FINDING OF NO SIGNIFICANT IMPACT (FONSI)

PROGRAMMATIC ENVIRONMENTAL ASSESSMENT

TO IMPLEMENT AN AREA DEVELOPMENT PLAN

AT HUNTER ARMY AIRFIELD, GA

1.0 Introduction

The United States (U.S.) Army manages millions of acres of land and billions of dollars in facilities and infrastructure across the world. The effective long-term management of these resources requires thoughtful and thorough planning. This is accomplished primarily at the installation level through a comprehensive and collaborative real property master planning process, which provide a means for sustainable installation development that supports mission and environmental requirements and establishes and prescribes planning philosophies and strategies applicable across all Army installations. Unified Facilities Criteria 2-100-01, *installation Master Planning*, establishes a consistent approach for master planning across all Department of Defense (DoD) properties, while Army Regulation 420-1, *Army Facilities Management*, and specifically addresses the management of real property resources on Army installations. Master planning documents developed through these processes typically cover a minimum 20-year planning horizon and provide their installation with a plan for executing its commitments.

The Fort Stewart/Hunter Army Airfield (FSGA/HAAF) Real Property Vision Plan (RPVP) was developed and completed in November 2014 and strives to support the training mission and power projection capacities by creating a sustainable community with well-defined town centers and other walkable campuses connected by public spaces and quality multi-modal transportation and pedestrian networks, while maintaining its southern coastal identity. As part of its Long Range Component, the RPVP divides the installation into identifiable and connected districts based on geographical features, land use patterns, building types, and transportation networks. This focus on districts allows for the identification of unique needs due to mission, requirements, or command priority changes, and each District is provided with a unique Area Development Plan (ADP).

The HAAF District is geographically separated from the other FSGA Districts, as it is located approximately 40 miles to the east of FSGA proper, encompassing 5,400 acres of land in Chatham County, Georgia, and sharing a common boundary with the City of Savannah. The ADP for HAAF was developed in a workshop at which stakeholders analyzed the District's existing condition, documented stakeholder preferences for future development, crafted guiding goals and objectives for development within the District, and proposed alternatives for implementing future development. The resulting ADP is the subject of the Programmatic Environmental Assessment (PEA), which analyzes the potential environmental impacts associated with adopting and implementing the proposed action. The PEA was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code Section 4321 et seq.); the Council on Environmental Quality (CEQ) regulations that implement

NEPA (Title 40 Code of Federal Regulations [CFR], Parts 1500 to 1508); and the Army's rule governing NEPA, 32 CFR Part 651, *Environmental Analysis of Army Actions.* The Army is currently in the process of updating its NEPA regulation; accordingly, based on this document's start date prior to September 14, 2020, it will be completed in accordance with the Army's NEPA regulation as it stands prior to that date.

2.0 Purpose and Need

The proposed action is to adopt and implement an ADP on HAAF, Georgia (GA) (PEA Figure 1). The installation is utilizing a programmatic approach to the analysis of the ADP to allow for early planning, coordination, and flexibility in project implementation and the identification of potential environmental impacts. This will provide the decision maker with the appropriate information required to make an informed decision as each project is developed. In accordance with 32 CFR Part 651.14 (c)(2), NEPA analysis for installation plans can be accomplished with a programmatic approach, creating an analysis that covers a number of smaller projects or activities, such as those in the HAAF ADP. In cases where such activities are adequately assessed as part of these normal planning activities, a record of environmental consideration (REC) can be prepared for smaller actions that cite the document in which the activities were previously assessed. If additional analyses are required, they can "tier" off the original analyses, eliminating duplication.

The purpose of the proposed action is to sustain the installation's mission for training and the environment, offer a superior Quality of Life for Soldiers, employees, and their Families on HAAF, and ensure the projects proposed within the ADP are implemented in accordance with the installation's environmental and operational constraints. The proposed action addresses the following needs maximizing training resource areas by sustaining training lands for tenant and visiting Soldiers; maximizing the facility infrastructure footprint by demolishing underused, inadequate building space and constructing more efficient facilities for Soldiers and the Civilian workforce; improving infrastructure through utility and road/paving upgrades and upgrading existing utilities to more sustainable, energy efficient systems; and enhancing the recreational opportunities on HAAF for Soldiers and their Families.

3.0 Description of the Alternatives

Alternative I: Implement Illustrative Plan (Preferred). Under Alternative I, the installation will adopt and implement an ADP for HAAF that meets the vision, goals, and objectives for the HAAF District, with development following the Illustrative Plan identified on PEA Figures 5-7 and PEA Table 1. Short-range actions are identified as high priority, can be quickly implemented, and/or have low implementation costs, and include 11.85 acres of construction, 11.73 acres of renovation, and 50 acres of demolition. Mid-Range actions are more complex, involve lengthier planning, programming, and budgeting processes, and/or are dependent upon other actions, such as construction being complete from the Short Range phase; for example, construction of a mid-range phase facility may require demolition of another facility to clear its footprint. They include 4.05 acres of construction, 2.95 acres of renovation, and 87

acres of demolition. Long Range actions are more distant in time and address future operations and personnel requirements on HAAF. They include 126.68 acres of construction and 25 acres of demolition, but no renovation at this time. The proposed projects are dispersed mainly within the existing cantonment area and south of the existing flightline, although some construction is also identified to the southwestern portion of the installation to promote and improve recreational opportunities in this portion of Post. Routine operations, repairs and maintenance of existing facilities, roads, and grounds, as well as training, will continue under this alternative, as detailed more fully in Alternative III: No Action/Status Quo.

Alternative II: Implement 3/160th Special Operations Aviation Regiment Infill. Under Alternative II, the installation will adopt and implement an ADP for HAAF that meets the vision, goals, and objectives for the HAAF District, with development following the Infill Plan as identified on PEA Figure 8 and PEA Table 2. Under this alternative, new construction will focus primarily within the cantonment area and the southwestern portion on Post and will not occur south of the existing flightline. Also, more existing facilities will be renovated and upgraded to meet the developing needs of the installation. In the Short-range phase, there will be slightly less construction (11.23 acres) and renovation (8.73), as the units scheduled to relocate there will instead remain within existing, renovated facilities in the cantonment area. Demolition under this phase will remain the same. Mid-range phase construction, demolition, and renovation/upgrade totals remain the same as under Alternative I. Long-range phase construction totals decrease by 25 acres, associated with not constructing south of the flightline, although demolition and renovation/upgrades remain the same. Routine operations, repairs and maintenance of existing facilities, roads, and ground, as well as training, will continue under this alternative, as detailed more fully in Alternative III: No Action/Status Quo.

Although this alternative meets the overall purpose and need, it is not preferred by the installation because it only partially meets the flexible training spaces criteria, as defined in Section 2.0 of the PEA. Specifically, it fails to maximize flightline access for aviation south of the flightline, either by developing an additional taxiway at this location or by developing this portion of the flightline. However, this alternative does meet the remainder of the screening criterial for flexible training spaces by preserving and enhancing airfield capabilities and by promoting infill development to conserve training lands; accordingly, it is carried forward for full analysis in this PEA.

Alternative III: No Action / Status Quo. Under the No Action Alternative (No Figures), the HAAF ADP would not be implemented, and none of the construction, renovation, and demolition projects it proposes would occur. Routine operations, training, and other activities on HAAF, would proceed, as discussed in full detail in the PEA. Although the No Action Alternative does not meet the Army's purpose and need for the Proposed Action, it is analyzed in the PEA to provide a baseline for evaluating the impacts of the action alternatives, as directed in NEPA, the CEQ regulations, and 32 CFR Part 651, Environmental Effects of Army Actions.

4.0 Environmental Analysis

Chapter 3 of the PEA focuses on the affected environment on HAAF and the potential environmental consequences that may arise as a result of implementing the proposed action. A thorough discussion is provided in the PEA and a summary is provided below. Each project proposed in the ADP for HAAF will undergo supplemental review as it enters the design process.

The Preferred Alternative (Alternative I) is anticipated to result in negligible adverse impacts to Protected Species, minor adverse impacts to Wildlife and Migratory Birds, and moderate adverse impacts to Vegetation. Supplemental review via the design process will ensure adherence to federal, state, and local laws and regulations requirements, to include required consultation/coordination requirements associated with protected species. Minor adverse impacts to Groundwater, Coastal Zone Management, and Floodplains, and moderate adverse impacts are anticipated to surface water sources and wetlands. Supplemental review will ensure early identification of permitting requirements, as applicable, as well as site-specific means by which to minimize and /or mitigate potential adverse impacts, such as prohibiting work within established buffer areas.

Minor adverse impacts are anticipated to Air Quality, Land Use, Noise, Hazardous Materials/Waste Management and Remediation; minor to moderate adverse impacts are anticipated to Cultural Resources and Visual Resources and Recreation; and moderate adverse impacts are anticipated to Utilities. Supplemental review will ensure adherence to federal, state, and local laws, regulations, and policies, such as ensuring the installation remains in attainment with all air quality requirements. All permitting, coordination, and consultation requirements will be met prior to implementation of any proposed action.

Minor beneficial impacts are anticipated to Transportation, Health and Safety, and Airfield Operations, and moderate beneficial impacts are anticipated to Socioeconomics, as actions proposed in the ADP are anticipated to correct traffic congestion, improve safety, and bring jobs into the community. No impacts are anticipated to airspace, as no changes are anticipated or requested for this resource.

Anticipated impacts under Alternative II are the same as under Alternative I for Protected Species, Wildlife and Migratory Birds; however, less impacts (minor) are anticipated to Vegetation, as less tree removal will occur under this alternative. Adverse impacts are also slightly less (minor) for Water Quality and Resources, due to less ground disturbance under this alternative. Impacts are the same as Alternative I for Air Quality, Land Use, Noise, Cultural Resources, Airfield Operations, Transportation, Health and Safety, and Socioeconomics, for those reasons as discussed under Alternative I.

Minor adverse impacts are anticipated to Visual Resources and Recreation, as less disturbance to existing visual and recreational sites on HAAF would be disturbed under this Alternative. Moderate adverse impacts are anticipated to Hazardous Materials/Waste Management and Remediation, as focusing more disturbance within

the cantonment area may result in more disturbance to these management areas. As under Alternative I, supplemental project review will ensure adherence to federal, state, and local laws, regulations, and policies, including review to ensure all actions are in accordance with all installation plans. All permitting, coordination, and consultation requirements, to include those for cultural resources laws, will be met prior to implementation of any proposed actions.

Under Alternative III (No Action/Status Quo), no impacts are anticipated to Protected Species, and negligible adverse impacts are anticipated to Wildlife, Migratory Birds and Vegetation. Overall negligible adverse impacts are anticipated to Water Quality and Resources, as current routine and ongoing practices do not currently exhibit more than this level of impact based on current texting and data. Negligible adverse impacts are also anticipated to Air, Cultural Resources, Land Use, Visual Resources and Recreation, Noise, Transportation, Health and Safety, and no impacts are anticipated to Airspace and Airfield Operations, Utilities, and Hazardous Materials/Waste Management.

5.0 Mitigation and Monitoring Measures

Implementation of the Preferred Alternative (Alternative I) will entail environmental mitigation and monitoring measures, typically associated with permitting and/or consultation requirements, as described in detail in the PEA Chapter 3.0 and as summarized below. For the resources not specifically discussed below, no specific mitigation or monitoring is proposed at this time, beyond standard, routine minimization measures and best management practices (BMPs), to include adherence to federal, state, local, and installation laws, regulations, policies, and procedures, and they are accordingly not discussed in this section of the FONSI.

Water Resources. Impacts to surface waters, streambanks, and associated wetlands and floodplains will be minimized via the implementation and adherence to permits associated with the Clean Water Act (CWA), Erosion Sedimentation Control Act, Georgia Water Quality Control Act, and Executive Orders (EOs) 11988 (Floodplains) and 11990 (Wetlands). Project-specific permitting and site-specific erosion control BMPs will be implemented prior to land disturbance, site preparation, timber harvest, construction, and site closure. BMPs are identified early by the responsible entity for each project, must be utilized continuously, and are inspected by the FSGA/HAAF Stormwater/Erosion and Sedimentation (E&S) Program Manager for adequacy. Notices of Intent for coverage under the State's National Pollutant Discharge Elimination System Permits are strictly adhered to and all requirements are inspected periodically by the Stormwater/E&S Program Manager.

In accordance with the CWA and EO 11990 (Wetlands), FSGA implements measures to avoid, minimize, and compensate for wetland impacts, and avoidance is a priority during project siting. All vegetation within the wetland areas and their buffers are flagged prior to the start of any work to ensure the contractor clearly understands the physical demarcation limit and utilizes appropriate equipment and techniques for felling and removing vegetation. The grubbing, grading, and discharge of dredged or fill material into streams and wetlands requires prior coordination with/permitting through the U.S.

Army Corps of Engineers (USACE)-Regulatory Branch (Wetlands). Wetland impact minimization efforts will be documented during the design phase to assist with completion of the Individual Permit application. The FSGA/HAAF Wetlands Program Manager coordinates all CWA Section 404 permitting requirements and ensures approvals/permits are obtained prior to work. FSGA/HAAF will submit a Pre-construction Notification (PCN) in accordance with Section 404 of the CWA to the USACE-Regulatory Branch (Wetlands). Mid- and post-construction inspections ensure all actions are proceeding in accordance with the terms and conditions of the PCN.

In accordance with EO 11988 (Floodplains), all new construction is designed to reduce the risk of flood loss and to minimize the impact of floods on human safety, health, and welfare. Designs emphasize drainage and stormwater management practices that minimize impacts to floodplains, such as stormwater elevation potential and risk of damage to the surrounding infrastructure. The design engineer is responsible for the preparation and documentation of technical support showing DoD/Section 438 adherence and FSGA/HAAF Stormwater and Engineering Detention Basin policies are being adhered to for runoff reduction, water quality, aquatic protection, and flood controls. Floodway encroachment, including structures, fill placement, etc., is prohibited unless certification with supporting technical data is provided by a registered professional engineer demonstrating the encroachment will not result in any increase in flood elevations upstream or downstream. A professional engineer registered in the State of Georgia will document a hydrological analysis in the E&S Plan and incorporate appropriate post construction stormwater BMPs, ensuring the State and Federal requirements are met for floodplain encroachments and flood controls, inclusive of the runoff reduction and water quality requirements.

Construction and renovation of facilities located within the floodplain must be in accordance with the standards and criteria of the National Flood Insurance Program, including the application of accepted flood-proofing/flood protection measures, such as elevate structures were practicable. In addition, State of Georgia requirements must be met, such as elevating the structures at a minimum of one-three foot above the base flood elevation of the 100-year floodplain level, adequately anchoring the facility to prevent flotation, and collapse. Potential impacts to floodplains are due to reducing the floodplain's capacity and can include the increased risk of flood damage to the surrounding landscape (including wetlands or other potentially sensitive habitat or human-occupied areas). Increasing disruption to floodplain, i.e. decreasing floodplain space, will increase flood heights elsewhere; however, this can be mitigated to some extent through landscape features that deal with larger stormwater events, such as placing dry detention basins, bio-retention cells and/or grassed channels near natural outfalls from the site. Such features are designed to detain stormwater and gradually release it to reduce potential of downstream flooding and erosion. In accordance with the CWA and EOs 11990 and 11988, a Finding of No Practicable Alternative (FONPA) has been prepared for the projects analyzed in the ADP for HAAF; see PEA Section 3.4, Water Quality, and the FONPA prepared for this action for additional details.

Air Quality. Implementation of standard air quality and installation BMPs during all ground-disturbing activities will be utilized to minimize the potential for adverse impacts

resulting from airborne particulates and fugitive dust, as well as the greenhouse gases associated with site clearing and construction processes. These include watering of exposed surfaces and covering areas with exposed soils. Dust resulting from construction and maintenance traffic can also be minimized by limiting speed limits on unimproved roads, as well as by limiting vehicular access on these surfaces and/or times of usage on these unimproved vehicular networks. When there are periods of high wind during excavation and grading, temporary suspension of those activities would also reduce the volume of fugitive dust they emit. These minimization efforts will assist the installation in ensuring it does not fall out of attainment status, and all such actions will be tracked by the installation Air Quality Manager, none of which are anticipated to result in a non-attainment status.

The installation Air Program Manager will determine which project-specific requirements apply, to include required data tracking and associated air permitting, as applicable. It is possible that air quality in the Study Area might actually improve, as older generators, air cooling systems, and chillers are replaced with more modern systems, specifically during the proposed renovation of facilities and the demolition of older buildings that are replaced with new facilities. To offset potential actions that will contribute greenhouse gases to the earth's atmosphere due to the removal of trees, which would otherwise absorb carbon dioxide, permanent grasses will be established. HAAF is located within an attainment area and none of the projects proposed are anticipated to impact this status, nor will they require an amendment to the installation's existing air permits.

NOTE: At the time of the completion of this PEA and its associated FONSI and FONPA, climate change and extreme weather were not assessed as integral factors to the FSGA/HAAF Real Property Master Plan or its component ADPs; however, the installation is in the process of updating these documents and this will be more specifically addressed in their future iterations. In the interim, the Air Quality and NEPA points of contact (POCs) for FSGA/HAAF will ensure that minimization and mitigation measures will be incorporated, as applicable, into each project analyzed in the ADP for HAAF via the established FSGA/HAAF project review process.

Cultural Resources. The Cultural Resources Management Program (CRM) will review each iteration of design, ensuring potential impacts are anticipated early and ensuring ample time to conduct required actions, such as surveys, consultation, and, if required, mitigation. Through this process, CRM will ensure eligible and potentially eligible buildings are not damaged or demolished prior to implementation of the proper National Historic Preservation Act (NHPA) Section 106 procedures, minimizing the potential for adverse impacts. With the exception of an accidental/inadvertent archaeological discoveries, no impacts and associated mitigation requirements are anticipated within the cantonment area at HAAF. The CRM Section implements a monitoring program for its eligible/potentially eligible archaeological sites in the range and training lands, following procedures outlined in its Integrated Cultural Resources Management Plan and its Programmatic Agreement with the GA State Historic Preservation Office (SHPO). All findings of no adverse effect to historic properties are summarized within an Annual Report to the GA SHPO for all NHPA Section 106 undertakings executed by the installation. A copy of the installation's PA is available in Appendix C to the PEA.

Noise. In 2015, the Centers for Disease Control and Prevention published a document that identified an 85 (decibel-A-weighted (dBA) recommended exposure limit for noise and accordingly, FSGA/HAAF maintains adherence to an exposure limit of 85 dBA as an eight-hour time-weighted average for all personnel working on the installation. Compliance with this measure is required as a measure to minimize the potential for hearing loss at all project sites. Impacts from exposure to noise may be minimized via adherence to standard BMPs, such as safety helmets and ear plugs and modification of shifts. Additional measures to minimize potential noise impacts to workers may be found in DoD Instruction 6055.12, *Hearing Conservation Program*, and U.S. Department of the Army Pamphlet 40-501, *Hearing Conservation Program*. Continued utilization of past minimization measures are anticipated to be successful in minimizing potential adverse impacts. This includes reinforcing the use of the buffer to each side of the corridor to reduce possible annoyance to receptors (the public) along the route. HAAF has also adopted a "Fly Friendly Program," which works to reduce noise by training Army/other helicopter pilots on how to reduce noise complaints when flying in developed areas.

Restoration. There are several active and inactive Environmental Restoration Area (ERA) Army Sites located in the vicinity of the projects proposed in the ADP for HAAF. Efforts will first be made to shift these project footprints out of the ERA sites, and soil/groundwater testing will be conducted, as required, to confirm site and contamination boundaries, as discussed in the PEA. If ERA Site avoidance is not possible, all contaminated materials, including soils, concrete rubble, timber, and/or groundwater, must be handled, contained, and disposed of by trained, certified personnel and sent to an approved disposal facility off of HAAF lands. All containment, management, and removal actions, as required, must be coordinated with the FSGA/HAAF Restoration Section POC, in accordance with all pertinent federal, state, and local laws, policies, and regulations. If hazardous materials/wastes are encountered at any of these project locations, the level of contamination shall be assessed and remediated as directed by the FSGA/HAAF Restoration POC. Any hazardous material found onsite shall be removed and disposed of in a permitted off-Post facility by appropriately-licensed waste management and transportation companies.

6.0 Public Review and Comments

The PEA was available for a 30-day public review period (April 24-May 23, 2021) at (https://home.army.mil/stewart/index.php/about/Garrison/DPW/environmental/prevention-and-compliance/nepa.). The Notice of Availability of the Draft PEA/FONSI/FONPA was published in the *Savannah Morning News*, *Coastal Courier*, and *The Frontline* in the Savannah/Fort Stewart and City of Savannah area. Notification of the Draft PEA/FONSI/FONPA's availability were mailed to the members of the regulatory community and joint land use partners with whom the installation consults, to include the USACE-Wetland Regulatory Division, U.S. Environmental Protection Agency-Region IV, the Georgia Environmental Protection Division (GA EPD), and the Cities of Hinesville and Savannah, Georgia, among others, a record of which is incorporated into the Final PEA at its Appendix G.

FSGA/HAAF received one comment on this PEA. The GA EPD-Land Protection Branch (LPB) inquired about the lack of site-specific impact determinations to ERA sites in the vicinity of construction on HAAF. A follow-up meeting was conducted between the GA EPD-LPB and FSGA NEPA and Restoration POCs where the programmatic nature of the PEA was more thoroughly discussed. i.e., that the PEA is process-focused versus site/project-focused, as the funding and design for the majority of the projects under analysis is not yet available, making an assessment of potential impacts not possible at this stage. If/when these projects are approved and funded, the design process will be initiated and the FSGA/HAAF Environmental Division, Engineering Branch, and other stakeholders will work to ensure none-to-minimal impacts will occur to ERA sites on the installation. The GA EPD-LPB approved of this approach and asked only to be included in the process if/when the identified projects are funded and approved. This will most likely be in the form of RECs that tier from this PEA, in accordance with the processes established in Chapter 1.1 of this PEA. The GA EPD-LPB did not request an amendment to the PEA, follow-up comment letter, and/or summary of meeting; however, their initial comment letter is at Appendix G of this PEA, Record of Public and Regulatory Review. No other comments were received.

7.0 Conclusions

Based on a careful review of the information and analysis presented in the PEA, which is incorporated by reference, and based on comments received during the public and regulatory review and comment period, I have determined that no significant direct, indirect, and cumulative impacts to the human and/or natural environment will occur as a result of implementation of the proposed action, *Implementation of an Area Development Plan for Hunter Army Airfield, Georgia.* The Army's review indicates that the PEA's analysis is adequate and its conclusion that there are no significant impacts from the alternatives analyzed is valid.

The Army concludes that the Proposed Action and Action Alternatives are not major Federal actions that would significantly affect the quality of the environment per Section 102(2)(c) of NEPA and an environmental impact statement is not required and will not be prepared. This decision meets the requirements of NEPA and its implementing regulations and has been made after taking into account all submitted information and considering a full range of reasonable alternatives and all environmental impacts.

MANUEL F. RAMIREZ
Colonel, U.S. Army
Commanding

12 APRIL 2023
Date