

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

**PROPOSED AREA DEVELOPMENT PLAN PROJECTS FOR JOINT BASE SAN ANTONIO,
FORT SAM HOUSTON, BEXAR COUNTY, TEXAS**

Pursuant to provisions of the *National Environmental Policy Act* (NEPA), Title 42 United States Code §§ 4321–4347; Council on Environmental Quality (CEQ) regulations at 40 Code of Federal Regulations (CFR) Parts 1500–1508; and 32 CFR Part 989, *Environmental Impact Analysis Process* (EIAP), the United States (US) Air Force (Air Force) prepared the attached Draft Environmental Assessment (EA) to address the potential environmental consequences associated with proposed Area Development Plan (ADP) projects at Joint Base San Antonio, Fort Sam Houston (JBASA-FSH) in Texas.

Purpose and Need

The purpose of the Proposed Action at JBASA-FSH is to maintain the joint training mission through selected development actions and real-property improvements, as well as develop the Installation in a manner that provides flexibility to meet future mission requirements. The Air Force recently completed ADPs for three planning districts within JBASA-FSH: the Commercial, Medical Education and Training (hereinafter Training), and Service districts. Each ADP establishes a framework and timeline for the future development of JBASA-FSH. The proposed development projects were selected from the short-term phase of the ADPs for implementation within the next 5 years, from approximately 2023 to 2027. The Proposed Action is needed to address the condition and capability of facilities and infrastructure at the Installation. Many buildings and infrastructure systems are outdated and in poor condition; others lack the functionality required to accomplish the mission. These real-property assets require maintenance, renovation, expansion, or replacement to remain operable and support future mission expansion.

Consistent with 32 CFR § 989.8(c), the following selection standards meet the purpose of and need for the Proposed Action at JBASA-FSH and were used to identify reasonable alternatives for analysis in the EA. The supporting alternatives must consider the following:

- Increase the amount of developable land through more efficient and functional land use.
- Preserve or enhance the quality of life of the military personnel and their dependents that train, work, and/or live on the Base, as well as for visitors of the Base (e.g., Veterans).
- Avoid adverse effects on valued environmental and cultural resources, to the extent practicable.
- Comply with federal and Air Force mandates for sustainable design and development.
- Provide flexibility to respond to new or different missions or accommodate future growth.

Based on the screening criteria, the Air Force determined that only the Proposed Action (i.e., the full suite of proposed ADP projects) would meet the purpose and need.

Description of Proposed Action and Alternatives

The Proposed Action would implement a total of **35** short-term development actions and real-property improvements on JBASA-FSH from approximately 2023 to 2027. Of these projects, **29** would involve construction and demolition projects and **6** would involve infrastructure actions across the Commercial, Training, and Service districts (**Tables 1–3**):

- Commercial District – **9** construction/demolition projects and **1** infrastructure action
- Training District – **13** construction/demolition projects and **4** infrastructure actions
- Service District – **7** construction/demolition projects and **1** infrastructure action.

Table 1
List of Proposed ADP Projects for the Commercial District

Map ID ^a	Project	Approx. Size or Footprint ^b
Construction and Demolition		
C1	Construct entertainment center, phase II (N).	35,000
C2	Construct Army lodging hotel; phases II & III (Sub-District North [N]).	305,000
C3	Resurface Ludington Road; construct cul-de-sac at the end of Ludington Road (E).	42,030
C4	Construct entertainment center, phase I (N).	52,000
D5	Demolish B-2420, B-2434, and B-2540 (N).	-160,546
C6	Construct traffic circle (N).	76,950
C7	Construct TEMF (E).	18,360
C8	Construct fuel depot (E).	100,000
D9	Demolish B-350, B-2400, and B-2401 (N).	-191,170
Infrastructure		
I1	Provide trailer switch point; resurface existing pavement and provide fencing/lighting (S & E).	3,560

Notes:

a Numerical and alphabetical Map IDs correspond with **Figure 2-1** in the EA.

b Approximate size in square feet unless noted otherwise.

ac = acre(s); B = Building (e.g., Building 350 is B-350); E = East Campus; N = North Campus; S = South Campus; TEMF = Tactical Equipment Maintenance Facility

Table 2
List of Proposed ADP Projects for the Training District

Map ID ^a	Project	Approx. Size or Footprint ^b
Construction and Demolition		
C10	Construct sidewalks between B-3312 and B-3314 to DFAC (NE).	2,300
C11	Construct fence between North Housing Area and William Hardee Road (NW).	1,300
C12	Construct pedestrian bridge across Williams Way (NE).	5,000
C13	Construct sidewalk/path between 900s building block to sidewalk network east (NW).	900
C14	Construct covered areas for troop staging at B-1287 DFAC (NW).	7,200
C15	Construct sidewalk/path between 900s building block to DFAC (NW).	900
C16	Construct food inspection building and relocate operations from B-325 (NW).	30,000
C17	Construct single-bay POV wash rack (NW).	N/A
C18/D18	Demolish B-1111 and construct additional parking (NW).	3,166
C19/D19	Demolish B-1158, B-1159, and B-1162; construct temporary facilities (S).	20,000
C20/D20	Demolish B-1161 and construct temporary facilities (S).	13,552
C21/D21	Demolish B-1151, B-1152, B-1153, and B-1154 and construct temporary facilities (S).	20,000
C22	Construct two dormitory facilities.	350,000
Infrastructure		
I2	Improve sidewalks and add sidewalk lighting (District-wide; NE).	N/A
I3	Repair and level athletic field (NE).	180,000
I4	Relocate Binz-Engleman ACP (NE).	53,143
I5	Renovate/convert B-1160 from housing to administrative facility (S).	12,896

Notes:

a Numerical and alphabetical Map IDs correspond with **Figure 2-2** in the EA.

b Approximate size in square feet unless noted otherwise.

ACP = Access Control Point; B = Building (e.g., Building 3312 is B-3312); DFAC = Dining Facility; NE = Northeast Campus; NW = Northwest Campus; POV = Privately Owned Vehicle; S = South Campus

Table 3
List of Proposed ADP Projects for JBSA-FSH Services District

Map ID ^a	Project	Approx. Size or Footprint ^b
Construction and Demolition		
C23	Construct military working dog facility.	9,000
C24	Expand/construct addition to school district elementary school gym.	8,000
C25	Construct Directed Energy Research Center; construct addition to TSRL.	543,000
C26	Construct new school district office.	5,400
C27	Construct new school district bus barns.	21,000
C28	Construct new school district arts and craft building.	20,000
C29	Construct new school district office athletic fields and parking lot.	150,000
Infrastructure		
I6	Upgrade/improve youth soccer fields.	150,000

Notes:

a Numerical and alphabetical Map IDs correspond with **Figure 2-3** in the EA.

b Approximate size in square feet unless noted otherwise.

TSRL = Tri-Services Research Lab

No Action Alternative

Under the No Action Alternative, the Air Force would not implement the ADP projects, and JBSA-FSH would continue to operate under current conditions. The facility and infrastructure assets of the Base would continue to degrade or become outdated. In the short-term, military training and operations would continue at JBSA-FSH in accordance with the status quo. Over time, the mission support capabilities of the Base would diminish along with its ability to support the future missions and requirements of its tenant activities.

While the No Action Alternative would not satisfy the purpose of and need for the Proposed Action, this alternative is retained to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under the CEQ regulations (40 CFR § 1502.14(c)). The No Action Alternative reflects the status quo and serves as a benchmark against which the effects of the Proposed Action can be evaluated.

Summary of Findings

Potentially affected environmental resources were identified through communications with state and federal agencies and review of past environmental documentation. Specific environmental resources with the potential for environmental consequences include land use; air quality; noise; earth, water, biological, and cultural resources; environmental justice and protection of children; infrastructure, transportation, and utilities; hazardous materials and waste; and safety.

Land Use

No significant adverse effects to land use would be anticipated to occur under the Proposed Action. Land use within the Commercial, Training, and Service districts would remain generally unchanged. No impacts to land use outside of the boundary of JBSA-FSH would be anticipated. Projects within the three planning districts would not be expected to alter the current land use categories nor require the placement of additional restrictions.

Air Quality

No significant adverse effects to air quality would be anticipated to occur under the Proposed Action. The estimated total annual emissions of the Proposed Action would not exceed the *de minimis* or Prevention of Significant Deterioration permitting thresholds for any criteria pollutant or precursor. Based on the Air Force Air Conformity Applicability Model (ACAM), the net change in emissions associated with the Proposed Action would not result in significant adverse effects in the long term. The ACAM steady-state emissions for some criteria pollutants would decline from implementation of the Proposed Action because of the reduced building footprint and subsequent maintenance requirements that would occur with proposed demolition.

Noise

No significant adverse effects to noise would be anticipated to occur under the Proposed Action. The Proposed Action would include construction and demolition activities that would occur entirely within the boundaries of JBSA-FSH. Noise associated with the proposed construction and demolition projects would not cause any significant direct or indirect impacts on noise-sensitive receptors. There would be no increase in operational noise at JBSA-FSH from implementation of the Project Action.

Earth Resources

No significant adverse long-term, adverse effects to geological resources would be anticipated to occur under the Proposed Action. Across the three planning districts, where excavation and backfill are required, the Proposed Action could alter soil structure, composition, and function. All soils associated with the Proposed Action are previously disturbed, and the majority of projects would be anticipated to occur in soil areas with low-to-medium runoff potential. Projects C6, C14, and I1 would occur in areas with a high potential for erosion and runoff. Best management practices (BMPs) would be implemented during construction, demolition, and infrastructure activities in order to reduce the potential for increased soil erosion and runoff associated with the Proposed Action.

Water Resources

No significant adverse effects to water resources would be anticipated to occur under the Proposed Action.

Watershed Management – During construction and for a period thereafter, soils would be exposed, increasing the potential for erosion and sedimentation of nearby surface waters. Short-term, negligible impacts would be expected during the construction period; no long-term, adverse impacts would be expected. Implementation of the Proposed Action at JBSA-FSH would not be anticipated to have significant adverse effects on the San Antonio River Basin.

Surface Water and Water Quality – No surface waters would be directly impacted by implementation of the Proposed Action. Potential effects from project implementation would be short term and would not be expected to be significant. Indirect changes to the overall surface water quality would be minimal and short term, centered around construction and demolition projects within proximity of these resources. Long-term, adverse impacts to surface water and water quality would not be expected at JBSA-FSH.

Wetlands – No project activities under the Proposed Action would directly impact wetlands. Project C12 would be located adjacent to an emergent wetland. Work would consist of constructing a pedestrian bridge across the nearby roadway. Work would not be likely to expand beyond the immediate footprint of the roadway bridge, and adverse impacts to the wetland would not be expected to occur. Potential effects on wetlands from additional project actions would be managed by individual project design and implementation of BMPs. Long-term, adverse effects to wetlands would not be expected.

Stormwater Management – The demolition of outdated structures coupled with the proposed facility construction would increase the amount of impermeable surface by approximately 1,000,000 square feet. The Installation is already highly developed; however, this increase in impervious surface would potentially increase the amount of stormwater runoff. Stormwater infrastructure capacity at JBSA-FSH is adequate and would be able to accommodate an increase in stormwater runoff associated with the Proposed Action.

Floodplains – Project I4, which would improve the Binz-Engleman Access Control Point within the Training District, would occur fully within a 100-year floodplain. While project activities potentially would result in runoff and sedimentation, any effects would be managed by implementation of BMPs and reduced to the extent practicable.

Groundwater – Contamination from surface- and stormwater runoff is unlikely to have a significant, adverse effect on the groundwater supply or quality in the Region of Influence, and JBSA-FSH is not subject to any Edwards Aquifer Authority rules or regulations. With BMPs in place, potential adverse effects on groundwater resources under the Proposed Action would be minor and short term.

Biological Resources

No significant adverse effects to biological resources would be anticipated to occur under the Proposed Action.

Vegetation – Under the Proposed Action, effects to native or non-native plant species would be minimal at JBSA-FSH. Any impacts to undisturbed vegetation would be short term and temporary. Trees would be painted immediately after trimming to prevent Oak Wilt.

Wildlife Species and Habitat – Adverse effects to wildlife species and habitat would not be expected to occur under the Proposed Action. Projects under the Proposed Action would occur in previously disturbed areas with minimal changes to the current landscape and available habitat. JBSA currently has one final Biological Opinion in place, *The Effects of JBSA Water Draw on Listed Species of the Edwards Aquifer* (Consultation No. 02ETAU00-2013-F-0060). The Biological Opinion pertains to water draw limits for all JBSA, including any new landscaping, and addresses effects of JBSA water withdrawal from the Edwards Aquifer on federally protected species. Under this Biological Opinion, JBSA must follow the *Critical Period Management Plan* for aquifer dependent listed species. No long-term, adverse impacts to the wildlife present on the Installation would be expected.

Threatened and Endangered Species – Federally and state-listed threatened or endangered species are not known to occur within the boundaries of the Installation. However, there would be the potential to encounter state-protected reptiles within the undeveloped portions of the Service District. The construction contractor would take measures to minimize interference, disturbance, or damage to wildlife species in areas where risk of encountering the species would be greater. The Air Force has determined that the Proposed Action would have *No Effect* on federally threatened and endangered species.

Migratory Birds – Under the Proposed Action, construction and demolition activities would proceed under the terms of the existing restrictions, including tree removal and demolition taking place outside of the nesting season (15 September through 28 February) in order to minimize the potential for impacts to migratory birds.

Cultural Resources

No significant adverse effects to cultural resources would be anticipated to occur under the Proposed Action.

Archaeological Sites – No identified archaeological resources are known to exist within the direct Area of Potential Effect of any projects under the Proposed Action.

Historic Architectural Properties – Projects C1, C4, and C6 under the Proposed Action would involve construction of new buildings and roadwork within the Conservation District. Each of these projects would be required to have 35-percent design plans submitted to JBSA Cultural Management for approval prior to the start of any construction activity. Any potential for impacts to the Conservation District would be minimized through design and BMPs.

Multiple individually eligible or contributing properties would be demolished under the Proposed Action. Proposed Projects D5, D9, C18/D18, and C19/D19 would require consultation with the Texas State Historic Preservation Officer (SHPO) under Section 106 of the *National Historic Preservation Act* for the demolition of eligible buildings.

The remaining projects under the Proposed Action would not impact individually historic properties and would not take place within the boundaries of historic districts. JBSA maintains a programmatic agreement (PA) with the Texas SHPO for the management of cultural resources on its properties. The need for consultation with the Texas SHPO would be evaluated on a project-level basis by the JBSA Cultural Resources team as individual ADP project plans are developed. The applicability of the existing PA and eligibility determinations would be considered, and where adverse effects could not be avoided to eligible resources, JBSA would develop mitigation measures acceptable to the SHPO. With the SHPO's

acceptance of mitigation measures, individual Section 106 Memoranda of Agreement are not needed under the PA.

Traditional Cultural Properties – No Traditional Cultural Properties or sacred sites have been identified at JBSA-FSH; therefore, no effects to these properties would be anticipated.

Environmental Justice and Protection of Children

The Proposed Action would not be anticipated to result in disproportionately high and adverse impacts to minority, low-income, or youth populations. The Proposed Action would not impact the availability of housing, community resources, and community services in the Region of Influence. All actions under the Proposed Action would occur within Installation boundaries.

Infrastructure, Transportation, and Utilities

No significant adverse effects to infrastructure, transportation, or utilities would be anticipated to occur under the Proposed Action.

Infrastructure and Transportation – The potential for long-term, beneficial impacts would be anticipated within the transportation environment. Projects C3 and C6 would improve vehicle flow through the Installation, and Projects I2, C10, C13, and C15 would provide necessary pedestrian infrastructure improvements at JBSA-FSH.

Utilities – Short-term, negligible, adverse impacts on the electrical distribution system could occur under the Proposed Action because the operation of newly constructed buildings may increase the demand on the system; however, net changes in long-term demand would be anticipated to be minimal. Short-term, negligible, adverse impacts on the potable water supply system would occur during construction and demolition when existing lines would be connected to new buildings or capped as appropriate. Short-term, minor, adverse impacts on solid waste management may occur with construction and demolition projects under the Proposed Action. The Proposed Action would result in an additional 3,446 tons of construction debris and 27,786 tons of demolition debris. Short-term, negligible, adverse impacts on the sanitary sewer and wastewater treatment system would occur during construction and demolition when existing lines would be connected to new buildings or capped as appropriate.

Hazardous Materials and Waste

No significant adverse effects to hazardous materials (HAZMAT) and hazardous wastes would be anticipated to occur under the Proposed Action.

Hazardous Materials and Waste – Under the Proposed Action, a limited use of certain HAZMAT would be required during construction and demolition. With the applicable requirements and management plans in place for construction of the Proposed Action and no contaminants at concentrations that would pose a risk to construction workers, potential HAZMAT effects would be minor and short term.

Asbestos, Lead-Based Paint, and Polychlorinated Biphenyls – The Proposed Action would include activities involving 15 buildings with the potential for asbestos-containing material (ACM), three of which also have the potential to contain lead-based paint (LBP), or polychlorinated biphenyls (PCBs). With proper handling and development of procedures, no related, significant effects would be expected to result with implementation of the Proposed Action. Removal of ACMs, LBPs, and PCBs during implementation of the Proposed Action would result in the beneficial impact of creating safer indoor spaces by avoiding future exposure.

Storage Tanks – Although some projects would be located within proximity of an existing above-ground storage tank, work under the Proposed Action would not be expected to result in significant impacts.

Per- and Polyfluoroalkyl Substances and Aqueous Film Forming Foam – Ground-disturbance activities under the Proposed Action would not take place within release areas. Adverse effects to these resources would not be anticipated.

Environmental Restoration Program Sites – No significant effects to Environmental Restoration Program or Military Munitions Response Program sites would be anticipated to occur under the Proposed Action.

Safety

No significant adverse effects to safety would be anticipated to occur under the Proposed Action. Construction and demolition activities can potentially expose personnel to health and safety hazards from heavy-equipment operation; HAZMAT and chemical use; and working in confined, poorly ventilated, and noisy environments. Therefore, short-term, negligible-to-minor impacts on contractor health and safety could occur during proposed construction and demolition projects under the Proposed Action.

Cumulative Impacts

The EA considered cumulative impacts that could result from the incremental impact of implementation of the Proposed Action when added to other past, present, or reasonably foreseeable environmental trends and planned actions at JBSA-FSH. When considered in conjunction with other past, present, or reasonably foreseeable environmental trends and planned actions, no potentially significant cumulative impacts were identified.

Mitigation

The EA analysis concluded that the Proposed Action would not result in significant environmental impacts; therefore, no mitigation measures are recommended. BMPs are described and recommended in the EA where applicable.

Conclusion

Finding of No Practicable Alternative. Pursuant to Executive Order 11988, *Floodplain Management* (amended by Executive Order 13690), and Executive Order 11990, *Protection of Wetlands*, and considering all supporting information, the Air Force finds that there is no practicable alternative to locating the Proposed Action in floodplains or wetlands, as discussed in the attached Draft EA. The Air Force evaluated additional options for project locations during the ADP planning process. However, the nature of the relocation projects directly impacting floodplains involves the construction or renovation of infrastructure specifically in place to traverse these areas. Due to various planning constraints and the complexity of other factors, such as land use and the military mission, no other practicable alternatives for siting these projects were identified under the Proposed Action

Finding of No Significant Impact. After review of the EA prepared in accordance with the requirements of NEPA, CEQ regulations, and 32 CFR Part 989, and which is hereby incorporated by reference, I have determined that the proposed activities would not have a significant impact on the quality of the human or natural environment. Accordingly, an Environmental Impact Statement will not be prepared. This decision was 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 US Air Force.

NAME
Rank, US Air Force
Position

DATE