

**PROPOSED FINDING OF NO SIGNIFICANT IMPACT (FONSI)
RANDOLPH 2A LOW MILITARY OPERATIONS AREA SPECIAL USE AIRSPACE**

Pursuant to provisions of the National Environmental Policy Act (NEPA) (42 United States Code (U.S.C.) §§ 4321-4347); Council on Environmental Quality (CEQ) NEPA regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508); the Department of the Air Force (DAF) Environmental Impact Analysis Process (EIAP) (32 CFR Part 989), and Federal Aviation Administration (FAA) Order 1050.1F, *Environmental Impacts: Policies and Procedures*, the DAF has prepared the attached Environmental Assessment (EA) to evaluate the potential environmental consequences from the Proposed Action to establish a new permanent low-altitude Military Operations Area (MOA) near San Antonio, Texas. The Proposed Action would support current and anticipated future pilot training requirements of the 12th Flying Training Wing (12 FTW) at Joint Base San Antonio-Randolph Air Force Base (JBSA-Randolph), Texas as well as other transient DAF users. The FAA is participating as a cooperating agency during the preparation of this EA in accordance with the Memorandum of Understanding between the DoD and the FAA for environmental review of Special Use Airspace (SUA) actions under FAA Order JO 7400.2P, *Procedures for Handling Airspace Matters*. As part of this process, the FAA will publicly circularize the proposed airspace with aeronautical users to solicit information to assist in determining what effect it would have on navigable airspace. That circularization will occur in addition to public involvement associated with this EA. Comments received during the FAA circularization process will be considered in the Final EA, as applicable. The DAF will request the FAA to issue its own FONSI and chart the RAN2A Low MOA airspace as soon as practicable after the DAF issues its FONSI. The attached EA is incorporated by reference in this proposed Finding of No Significant Impact (FONSI).

The DAF is aware of the November 12, 2024, decision in *Marin Audubon Society v. Federal Aviation Administration*, No. 23-1067 (D.C. Cir. November 12, 2024). To the extent that a court may conclude that the CEQ regulations implementing NEPA are not judicially enforceable or binding on this agency action, the DAF has nonetheless elected to follow those regulations at 40 CFR Parts 1500–1508, in addition to the DAF’s procedures and regulations implementing NEPA at 32 CFR 989, to meet the agency’s obligations under NEPA, 42 U.S.C §§ 4321 et seq.

Purpose and Need

The purpose of the DAF Proposed Action is to obtain new low-altitude airspace under existing airspace, managed by the 12 FTW, to afford independent scheduling of nonhazardous, low-altitude flight training in proximity to JBSA-Randolph and meet tactical flight training requirements at altitudes at or above 500 feet above ground level (AGL). The need for the action is to minimize current 12 FTW aircraft commute times to access training airspace; maximize nonhazardous flying training syllabi execution; and produce pilots faster. This need is not tied to a basing or beddown proposal or support for a specific aircraft. The FAA’s purpose and need for the Proposed Action is to provide the SUA to support the DAF undergraduate pilot training requirements while minimizing the impacts on the National Airspace System.

Description of Proposed Action and Alternatives

Under the Proposed Action, the DAF would request the FAA to establish new, low-altitude training airspace under the existing Randolph 2A (RAN2A) MOA. The proposed airspace would have a floor (i.e., minimum altitude) of 500 feet AGL to support low-altitude aircraft training

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operations. As needed, and based on applicable operational and air traffic control (ATC) requirements, aircraft would continue to have access to the existing RAN2A MOA and RAN2A Air Traffic Control Assigned Airspace (ATCAA) for training above 9,000 feet mean sea level (MSL). The proposed airspace would have the same lateral boundaries as the existing RAN2A MOA and would be divided into four numbered quadrants to facilitate ATC and aircraft navigation. Once operational, the proposed airspace would be managed and scheduled by the 435th Fighter Training Squadron of the 12 FTW/12th Operations Group at JBSA-Randolph. No demolition, construction, or other ground-disturbing activities would occur under the Proposed Action. The Proposed Action would not require changes to the number of personnel or to the number or types of aircraft assigned to JBSA-Randolph, or changes to the existing boundaries of that installation.

The Boeing/Saab T-7A *Red Hawk* (T-7A) is projected to begin operating at JBSA-Randolph in fiscal year (FY) 2027 and would be a one-for-one replacement of the current T-38C jet trainer. Full transition to the T-7A at JBSA-Randolph is expected by FY31 (potential environmental impacts from proposed operation of the T-7A at JBSA-Randolph were assessed in the 2022 *JBSA T-7A Recapitalization Final Environmental Impact Statement*). The ratio and timeline for transition to the T-7A and phase-out of the T-38C at JBSA-Randolph is not currently known. Use of the T-7A by the 12 FTW was assumed as the basis for analysis of potential environmental consequences from the Proposed Action (Alternative 1) and Alternative 2.

Approximately 2,968 annual sorties would be conducted within the proposed airspace. Training flights would be distributed throughout the proposed airspace, although most would be conducted between 500 feet AGL and 5,000 feet MSL. Training would also occur from 5,000 feet MSL to 9,000 feet MSL but would primarily include transit and setup for training maneuvers. None of the training activities would involve the release of live or inert ammunition or ordnance (including defensive countermeasures such as chaff and flares). Aircraft would not exceed supersonic speeds while operating within the proposed airspace.

Training activities within the proposed airspace would primarily consist of low-altitude air-to-air training, low-altitude air-to-ground training, and low-level operations. In addition to the 12 FTW, the Proposed Action would support training requirements of other transient DAF users, such as Fighter Bomber Fundamentals for pilots flying T-38s from Laughlin Air Force Base near Del Rio, Texas and F-16s from JBSA-Kelly Field in San Antonio. The number of sorties that would be flown by these units is included in the approximately 2,968 total annual sorties.

Individual training activities in the proposed airspace would last approximately 20 minutes. Airspace activity would not be continuous but could occur at any time during existing JBSA-Randolph operational hours between 7:00 a.m. and 10:00 p.m. local time, Monday through Friday. Approximately 16 proposed sorties would occur between 7:00 p.m. and 10:00 p.m., representing approximately 0.5 percent of the total annual sorties. Use of the proposed airspace after 10:00 p.m. is not anticipated and would only result from an in-flight emergency or other unforeseen circumstances.

Alternative 1 – Establish Randolph 2A Low-Altitude MOA

Under this alternative, the proposed low-altitude MOA underneath the existing RAN2A MOA would have a vertical extent from 500 feet AGL up to, but not including 9,000 feet MSL (i.e., the floor of the existing RAN2A MOA). The new airspace would be designated as the Randolph 2A

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Low-Altitude (RAN2A Low) MOA and would be managed and operated as a separate airspace distinct from the existing RAN2A MOA and RAN2A ATCAA. This would allow FAA civilian ATC to restrict military operations in the RAN2A MOA or proposed RAN2A Low MOA, when needed, to facilitate safe transit of the airspace by civilian aircraft. Based on training requirements, and in coordination with FAA civilian ATC, the proposed RAN2A Low MOA could be combined with the existing RAN2A MOA and RAN2A ATCAA to provide seamless flight operations from 500 feet AGL to flight level (FL) 290.

Alternative 2 – Vertical Expansion of RAN2A MOA

This alternative would modify the existing RAN2A MOA by lowering its floor from 9,000 feet MSL to 500 feet AGL to support low-altitude aircraft training operations. The modified airspace would continue to be operated as the RAN2A MOA rather than creating a new, separate airspace as proposed under Alternative 1. Aircraft operations within the modified airspace would be permitted from 500 feet AGL up to, but not including FL 180 (i.e., the floor of the existing RAN2A ATCAA). Based on training needs and in coordination with FAA civilian ATC, the modified airspace could be combined with the existing RAN2A ATCAA to provide seamless operations from 500 feet AGL to FL 290.

No Action Alternative

Under the No Action Alternative, the proposed low-altitude MOA would not be established under the existing RAN2A MOA and existing conditions would continue (the 12 FTW would transition to the T-7A by FY31). Pilots from JBSA-Randolph would continue to transit to the Brady MOA to conduct low-altitude training, resulting in operational inefficiencies and continuing to limit time spent in actual training. The No Action Alternative does not meet the purpose and need but is carried forward for detailed analysis in accordance with CEQ NEPA regulations at 40 CFR Parts 1500-1508 and 32 CFR Part 989. The No Action Alternative provides a baseline for the evaluation of potential impacts from the Proposed Action and also represents a potential and viable decision to not implement the Proposed Action.

Summary of Findings

The summary of findings presented below is based on the detailed analysis provided in the attached EA. Unless otherwise noted, potential impacts from Alternative 1 and Alternative 2 would be the same; these alternatives are collectively referred to as the Proposed Action. Throughout this proposed FONSI and the attached EA, the terms “impacts” and “effects” are used interchangeably and mean the same thing.

Airspace

The Proposed Action would have no significant adverse impacts on airspace. The Proposed Action would result in an approximately 11 percent increase in total air traffic transiting the proposed RAN2A Low MOA. Based on the overall airspace size and number of hourly and daily crossings, the proposed RAN2A Low MOA would be more than adequate to absorb the additional traffic flow associated with the Proposed Action. Controller workload would be reviewed at FAA Houston Air Route Traffic Control Center to ensure the safe and efficient handling of this increase in traffic.

Potential conflicts could occur between existing aviation activity and when the RAN2A Low MOA is active. These types of conflicts are routinely addressed primarily through FAA procedural

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deconfliction. These conflicts could cause aircraft operating under Instrument Flight Rules (IFR), which receive clearance and direction from FAA civilian ATC operators, to be rerouted, with associated delays or require schedule adjustments that may be impractical.

Potential impacts on future air traffic in the existing RAN2A MOA would include all IFR flights that would be expected to be scheduled daily by the 12 FTW. IFR crossings already require FAA procedural deconfliction with existing military operations in the RAN2A MOA. Any new impacts would be expected to be minor and significantly reduced via FAA procedural deconfliction. As such, impacts on air traffic in the existing RAN2A MOA would not be significant.

In the RAN2A ATCAA, current IFR flights were not reported; however, the percentage of civilian and military crossings is close to those reported for the RAN2A MOA. It is anticipated that all future IFR flights in the RAN2A ATCAA would be handled using FAA deconfliction procedures, similar to the RAN2A MOA, such that impacts on these flights would be minor and not significant.

Local civilian airports operating within the proposed RAN2A Low MOA include South Texas Regional Airport at Hondo (HDO), Castroville Municipal, Devine Municipal, and multiple private airfields that do not have flight plans and do not appear in the radar data. Thus, the total number of local airport IFR flights is not known. However, a substantial number of IFR approaches to HDO were observed in the data and therefore could be affected by the Proposed Action, whereas aircraft operating under Visual Flight Rules (VFR) would continue to use “see and avoid” flying to prevent conflicts. Since the proposed RAN2A Low MOA would typically be scheduled simultaneously with the existing higher altitude RAN2A MOA and RAN2A ATCAA, FAA procedural deconfliction of local airport IFR flights would occur by the same restricting of military flights to certain airspace quadrants or altitude bands to provide available airspace for these local flights to cross the RAN2A Low MOA. As a result, potential impacts on local airport IFR operators would be minor and not significant.

Military airfields other than JBSA-Randolph utilize the existing RAN2A MOA and would utilize the proposed RAN2A Low MOA. Deconfliction of the affected military IFR flights would be required when the proposed RAN2A Low MOA is active. As with civilian IFR flights, FAA Houston Center would be required to perform procedural deconfliction of these transiting military IFR operations from active RAN2A Low MOA operations. Some military IFR flights might also fly around the MOAs. Potential impacts on military airfield IFR operators would be minor and not significant.

Four active military training routes (MTRs) cross the proposed RAN2A Low MOA operating a relatively low number of annual flight operations. Future MTR operations representing the Proposed Action would be expected to have about the same annual operations as existing conditions, with the exception that T-38C flight operations would be gradually replaced by T-7A flight operations. VFR are used on these MTRs to prevent potential conflicts and low annual operations may offer scheduling flexibility for periods when the RAN2A Low MOA is inactive. As such, deconfliction of these routes may not be required regularly; although should this become necessary, appropriate MTR deconfliction procedures from aircraft operations in the proposed RAN2A Low MOA operations would need to be codified in an approved written agreement with JBSA-Randolph scheduling authorities to schedule these operations safely and effectively, as required. Potential impacts on MTR operations from the Proposed Action would be minor and not significant.

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Noise / Acoustic Environment

The Proposed Action would have no significant adverse impacts from noise. Single-event noise levels would be heard at various locations under the RAN2A Low and RAN2A MOAs. Most of the annual T-7A flights (73 percent) and F-16C flights (90 percent) would occur in the RAN2A MOA, at altitudes above 9,000 feet, and therefore would not be expected to cause annoyance or disrupt common activities any more than typical everyday sound events (automobile noise, lawn mowing, other civil aircraft flyovers, etc.). Of the remaining flights in the proposed RAN2A Low MOA under the Proposed Action, individual noise events would occasionally be heard, though flight paths in the proposed RAN2A Low MOA (similar to the RAN2A MOA) would typically be distributed throughout the airspace such that the highest expected overflight levels would not occur repeatedly at a single location on the ground.

Cumulatively, noise associated with proposed aircraft operations would not exceed 50 A-weighted decibels (dBA) within the MOAs, in areas that would be crossed by the MTR segments overlapping the MOAs, or at potential noise-sensitive receptors and would remain well below the 65 dBA threshold below which most types of land use are compatible with aircraft noise. Most changes (increases) in noise levels from the Proposed Action would be considered “reportable” but not significant in accordance with FAA Order 1050.1F. Although the number of aircraft operations in the MOAs would show a minor increase under the Proposed Action relative to historic conditions, noise from proposed aircraft operations would not be expected to temporarily or permanently impede or prevent the continued occupation of any land use underlying the RAN2A Low and RAN2A MOAs.

Land Use

The Proposed Action would have no significant adverse impacts on land use, including the ability to site new wind farms in the areas below the proposed airspace. The U.S. Wind Turbine Database, which provides the location of land based and offshore wind turbines in the United States, does not identify any wind turbines in the Region of Influence (ROI) and wind speed modeling estimates do not indicate that optimum wind speeds for siting wind turbines occur within the ROI. Further, the DoD Energy Siting Clearinghouse, through its mitigation response team process usually finds a compromise where turbines can proceed under airspace if some or many of the turbines are moved laterally or other types of mitigation strategies are implemented.

The Proposed Action would not involve development activities or population changes that could require changes to existing or proposed land use patterns or be inconsistent with existing land use plans and policies. The majority of proposed aircraft operations would occur in the RAN2A MOA and would not be expected to cause annoyance. Generally, these operations would be similar to existing ambient noise conditions and would have minimal potential to affect or be noticeable to human populations in the ROI. The remaining flights would occur in the proposed RAN2A Low MOA but would be distributed throughout the airspace such that the highest expected overflight levels would not occur repeatedly at a single location on the ground. Additional aircraft overflights of Lost Maples State Natural Area and Love Creek Preserve would not be anticipated under the Proposed Action given their proximity to the proposed airspace’s lateral boundaries and the need for pilots to prevent unintentional “spill outs” of their aircraft beyond those boundaries. Noise levels associated with the Proposed Action would not exceed the 65 dBA threshold below which most land uses are compatible with aircraft noise and therefore, would have no potential to require temporary or permanent changes to existing or proposed land uses, prevent the continued use and

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occupation of existing land uses, or result in incompatibilities with existing or planned land use plans and policies.

Air Quality, Greenhouse Gases, and Climate Change

The Proposed Action would have no significant adverse impacts on air quality, greenhouse gases (GHG), and climate change. Emissions of criteria pollutants from the Proposed Action would increase, but would remain below applicable insignificance indicators. Such increases would not affect the attainment of status of the Air Quality Control Region that comprises the ROI. Regional haze or visibility would not be a concern because no Class 1 areas are located within 100 kilometers (62 miles) of the airspace. GHG emissions associated with the Proposed Action would be negligible relative to statewide and national GHG emissions and would not be expected to result in a significant impact on climate change at a regional or global scale.

Biological Resources

The Proposed Action would have no significant adverse impacts on biological resources. The Proposed Action would have the potential to inadvertently injure or destroy individual animals of common wildlife species, primarily as a result of collisions between birds and aircraft. Aircraft operations, associated noise, and visual effects associated with approaching aircraft could induce startle responses that could cause some animals to temporarily leave the immediate area or interrupt nesting, breeding, or foraging activities. While these impacts would be adverse, they would be highly localized and limited to individuals or small numbers of animals and would not affect the continued propagation of domestic animals, game animals, or wildlife at the population or species level. Any “take” of birds protected by the Migratory Bird Treaty Act would be small on an annual basis and would be considered incidental to military readiness activities in accordance with 50 CFR § 21.42.

The RAN2A MOA is located within the Central Flyway, a major migratory bird corridor between arctic regions to the north and tropical habitats to the south. Aircraft operating in the RAN2A Low MOA would have the potential to inadvertently strike individual migratory birds, some of which are federally listed as threatened and endangered under the Endangered Species Act. Given the relative infrequency of proposed flight operations in the RAN2A Low MOA (approximately 11 sorties per day distributed between 7 a.m. and 10 p.m., Monday through Friday) and the large geographic area that would be contained within the boundaries of the proposed RAN2A Low MOA (approximately 1,925 square miles), the DAF has determined that the Proposed Action may affect, but it not likely to adversely affect the federally threatened rufa red knot (*Calidris canutus rufa*), federally threatened piping plover (*Charadrius melodus*), and federally endangered golden-cheeked warbler (*Setophaga chrysoparia*); and would not jeopardize the continued existence of the tricolored bat (*Perimyotis subflavus*) and monarch butterfly (*Danaus plexippus*). U.S. Fish and Wildlife Service concurrence with this determination is pending. The Proposed Action would have no effect on federally listed or proposed terrestrial species because no activities involving disturbance of land or water bodies would occur.

Cultural Resources

The Proposed Action would have no significant adverse physical impacts on archaeological or architectural resources because no construction, demolition, or other ground-disturbing activities would occur. Noise increases associated with the Proposed Action would be low, brief, and relatively infrequent, and would have no potential to affect the character, setting, or integrity of

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any historic property in the Area of Potential Effects (APE). The Proposed Action would have no potential to affect traditional cultural properties or Indian sacred sites as defined in E.O. 13007, Indian Sacred Sites because no such properties or sites have been identified in the APE.

Per 36 CFR § 800.5, the DAF has determined that the Proposed Action would have no adverse effect on historic properties, including significant architectural resources, archaeological sites, traditional cultural properties, or Indian sacred sites. In an email dated September 24, 2024, the Texas State Historic Preservation Officer concurred that the Proposed Action would have no adverse effects on historic properties, including archaeological sites. To date, no tribal consultation responses have been received.

Safety

The Proposed Action would have no significant adverse impacts on safety. The limited amount of time an aircraft would be over any specific location, combined with sparsely populated areas under the proposed RAN2A Low MOA and existing RAN2A MOA and ATCAA, including limited areas that would be crossed by existing MTRs, would minimize the probability that an aircraft mishap would occur over a populated area. All MOA flight operations would continue to be conducted in accordance with procedures established in the applicable DAF regulations and orders with the safety of its pilots and people in the surrounding communities as the primary concern. Aircrews operating within the proposed RAN2A Low MOA and existing RAN2A MOA and ATCAA would continue to follow applicable procedures outlined in the DAF bird/wildlife aircraft strike hazard (BASH) plans. Flight safety risk including BASH risk would be assessed for flights lower than 1,000 feet AGL, and additional avoidance procedures outlined in the installation BASH plans would be followed during low-altitude training as applicable. Continued adherence to current safety procedures, and taking preventative action when BASH risk increases, would ensure that potential impacts from BASH under the Proposed Action would not be adverse. Under the Proposed Action, pilots would exercise “see and avoid” actions during visual conditions to avoid potential obstructions in accordance with all applicable DAF procedures and requirements.

Socioeconomics

The Proposed Action would have no significant adverse impacts on socioeconomic conditions in the ROI. The Proposed Action does not involve construction or demolition activities or involve changes in the number or types of personnel or aircraft assigned to JBSA-Randolph. Civilian and commercial flights could be delayed or be required to deviate slightly for avoidance of training activities in the airspace; however, training activities would be scheduled or deconflicted appropriately to limit such conflict. The Proposed Action would not affect economic activity or the output of regional airfields or notably impede the movement of people and goods.

Environmental Justice

The Proposed Action would have no disproportionately adverse impact on minority populations, low-income populations, persons younger than 18 years, or persons older than 65 years, in local jurisdictions underlying the proposed RAN2A Low MOA. The Proposed Action does not involve construction, renovation, or demolition of facilities or infrastructure on DoD or DAF lands, changes to the number or types of personnel or aircraft stationed at JBSA-Randolph, or other activities that would result in population changes or additional financial expenditures that could create or exacerbate conditions that would result in unequal or disproportionate economic conditions in local jurisdictions underlying the proposed RAN2A Low MOA.

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Noise levels associated with the Proposed Action would have the potential to temporarily disturb or interfere with underlying land uses, including residential, educational, and business uses, and sites of cultural, religious, or historic importance. However, the duration of increased noise levels would be brief and distributed throughout the proposed RAN2A Low MOA such that increases would be unlikely to be experienced repeatedly at the same receptor. Further, cumulative noise levels under the Proposed Action would not exceed 50 dBA within the MOAs, including areas that would be crossed by the MTR segments overlapping the MOAs, or at potential noise-sensitive receptors.

Visual Resources

The Proposed Action would have no significant adverse impacts on visual resources in the ROI. Randolph AFB was established in 1931 and training in military airspace has occurred over south-central Texas, including the areas containing the RAN2A MOA, for more than 90 years. The Proposed Action does not involve construction, demolition, or other earth-disturbing activities and therefore, would not introduce new permanent or temporary buildings, structures, or other constructed, inanimate features or light sources into the existing visual landscape, nor would it change, modify, remove, or otherwise alter existing topography, vegetation, or other naturally occurring features. Therefore, the Proposed Action would have no permanent impacts on visual resources, including from light emissions, in the ROI.

Aircraft operating in the proposed airspace at altitudes as low as 500 feet AGL would likely be visible to viewers in the ROI, given the relatively clear weather conditions that occur most days in the area; however, given that these operations would consist of jet aircraft traveling at hundreds of miles per hour, their appearance in the overlying airspace would be brief (likely less than a few minutes) at any given time as observed from a particular location. Low-altitude aircraft operations in the proposed airspace would also be distributed throughout an approximately 1,925-square mile area, further minimizing the appearance of aircraft at any particular location in the ROI. The Proposed Action would be unlikely to contribute to additional overflights of Lost Maples State Natural Area and Love Creek Preserve, given their locations along or near the lateral boundaries of the proposed airspace and the need for pilots to adjust their flight patterns to prevent unintentional “spill outs” of those boundaries. Aircraft operations in the airspace overlying the ROI are already part of the existing visual landscape in the ROI, and aircraft operations under the Proposed Action would not introduce a new visual element, including light emissions, that is not already commonly observed within the affected environment.

Reasonably Foreseeable Future Actions

When considered with other reasonably foreseeable future actions occurring in and around the proposed RAN2A Low MOA and the RAN2A MOA and ATCAA, the Proposed Action would not contribute to cumulatively significant adverse impacts on resources analyzed in the EA.

Mitigation

No project-specific best management practices or environmental commitments are identified in the EA; however, the use of standard best management practices is assumed, when applicable, in the discussion of environmental consequences for each resource analyzed in the EA.

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Public Involvement

A Notice of Availability for the Draft EA and proposed FONSI was published in the *San Antonio Express News*, *Hondo Anvil Herald*, *The Devine News*, the *Frio-Nueces Current*, and the *Uvalde Leader News* inviting the public to review and comment on the Draft EA during the 30-day public comment period. The Draft EA and proposed FONSI were made available for public review at local public libraries in Hondo, Devine, Castroville, Medina, and Uvalde, Texas and online at <https://www.jbsa.mil/Resources/Environmental/>. Comments on the Draft EA will be addressed in the Final EA and FONSI, as applicable.

Conclusion

Finding of No Significant Impact. After review of the attached EA, which was prepared in accordance with the requirements of NEPA, CEQ regulations, and the DAF EIAP, I have determined that the Proposed Action including Alternatives 1 and 2 to establish a new permanent low-altitude MOA near San Antonio, Texas 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 has been made after considering all submitted information, including a review of any public and agency comments received during the 30-day public comment period, and considering a full range of reasonable alternatives that meet project requirements and are within the legal authority of the DAF.

SIGNATURE BLOCK

DATE