

# **Finding of No Significant Impact/ Finding of No Practicable Alternative**

## **Environmental Assessment for Security Hill Campus, Joint Base San Antonio-Lackland, Texas**

### **Introduction**

Joint Base San Antonio (JBSA)-Lackland, located in the southwest part of San Antonio, Texas, proposes to develop the Security Hill Campus in accordance with the Security Hill Campus Development Plan (CDP). The development would consist of the phased demolition of existing facilities and construction of new facilities and associated infrastructure to meet mission requirements.

This Environmental Assessment (EA) was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code 4321 et seq.), the White House Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500–1508), and the United States Air Force (USAF) Environmental Impact Analysis Process (EIAP) (32 CFR Part 989), to evaluate the potential environmental impacts associated with implementation of the Proposed Action.

The purpose of the Proposed Action is to provide adequate facilities for units of the 16th Air Force (16 AF, also known as Air Forces Cyber) assigned to JBSA and sustain the Information Warfare mission; to minimize the total life-cycle cost of those facilities; and to manage installation land and other resources through careful, efficient development.

The Proposed Action is needed to enable the 16 AF to meet its current and future operational requirements. The existing facilities and infrastructure are inadequate, unsafe, and dispersed. Secure, consolidated, and modern facilities in the Security Hill District are necessary for the 16 AF to enhance their operational effectiveness now, and into the future. Furthermore, the Proposed Action is needed to ensure the Security Hill District is consistent with the Lackland East District Area Development Plan which aims to facilitate the effective and efficient use of real-property resources and land into JBSA Lackland's long-term future.

Pursuant to the provisions of Executive Order (EO) 11988, *Floodplain Management*, the Coastal Zone Management Act, and Air Force Instruction 32-7064, *Integrated Natural Resources Management* (paragraph 5.3), the Air Force has prepared an EA that analyzes the potential environmental consequences associated with implementing the Proposed Action. This Finding of No Significant Impact (FONSI) and Finding of No Practicable Alternative (FONPA) summarizes the alternatives considered and explains why the project was designed and sited as proposed.

### **Background**

The Security Hill Campus is one of four campuses within the JBSA-Lackland East Planning District. The campus is located in the southernmost portion of the district; bounded by Brad Clemons Drive to the north, Military Drive to the south and west, and the Kelly Field Annex District to the east.

Installation development at JBSA-Lackland is done in accordance with the Air Force Comprehensive Planning Program established in AFI 32-1015, *Integrated Installation Planning*. Installation Planning establishes a systematic framework for informing decision making on the physical development of USAF installations and their environment. The objective of Installation Planning is to synthesize data and information to enable effective development decision-making affecting installations and the surrounding community. A thorough analysis of the existing conditions, a study of the requirements, and the vision, goals, and objectives of the installation allow the development of conceptual alternatives. These alternatives are evaluated against measurable criteria/selection standards and evaluated.

In an effort to satisfy the purpose and need for the project, the USAF developed criteria to compare and contrast alternative ways of fulfilling the objectives in accordance with 32 CFR 989.8.

The JBSA-Lackland East Vision Statement reads, “Lackland East will be a series of connected campuses that promote healthy environments, with modern, flexible facilities, and efficient circulation” (JBSA-Lackland 2019). Each alternative was evaluated against this Vision Statement and the following four goals:

1. Provide connected campuses, including one-stop services for the mission and the community, safety and security, and room for growth.
2. Provide healthy environments, including public spaces, walkability, and separation of permanent parties and visitors.
3. Provide modern, flexible facilities and a resilient infrastructure.
4. Provide efficient circulation, including compliant access controls and connected roadways.

It has been determined that an EA is required to analyze the impacts associated with the Security Hill Campus Development project under NEPA.

## **1. Description of Proposed Action and Alternatives**

### **Proposed Action**

Under the Proposed Action, JBSA-Lackland would implement the comprehensive set of projects identified in the Security Hill Campus Development Plan. The Proposed Action would develop the Security Hill Campus in three smaller, mission-focused areas identified as:

- Cyber Campus
- HQ Campus
- Crypto Campus

In addition, supporting actions would improve the infrastructure and other features within the Security Hill Campus. The Proposed Action includes a new road that would cross a 100-year floodplain associated with a tributary to Leon Creek; however, no inhabited facilities would be constructed within the 100-year floodplain. The Proposed Action would consist of enacting the following stand-alone but complementary projects in approximately 11 phases over the next approximately 20 years. As CDP project-specific actions become ripe for implementation, the USAF will evaluate the specific actions against this EA for sufficient NEPA compliance. As warranted, the USAF would then prepare additional focused NEPA documentation (likely a Categorical Exclusion or a supplemental EA) for the project-specific action.

The USAF would complete these projects in 11 phases as outlined in the Security Hill Campus Development Plan, with the first priority being completion of the 91 Cyber Operations Center.

At this time, there are no new mission beddowns associated with the Proposed Action that would result in a substantial change in personnel levels. However, there may be some minor staffing changes to existing units over time. Any potential impacts from these minor unit-level changes in staffing are anticipated to be negligible. Conversely, any future projects that would include a substantial change in personnel levels may be subject to additional NEPA analysis.

## **Floodplain**

Portions of the Security Hill Campus lie within the 100-year floodplain as designated by the Federal Emergency Management Agency (FEMA). EO 11988, *Floodplain Management*, seeks to avoid construction of facilities or structures within floodplains “to reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by floodplains”. The Proposed Action includes a new road that would cross a 100-year floodplain associated with a tributary to Leon Creek; however, no inhabited facilities would be constructed within the 100-year floodplain. There is no practicable alternative to constructing the new roadway crossing a tributary to Leon Creek within the floodplain. No habitable structures would be constructed within the 100-year floodplain. The Proposed Action would not result in adverse effects on human health or welfare and would not create any additional safety risks. In addition, the project would not negatively impact the natural and beneficial value of the floodplain because the structures and site improvements would be designed to ensure that the post-project hydrology mirrors pre-project hydrology to the maximum extent technically feasible with respect to temperature, rate, volume, and duration of flow. Therefore, although being completed in the floodplain, the Proposed Action would have no significant impacts to the floodplain.

## **No Action Alternative**

The No Action Alternative serves as a benchmark against which the effects of the Proposed Action can be evaluated. For this project, the No Action Alternative is defined as not taking any further action with regards to developing the Security Hill Campus. The Security Hill Campus would remain in its current configuration.

The No Action Alternative would challenge JBSA’s objective of establishing a modern, secure, and consolidated 16 AF headquarters at the JBSA-Lackland Security Hill Campus. The No Action Alternative is not considered a reasonable alternative because it does not meet the purpose of and need for the Proposed Action. However, as required under CEQ regulations (40 CFR 1502.14[d]), the No Action Alternative does provide a description of the baseline conditions against which the impacts of the Proposed Action can be compared.

## **2. Environmental Analysis**

The following table summarizes the potential environmental impacts of the Proposed Action and No Action Alternative. Any potential adverse effects on these technical resource areas would be further reduced or avoided through the implementation of standard environmental Best Management Practices (BMP) or optional management measures as discussed in the EA.

<b>Resource Area</b>	<b>Proposed Action</b>	<b>No Action Alternative</b>
Meets Purpose of and Need for Action	Yes	No
Air Quality and Climate Change (Greenhouse Gas Emissions)	Less than significant impacts to air quality; negligible impact on climate change	Less than significant impacts to air quality and climate change

Resource Area	Proposed Action	No Action Alternative
Cultural Resources	No adverse effect with completion of mitigation action	Less than significant impact
Biological and Natural Resources	No adverse effect on sensitive species, less than significant impact	Less than significant impact
Water Resources	Less than significant impact	Less than significant impact
Floodplains, Wetlands, and Coastal Zone Management	Less than significant impact	Less than significant impact
Geology and Soils	Less than significant impact	Less than significant impact
Noise and Vibration/Acoustic Environment	Less than significant impact	Less than significant impact
Land Use and Aesthetics	Less than significant impact	Less than significant impact
Infrastructure and Utilities	Less than significant impact, potential beneficial impact	Less than significant impact
Solid and Hazardous Materials/Waste	Less than significant impact	Less than significant impact
Transportation and Parking	Beneficial impact	Less than significant impact
Safety and Occupational Health	Less than significant impact	Continuation of current impacts
Socioeconomics	Less than significant impact	Less than significant impact
Community Services	Less than significant impact, potential beneficial impact	Less than significant impact
Environmental Justice	Less than significant impact	Less than significant impact

### 3. Mitigation Measures

JBSA is in compliance with Section 106 of the National Historic Preservation Act (NHPA). As the planning process for each project outlined in the Security Hill CDP matures and project details become more refined, NHPA Section 106 consultation with the Texas State Historic Preservation Officer (SHPO) and other related parties will continue or commence as necessary. Consultation for each project will occur as project planning matures and details become more refined to identify and implement measures to address adverse effects.

JBSA would mitigate demolitions to reduce impacts to less than significant. Mitigation measures would include preparing documentation of the most representative examples of the different building types and styles to be demolished in accordance with Section 110 of the NHPA (54 USC § 306103) to ensure documentation of properties to be substantially altered. Other potential measures include implementing, as appropriate, the project review process identified in the installation’s existing Programmatic Agreement with the Texas SHPO for the operation, maintenance, and development of JBSA; signage and displays; brochures; or other measures to be identified through consultation for each project.

### 4. Agency and Public Comment

As stated in the USAF’s EIAP (32 CFR Part 989), public involvement for an EA may include public engagement during scoping and drafting and finalizing the EA through publication of notices or public meetings. The public involvement process for this EA consisted of an early public notice announcing the project and upcoming availability of a Draft EA, publication of a Notice of Availability of the Draft EA,

and a public comment period on the Draft EA. Public comments will be taken into consideration during preparation of the Final EA and FONSI/FONPA.

Since the selected alternative would include construction activities within a wetland or a floodplain, a FONPA must be considered, and early public notice of the project must be announced. The early public notice for this EA was published in the San Antonio Express and News on March 7-8, 2021, in the La Prensa on March 14, 2021, and in the San Antonio Observer on March 24, 2021.

The USAF's NEPA guidance states that the EA process must include at least a 30-day public comment period on the Draft EA, which starts with the publication of a Notice of Availability (NOA). The NOA for the Draft EA was published in the San Antonio Express and News on September 24, 2021, in the La Prensa on September 24, 2021, and in the San Antonio Observer on September 24, 2021. A copy of the Draft EA will be made available from September 24, 2021 to October 24, 2021 at the San Antonio Central Library. An electronic version of the Draft EA will also be made available on the Joint Base San Antonio Environmental Information website.

(<https://www.jbsa.mil/Resources/Environmental>).

## **5. Finding of No Significant Impact**

As a result of the analysis of impacts in this EA, summarized and incorporated by reference herein, it is the conclusion of the USAF that, with the implementation of appropriate best management practices included herein as Attachment A, the Proposed Action would not have a significant adverse impact on the quality of the natural or human environment within the meaning of Section 10 2(2c) of the NEPA. Therefore, preparation of an environmental impact statement is not required.

## **6. Finding of No Practicable Alternative**

The Proposed Action would not negatively impact the natural and beneficial value of the floodplain because the structures and site improvements would be designed to ensure that the post-project hydrology mirrors pre-project hydrology to the maximum extent technically feasible with respect to temperature, rate, volume, and duration of flow. Therefore, although being completed in the floodplain, the Proposed Action would have no significant impacts to the floodplain.

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