

**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 –
RANDOLPH AND SEGUIN AUXILIARY AIRFIELD, BEXAR AND GUADALUPE COUNTIES, TEXAS**

Pursuant to provisions of the *National Environmental Policy Act* (NEPA), Title 42 *United States Code* (USC) §§ 4321–4370; 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, Randolph (JBSA-RND) and Seguin Auxiliary Airfield (SAF) in Texas.

Purpose and Need

The purpose of the Proposed Action at JBSA-RND is to develop, improve, and maintain JBSA-RND to accommodate future mission growth. JBSA-RND performs a critical task for the Air Force and other Department of Defense (DoD) components in training pilots to fly, maneuver, operate, and maintain aircraft in preparation for deployment. For continued mission success, the Base must be modernized to be more efficient and provide the necessary mission support capabilities to train pilots and others involved in air operations (Air Force, 2020a). The future development of JBSA-RND must also retain the unique characteristics of the Base and ensure land use that is compatible, connected, safe, and secure.

A secondary purpose of the Proposed Action is to develop JBSA-RND in a manner that provides flexibility to meet future mission requirements, some of which are not yet known. The Proposed Action must be consistent with the planning processes and principles of Air Force Instruction 32-1015. Development plans for JBSA-RND need to consider and evaluate limiting factors such as space, natural and cultural resources, and operational standards or requirements. The Proposed Action would accomplish these objectives in the short term by implementing the selected projects at JBSA-RND and SAF from approximately 2023 to 2027, consistent with the Support Services ADP and Flight Operations ADP (Air Force, 2019a, 2019b).

Consistent with [32 CFR § 989.8\(c\)](#), the following selection standards meet the purpose of and need for the Proposed Action and were used to identify reasonable alternatives for analysis in this EA.

- **Mission** – Ensure the continued mission support capabilities of flight operations at JBSA-RND and SAF through targeted infrastructure investment, improvement, and maintenance.
- **Land Use** – Preserve developable land for future mission growth through more efficient and functional land use; consolidate mission and support functions into campus areas.
- **Safety** – Minimize aircraft interactions with vehicles and pedestrians by design. Comply with airfield safety criteria (e.g., remove obstructions) and ensure new development is compatible with flight operations.
- **Security** – Comply with applicable security/setback and access control requirements.
- **Community** – Enhance quality of life at JBSA-RND via infrastructure investments (e.g., safe, efficient, well-connected multimodal transport options) that also preserve its unique history and character.
- **Environmental** – Avoid adverse effects on sensitive or beneficial environmental resources to the extent practicable.
- **Sustainability** – Comply with federal and Air Force mandates for sustainable design and development.

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 **27** short-term development actions and real-property improvements on JBSA-RND and SAF from approximately 2023 to 2027. Of this total, **15** projects would involve construction or demolition and **12** would involve infrastructure actions.

**Table 1
List of Proposed Construction and Demolition Projects at JBSA-RND**

Map ID ^a	Project	Approx. Size or Footprint ^b
Flight Operations District		
C1	Add field-level repair facility in H-7.	29,460
D2	Demolish B-1040 (clinic) parking lot in the NW airfield CZ.	-56,223
D3	Demolish existing CATM in the SW airfield CZ.	-5,124
C4/D4	Construct an east ACP gate outside the airfield CZ, including a guard house, sentry booths, and entry lanes; demolish existing east ACP gate.	4 ac
C5/D5	Construct a new west ACP gate system with LVIP and road behind the school; demolish existing south ACP gate.	6 ac
C6	Construct a reinforced access road between the east runway and East Perimeter Road.	30,000
D7	Remove athletic fields and demolish their associated buildings and infrastructure in the NE CZ.	199,122
Support Services District		
C8	Construct a Child Development Center.	28,835
C9	Construct a consolidated MSC for CE.	194,246
C10	Construct a multi-purpose service station with fuel pumps.	-26,167
C11	Construct addition to RPA medical administrative facility (i.e., flight surgeon).	8,250
C12/D12	Relocate Eberle Park to Heritage Park by demolition of six buildings (B-1180, B-1181, B-1183, B-1184, B-1185, B-1187); remove trees and return area to grass.	33,639
		300,000

Notes:

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

b Approximate size in square feet unless note otherwise.

ac = acre(s); ACP = Access Control Point; B = Building (e.g., Building 1040 is B-1040); C = construction project; CATM = Combat Arms Training and Maintenance; CE = Civil Engineering; CZ = Clear Zone; D = demolition project; H = Hangar (aircraft); LVIP = large vehicle inspection point; MSC = Mission Support Complex; NW = northwest; RPA = Remotely Piloted Aircraft; SW = southwest

**Table 2
List of Proposed Infrastructure Projects at JBSA-RND**

Map ID ^a	Project	Approx. Size or Footprint ^b
Flight Operations District		
I1	Realign golf course to clear trees and remove brush along the South Gate perimeter fence line for operational safety.	84,213
I2	Renovate MTC H-62.	18,940
I3	Repair/rebuild west runway by full replacement, including drainage improvements.	800,882 sy
I4	Pave/resurface the east and south taxiway shoulders.	126,000
Support Services District		
I5	Renovate B-675.	65,274
I6	Right-size transportation facilities and hardstand; make vehicle maintenance improvements.	-
I7	Make road, safety, and parking improvements; create a transit route and construct transient stops.	54 mi
I8	Repurpose Arts and Crafts for CE Complex.	15,059

Map ID ^a	Project	Approx. Size or Footprint ^b
I9	Renovate B-663.	65,231
I10	Renovate B-494.	27,596

Notes:

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

b Approximate size in square feet unless noted otherwise.

B = Building (e.g., Building 675 is B-675); CE = Civil Engineering; H = Hangar (aircraft); I = infrastructure project; mi = mile(s); MTC = Mission Training Complex; sy = square yard(s)

Table 3
List of Proposed Construction, Demolition, and Infrastructure Projects at SAF

Map ID ^a	Project	Approx. Size or Footprint ^b
Construction and Demolition		
C13	Secure Airfield with UFC-compliant fence	-
C14	Construct emergency access road with shoulders at Seguin Airfield.	200,000
C15/ D15	Demolish portions of the runway and taxiway; construct new shoulders.	12 ft (width)
Infrastructure		
I11	Repair/resurface Seguin Airfield apron to comply with UFC.	20 ac
I12	Renovate Flight Line Fire Station (B-415).	4,456

Notes:

a Alpha/Numeric Map IDs correspond with **Figure 2-2** in the EA.

b Approximate size in square feet unless noted otherwise.

ac = acre(s); B = Building (e.g., Building 415 is B-415); C = construction project; D = demolition project; I = infrastructure project; UFC = Unified Facilities Criteria

No Action Alternative

Under the No Action Alternative, the Air Force would not implement the ADP projects, and JBSA-RND would continue to operate under current conditions. The facility and infrastructure assets of the Base would continue to degrade or become outdated. The current level of mission support on Base would not be maintained or able to accommodate evolving mission requirements in the short or long term. Training and operations conducted at JBSA-RND would continue to be affected by a less efficient, functional, and sustainable built environment. Overall, the combat readiness of the DoD and Air Force personnel that rely on JBSA-RND to meet training requirements would be diminished or reduced without another readily available, comparable training venue.

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[d]). 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 JBSA-RND and SAF would remain generally unchanged, as this area is highly developed and has many uses. Projects on both JBSA-RND and SAF would not be expected to alter the current land use categories nor place additional restrictions.

Implementation of the Proposed Action would be expected to have short-term, negligible impacts to air quality for all criteria pollutants. Air quality impacts from construction would be short term, local, direct, and minor in nature for these constituents. There would be no impacts from operational activities and no anticipated changes to the number and/or type of site personnel on Base after construction is complete.

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-RND and SAF. 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-RND and SAF would not increase from implementation of the Project Action.

Earth Resources

No significant long-term effects to geological resources would be anticipated to occur under the Proposed Action. The Proposed Action would involve earthwork to include trenching, backfilling, and compacting of soils or fill materials on and immediately adjacent to the project sites. Depending on the scope and design of the individual projects, excavated soils and fill materials would require temporary storage on Base and/or transport to/from JBSA-RND and SAF for use or disposal. These activities would expose soils and increase their susceptibility to water and wind erosion. Where excavation and backfill are required, soil structure, composition, and function could be altered. Further, operating heavy vehicles and equipment to remove, place, or stabilize infrastructure could result in soil compaction, potentially altering the normal function of the soils on a temporary basis.

Water Resources

No long-term, adverse effects to water resources would be anticipated to occur under the Proposed Action. Several projects under the Proposed Action would have the potential to cause indirect impacts to surface- and groundwater resources and wetlands as a result of surface-water runoff but would not be expected to generate long-term, adverse impacts if best management practices (BMP) are implemented. Under the Proposed Action, the construction contractor would be required to obtain applicable Texas Pollutant Discharge Elimination System permit(s), including a Construction General Permit (CGP) for sites that individually or collectively disturb one or more acres of land. The CGP would identify measures to prevent and minimize stormwater discharges during construction and, when appropriate, require preparation of a Texas Council on Environmental Quality (TCEQ)-approved Stormwater Pollution Prevention Plan. With these measures in place, potential adverse effects on surface waters would be anticipated to be minor and short term. No long-term, adverse effects to surface waters would be anticipated.

Two projects would occur within or across existing 100-year floodplains: Project I1 at JBSA-RND, which would realign the Randolph Oaks Golf Course to clear trees and remove brush along the South Gate perimeter fence, and Project C13 at SAF, which would secure the airfield with fencing. One project, C4/D4, would occur in proximity to 100-year floodplains. Potential effects on floodplain resources from these projects would be minor and short term under the Proposed Action because the improvement/maintenance projects in or immediately adjacent to 100-year floodplains would involve the repair, maintenance, or improvement of existing infrastructure. Therefore, no change on the quality, state, or function of 100-year floodplains would be anticipated from that of the status quo.

Project I1 at JBSA-RND would occur within proximity of Woman Hollering Creek; however, effects would be negligible and temporary. Project I1 also would occur in wetlands surrounded by a 100-year floodplain. Projects I4 at JBSA-RND and Project C15/D15 at SAF would occur within proximity of wetlands. Potential adverse effects would be manageable by design and BMPs. Project D2, demolition of a parking lot within the Clear Zone (CZ), is located within the Edwards Aquifer artesian zone, but is not subject to any Edwards Aquifer Authority rules or regulations. JBSA-RND and SAF mostly contain improved and impervious surfaces with limited ability for water to permeate groundwater resources. The Proposed Action would have limited potential to adversely affect the water quality of groundwater in this location.

Biological Resources

No long-term, adverse effects to native vegetation would be anticipated to occur under the Proposed Action. The majority of projects under the Proposed Action would occur in previously disturbed areas without native vegetation. Project I1 at JBSA-RND would directly impact vegetation. Invasive trees and brush would be removed from the fence line to create a belt of land at least 30 feet on both sides for security purposes. No native trees would be removed. The area would be maintained by contractors.

No long-term, adverse effects to wildlife would be anticipated to occur under the Proposed Action. The noise and movement temporarily caused by repair and replacement activities would be anticipated to have negligible, short-term impacts on wildlife.

No long-term, adverse effects to protected species would be anticipated to occur under the Proposed Action. Migratory birds would be protected by restrictions during the bird breeding season, which generally occurs 1 March through 15 August. Restrictions during this period aim to reduce disturbance of bird habitat and include limitations on vegetation and brush removal, vehicle use, equipment locations and duration of use, and the use of chemical substances.

Cultural Resources

Several projects under the Proposed Action would have the potential to result in minor, long-term, adverse impacts to cultural resources. Under the Proposed Action, the direct Area of Potential Effect (APE) for multiple project actions would occur within the Randolph Field National Historic Landmark District (NHLD). The majority of actions would not modify eligible or contributing resources; however, modification of three contributing buildings and one landscape feature within the NHLD would occur. Projects I2, I5, and I9 would renovate buildings that are listed as contributing to the NHLD. Project actions include heating, ventilation, and air conditioning replacement; fire alarm system upgrades; electrical system replacement; and communication system upgrades, and could involve demolition of interior walls, doors, insulation, floors, and ceilings. JBSA maintains a programmatic agreement (PA) with the Texas State Historic Preservation Office for the management of cultural resources on its properties. The PA outlines procedures and protocols within and between the parties for this purpose, including the Section 106 consultations under the *National Historic Preservation Act*. Architectural resources within the indirect APE for these projects, including Randolph Field NHLD as well as individually eligible buildings, could experience an altered viewshed from implementation of the proposed projects; however, these resources are located within existing areas of the Installation that undergo regular construction or demolition of facilities in order to support the JBSA-RND mission.

The following projects fall outside of the NHLD: C5/D5, C6, C8, C9, C10, C11, C12/D12, C13, C14, C15/D15, D2, D3, D7, I1, I3, I8, I11, and I12. No adverse effects to cultural resources or to the NHLD viewshed are expected as a result of these projects. The projects included within the NHLD are C1, C4/D4, D7, I2, I4, I5, I6, I7, I9, and I10. NEPA is being accomplished at this point for efficiency, though JBSA is pursuing Section 106 consultations for each separate project as they are developed and project details and designs become available. JBSA shall follow the agreed upon guidelines from the PA for accomplishing the NHPA and Section 106 requirements.

Multiple project actions would impact buildings that would be 50 years of age or older by the time project implementation would occur. Project C12/D12 would demolish six buildings, including B-1187, which was constructed in 1975. Project I12 would renovate the Flight Line Fire Station (B-415), which was constructed in 1977. These structures would be evaluated for eligibility on the National Register of Historic Preservation prior to project implementation.

No eligible archaeological sites have been identified at JBSA-RND or SAF. In the event of an unanticipated discovery of an archaeological resource during demolition or construction, ground-disturbing activities would be suspended, and a cultural resources meeting called to determine if an unanticipated discovery plan would be developed and implemented.

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

Temporary, minor adverse impacts to transportation infrastructure would be anticipated to occur under the Proposed Action; however, local and regional roadways would be able to readily absorb construction-related traffic. Minor delays on or in the immediate vicinity of JBSA-RND and SAF would be anticipated, but impacts on roadway capacity or condition would not be discernable. No permanent adverse impacts to transportation infrastructure would result from the Proposed Action, and any increase in personnel, traffic, or equipment would be temporary during the construction period and long-term. Adverse impacts to utilities would not be expected under the Proposed Action. Long-term, beneficial impacts would be expected to occur for transportation systems at JBSA-RND.

Potential short-term, negligible, adverse impacts on the electrical distribution system could occur during construction and demolition activities under the Proposed Action. These impacts would occur as a result of temporary electrical service interruptions, rerouting aboveground or underground electrical lines, or when a proposed facility is connected to the Installation's electrical distribution system. Minimal net changes in long-term demand would be anticipated.

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. Long-term, negligible, adverse impacts would occur because the operation of the new buildings would increase the demand on the potable water supply system; however, the cessation of operations at demolished buildings would decrease the demand. Changes in demand would be minimal, and the potable water supply system has the capacity required to meet new demands.

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. Long-term, negligible, adverse impacts would occur because the operation of the new buildings would increase the demand on the sanitary sewer and wastewater treatment system; however, the cessation of operations at demolished buildings would decrease the demand. Changes in demands would be minimal, and the sanitary sewer and wastewater treatment system has the capacity required to meet new demands.

Short-term, minor, adverse impacts on solid waste management may occur with construction and demolition projects under the Proposed Action. No long-term impacts on solid waste management would be anticipated to occur under the Proposed Action because the projects would not appreciably increase the amount of solid waste generated on the Base from everyday functions.

Hazardous Materials and Waste

No significant effects to hazardous materials (HAZMAT) and wastes would be anticipated to occur under the Proposed Action. The Proposed Action would use, generate, and require management of hazardous substances and materials during construction. These include paints, welding gases, solvents, preservatives, sealants, pesticides, and hydraulic fluids and petroleum products used in construction vehicles and equipment. Construction contractors would be responsible for monitoring HAZMAT exposure. Proper handling, removal, and disposal of all such substances/materials would be conducted in accordance with Air Force, local, state, and federal regulations. Several project actions have the potential to involve structures with the potential to contain asbestos-containing material, lead-based paint, and polychlorinated biphenyls. If encountered, HAZMAT used or generated during construction or demolition would be handled, stored, and disposed of in accordance with federal and state laws and regulations. All applicable permits for handling and disposal of HAZMAT would be obtained prior to starting construction or demolition activities. Construction and demolition work under the Proposed Action would be subject to the procedural

requirements of the JBSA Hazardous Waste Management Plan; Spill Prevention, Control, and Countermeasures Plan; and other applicable management plans to prevent and minimize risks associated with contaminant release or transport in the environment. During construction or demolition, if HAZMAT is discovered, work in that location would stop until the potential contamination has been properly evaluated and addressed. Any work involving the installation of new tanks for modification of existing above- or below-ground storage tanks would be required to be communicated through the JBSA Tanks/Petroleum, Oil, and Lubricants Manager.

No significant effects to Environmental Restoration Program (ERP) or Military Munitions Response Program (MMRP) sites would be anticipated to occur under the Proposed Action, as the proposed projects would not occur in the vicinity of the active ERP site. Projects C1, C9, C11, D7, I2, I3, and I8 would occur on or near closed ERP or MMRP sites. These sites have received approval for closure from the Texas Council on Environmental Quality (TCEQ) based on non-residential land use. Based on these land use restrictions, the Air Force ERP requires annual inspections and five-year reviews of each site. At JBSA-RND, Project C11 would occur near aqueous film forming foam (AFFF) Release Area 2 (B-700, Fire Station). Through the interagency and intergovernmental coordination for environmental planning process, TCEQ stated that determination regarding the extent of contamination at this site is still underway. The TCEQ Remediation Division recommends that measures be taken to ensure that no additional releases occur as a result of the planned activities and that any derived waste from investigation of this site be disposed of in an authorized facility. Project C11 involves the construction of a new medical facility and is unlikely to directly impact the release site. At SAF, Project I11 is within approximately 100 meters of AFFF Release Area 5 (the SAF former fire protection training area). Projects C6, I1, and I4 would have the potential to involve removal of AFFF-contaminated soils due to site proximity.

Safety

No significant effects to safety would be anticipated to occur under the Proposed Action. The construction and demolition projects would not change existing CZs or accident protection zones (APZs). Under the Proposed Action, Projects D2, D3, C4/D4, C5/D5, and D7 would remove or relocate existing structures from within the CZ at JBSA-RND. East Gate and West Gate are currently located within the CZ of the east and west runways, respectively. Project C4/D4 would relocate the East Gate guardhouse, sentry booths, and entry lanes while accommodate additional queuing. West Gate does not meet current antiterrorism/force protection standards; however, airfield criteria limiting land uses in the CZ prevent this gate from being modified to meet those standards. Project C5/D5 would construct a new covered inspection station, queuing lanes, over-watch station, and intrusion prevention system outside of the CZ, but within the necessary setbacks from the existing facilities. Projects D2, D3, and D7 would involve the demolition of existing structures within the CZs at JBSA-RND. The proposed projects would result in no change to flight safety CZs or APZs at JBSA-RND or SAF; therefore, no impacts to flight safety would occur. Beneficial impacts would include the removal or relocation of these incompatible land use structures from the CZ at JBSA-RND.

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. To minimize health and safety risks, contractors would be required to use appropriate personal protective equipment and establish and maintain site-specific health and safety programs for their employees and follow all applicable Occupational Safety and Health Administration regulations. Additionally, construction contractors at JBSA-RAND and SAF are required to follow ground safety regulations and worker's compensation programs to avoid risks to workers or personnel on or off Base.

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-RND and SAF. When considered in conjunction with other past, present, or reasonably foreseeable environmental trends and planned actions, adverse cumulative effects to cultural resources could occur without the implementation of appropriate mitigation measures as approved by the

Texas Historical Commission. Failure to protect NHLD structures and sites from significant impacts would threaten the historic character and integrity of the NHLD in the long term. No other potentially significant cumulative impacts were identified for JBSA-RND or SAF.

Mitigation

The EA analysis concluded that the Proposed Action would not result in significant environmental impacts; therefore, no mitigation measures are required. 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 EA. Although two projects (Project I1 and Project C13) would be located within the Zone A floodplain, these projects would occur in previously disturbed land with existing infrastructure. Neither project would add new impervious surfaces or otherwise alter the function of 100-year floodplains. Each project would repair existing infrastructure; therefore, no practicable alternatives to development in the floodplain exist.

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.

CYNTHIA OLIVA, GS-15, USAF
Division Chief, AETC/A4P

DATE