Moderately high to high capacity to transmit water.
B2	Lewisville	Silty Clay	Well drained soil with a slope of 0 to 1 percent. Moderately high to high capacity to transmit water.
B3	Lewisville	Silty Clay	Well drained soil with a slope of 0 to 1 percent. Moderately high to high capacity to transmit water.
B4	Lewisville	Silty Clay	Well drained soil with a slope of 0 to 1 percent. Moderately high to high capacity to transmit water.
	Pits and Quarries	Variable	Well drained soil with a slope of 1 to 90 precent slope.
B5	Lewisville	Silty Clay	Well drained soil with a slope of 0 to 1 percent. Moderately high to high capacity to transmit water.
B6	Pits and Quarries	Variable	Well drained soil with a slope of 1 to 90 precent slope.
C	Lewisville	Silty Clay	Well drained soil with a slope of 0 to 1 percent. Moderately high to high capacity to transmit water.
	Pits and Quarries	Variable	Well drained soil with a slope of 1 to 90 precent slope.
	Sunev	Clay Loam	Well drained soil with a slope of 3 to five percent slope.
D	Lewisville	Silty Clay	Well drained soil with a slope of 0 to 1 percent. Moderately high to high capacity to transmit water.
	Pits and Quarries	Variable	Well drained soil with a slope of 1 to 90 precent slope.
	Sunev	Clay Loam	Well drained soil with a slope of 3 to five percent slope.

E	Lewisville	Silty Clay	Well drained soil with a slope of 0 to 1 percent. Moderately high to high capacity to transmit water.
	Pits and Quarries	Variable	Well drained soil with a slope of 1 to 90 precent slope.
	Sunev	Clay Loam	Well drained soil with a slope of 3 to five percent slope.
F	Lewisville	Silty Clay	Well drained soil with a slope of 0 to 1 percent. Moderately high to high capacity to transmit water.

3.9.1.3 Topography

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the project area, what downgradient sites might be impacted. Based on the local topographical profile, groundwater flow direction in the vicinity of the project area is inferred to be generally west northwest (EDR 2022). The highest point in elevation of the project area is approximately 688 feet above sea level. Overall, surface topography within the project area and the surrounding vicinity is flat with occasional pits. The project area is underlain by Alluvium and Fluviatile terrace deposits.

3.9.2 Environmental Consequences

3.9.2.1 Geology

3.9.2.1.1 Alternative 1: Proposed Action

The acquisition of the project area would not have an impact on the geology of the area. However, the potential future renovation and construction developments could have minor impacts on the geology of the project area. Potential ground disturbance due to grading and potential excavation for facility construction activities could result in impacts to the geology of the project area.

3.9.2.1.2 Alternative 2

The proposed action under Alternative 2 would not impact the underlying geology of the area. The impacts to geological resources would be similar for this alternative as those described under the Proposed Action. Therefore, no impacts on the geology of the project area are anticipated.

3.9.2.1.3 No-Action Alternative

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

3.9.2.2 Soils

3.9.2.2.1 Alternative 1: Proposed Action

The Proposed Action would enable the implementation of renovation and construction development projects as set forth in the "Go West" Plan over the next 20 years. These projects could result in minor, localized short-term effects on soils related to construction of the Proposed Action. No long-term impacts to soil is anticipated. There would be minor short-term increase in soil disturbance and dust generated from construction and construction operations.

As described in **section 3.4.1.3** above, excavation and construction could temporarily increase the potential for erosion of soils and sedimentation runoff into Leon Creek directly or via storm water ditches. Increased erosion of soils and sedimentation could occur. The proposed construction projects would need to include site-specific sediment and erosion control plans that detail BMPs to prevent soil disturbance, capture and contain loose soil, and slow the movement of storm water during heavy rains.

3.9.2.2.2 Alternative 2

The impacts to soil under this alternative would be expected to be slightly less than those described for the Proposed Action. Without acquiring the City of San Antonio Impound Lot land, construction would not occur on this plot, and construction-related soil disturbance would be slightly reduced.

3.9.2.2.3 No-Action Alternative

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

3.9.2.3 Topography

3.9.2.3.1 Alternative 1: Proposed Action

The proposed future projects under the Proposed Action could temporarily alter the topography in the vicinity of the project area. The topography of the project area is currently suitable for building, as most of the area is level, with existing infrastructure. The impacts to the project area would not be significant as the topography of the project area would have minor changes caused by excavation and grading at the time of the proposed construction projects. However, this would result in minor short-term impacts.

Therefore, the proposed action would not directly or indirectly impact topography.

3.9.2.3.2 Alternative 2

The proposed future projects under Alternative 2 are similar to the impact under the Proposed Action. Therefore, alteration to the topography in the vicinity of the project area is not anticipated.

3.9.2.3.3 No-Action Alternative

Under the No-Action Alternative, topography within the project area would remain unchanged

because the proposed action would not be implemented.

3.10 SOCIOECONOMIC RESOURCES/ENVIRONMENTAL JUSTICE

3.10.1 Affected Environment

Socioeconomic resources include the basic attributes and resources associated with the human environment. In particular, this includes population and economic activity. Economic activity typically encompasses employment, personal income, and industrial growth. Additionally, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, and EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks* require consideration of environmental justice issues and health and safety risks to children (OFR, 1994 and OFR, 1997).

Demographic data are used to identify levels and changes among those levels. A proposed action can be evaluated using demographic data, including population characteristics in terms of race, ethnicity, poverty status, educational level, and other broad indicators. A minority population is defined as a group of people and/or community experiencing common conditions of exposure or impact that consists of persons classified by the U.S. Census Bureau as Black or African American, Asian, American Indian, or Alaska Native, Native Hawaiian or other pacific Islander, Hispanic or Latino, or other non-white persons, including those of two or more races. A low-income population is defined as a population whose median household income is at or below the U.S. Department of Health and Human Services poverty guidelines.

The evaluation of environmental justice is designed to:

- Focus attention of Federal agencies on the human health and environmental conditions in minority communities and low-income communities with the goal of achieving environmental justice.
- Foster nondiscrimination in Federal programs that may substantially affect human health or the environment.
- Give minority communities and low-income communities greater opportunities for public participation in, and access to, public information on matters relating to human health and environmental conditions.

3.10.1.1 Socioeconomics

JBSA-Lackland and the project area are located in Bexar County, Texas, 12.8 miles southwest of downtown San Antonio. According to the 2022 U.S. Census, the population of Texas was roughly 30 million, with the total population of Bexar County was roughly 2 million people.

The region of Bexar County surrounding JBSA-Lackland and the Subjects Property reports approximately 1.9 percent of the population living below the poverty line (U.S. Census Bureau 2022). The poverty rate for the rest of Bexar County is at 15.6 percent, the state of Texas at 14.2 percent, and the US at 12.8 percent, respectively (U.S. Census Bureau 2022). **Table 3-6** below summarizes the census data.

3.10.1.2 Environmental Justice

An environmental justice analysis was conducted in accordance with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, to consider disproportionately high and adverse impacts on minority and low-income populations in the surrounding community. The nearest low- income population in the vicinity of the Subject Property is located to the northeast in the Las Jardines neighborhood, along U.S. Highway 90, between the Stotzer Freeway and Athel Avenue. This region has a total population of 1,532 people, a 69 percent unemployment rate, with 95 percent of the community being considered low income (USEPA 2022)

Table 3-6: Total Population and Populations of Concern

Location	Total Population	Percent Minority	Percent Hispanic or Latino	Percent below Poverty
JBSA-Lackland, Texas	9,467	17.5 %	11.6 %	1.9 %
Bexar County	2,028,236	13.8%	61.3%	14.8%
San Antonio	1,451,853	10.4%	65.7%	17.6%
State of Texas	30,029,572	20%	40.2%	14.2%

3.10.2 Environmental Consequences

3.10.2.1 Socioeconomics

3.10.2.1.1 Alternative 1: Proposed Action

The Proposed Action would not substantially affect the local populations, housing, education or overall socioeconomics of the community. Socioeconomic impacts would be considered significant if the long-term employment rates decreased or the number of local businesses decreased. There are few business and private residences within the ROI. Although the business would be impacted by having to relocate, this would be a temporary impact. Therefore, negligible short-term impacts are anticipated.

However, the proposed projects renovation and construction projects would require temporary personnel at JBSA-Lackland, through their construction contractors, would attempt to hire temporary construction staff from the local population, if the local population offers skilled workers in the fields related to building construction. Hiring staff from the local community would result in temporary impacts toward lowering the county unemployment rates. However, beneficial impacts resulting from construction payrolls and materials purchased would be negligible on a

regional scale. The Proposed Action would not affect long-term employment rates.

There would be no anticipated population increase within the region surrounding JBSA-Lackland as a result of the Proposed Action and therefore, would result in less than significant socioeconomic impacts. Implementation of the Proposed Action would not disrupt or divide established communities.

Therefore, negligible short-term benefits and minor long-term benefits are anticipated to socioeconomic factors at or near JBSA-Lackland as a result of implementation of this alternative. Additionally, no indirect impacts are expected.

3.10.2.1.2 Alternative 2

The potential impacts the socioeconomic to the area surrounding the project area under Alternative 2 would be similar to those described for the Proposed Action. However, the City of San Antonio Impound Lot would remain in place and not require them to relocate. This could be economical beneficial for the City of San Antonio Impound Lot, as relocation could take some time and be costly for the City of San Antonio.

Therefore, negligible short-term benefits and minor long-term benefits are anticipated to socioeconomic factors at or near JBSA-Lackland as a result of implementation of this alternative. Additionally, no indirect impacts are expected.

3.10.2.1.3 No-Action Alternative

Under the No-Action Alternative, socioeconomics within the project area and region surrounding the project area would remain unchanged because the proposed action would not be implemented.

3.10.2.2 Environmental Justice

3.10.2.2.1 Alternative 1: Proposed Action

Under the Proposed Action, no significant adverse environmental justice impacts would occur as a result of the acquisition of land and future proposed construction and no populations (minority, low-income, or otherwise) would be disproportionately impacted. Most impacts would be localized to the project area and would not impact the surrounding communities. However, one single family residence is located within the project area and the Proposed Action would require that homeowner to relocate, which depending on that homeowner's income, may be challenging and potentially economically harmful.

Given that no minority or low-income populations would have access to or be within the project area boundary, minority or low-income populations would not be disproportionately impacted by the Proposed Action. Therefore, impacts to environmental justice would be minor.

3.10.2.2.2 Alternative 2

The impacts to environmental justice of the local community under this alternative would be expected to be similar to those described for the Proposed Action. Without acquiring the City of Little impacts to the surrounding low-income communities would be expected from this alternative.

3.10.2.2.3 No-Action Alternative

Under the No-Action Alternative, environmental justice within the project area and region surrounding the project area would remain unchanged because the proposed action would not be implemented.

3.11 CUMULATIVE EFFECTS

This cumulative effects analysis was prepared pursuant to regulations at 40 CFR Parts 1500-1508. Cumulative effects, as defined by the CEQ are the effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time. In accordance with NEPA, a discussion of cumulative effects resulting from projects that are proposed, currently under construction, recently completed, or anticipated to be implemented in the near future is presented below.

Past development projects on JBSA-Lackland and in the community immediately surrounding the project areas that converted open, vegetated lands to industrial or commercial land uses had incremental adverse effects on natural resources and generally beneficial effects on socioeconomics of the region. These individual projects were developed and operated in accordance with environmental rules and regulations designed to prevent significant adverse impacts on human health and the environment. The incremental environmental effects from the proposed alternatives when added to current and foreseeable future environmental effects from other development projects in the area were evaluated to determine if they collectively contribute to significant cumulative impacts.

3.11.1 Relevant Past, Present, and Foreseeable Future Actions

JBSA-Lackland is an active military installation that experiences continuous evolution of mission and operational requirements. All construction projects must comply with land use controls, which include safety and environmental constraints. JBSA-Lackland, like other major military installations, requires new construction, infrastructure improvements, and general maintenance. Routine projects are environmentally cleared using the Air Force's Categorical Exclusion process (32 CFR Part 989, Appendix B) and would continue to occur during operation of the Proposed Action. In addition to these routine projects, the past, present, and reasonably foreseeable future major Air Force projects anticipated to occur are described below.

Past Actions

Past activities are the activities and actions that have occurred within the geographic scope of the cumulative effects analysis and shaped the current environmental conditions of the project area. The effects of these past activities and actions are now part of the existing environment and are included in the description of the affected environment. Reasonably foreseeable actions are those that have been planned and could be completed within the timeframe of projects addressed in this EA.

Growdon Gate/Road Relocation and Property Acquisition EA (2011): An EA was completed in 2011 for the relocation of the Growdon Gate/Road to reduce conflicts between commercial traffic and the 433d Airlift Wing's mission and the acquisition of land to accommodate expansion planning needs. This project did not move forward.

Environmental Assessment of Installation Development at JBSA – Lackland, Texas (2013): An EA was completed regarding future installation development projects including demolition, construction, infrastructure improvement, and natural infrastructure management. Including potential minor impacts to wetlands and 100-year floodplains, potential safety impacts from demolition of buildings previously used for storage or assembly of nuclear components for atomic weapons.

Chaff and Flares in Crystal North MOA Categorical Exclusion: An evaluation of the ability to expand chaff and flares in the Crystal North MOA for F-16 training was completed in 2018.

Construction of Firefighter Training Facility: Construction of a single-story, 4,200 sf firefighter classroom training and storage facility across the street from the existing fire station was implemented in 2018. The facility includes space for training, briefing, testing, administration, equipment storage, and personnel lockers.

Construct new Air Traffic Control Tower Categorical Exclusion: Construction of a new 6,313 sf Air Traffic Control Tower and demolish Building 1160 existing control tower was required to meet Air Force siting and structural, mechanical, and electrical components would be made to standard. A 10,000-square-foot lay down area for construction would be required.

Construct Nondestructive Inspection Shop: Renovation of building 932 or constructing a new 4,000-square-foot nondestructive inspection lab for inspection aircraft components.

Recent Developments

Modification of Crystal Operating Airspace: The proposed action modified the existing Crystal MOA by updating the low-altitude airspace to 500 feet above ground level to allow for low-level flight training at high air speeds.

Addition and Alteration of Medical and Security Forces Facility: Construction of a 2,000 sf addition to the medical and security forces facility (Building 930) to support existing mission requirements.

Foreseeable Future Actions

Advanced Pilot Trainer T-X Program: The beddown would include 81 aircraft, 10 flight simulators, 200 permanent personnel, 60 temporary personnel over a 2-year period, demolition of some existing buildings, and new construction of additional buildings. Currently proposed RAN-1A MOA but has limited capacity, and use of RAN-2A, and Brady High and Low MOAs.

Repair Airfield Aprons**:** Replacement of approximately 45,175 square yards of deteriorated apron pavements; repair approximately 3,777 square yard of asphalt shoulder.

Airfield Support Unit Relocation from Port San Antonio to Kelly Field Annex: Relocation of the fire training pit and tower and demolition of buildings to provide infill opportunities for

construction of new hangars and facilities to allow relocation of airfield support units from Port San Antonio to Kelly Field Annex.

***Construct Corrosion Control Facility*:** Convert the aircraft wash rack (Building 936) into a corrosion control facility. Facility would include space for paint preparation and drying, abrasive blasting room, booths for mixing and applying paint, tool storage, lockers, and administrative areas.

Connector Trail for Leon Creek Greenway Trail: The Howard W. Peak Greenway Trails are a series of leisure trails throughout the San Antonio area. Approximately 100 miles of trails have been completed to date. The next portion of trails to be completed is the Leon Creek Greenway Trail System. This system will connect Pearshall Park located south of JBSA-Lackland to Camargo Park which is located northwest of JBSA-Lackland. This proposed trail route will be located to the east of JBSA-Lackland. A request for access through U.S. Government property outside the security fence will be required to in order complete a portion of the trail to the north and south of the airfield.

3.11.2 Magnitude and Significance of Cumulative Effects

3.11.2.1 Scope of Analysis

This section summarizes the potential for cumulative impacts for the resource areas identified in the table as having the potential for cumulative impacts; those with no potential for cumulative impacts are not discussed further.

The Proposed Action would have negligible or no effect on floodplains or wetlands, groundwater, wildlife, threatened or endangered species, archaeology, geology, topography, or environmental justice. The Proposed Action would result in insignificant adverse effects on air quality, surface waters, stormwater, transportation safety, solid waste, hazardous/toxic materials, vegetation, architectural resources, and soils.

Noise Environment

Implementation of the Proposed Action would have a negligible impact on noise. There would be a short-term temporary increase in noise levels during the implementation of individual construction and demolition activities; however, given the location of the project area located in close proximity to an active airfield, these temporary increases in noise would be negligible and would not affect sensitive receptors in the surrounding vicinity.

Operationally, the project area is currently undeveloped or otherwise used for industrial activities (e.g., City of San Antonio Impound Lot). The operation of new land uses within this area would introduce new sources of noise. However, the noise levels would be similar to existing industrial noise and would substantially contribute to increases in noise given the located of the project area near the airfield.

Air Quality

Implementation of the Proposed Action would have a negligible impact on air quality. There would be a short-term temporary increase in air emissions during the implementation of individual construction and demolition activities; however, emissions would be expected to remain below de minimis thresholds.

Additionally, given that the Proposed Action is intended to facilitate a relocation of facilities, it is anticipated that operational air emissions would remain similar to existing conditions. Expansion of existing facilities would be considered in future environmental impact analyses, as necessary. This would include an analysis of potential air quality impacts.

Water Resources

Implementation of the Proposed Action could result in indirect impacts to water quality during construction. However, with the implementation of standard construction BMPs, the implementation of the Proposed Action would not contribute to cumulative impacts to water quality.

Operationally, potential stormwater impacts would be considered as individual projects are proposed and developed. Each project would consider impervious surfaces and the potential impact on drainage. Stormwater and other drainage facilities would be constructed as necessary. Therefore, the potential for individual projects to result in contribute to cumulative impacts on water resources would be minimal.

Safety and Occupational Health

Implementation of the Proposed Action would have a beneficial effect on safety and a negligible impact on transportation. As previously described, the current MSA facility does not allow for multiple explosive operations due to only having one operating location, this impedes mission capabilities and efficiency. There is currently no adequate storage area for missiles and missile containers. The transportation of live munitions from the Chapman Training Annex to JBSA-Lackland is completed on 9.2 miles on public roads. This current route exposes civilians to hazardous explosives and violates the cardinal rule of explosives safety, which is to expose the minimum number of people to the minimum amount of ammunition and explosives for the minimum amount of time. The relocation of the MSA would eliminate the potential hazards and safety issues of transporting munitions on public roads and storing them within high use areas. No significant adverse cumulative impacts to safety and occupational health are expected.

Hazardous Materials and Waste

The Proposed Action would require the management of minimal amounts of potential hazardous materials, including ACM and LBP present in buildings that are to be demolished under the implementation of the “Go West” Plan. Management of these materials would occur under the existing JBSA-Lackland Asbestos plan, JBSA-Lacklands management programs compliance with the Hazardous Waste Management Plan. These plans ensure that procedures for managing hazardous waste are in accordance with federal, state, and local regulations; therefore, no cumulative impacts to hazardous disposal or storage is expected. Hazardous wastes are not expected to be generated as a result of the Proposed Action. Therefore, the Proposed Action

would not contribute to cumulative effects to hazardous materials and wastes in or around JBSA-Lackland. No significant adverse cumulative impacts to hazardous materials and wastes, contaminated sites, and toxic substances are expected.

Biological and Natural Resources

As described in **Section 3.7**, the Proposed Action would not be anticipated to affect vegetation, wildlife, or special status species. The project area is disturbed and in some case developed and does not provide high quality native habitat. The riparian area by Leon Creek would not be affected by the implementation of the Proposed Action. Therefore, the Proposed Action would not contribute to cumulative impacts to biological and natural resources.

Cultural Resources

There would be no significant incremental adverse cumulative effects on cultural resources. There are no projects located in areas where known archaeological sites or historical properties are present. Since there are no known eligible archeological resources or historic properties within the APE, the Proposed Action would not contribute to any cumulative effects trends for these resources in the area. Inadvertent discovery of cultural resources would trigger standard operating procedures detailed in JBSA-Lackland's ICRMP so as not to disturb the integrity of the resources. The Proposed Action would not facilitate access to previously remote sites or contribute to their disturbance.

Earth Resources

The Proposed Action would have no effect on topography or geology and negligible impacts to soils. There would be no significant incremental adverse cumulative effects on earth resources from the acquisition of land. Future construction and demolition activities occurring under the "Go West" Plan, would result in a short-term increase in soil disturbance and dust generated. These impacts would last only as long as the duration of construction and would be managed through use of BMPs associated with a site specific SWPPP. Contractors should take care to implement BMPs. However, there would be no significant impacts to the soil, geology, and topography of the Subject Property.

Socioeconomic Resources and Environmental Justice

The Proposed Action would not negatively impact the local population, housing, or education. However, all of the future development projects under the "Go West" Plan would involve the purchase of goods and services and short-term employment during construction. No minority, low-income, or other populations would be disproportionately impacted as a result of the cumulative impact of these projects. Overall, there is expected to be a minor incremental beneficial cumulative effect on the local economy.

3.11.3 Summary of Cumulative Effects

The Proposed Action would result in insignificant adverse effects on air quality, surface waters, stormwater, transportation safety, solid waste, hazardous/toxic materials, vegetation, architectural resources, and soils. Additionally, there would be no incremental adverse cumulative effects on floodplains or wetlands, groundwater, wildlife, threatened or endangered

species, archaeology, geology, topography, or environmental justice when compared to past, present, and foreseeable future due to the small magnitude and/or short, temporary duration of effects from other relevant actions in the project area from the implementation of the Proposed Action or any of the action alternatives. This is in part due to the avoidance of the resources from implementation of the Proposed Action or any of the action alternatives in this EA.

4.0 LIST OF PREPARERS

Name/Organization	Degree	Contribution	Years of Experience
Eric Gardner Nicklaus Engineering, Inc	B.S. Civil Engineering M.B.A.	Project Manager	17
Serena Scott Nicklaus Engineering, Inc	B.A., Sustainability Studies B.A., Political Science M.P.S., Coastal Zone Management	Project Scientist	4
Kendra Sultzer Wood Environment & Infrastructure Inc.	B.S. Environmental Studies and Biology MEM Ecosystem Science and Conservation	Biologist	8
Nick Meisinger WSP Environment & Infrastructure Inc.	B.S. Environmental Science	QA/QC	12

5.0 PERSONS AND AGENCIES CONSULTED/COORDINATED

Tribal Governments

- Comanche Nation, Oklahoma
- Mescalero Apache Tribe of the Mescalero Reservation
- Tonkawa Tribe of Oklahoma

Federal, State, and Local Agencies

- Federal Emergency Management Agency
- U.S. Army Corps of Engineers, Fort Worth District
- U.S. Environmental Protection Agency, Region 6
- U.S. Fish & Wildlife Service, Southwest Region
- Texas Commission on Environmental Quality
- Texas Historical Commission
- Texas Parks and Wildlife Department
- Texas Water Development Board
- Alamo Area Council of Government
- Bexar County Infrastructure Department
- City of San Antonio
- Conservation Society of San Antonio
- San Antonio River Authority
- San Antonio Parks and Recreation

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Appendix A:

Interagency/Intergovermental Coordination

and Public Participation

IICEP Consultation Letter

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Ross Richardson, Chief
Federal Emergency Management Agency
Floodplain Management and Insurance Branch
800 North Loop 288
Denton, TX 76209-3698

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

Joint Base San Antonio (JBSA) is preparing an Environmental Assessment (EA) pursuant to the National Environmental Policy Act (NEPA) and in accordance with the National Environmental Policy Act Implementing Regulations Revisions (87 FR 23453-23470).

JBSA is proposing to acquire a 345-acre site in the area adjacent to the JBSA Growdon Entry Control Point for multiple planned construction, demolition, infrastructure, and natural infrastructure projects. The Proposed Action is needed to meet current and future mission requirements and national security objectives associated with JBSA. This involves increasing the capacity, efficiency, and effectiveness of JBSA by enhancing the Base's ability to expand.

Any information your agency could provide regarding the following resource areas within or in the vicinity of JBSA would be appreciated:

- Potential environmental concerns or issues;
- Groundwater resources, including streams, wells, and local aquifers;
- Natural resource issues;
- Traffic, noise, or socioeconomic concerns;
- Air quality concerns; and
- Any additional environmental, cultural, land use, or socioeconomic information or concerns your agency may have with regard to JBSA.

Agency input is valuable and necessary for the assessment of environmental impacts provided in the EA. Pursuant to the requirements of NEPA and in accordance with 87 FR 23453-23470, local citizens, groups, and agencies, among others, will have ample future opportunity to review and comment on the information and alternatives addressed in the Draft EA, which will be published and distributed at a later date.

A list of agencies and organizations to which this request was sent is provided as Attachment 1. Should you identify any agencies or organizations with interests relevant to this project that were not included on this list, please provide them with a copy of this memorandum or contact us with their information.

Please provide any comments or information to Benjamin Lamm, Joint Base San Antonio-Lackland NEPA Program Manger at (210) 925-8768, email at 802ces.ceie.nepateam@us.af.mil, or regular mail at 802d Civil Engineer Squadron 1555 Gott St., Bldg. 5595 JBSA-Lackland, TX 78236. If you choose to e-mail comments, please include "DEAAG Property at Kelly Field Annex-Joint Base San Antonio " in the subject line. Please respond within 30 days of the date of this memorandum to enable us to complete this phase of the project within the scheduled timeframe.

Sincerely,

ROBERSON.EDWARD.LEWIS.1124911636
Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:46:23 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

Attachment:
1. Distribution List

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Attn: CESWF-PER-R
Stephen Brooks
U.S. Army Corps of Engineers, Fort Worth District
Regulatory Branch, Permit Section
819 Taylor Street, Room 3A37
Fort Worth, TX 76102

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

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Sincerely,

ROBERSON.EDWARD.LEWIS.1124911636
Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:46:37 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

Attachment:
1. Distribution List

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

David W. Gray, Deputy Regional Administrator
U.S. Environmental Protection Agency Region 6
1201 Elm Street
Dallas, TX 75270

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

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Please provide any comments or information to Benjamin Lamm, Joint Base San Antonio-Lackland NEPA Program Manger at (210) 925-8768, email at 802ces.ceie.nepateam@us.af.mil, or regular mail at 802d Civil Engineer Squadron 1555 Gott St., Bldg. 5595 JBSA-Lackland, TX 78236. If you choose to e-mail comments, please include "DEAAG Property at Kelly Field Annex-Joint Base San Antonio " in the subject line. Please respond within 30 days of the date of this memorandum to enable us to complete this phase of the project within the scheduled timeframe.

Sincerely,

ROBERSON.EDWARD.LEWIS.1124911636

Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:46:52 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

Attachment:
1. Distribution List

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Adam Zerrenner, Field Supervisor
U.S. Fish & Wildlife Service, Southwest Region
10711 Burnet Road Suite 200
Austin, TX 78758

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

Joint Base San Antonio (JBSA) is preparing an Environmental Assessment (EA) pursuant to the National Environmental Policy Act (NEPA) and in accordance with the National Environmental Policy Act Implementing Regulations Revisions (87 FR 23453-23470).

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Sincerely,

ROBERSON.EDWARD.LEWIS.1124911636
Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:47:07 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

Attachment:
1. Distribution List

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Toby Baker, Executive Director
Texas Commission on Environmental Quality
Office of Permitting and Registration
MC 109, P.O. Box 13087
Austin, TX 78711-3087

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

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Sincerely,

ROBERSON.EDWARD.LEWIS.1124911636
Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:47:22 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

Attachment:
1. Distribution List

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

NEPA Coordinator
Texas Commission on Environmental Quality
MC 109, P.O. Box 13087
Austin, TX 78711-3088

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

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Sincerely,

ROBERSON.EDWARD.LEWIS.1124911636
Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:47:51 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

Attachment:
1. Distribution List

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Laura Zebehazy
Texas Parks and Wildlife Department
Wildlife Habitat Assessment Program
4200 Smith School Road
Austin, TX 78744-3291

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

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Sincerely,

ROBERSON.EDWARD.LEWIS.1124911636
Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:48:11 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

Attachment:
1. Distribution List

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Michael Segner, NFIP State Coordinator
Texas Water Development Board
1700 North Congress Avenue
Austin, TX 78711-3231

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

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ROBERSON.EDWARD.LEWIS.1124911636
Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:48:26 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

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JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Miguel Segura, Director of Public Affairs and Regional Development
Alamo Area Council of Governments
1700 North Congress Avenue
San Antonio, TX 78217

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

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Sincerely,

ROBERSON.EDWARD.LEWIS.1124911636
Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:48:41 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

Attachment:
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DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Diane Bartlett, P.E., Floodplain Administrator
Bexar County Infrastructure Department
233 North Pecos Street, Suite 420
San Antonio, TX 78207

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

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Sincerely,

ROBERSON.EDWARD.LEWIS.1124911636
Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:48:56 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

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JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Kerry Averyt P.E., Aarin Teague Dr.
San Antonio River Authority
Engineering Design and Construction Manager, Ecological
100 East Guenther Street
San Antonio, TX 78204

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

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Sincerely,

ROBERSON.EDWARD.LEWIS.1124911636
Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:49:12 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

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1. Distribution List

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JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

John E. Cantu, Environmental Manager
City of San Antonio
Municipal Plaza Building
114 W. Commerce, 2nd Floor
San Antonio, TX 78283-3966

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

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Sincerely,

ROBERSON.EDWARD.LEWIS.1124911636
Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:49:27 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

Attachment:
1. Distribution List

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Brandon Ross, AICP
San Antonio Parks and Recreation
P.O. Box 839966
San Antonio, TX 78283-3967

SUBJECT: Intergovernmental and Interagency Coordination for Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland, Texas

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Sincerely,

ROBERSON.EDWARD.LEWIS.1124911636
Digitally signed by ROBERSON.EDWARD.LEWIS.1124911636
Date: 2023.03.28 15:49:44 -05'00'

Edward L. Roberson, P.E.
802d Civil Engineer Squadron

Attachment:
1. Distribution List

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Mr. Mark Wolfe
Texas Historical Commission
State Historic Preservation Office
1511 Colorado Street
Austin, TX 78701

This letter is being submitted to your office in order to fulfill Section 106 and NEPA requirements under federal law.Joint Base San Antonio (JBSA) is proposing to acquire a 345-acre site in the area adjacent to the JBSA Growdon Entry Control Point for multiple planned construction, demolition, infrastructure, and natural infrastructure projects. This undertaking is needed to meet current and future mission requirements and national security objectives associated with JBSA. This involves increasing the capacity, efficiency, and effectiveness of JBSA by enhancing the JBSA's ability to expand. The Description of Proposed Action and Alternatives (DOPAA) is provided as an attachment for your review (Attachment 1). The Area of Potential Effect (APE) for this undertaking is located 8 miles southwest of San Antonio, TX and is bound to the north of Kelly Airfield, to the south by Leon Creek, to the west by Growdon Rd, and to the east by the Gateway Hills Golf Course (Attachment 1, Page 2-5).

A cultural resource survey was completed in 2011 during the planning phase for the proposed Growdon Gate / Road Relocation and Property Acquisition (Attachment 2). This survey covered the same APE described for the current undertaking. The following six archaeological sites were revealed during the 2011 survey: 41BX958, 41BX1061, 41BX1065, 41BX1066, 41BX1107, and 41BX1108. All six sites are located within a 1-mile radius of the APE. A detailed overview of the identified archaeological sites and their eligibility for listing on the National Register of Historic Places (NRHP) is provided in Table 1.

Table 1. Previously Identified Sites in the Vicinity of the APE

Site No.	Site Data	NRHP Eligibility Status	Comments
41BX958	Historic period site constructed between 1922 and 1938	Ineligible	Outside APE; originally recorded in 1991 by Geo-Marine, Inc.
41BX1061	Historic sewer line dating to the early 1900s	Ineligible	Outside APE; originally recorded in 1997 by Center for Archaeological Research; UTSA; reevaluated by Geo-Marine, Inc. in 2006
41BX1065	Middle to Transitional Archaic period campsite on terrace overlooking Leon Creek	Site considered to have moderate to high research	Outside APE; recorded in 1997 by Center for Archaeological Research, UTSA

Site No.	Site Data	NRHP Eligibility Status	Comments
		potential, but no further work recommended	
41BX1066	Small, surficial lithic scatter; no diagnostics or features present	Ineligible	Outside APE; originally recorded in 1997 by Center for Archaeological Research, UTSA
41BX1107	Early to Transitional Archaic period quarry site; testing of site revealed low density scatter of artifacts in a secondary context	Ineligible	Outside APE; originally recorded in 1997 by Center for Archaeological Research, UTSA; reevaluated by Geo-Marine, Inc. in 2006
41BX1108	Prehistoric campsite of unknown age (possibly Early Archaic) with burned rock midden	Eligible	Outside APE; originally recorded in 1997 by Center for Archaeological Research, UTSA

Note: See Attachment 2.

In 2011, Geo-Marine, Inc. conducted an archaeological survey of the APE that involved a pedestrian walkover at systematic intervals. Shovel tests were excavated where there was potential for buried deposits and all cutbacks exposures were examined. Archival research and the archaeological survey result in the identification of the remnants of a historic structure, designated site 41BX1886. The razed structure is divided into two sections by a concrete pathway and a dual-step porch. East of the walkway, the areas appears to have been used as an outbuilding, while an enclosed wooden fence west of the walkway indicates that the western portion was likely used as a small stable area. According to the survey completed in 2011, site 41BX1886 was identified as ineligible. Additionally, site 41BX1886 is located outside of the current APE.

The earliest topographic map to show structures in this vicinity is the 1953 West San Antonio topographic quad which depicts a road system connecting this structure along with several other structures within and south of the APE. According to the 1963 aerial image, this road system appears to have extended south into the interior of the Leon Creek meander, and may have been used to access a construction staging area. The area immediately south of the collapsed structure was inspected for the presence of the additional mapped structures; however, none was encountered in primary context. Instead, structure remnants were found piled along a steep ridge to the south above the Leon Creek floodplain. The materials mixed within the rubble consist primarily of large concrete slabs and corrugated metal, although numerous domestic items such as glass bottles, aluminum cans, tin wash pales, tin cans, and other household items were also observed. The majority of the aluminum cans found across the site exhibited a pull-tab opening, and according to approximate initial production dates of pull tabs, one can of Schlitz beer can be dated to as early as 1963.

The area where the structures are mapped appears to have been impacted by construction activities sometime between 1963 and 1966, although the type of construction and degree to which it impacted the structures is unclear. Together, the artifacts observed, in addition to the historic topographic and aerial maps reviewed, suggest that the area represents a demolished, mid-twentieth century structure that may have been used into the 1970s. No other time-diagnostic items or historic imagery was found that would suggest that the site was occupied prior to the mid-twentieth century. Due to the minimum informational potential of this site and its general lack of integrity, the site was recommended ineligible for inclusion in the NRHP. The State Historic Preservation Officer (SHPO) concurred with this determination (Attachment 3).

Five existing buildings and/or structures are located within the APE and are present on aerial imagery dating back to 1966 and 1973. Although these buildings are over 50 years old, they do not meet the requirements under the SHPO Criteria for Evaluation for the following reasons: The structures are not associated with important events that have contributed significantly to the broad pattern of our history; they are not associated with the lives of persons significant in our past; they do not embody the distinctive characteristics of a type, period or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; and they have not yielded, or may be likely to yield, information important in prehistory or history. Additionally, implementation of the undertaking would facilitate a land transfer and would not result in immediate demolition of any facilities within the APE. Prior to the implementation of any proposed projects involving demolition of these structures, the USAF would consult with the SHPO pursuant to the requirements under Section 106 of the NHPA.

Based on the results of the 2011 survey (which covered the same area involved in the current undertaking), no eligible archaeological sites or historic buildings/structures are located within the APE. The vast majority of the project area was found to be in a disturbed context resulting from numerous modern construction activities associated with Lackland Air Force Base and the City of San Antonio. As a result, no further investigations were recommended for the APE. Based on the evidence and data provided herein, the USAF has determined that the current undertaking would have *no effect* on any historic resources that are eligible or potentially eligible for listing on the NRHP. We respectfully seek your concurrence with our determination of *no historic properties affected*. In accordance with 36 Code of Federal Regulations (CFR) §800.4(d)(1)(i), we are open to receiving your comments or questions within 30 days of your office's receipt of this consultation package. If your office chooses to send written comments, please address them to Benjamin Lamm. If you choose to e-mail comments, please include "DEAAG Property at Kelly Field Annex-Joint Base San Antonio" in the subject line. Thank you for your assistance in reviewing this undertaking.

If you have any questions, please contact me at 802ces.ceie.nepateam@us.af.mil.

Sincerely,

Dayna A. Cramer

Digitally signed by Dayna A. Cramer
Date: 2023.04.05 15:06:40 -05'00'

DAYNA CRAMER, GS-13, DAF
Chief, JBSA Cultural and Natural Resources

Attachment:

1. Description of the Proposed Action and Alternatives
2. Cultural Resources Survey for the Relocation of Growdon Gate at Lackland Air Force Base, Bexar County, Texas
3. Previous Section 106 Consultation Correspondence for the APE

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Conservation Society of San Antonio
107 King William Street
San Antonio, TX 78204

Joint Base San Antonio (JBSA) is proposing to acquire a 345-acre site in the area adjacent to the JBSA Growdon Entry Control Point for multiple planned construction, demolition, infrastructure, and natural infrastructure projects. This undertaking is needed to meet current and future mission requirements and national security objectives associated with JBSA. This involves increasing the capacity, efficiency, and effectiveness of JBSA by enhancing the JBSA's ability to expand. The Description of Proposed Action and Alternatives (DOPAA) is provided as an attachment for your review (Attachment 1).

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Notes: See Attachment 2.

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integrity, the site was recommended ineligible for inclusion in the NRHP. The State Historic Preservation Officer (SHPO) concurred with this determination (Attachment 3).

Five existing buildings and/or structures are located within the APE and are present on aerial imagery dating back to 1966 and 1973. Although these buildings are over 50 years old, they do not meet the requirements under the SHPO Criteria for Evaluation for the following reasons: The structures are not associated with important events that have contributed significantly to the broad pattern of our history; they are not associated with the lives of persons significant in our past; they do not embody the distinctive characteristics of a type, period or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; and they have not yielded, or may be likely to yield, information important in prehistory or history. Additionally, implementation of the undertaking would facilitate a land transfer and would not result in immediate demolition of any facilities within the APE. Prior to the implementation of any proposed projects involving demolition of these structures, the USAF would consult with the SHPO pursuant to the requirements under Section 106 of the NHPA.

Based on the results of the 2011 survey (which covered the same area involved in the current undertaking), no eligible archaeological sites or historic buildings/structures are located within the APE. The vast majority of the project area was found to be in a disturbed context resulting from numerous modern construction activities associated with Lackland Air Force Base and the City of San Antonio. As a result, no further investigations were recommended for the APE. Based on the evidence and data provided herein, the USAF has determined that the current undertaking would have *no effect* on any historic resources that are eligible or potentially eligible for listing on the NRHP. We respectfully seek your concurrence with our determination of *no historic properties affected*. In accordance with 36 Code of Federal Regulations (CFR) §800.4(d)(1)(i), we are open to receiving your comments or questions within 30 days of your office's receipt of this consultation package. If your office chooses to send written comments, please address them to Benjamin Lamm. If you choose to e-mail comments, please include "DEAAG Property at Kelly Field Annex-Joint Base San Antonio" in the subject line. Thank you for your assistance in reviewing this undertaking.

If you have any questions, please contact me at 802ces.ceie.nepateam@us.af.mil.

Sincerely,

Dayna A. Cramer

Digitally signed by Dayna A. Cramer
Date: 2023.04.05 15:06:22 -05'00'

DAYNA CRAMER, GS-13, DAF
Chief, JBSA Cultural and Natural Resources

Attachment:

1. Description of the Proposed Action and Alternatives
2. Cultural Resources Survey for the Relocation of Growdon Gate at Lackland Air Force Base, Bexar County, Texas
3. Previous Section 106 Consultation Correspondence for the APE

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Comanche Nation of Oklahoma
Mr. William Nelson Sr., Chairman
PO Box 908
Lawton, OK 73502-0908

Dear Mr. Nelson,

This letter is being submitted to your office in order to fulfill Section 106 and NEPA requirements under federal law. Joint Base San Antonio (JBSA) is proposing to acquire a 345-acre site in the area adjacent to the JBSA Growdon Entry Control Point for multiple planned construction, demolition, infrastructure, and natural infrastructure projects. The Proposed Action is needed to meet current and future mission requirements and national security objectives associated with JBSA. This involves increasing the capacity, efficiency, and effectiveness of JBSA by enhancing the Base's ability to expand. The Description of Proposed Action and Alternatives (DOPAA) is provided as an attachment for your review.

The Area of Potential Effect (APE) for these undertakings is located 8 miles southwest of San Antonio, TX and is bound to the north of Kelly Airfield, to the south by Leon Creek, to the west by Growdon Rd, and to the east by the Gateway Hills Golf Course (see Page 2-5 in Attachment 1). As a tribe with potential interests within the APE, JBSA is reaching out to request your assistance in our analysis of the undertaking's effect. On behalf of JBSA, I am writing to invite the Comanche Nation of Oklahoma to enter into government-to-government consultation, pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and Title 36 Code of Federal Regulations (CFR), Part 800, Protection of Historic Properties. JBSA is also consulting with the Texas State Historic Preservation Office (SHPO) under Section 106 of the NHPA.

JBSA is seeking available information on the existence of any traditional resources that may be located in or near the proposed APE, or any knowledge of historic properties that might be affected by the proposed undertaking in the APE.

JBSA is committed to early and continuous consultation with all potentially affected Native American tribes. In accordance with 36 Code of Federal Regulations (CFR) § 800.4(d)(1)(i), we are open to receiving your comments, questions, or requests for government-to-government consultation within 30 days of your receipt of this consultation package. Please feel free to contact Benjamin Lamm, Joint Base San Antonio-Lackland NEPA Program Manger at (210) 925-8768 email at 802ces.ceie.nepateam@us.af.mil, or regular mail at 802d Civil Engineer Squadron 1555 Gott St., Bldg. 5595, JBSA-Lackland, TX 78236. If you choose to e-mail comments, please include

“DEAAG Property at Kelly Field Annex-Joint Base San Antonio " in the subject line. Thank you for your assistance.

Sincerely

Dayna A. Cramer

Digitally signed by Dayna A. Cramer
Date: 2023.04.05 15:02:34 -05'00'

DAYNA CRAMER, GS-13, DAF
Chief, JBSA Cultural and Natural Resources

Attachment:
1. Description of the Proposed Action and Alternatives

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Mescalero Apache Tribe of the Mescalero Reservation
Mr. Gabe Aguilar, President
108 Central Ave
Mescalero, NM 88340-0227

Dear Mr. Aguilar,

Joint Base San Antonio (JBSA) is proposing to acquire a 345-acre site in the area adjacent to the Growdon Entry Control Point for multiple planned construction, demolition, infrastructure, and natural infrastructure projects. The Proposed Action is needed to meet current and future mission requirements and national security objectives associated with JBSA. This involves increasing the capacity, efficiency, and effectiveness of JBSA by enhancing the Base's ability to expand. The Description of Proposed Action and Alternatives (DOPAA) is provided as an attachment for your review.

The Area of Potential Effect (APE) for these undertakings is located 8 miles southwest of San Antonio, TX and is bound to the north of Kelly Airfield, to the south by Leon Creek, to the west by Growdon Rd, and to the east by the Gateway Hills Golf Course. (see page 2-5 in Attachment 1). As a tribe with potential interests in the APE, JBSA is reaching out to you to assist in our analysis of the undertaking's effect. On behalf of JBSA I am writing to invite the Mescalero Apache Tribe of the Mescalero Reservation to enter into government-to-government consultation, pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and Title 36 Code of Federal Regulations (CFR), Part 800, Protection of Historic Properties. JBSA is also consulting with the Texas State Historic Preservation Office (SHPO) under Section 106 of the NHPA.

In particular, JBSA requests your input about 1) the existence of any traditional resources that may be located in or near the proposed APE; and 2) whether you have knowledge of any historic properties that might be affected by the proposed undertaking in the APE.

JBSA is committed to early and continuous consultation with all potentially affected Native American tribes. In accordance with 36 Code of Federal Regulations (CFR) § 800.4(d)(1)(i), we are open to receiving your comments, questions, or requests for government-to-government consultation within 30 days of your receipt of this consultation package. Please feel free to contact Benjamin Lamm, Joint Base San Antonio-Lackland NEPA Program Manger at (210) 925-8768, email at 802ces.ceie.nepateam@us.af.mil, or regular mail at 802d Civil Engineer Squadron 1555 Gott St., Bldg. 5595 JBSA-Lackland, TX 78236. If you choose to e-mail comments, please include

“DEAAG Property at Kelly Field Annex-Joint Base San Antonio " in the subject line. Thank you for your assistance.

Sincerely

Dayna A. Cramer

Digitally signed by Dayna A. Cramer
Date: 2023.04.05 15:02:13 -05'00'

DAYNA CRAMER, GS-13, DAF
Chief, JBSA Cultural and Natural Resources

Attachment:
1. Description of the Proposed Action and Alternatives

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Tonkawa Tribe of Oklahoma
Mr. Russell Martin, President
1 Rush Buffalo Road
Tonkawa, OK 74653-4449

Dear Mr. Martin,

Joint Base San Antonio (JBSA) is proposing to acquire a 345-acre site in the area adjacent to the Growdon Entry Control Point for multiple planned construction, demolition, infrastructure, and natural infrastructure projects. The Proposed Action is needed to meet current and future mission requirements and national security objectives associated with JBSA. This involves increasing the capacity, efficiency, and effectiveness of JBSA by enhancing the Base's ability to expand. The Description of Proposed Action and Alternatives (DOPAA) is provided as an attachment for your review.

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In particular, JBSA requests your input about 1) the existence of any traditional resources that may be located in or near the proposed APE; and 2) whether you have knowledge of any historic properties that might be affected by the proposed undertaking in the APE.

JBSA is committed to early and continuous consultation with all potentially affected Native American tribes. In accordance with 36 Code of Federal Regulations (CFR) § 800.4(d)(1)(i), we are open to receiving your comments, questions, or requests for government-to-government consultation within 30 days of your receipt of this consultation package. Please feel free to contact Benjamin Lamm, Joint Base San Antonio-Lackland NEPA Program Manger at (210) 925-8768, email at 802ces.ceie.nepateam@us.af.mil, or regular mail at 802d Civil Engineer Squadron 1555 Gott St., Bldg. 5595 JBSA-Lackland, TX 78236. If you choose to e-mail comments, please include

“DEAAG Property at Kelly Field Annex-Joint Base San Antonio " in the subject line. Thank you for your assistance.

Sincerely

Dayna A. Cramer

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Date: 2023.04.05 15:01:54 -05'00'

DAYNA CRAMER, GS-13, DAF
Chief, JBSA Cultural and Natural Resources

Attachment:
1. Description of the Proposed Action and Alternatives

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Wichita and Affiliated Tribes
Terri Parton, President
P.O. Box 729
Andarko, OK 73005-0729

Dear Ms. Parton,

Joint Base San Antonio (JBSA) is proposing to acquire a 345-acre site in the area adjacent to the Growdon Entry Control Point for multiple planned construction, demolition, infrastructure, and natural infrastructure projects. The Proposed Action is needed to meet current and future mission requirements and national security objectives associated with JBSA. This involves increasing the capacity, efficiency, and effectiveness of JBSA by enhancing the Base's ability to expand. The Description of Proposed Action and Alternatives (DOPAA) is provided as an attachment for your review.

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In particular, JBSA requests your input about 1) the existence of any traditional resources that may be located in or near the proposed APE; and 2) whether you have knowledge of any historic properties that might be affected by the proposed undertaking in the APE.

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“DEAAG Property at Kelly Field Annex-Joint Base San Antonio " in the subject line. Thank you for your assistance.

Sincerely

Dayna A. Cramer

Digitally signed by Dayna A. Cramer
Date: 2023.04.05 15:01:15 -05'00'

DAYNA CRAMER, GS-13, DAF
Chief, JBSA Cultural and Natural Resources

Attachment:
1. Description of the Proposed Action and Alternatives

Section 106 Consultations with Texas Historic Preservation Division

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Mr. Mark Wolfe
Texas Historical Commission
State Historic Preservation Office
1511 Colorado Street
Austin, TX 78701

Greetings Mr. Wolfe,

We are following up on a consultation letter that was sent to your office on April 13, 2023 in order to fulfill our requirements pursuant to Section 106 of the National Historic Preservation Act (NEPA) and the National Environmental Policy Act of 1969 (NEPA). As described in that original consultation letter, Joint Base San Antonio (JBSA) is proposing to acquire a 345-acre site in the area adjacent to the JBSA Growdon Entry Control Point for multiple planned construction, demolition, infrastructure, and natural infrastructure projects. This undertaking is needed to meet current and future mission requirements and national security objectives associated with JBSA. The Area of Potential Effect (APE) for this undertaking is located 8 miles southwest of San Antonio, TX and is bound to the north of Kelly Airfield.

Based on the evidence provided in the original consultation letter, the U.S. Air Force (USAF) has determined that the undertaking would have *no effect* on any historic resources that are eligible or potentially eligible for listing on the National Register of Historic Places (NRHP). We respectfully request your concurrence with our finding of "no effect." If your office chooses to send written comments, please address them to Benjamin Lamm, Joint Base San Antonio-Lackland NEPA Program Manager at (210) 925-8768, email at 802ces.ceie.nepateam@us.af.mil, or regular mail at 802d Civil Engineer Squadron 1555 Gott St., Bldg. 5595 JBSA-Lackland, TX 78236. If you choose to e-mail comments, please include "DEAAG Property at Kelly Field Annex-Joint Base San Antonio " in the subject line. Thank you for your assistance.

Sincerely,

LARSON.BRENT.DANIEL
Digitally signed by LARSON.BRENT.DANIEL
Date: 2023.08.30 08:02:11 -05'00'

BRENT D. LARSON, GS-14, DAF
Chief, JBSA Installation Management Flight

Attachment:
1. April 13, 2023 Consultation Letter (sent via Certified Mail)

Section 7 Consultations with U.S. Fish and Wildlife Service

DEPARTMENT OF THE AIR FORCE
JOINT BASE SAN ANTONIO, TEXAS

802 CES/CEIE
1555 Gott St,
Bldg. 5595
JBSA-Lackland, TX 78236-5645

Adam Zerrenner, Field Supervisor
U.S. Fish & Wildlife Service, Southwest Region
10711 Burnet Road Suite 200
Austin, TX 78758

Dear Mr. Zerrenner,

As described in a scoping letter sent to your office on April 13, 2023, Joint Base San Antonio (JBSA) is preparing an Environmental Assessment (EA) pursuant to the National Environmental Policy Act of 1969 (NEPA).

JBSA is proposing to acquire a 345-acre site in the area adjacent to the JBSA Growdon Entry Control Point for multiple planned construction, demolition, infrastructure, and natural infrastructure projects. The Proposed Action is needed to meet current and future mission requirements and national security objectives associated with JBSA.

The attached official species list – generated using the U.S. Fish and Wildlife's (USFWS's) Information for Planning and Consultation (IPaC) system – identified the federally endangered Golden-checked Warbler (*Setophaga chrysoparia*), Texas Blind Salamander (*Eurycea rathbuni*), Fountain Darter (*Etheostoma fonticola*), Beetle *Rhadine exilis*, beetle *Rhadine infernalis*, Comal Springs Dryopid Beetle,Comal Springs Riffle Beetle (*Heterlmis comalensis*), Helotes Mold (*Batrisodes venyivi*), Cokendolpher Cave Harvestman (*Texella cokendolpheri*), Government Canyon Bat Cave Meshweaver (*Cicurina vespera*), Government Canyon Bat Cave Spider (*Tayshaneta microps*), Madla Cave Meshweaver (*Cicurina madla*), Robber Baron Cave Meshweaver (*Cicurina baronia*), Peck's Cave Amphipod (*Stygobromus (=Stygonectes) pecki),* Texas Wild-rice (*Zizania texana*); the proposed endangered Tricolored Bat (*Perimyotis subflavus*); the threatened Piping plover (*Charadrius melodus*), Red Knot (*Calidris canutus rufa*), and San Marcos Salamander (*Eurycea nana*); and federally candidate the Monarch Butterfly (*Danaus plexippus*). Additionally, a habitat survey was conducted in May 2011 that identified the federally endangered whooping crane (*Grus americana)*. Critical habitat is not designated in the project area for any of the potentially occurring federally listed species.

The 345-acre site has historically been used for agriculture, mining, and industrial uses. Currently the site consists of various industrial activities, with buildings, surface parking, gravel surface parking, and construction staging. Additionally, a portion is used for agriculture use, as

well as an unmaintained area with trees and vegetation along Leon Creek. Wildlife habitat is limited to trees, grasses, shrubs, vegetation, and the area along Leon Creek.

The wildlife inhabiting the area would be disturbed by the noise and activity (e.g., initial startle and avoidance of area adjacent to the activity) that would occur during the Proposed Action. The area impacted by the action is small, and impact on wildlife would be short-term. Note also that wildlife in the project area is already exposed to average aircraft noise levels of 65 to 79 A-weighted decibels (dBA) Day-Night Average Sound Level (DNL); therefore, it is likely that wildlife in the area is acclimated to increased noise levels.

Based on these findings the U.S. Air Force has determined that there would be "no effect" to federally listed species. We understand that it is not necessary to contact the USFWS regarding a "no effect" determination. Nevertheless, we respectfully request your concurrence with our finding of "no effect" within 30 days of your receipt of this letter. If your office chooses to send written comments, please address them to Benjamin Lamm, Joint Base San Antonio-Lackland NEPA Program Manager at (210) 925-8768, email at 802ces.ceie.nepateam@us.af.mil, or regular mail at 802d Civil Engineer Squadron 1555 Gott St., Bldg. 5595 JBSA-Lackland, TX 78236. If you choose to e-mail comments, please include "DEAAG Property at Kelly Field Annex-Joint Base San Antonio " in the subject line. Thank you for your assistance.

Sincerely,

LARSON.BRENT.DANIEL
Digitally signed by LARSON.BRENT.DANIEL
Date: 2023.08.30 08:05:26 -05'00'

BRENT D. LARSON, GS-14, DAF
Chief, JBSA Installation Management Flight

Enclosures:
1) Figure 1, Project Site
2) USFWS IPaC Official Species List

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Appendix B: Agency Correspondence

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 3, 2023

Benjamin Lamm
NEPA Program Manger
802d Civil Engineer Squadron
1555 Gott St., Bldg. 5595
JBSA-Lackland, TX 78236.

Via: **E-mail**

Re: **TCEQ NEPA Request #2023-077. Defense Economic Adjustment Assistance Grant (DEAAG) Property at Kelly Field Annex-Joint Base San Antonio, Lackland. Bexar County.**

Dear Mr. Lamm,

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced project and offers the following comments:

The proposed action is located in Bexar County, which is designated nonattainment for the 2015 eight-hour ozone National Ambient Air Quality Standard (NAAQS) with a classification of moderate; therefore, federal Clean Air Act, §176(c) general conformity requirements apply. Per federal general conformity regulations at 40 CFR §93.153, a conformity demonstration may be required when the total projected direct and indirect volatile organic compounds (VOC) and nitrogen oxides (NOX) emissions—precursor pollutants that lead to the formation of ozone—from an applicable federal action are equal to or exceed the de minimis emissions level of 100 tons per year for ozone NAAQS moderate nonattainment areas.

We recommend the environmental assessment address actions that will be taken to prevent surface and groundwater contamination.

Any debris or waste disposal should be at an appropriately authorized disposal facility.

Thank you for the opportunity to review this project. If you have any questions, please contact the agency NEPA coordinator at (512) 239-2619 or NEPA@tceq.texas.gov

Sincerely,

Ryan Vise,
Division Director
External Relations

Serena Scott

Subject: FW: SWF-2023-00206 (DEAAG Property at Kelly Field Annex-Joint Base San Antonio)

-----Original Message-----
From: 802 CES/CEIE NEPA Team <802CES.CEIE.NEPATeam@us.af.mil>
Sent: Monday, May 1, 2023 1:01 PM
To: LAMM, BENJAMIN T CIV USAF AETC 802 CES/CEIE <benjamin.lamm.1@us.af.mil>
Cc: SCHMIDT, FRANZ J CIV USAF AETC 802 CES/CEI <franz.schmidt.1@us.af.mil>
Subject: FW: SWF-2023-00206 (DEAAG Property at Kelly Field Annex-Joint Base San Antonio)

-----Original Message-----
From: Gray, Natasha A CIV USARMY CESWF (USA) <Natasha.A.Gray@usace.army.mil>

Sent: Monday, May 1, 2023 12:59 PM
To: 802 CES/CEIE NEPA Team <802CES.CEIE.NEPATeam@us.af.mil>
Cc: Bartels, Brian C CIV USARMY CESWF (USA) <Brian.C.Bartels@usace.army.mil>
Subject: SWF-2023-00206 (DEAAG Property at Kelly Field Annex-Joint Base San Antonio)

Dear Mr. Lamm:

Thank you for your letter received April 27, 2023, concerning a proposal for the construction of infrastructure projects on 345-acre site located on Joint Base San Antonio Lackland, Texas. The project has been assigned Project Number SWF-2023-00206, please include this number in all future correspondence concerning this project.

Mr. Brian Bartels has been assigned as the regulatory project manager for your request and will be evaluating it as expeditiously as possible.

You may be contacted for additional information about your request. For your information, please refer to the Fort Worth District Regulatory Division homepage at http://www.swf.usace.army.mil/Missions/regulatory <http://www.swf.usace.army.mil/Missions/regulatory> and particularly guidance on submittals at https://swf-apps.usace.army.mil/pubdata/environ/regulatory/introduction/subm
ital.pdf
<https://swf-apps.usace.army.mil/pubdata/environ/regulatory/introduction/sub
mital.pdf> and mitigation at
https://www.swf.usace.army.mil/Missions/Regulatory/Permitting/Mitigation
<https://www.swf.usace.army.mil/Missions/Regulatory/Permitting/Mitigation>
that may help you supplement your current request or prepare future requests.

If you have any questions about the evaluation of your submittal or would like to request a copy of one of the documents referenced above, please refer to our website at http://www.swf.usace.army.mil/Missions/Regulatory <http://www.swf.usace.army.mil/Missions/Regulatory> or contact Mr. Brian Bartels by telephone (817) 886-1742, or by email Brian.C.Bartels@usace.army.mil <mailto:Brian.C.Bartels@usace.army.mil> , and refer to your assigned project number. Please note that it is unlawful to start work without a Department of the Army permit if one is required.

Please help the regulatory program improve its service by completing the survey on the following website: http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey <http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey>

Brandon W. Mobley

Chief, Regulatory Division

Please do not mail hard copy documents to Regulatory staff or office, unless specifically requested. For further details on corresponding with us, please view our Electronic Application Submittals special public notice at: https://www.swf.usace.army.mil/Portals/47/docs/regulatory/publicnotices/2020 /PublicNoticeElectronicApplications.pdf?ver=2019-11-21-123723-627 <https://www.swf.usace.army.mil/Portals/47/docs/regulatory/publicnotices/202 0/PublicNoticeElectronicApplications.pdf?ver=2019-11-21-123723-627>

USACE Fort Worth District Regulatory Division Website http://www.swf.usace.army.mil/Missions/Regulatory.aspx <http://www.swf.usace.army.mil/Missions/Regulatory.aspx>

Please assist us in better serving you by completing the survey at the following website: https://regulatory.ops.usace.army.mil/customer-service-survey/ <https://regulatory.ops.usace.army.mil/customer-service-survey/>

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Chairman-Emeritus
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T. Dan Friedkin
Chairman-Emeritus
Houston

David Yoskowitz, Ph.D.
Executive Director

May 12, 2023

Benjamin Lamm
NEPA Program Manager
Joint Base San Antonio-Lackland
802d Civil Engineer Squadron
1555 Gott Street, Building 5595
JBSA-Lackland, TX 78236

RE: Preparation of an Environmental Assessment for the acquisition of a 345-acre site adjacent to Kelly Field Annex, Joint Base San Antonio-Lackland, Bexar County, Texas

Dear Mr. Lamm:

This letter is in response to your request for comments regarding the proposed project activity referenced above. Texas Parks and Wildlife Department (TPWD) has reviewed the information provided and offers the following comments and recommendations.

Project Description

Joint Base San Antonio (JBSA) is preparing an Environmental Assessment (EA) for the proposed action of acquiring a 345-acre site in the area adjacent to the JBSA Growdon Entry Control Point. The proposed action is necessary to meet the current and future mission requirements and national security objectives of JBSA. Multiple planned construction, demolition, infrastructure, and natural infrastructure projects are proposed for the site.

Comment: TPWD does not anticipate significant adverse impacts to rare, threatened, or endangered species, or other fish and wildlife resources due to the Proposed Action of acquiring a 345-acre tract of land adjacent to JBSA-Lackland. However, the tract may contain natural resources that could be impacted by the future construction projects, each of which would presumably be evaluated through their own, independent National Environmental Policy Act (NEPA) review. General comments and recommendations addressing those resources are provided below to assist in future planning.

Impacts to Vegetation/Wildlife Habitat

Review of aerial photography and the Ecological Mapping Systems of Texas (EMST), indicate that southern half of the property has been maintained as row cops or hay fields; the northern half consists of native invasive mesquite shrubland and woodlands as well as floodplain forests (riparian) along Leon Creek.

4200 SMITH SCHOOL ROAD
AUSTIN, TEXAS 78744-3291
512.389.4800
www.tpwd.texas.gov

Recommendation: When planning future development of the property, TPWD recommends locating structures in areas that avoid or minimize the amount of native vegetation that would have to be cleared. Mature, mast producing native trees and shrubs, and riparian or forested wetland areas should be preserved to the greatest extent practicable. Colonization by invasive species, particularly invasive grasses and weeds, should be actively prevented. Vegetation management should include removing invasive species early on while allowing existing native plants to revegetate disturbed areas. TPWD recommends referring to the Lady Bird Johnson Wildflower Center Native Plant Database for regionally adapted native species that would be appropriate for landscaping and revegetation.

Federal Regulations

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) prohibits taking, attempting to take, capturing, killing, selling, purchasing, possessing, transporting, and importing of migratory birds, their eggs, parts, or nests, except when specifically authorized by the Department of the Interior. This protection applies to most native bird species, including ground nesting species. The U.S. Fish and Wildlife Service (USFWS) Migratory Bird Office can be contacted at (505) 248-7882 for more information on potential impacts to migratory birds.

The 345-acre tract include grasslands, woodlands, and a riparian corridor all of which may provide suitable cover, feeding, nesting, and resting habitat for resident and migratory birds. Data from the eBird online application have documented as many as 176 bird species at an eBird hotspot south of the project area (Pearsall Park, San Antonio hotspot). More than 50 species have been recorded at the Stillman Park hotspot, located one-quarter mile southwest of the project area.

Recommendation: TPWD recommends scheduling vegetation clearing on the acquired site to occur outside of the general bird nesting season (March 15 through September 15) to avoid adverse impacts to birds. If disturbance within the project area must be scheduled to occur during the nesting season, TPWD recommends any vegetation to be impacted (trees, shrubs, and grasses) or bare ground where occupied nests may be located should be surveyed for active nests by a qualified biologist prior to clearing. Nest surveys should be conducted no more than five days prior to scheduled clearing in order to maximize the detection of active nests, including recently constructed nests. If active nests are observed during surveys, TPWD recommends a 100-foot radius buffer of vegetation remain around nests until eggs have hatched and the young have

fledged; however, the size of the buffer zone is dependent on various factors and can be coordinated with the local or regional USFWS office.

Raptor nesting occurs late winter through early spring; TPWD recommends construction activities be excluded from a minimum zone of approximately 325 feet surrounding any raptor nest during the period of February 1 through July 15.

Clean Water Act

Section 404 of the Clean Water Act (CWA) establishes a federal program to regulate the discharge of dredged and fill material into waters of the U.S., including wetlands. The U.S. Army Corps of Engineers (USACE) and the Environmental Protection Agency (EPA) are responsible for making jurisdictional determinations and regulating wetlands and other waters under Section 404 of the CWA. Although the regulation of isolated wetlands has been removed from the USACE permitting process, both isolated and jurisdictional wetlands provide habitat for wildlife and help protect water quality.

It appears that portions of Leon Creek or its tributaries may occur within the portion of land being acquired.

Recommendation: TPWD recommends that any development be located and designed to avoid wetlands and other waterbodies.

All waterways and associated floodplains, riparian corridors, and wetlands, regardless of their jurisdictional status, provide valuable wildlife habitat and should be preserved to the maximum extent possible. Natural buffers contiguous to any wetland or aquatic system should remain undisturbed to preserve wildlife cover, food sources, and travel corridors. At a minimum, TPWD recommends implementing at least a 50-foot buffer on streams and wetlands to preserve their function and value as important wildlife habitat and flood water storage.

The destruction of inert microhabitats in aquatic habitats such as snags, brush piles, and fallen logs should be avoided, as these provide habitat for a variety of fish and wildlife species and their food sources.

BMP for erosion control and sediment runoff should be installed prior to construction and maintained until disturbed areas are permanently revegetated using site-specific native vegetation. BMP should be properly installed in order to effectively minimize the amount of sediment and other debris entering the

aquatic habitats. During construction, trucks and equipment should avoid impacting ponds or depressional wetlands, and equipment staging areas should be located in previously disturbed areas away from aquatic habitats.

If the proposed project would impact waterways or associated wetlands, TPWD recommends consulting with the USACE regarding potential impacts to waters of the U.S. including jurisdictional determinations, delineations, and mitigation.

State Regulations

Parks and Wildlife Code – Chapter 64, Birds

Texas Parks and Wildlife Code (PWC), section 64.002, regarding the protection of nongame birds, provides that no person may catch, kill, injure, pursue, or possess a bird that is not a game bird. PWC section 64.003, regarding destroying nests or eggs, provides that, no person may destroy or take the nests, eggs, or young and any wild game bird, wild bird, or wild fowl. PWC chapter 64 does not allow for incidental take.

Although not documented in the Texas Natural Diversity Database (TXNDD), many bird species which are not listed as threatened or endangered are protected by chapter 64 of the PWC and are known to be year-round or seasonal residents or seasonal migrants through the proposed project area.

Recommendation: Please review the *Federal Regulations: Migratory Bird Treaty Act* section above for recommendations as they are applicable for compliance with chapter 64 of the PWC.

Parks and Wildlife Code, Section 68.015

PWC regulates state listed threatened and endangered animal species. The capture, trap, take, or killing of state listed threatened and endangered animal species is unlawful unless expressly authorized under a permit issued by the USFWS or TPWD. A copy of *TPWD Guidelines for Protection of State-Listed Species*, which includes a list of penalties for take of species, can be found on the TPWD Wildlife Habitat Assessment Program website. State listed species may only be handled by persons with appropriate authorization from the TPWD Wildlife Permits Office. For more information regarding Wildlife Permits, please contact the Wildlife Permits Office at (512) 389-4647.

The potential occurrence of state listed species in the project area is primarily dependent upon the availability of suitable habitat. Direct impacts to high quality

or suitable habitat therefore are directly proportional to the magnitude and potential to directly impact state-listed species. State listed reptiles that are typically slow moving or unable to move due to cool temperatures are especially susceptible to being directly impacted (i.e., crushing by heavy equipment) during site preparation activities. Small wildlife such as lizards, turtles, and snakes are susceptible to falling into open pits, excavations, trenches, etc. left open and/or uncovered in a project area.

Please be aware that determining the actual presence of a species in a given area depends on many variables including daily and seasonal activity cycles, environmental activity cues, preferred habitat, transiency and population density (both wildlife and human). The absence of a species can be demonstrated only with great difficulty and then only with repeated negative observations, taking into account all the variable factors contributing to the lack of detectable presence.

> **Recommendation:** TPWD recommends reviewing the most current TPWD annotated county lists of rare species for Bexar County. The annotated county lists are available online at the TPWD Wildlife Diversity website and are updated quarterly. Environmental documents prepared for the project should include an inventory of existing natural resources within the project area. Specific evaluations should be designed to predict project impacts upon these natural resources including potential impacts to state listed species.

Species of Greatest Conservation Need

In addition to state and federally protected species, TPWD tracks species considered to be Species of Greatest Conservation need (SGCN) that, due to limited distributions and/or declining populations, face threat of extirpation or extinction but currently lack the legal protection given to threatened or endangered species. Special landscape features, natural communities, and SGCN are rare resources for which TPWD actively promotes conservation, and TPWD considers it important to evaluate and, if necessary, minimize impacts to such resources to reduce the likelihood of endangerment and preclude the need to list SGCN as threatened or endangered in the future. These species and communities are tracked in the TXNDD. The most current and accurate TXNDD data can be requested from the TXNDD website.

Please note that the absence of TXNDD information in an area does not imply that a species is absent from that area. Given the small proportion of public versus private land in Texas, the TXNDD does not include a representative inventory of rare resources in the state. Although it is based on the best data available to TPWD regarding rare species, the data from the TXNDD do not provide a definitive

statement as to the presence, absence, or condition of special species, natural communities, or other significant features within your project area. These data are not inclusive and **cannot be used as presence/absence data**. This information cannot be substituted for on-the-ground surveys.

> **Recommendation:** Please review the current TPWD county list for Bexar County as rare and protected species could be present, depending on habitat availability. If during construction, the project area is found to contain SGCN or protected species, natural plant communities, or special features, TPWD recommends that precautions be taken to avoid impacts to them.

I appreciate the opportunity to review and comment on this project. Please contact me at (361) 431-6003 or **russell.hooten@tpwd.texas.gov** if we may be of further assistance.

Sincerely,

Russell Hooten

Russell Hooten
Wildlife Habitat Assessment Program
Wildlife Division

/rh 50596