

**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 –
LACKLAND, BEXAR COUNTY, TEXAS**

Pursuant to provisions of the *National Environmental Policy Act* (NEPA), Title 42 *United States Code* (USC) §§ 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, Lackland (JBSA-LAK) in Texas.

Purpose and Need

The purpose of the Proposed Action at JBSA-LAK 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. For planning purposes, JBSA-LAK is divided into four districts: the Kelly Field Annex (Kelly Field), Lackland East (LAK-East), Lackland West (LAK-West), and the Chapman Training Annex (CTA). The Air Force recently completed ADPs for each of these planning districts, which establish a framework and timeline for the future development of JBSA-LAK. 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 Many buildings and infrastructure systems are outdated and in poor condition; others lack the functionality required to accomplish the mission.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 JBSA-LAK and were used to identify reasonable alternatives for analysis in the EA. The supporting alternatives must consider the following:

- Continue, maintain, and enhance mission or mission support capabilities, now or in the future.
- Increase the amount of developable land through more efficient and functional land use.
- Comply with security/setback requirements and operational safety standards.
- 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 sensitive or beneficial environmental resources and historic properties or sites, 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 **90** short-term development actions and real-property improvements on JBSA-LAK from approximately 2023 to 2027. Of these projects, **57** would involve construction and demolition projects and **33** would involve infrastructure actions.

Table 1
List of Proposed Construction and Demolition Projects – Kelly Field

Map ID ^a	Project	Approx. Size or Footprint ^b
C1	Construct flight simulator facility.	8,000
D2	Demolish B-1200, B-1201, B-1202, and B-1203; remove trees at Upson Park to reduce bird-strike risk and 7:1 slope violation.	-4,974
C3	Construct firefighter training facility.	4,123
C4/D4	Construct new ATC tower; demolish existing ATC tower (B-1160) and B-1161.	6,308 -7,621
C5	Construct additional F-16 parking apron for six aircraft.	937,967
C6	Construct taxiway extension from north end of C-5 parking apron to the 149 FW taxiway.	39,321
C7	Construct addition to B-909 for classroom space.	18,000
C8	Construct new elevated Hall Boulevard Bridge at Leon Creek to a 25-year flood design.	5,588
C9	Construct addition to B-896 to support simulators and associated functions.	26,400
C10/D10	Demolish B-807 and construct new storage facility to consolidate MWR outdoor recreation functions.	3,500 -2,183
C11	Construct addition to B-874 and consolidate back shops.	15,000

Notes:

a Alphabetical Map IDs correspond with **Figure 2-1** in the EA.

b Approximate size in square feet unless noted otherwise.

ATC = air traffic control; B = Building (e.g., Building 6274 is B-6274); CCAD = Community Care for Aged and Disabled; DevSecOps = Development, Security, and Operations (software); FW = Flight Wing; HQ = headquarters; MWR = morale, welfare, and recreation

Table 2
List of Proposed Infrastructure Projects – Kelly Field

Map ID ^a	Project	Approx. Size ^b
I1	Repair taxiway pavement.	15,468
I2	Renovate B-900 for ALCF (CRF).	6,468
I3	Renovate B-910 for LRS, SFS, CES, and MSG.	65,202
I4	Renovate B-908 (MPF).	17,730
I5	Renovate B-909 and consolidate FSS, communications, and training.	62,188
I6	Repair fire pumps and water storage tanks at B-820.	N/A
I7	Improve soil stabilization of hillside areas by constructing terraces.	50,043 cubic yards
I8	Renovate B-898 (aircraft maintenance hangar).	27,530
I9	Renovate existing AGE facility (B-894).	8,194
I10	Renovate B-876 for media blast.	3,941
I11	Renovate fuel cell and corrosion-control hangar at B-829 and construct addition to B-829.	52,624
I12	Consolidate 502 FSS and 433 AW functions in B-809 and B-817.	13,601

Notes:

a Alphabetical Map IDs correspond with **Figure 2-1** in the EA.

b Approximate size in square feet unless noted otherwise.

AGE = aerospace ground equipment; ALCF = Airlift Control Flight; AW = Air Wing; B = Building (e.g., Building 6274 is B-6274); CES = Civil Engineer Squadron; CRF = Contingency Response Force; FSS = Force Support Squadron; LRS = Logistics Readiness Squadron; MPF = Military Personnel Flight; MSG = Mission Support Group; N/A = not applicable; SFS = Security Forces Squadron

Table 3
List of Proposed Construction and Demolition Projects – LAK-East

Map ID ^a	Project	Approx. Size or Footprint ^b
D1	Demolish B-4880, B-4884, B-4886, B-4890, B-4895, and B-4897.	-63,223
C2	Construct green space park around the Medical Campus.	288,000
C3	Construct parking lot.	225,000
D4	Demolish B-4429, B-4600, and B-4604.	-7,498
C5	Construct addition to B-4430.	7,500
C6/D6	Demolish B-4550 (Old Wilford Hall Medical Center) and construct pavilion/food truck area.	-1,443,530 18,000
C7	Construct administrative facility.	45,000
C8/D8	Demolish the existing parking lot and construct the Luke Super Gate (potential for additional parking).	60,000 (parking) -1,372 (facilities)
C9	Construct short-term, temporary ballistics shack at Luke East Gate.	60
C10	Construct VOQ lodging at Kenly Avenue.	163,560
C11	Construct sidewalk/bridge to Parade Field/Truemper Street.	5,064
C12	Construct a Memorial Park at the corner of Truemper Street and Kenly Avenue.	148,500
C13	Construct temporary lodging facility at Truemper Street and Kenly Avenue.	30,000
C14	Construct ballistic gate shack at Selfridge East Gate.	60

Notes:

a Numerical Map IDs correspond with **Figure 2-2**.

b Approximate size in square feet unless noted otherwise.

B = Building (e.g., Building 6274 is B-6274); VOQ = Visiting Officer's Quarters

Table 4
List of Proposed Infrastructure Projects – LAK-East

Map ID ^a	Project	Approx. Size ^b
I1	Renovate B-3425 (Blood Donor Center).	23,769
I2	Close Biggs Avenue between Kelly Drive and Truemper Street.	-20,700
I3	Renovate B-2418 (Warhawk Fitness Center).	36,879
I4	Improve Parade Field per the <i>Nodal Plan</i> .	45,000
I5	Renovate B-1508.	3,579

Notes:

a Alphabetical Map IDs correspond with **Figure 2-2** in the EA.

b Approximate size in sf unless noted otherwise.

B = Building (e.g., Building 6274 is B-6274)

Table 5
List of Proposed Construction and Demolition Projects – LAK-West

Map ID ^a	Project	Approx. Size or Footprint ^b
D1	Demolish road segment of Arnold Circle behind Mesquite Inn (B-10175).	-10,800
C2	Construct TRS Security Forces Academy (Scott Drive).	45,000
C3	Construct Joint-Use (Air Force/Navy) Student Pavilions (attached to Carter Hall [B-10215]), i.e., small park areas with trees and plaza seating.	117,000
C4	Construct Virtual Technical Training Shoot House (north of B-10670 at Haby's Road).	6,000
C5	Construct parking lot for B-10330.	43,200
C6/D6	Convert drill pad for BMT visitor parking, demolish running track, and construct small park/plaza.	354,960
D7	Demolish B-10701.	-1,530
D8	Demolish B-10706, B-10708, and B-10710.	-452

Map ID ^a	Project	Approx. Size or Footprint ^b
C9	Construct troop walk bridge over Military Drive from ATC Campus to Parade Field.	23,760
C10	Construct perimeter road around the Base.	369,000
C11/D11	Construct detention pond, demolish parking lot north of B-9122 (ATC West Campus).	45,000
C12	Designated Area for temporary facilities.	315,000
D13	Demolish parking lot next to Chaparral Pool along Carswell Avenue (due to flooding).	-13,275
C14	Construct Communication Maintenance Facility next to B-5077.	7,500
C15	Expand detention pond at Selfridge Avenue and Carswell Avenue.	81,900
C16	Construct addition to B-5486 (EOD facility).	8,000
C17	Construct two parking lots to support IAAFA's mission; one northeast of B-7538 and one southeast of B-7538.	67,500
C18/D18	Construct new IAAFA HQ/Classroom Facility; demolish B-7353 and B-7355.	45,000 -27,887
C19/D19	Construct future dormitory; demolish B-7357 and B-7358.	30,000 -27,678
C20	Construct foreign liaison facilities.	30,000
D21	Demolish B-7448, B-7450, and B-7452.	-38,799
D22	Demolish Melvoher Drive from Metzger Drive to Ent Circle; Realign Intersection with Ent Circle.	-72,000

Notes:

a Numeral Map IDs correspond with **Figure 2-3** in the EA.

b Approximate size in square feet unless noted otherwise.

ATC = Airman Training Complex; B = Building (e.g., Building 6274 is B-6274); BMT = basic military training; EOD = Explosives Ordnance Disposal; HQ = Headquarters; IAAFA = Inter-American Air Forces Academy; TRS = Training Squadron

**Table 6
List of Proposed Infrastructure Projects – LAK-West**

Map ID ^a	Project	Approx. Size ^b
I1	Improve Base shuttle transportation route.	720
I2	Renovate Carter Hall (B-10215).	88,648
I3	Renovate B-10416 for reuse by BMT.	215,824
I4	Renovate B-6420 for 737 TRG BMT HQ.	32,947
I5	Renovate B-6629 or replace for BMT Drum and Bugle Corps (relocate current user).	14,510
I6	Renovate B-7249 for reuse.	9,357
I7	Renovate B-7360 for future tenant.	30,440

Notes:

a Alphabetical Map IDs correspond with **Figure 2-3** in the EA.

b Approximate size in square feet unless noted otherwise.

B = Building (e.g., Building 6274 is B-6274); BMT = basic military training; HQ = headquarters; TRG = Training Group

**Table 7
List of Proposed Construction and Demolition Projects – CTA**

Map ID ^a	Project	Approx. Size or Footprint ^b
C1	Construct TTF adjacent to existing obstacle course.	180,000
C2	Construct a secure overnight munitions truck holding parking area for transient cargo.	64,467
C3	Construct a latrine for the existing fitness facility.	540
C4/D4	Demolish B-146 and construct a facility to accommodate HPSG and HPTC.	-87,384 30,000
D5	Demolish B-140, -141, -142, -148, and structures associated with the outdoor pool.	-20,108
C6	Construct an AFRC administrative building.	2,500
C7/D7	Demolish B-300; reconfigure fencing and gate.	-611 543 linear feet

Map ID ^a	Project	Approx. Size or Footprint ^b
C8	Construct a munitions inspection and maintenance facility within the MSA to support future mission growth (i.e., ESQD arc reduction).	90,000
C9	Renovate and expand B-950.	45,970 12,000
C10	Construct a BMT Readiness Training Complex at the BEAST Campus (from old training site).	22,000

Notes:

a Numeral Map IDs correspond with **Figure 2-4** in the EA.

b Approximate size in square feet unless noted otherwise.

AFRC = Air Force Reserve Command; B = Building (e.g., Building 6274 is B-6274); BEAST = Basic Expedition Airman Skills Training; BMT = Basic Military Training; ESQD = Explosives Safety Quantity Distance; HPSG = Human Performance Support Group; HPTC = Human Performance Training Center; MSA = Munitions Storage Area; TTF = Training Test and Ferry

**Table 8
List of Proposed Improvement Projects – CTA**

Map ID ^a	Project	Approx. Size ^b
I1	Rebuild Medina Road and water crossing bridges (District-wide).	486,477
I2	Improve perimeter road for SFS and continued use for SWTG runs/trucks.	217,800
I3	Repair and upgrade MSA access control gates.	N/A
I4	Renovate B-150.	52,863
I5	Renovate B-147.	95,592
I6	Renovate B-310.	8,430
I7	Renovate B-242.	13,365
I8	Realign Alpha Range to the SDZ off Patrol Road.	N/A
I9	Provide redundant power at sanitary sewer lift stations.	N/A

Notes:

a Alphabetical Map IDs correspond with **Figure 2.4** in the EA.

b Approximate size in square feet unless noted otherwise.

B = Building (e.g., Building 6274 is B-6274); MSA = Munitions Storage Area; N/A = not applicable; SDZ = safety danger zone; SFS = Security Forces Squadron; SWTG = Special Warfare Training Group

No Action Alternative

Under the No Action Alternative, the Air Force would not implement the ADP projects, and JBSA-LAK 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-LAK 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 local, 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 wastes; and safety.

Land Use

No significant effects to land use would be anticipated to occur under the Proposed Action. Land use within Kelly Field, LAK-East, LAK-West, and the CTA would remain generally unchanged. No impacts to land use

outside of the boundary of JBSA-LAK would be anticipated. Projects in all four planning districts would not be expected to alter the current land use categories nor place additional restrictions.

Air Quality

No significant 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 be anticipated to be beneficial 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 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-LAK. Noise associated with the proposed construction and demolition projects would not cause any significant direct or indirect impacts on noise-sensitive receptors. Operational noise at JBSA-LAK would not increase from implementation of the Project Action.

Earth Resources

No significant long-term, adverse effects to geological resources would be anticipated to occur under the Proposed Action. Minor beneficial effects would occur as a result of multiple project actions. At Kelly Field, terraces would be constructed within the floodplain of Leon Creek for the purpose of soil stabilization. Existing water-crossing bridges would be repaired in multiple locations along Medina Road within the CTA, including bank stabilization measures and debris removal, reducing erosion. Across all four 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 no projects would be anticipated to occur in areas of soil with very high runoff potential.

Water Resources

No significant adverse effects to water resources would be anticipated to occur under the Proposed Action. Some projects under the Proposed Action would have the potential for minor beneficial impacts to wetlands, floodplains, and stormwater infrastructure.

Watershed Management – During construction, and for a period thereafter, soils would be exposed, increasing the potential for erosion and sedimentation of nearby surface waters. Projects C11/D11 and C15 within LAK-West would improve the watershed environment within the district by increasing detention pond capacity with additional pond construction and expansions of existing facilities. Reduction in overall impervious surface would result in minor benefits to water infiltration. Implementation of the Proposed Action at JBSA-LAK would not be anticipated to have significant adverse effects on the San Antonio River Basin.

Surface Water and Water Quality – Project C8 at Kelly Field has the potential to impact surface water through bridge construction within Leon Creek at Hall Boulevard; however, any impacts would be considered and minimized during bridge design. LAK-East Project C11 and LAK-West Project C9 would cross an ephemeral stream that serves as a tributary to Leon Creek and would have the potential to directly impact the tributary during the construction phase. Project I1 at CTA would have the potential to directly impact surface waters. Impacts to streams and tributaries would be minimized to the extent practical through the use of best management practices (BMPs) during renovation of existing bridges. Potential effects from project implementation would be short term and would not be expected to be significant. Changes to the overall surface water quality would be minimal and short term, centered around construction and demolition projects within these resources. Long-term, adverse impacts to surface water and water quality would not be expected at JBSA-LAK.

Wetlands – LAK-East Project C11 and LAK-West Project C9 would have the potential to directly impact a total of 0.03 acre of emergent wetlands associated with a drainage ditch; however, the projects also would

limit the potential for long-term, adverse impacts by diverting damaging foot traffic to a raised walkway. Project I1 at the CTA would take place within 100 feet of a riverine streambed wetland. Infrastructure work on the existing roadway would have the potential to impact the nearby wetland through runoff or sedimentation. Potential effects on wetlands from other project actions would be managed by individual project design and implementation of BMPs. Kelly Field Project I7 would result in a long-term, beneficial impact to one wetland by limiting erosion and runoff potential through the construction of terraces at Kelly Field within 1,000 feet of a downstream riverine wetland.

Stormwater Management – LAK-West Projects C11/D11 and C15 would address deficiencies in the existing stormwater infrastructure at JBSA-LAK. This reduction would allow for greater stormwater infiltration into the soils and reduce the strain on the stormwater infrastructure and the potential for flooding. These projects would improve the capacity and efficiency of stormwater conveyance across the Installation, resulting in long-term, beneficial impacts.

Floodplains – Kelly Field Project C8 would occur fully within the floodplain. The new bridge would be constructed to accommodate a 25-year flood design, with the potential to directly impact approximately 0.13 acre of the floodplain; however, the project would result in a long-term, beneficial impact to the floodplain environment. Kelly Field Project I7 would occur fully within the floodplain and would disturb approximately 50,000 cubic yards of soil but would reduce the soil's susceptibility to future erosion and sedimentation into the floodplain. LAK-East Project C11 would have the potential to directly impact up to 0.03 acre within the 100-year floodplain. CTA Project I1 would have the potential to impact approximately 1.26 acres of existing floodplain; however, the overall function of the floodplains would be improved by the removal of flood debris that presently block water flow and taking bank stabilization measures. CTA Project D5 would have the potential to directly impact approximately 0.46 acre within the floodplain; however, removal of abandoned structures from within the floodplain would reduce the potential for buildings to degrade within the floodplain. While runoff and sedimentation would have the potential to occur during project actions, the potential for these effects would be managed by implementation of BMPs and reduced to the extent practicable. Proposed project actions that would directly impact floodplains would be required to be coordinated through the Bexar County Floodplain Administrator for compliance under Executive Order 11988. Additional specific requirements may emerge from this coordination and would potentially include hydraulic modeling and floodplain map revisions.

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 (ROI), and JBSA-LAK 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. Groundwater monitoring and extraction wells would have the potential to be located within proposed project areas and would be coordinated with the former Kelly AFB Base Realignment and Closure Team prior to project implementation.

Biological Resources

No significant 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-LAK. Any impacts to undisturbed vegetation would be short term and temporary.

Wildlife Species and Habitat – Adverse effects to wildlife species and habitat would not be expected to result from implementation of the Proposed Action. Projects under the Proposed Action would occur in previously disturbed areas with minimal changes to the current landscape and available habitat. 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. The potential would exist to encounter state-protected reptiles within the undeveloped portions CTA. 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 in order to minimize the potential for impacts to migratory birds.

Cultural Resources

No significant 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 – Kelly Field Project I3 would renovate eligible resource Building 910, resulting in a long-term, beneficial impact to the resource by improving the condition of the building and ensuring the continued operation within Kelly Field. The Proposed Action would construct administrative facilities, new munitions inspection facilities, and upgraded security access points within the CTA Q-Area Historic District. The projects would be supporting the historic function of the district and would not be anticipated to result in adverse effects. No adverse visual impacts to eligible resources or districts would be anticipated.

Kelly Field Projects C4/D4, C10/D10, and I4 and CTA Projects D5 and I4 would demolish or renovate structures that are 50 years of age or older and not yet evaluated for eligibility for listing in the NRHP. These structures would be evaluated for eligibility prior to project implementation.

The need for consultation with the Texas State Historic Preservation Office (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 Programmatic Agreement 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 Programmatic Agreement.

Traditional Cultural Properties – No Traditional Cultural Properties or sacred sites have been identified at JBSA-LAK; therefore, no effect 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 ROI. 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. Kelly Field Project C8, LAK-East Projects C8/D8, C11 and I2, LAK-West Projects C9, C10, D22, and I1, and CTA Projects I1 and I2 would all improve transportation systems at JBSA-LAK.

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 6,800 tons of construction debris and 885 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. CTA Project I9 would provide redundant power to the lift stations that service the sanitary sewer in the district, providing a long-term benefit.

Hazardous Materials and Waste

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

Hazardous Materials and Wastes – Under the Proposed Action, a limited use of certain HAZMAT would be required during construction and demolition. Multiple KFA projects would be located within the boundaries of *Resource Conservation and Recovery Act* Hazardous Waste Permit #50310. The Installation would coordinate proposed activities with the Air Force Civil Engineer Center for guidance, and the soils and groundwater generated from the proposed actions would be handled as waste. 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 38 buildings with the potential for asbestos-containing material (ACM), lead-based paint (LBP), or polychlorinated biphenyls (PCBs). With proper handling and development 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 associated with the Proposed Action would not be anticipated to impact release areas, as the proposed project activities would be at or near surface level. Projects at Kelly Field would occur in previous release sites that would not restrict construction activities, but soil and groundwater must be sampled and disposed of according to applicable management plans. Significant adverse effects would not be anticipated to these resources.

Environmental Restoration Program (ERP) Sites – No significant effects to ERP sites would be anticipated to occur under the Proposed Action. LAK-East Project D1, which would demolish six existing structures, is located within the boundaries of ERP Site ST-024. Ground disturbance in the area would be managed in accordance with applicable JBSA-LAK and Air Force guidance, and potential impacts to water quality would be monitored under the Stormwater Pollution Prevention Plan.

Military Munitions Response Program (MMRP) – Projects at Kelly Field and LAK-EAST would occur within closed MMRP sites. Due to their locations within the boundaries of the sites, there is potential for the discovery of munitions and explosives of concern, munitions debris, and range-related debris during ground-disturbing activities associated with the Proposed Action. Should potential munitions and explosives of concern, munitions debris, or debris be encountered during any activities, all work activities would immediately stop, the discovery would be reported to JBSA-LAK Range Operations/Control, and appropriate safety measures would be implemented. Significant impacts to MMRP sites would not be anticipated under the Proposed Action.

Safety

No significant adverse effects to safety would be anticipated to occur under the Proposed Action. Kelly Field Project C3 would increase available training space for the Air Force Reserve Command Fire Department, resulting in a long-term, beneficial impact to ground safety. CTA Project I3 would improve security around munitions storage access, and Projects C2 and C8 would support future mission growth and potentially contribute to long-term explosives quantity distance arc reduction, resulting in a long-term, beneficial impact to explosives safety. Kelly Field Project D2 would reduce the likelihood of wildlife in the immediate area of the runway, resulting in a long-term, beneficial impact to flight safety.

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-LAK as well as those external to JBSA-LAK that could overlap in time and space with the Proposed Action. 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. Additional options for project locations were also evaluated during the ADP planning process. However, the nature of the 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 importance 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