

FINDING OF NO SIGNIFICANT IMPACT

Installation Development Projects

148th Fighter Wing Base

Duluth International Airport, Duluth, Minnesota

Pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969 (NEPA) (42 USC 4331 et seq.), the regulations of the President's Council on Environmental Quality (CEQ) that implement NEPA procedures (40 Code of Federal Regulations [CFR] 1500-1508), the US Air Force's Environmental Impact Assessment Process Regulations at 32 CFR Part 989, and US Air Force Instruction 32-7061 (12 March 2003), the Air National Guard (ANG) has prepared an Environmental Assessment (EA) to assess the impacts of proposed installation development projects at the Minnesota Air National Guard's (MNANG) 148th Fighter Wing (148 FW) installation¹ at Duluth International Airport (IAP), Duluth, Minnesota. The EA is incorporated by reference in this Finding of No Significant Impact (FONSI).

The 148 FW installation is located approximately five miles northwest of downtown Duluth. The majority of the 148 FW installation, hereafter referred to as the "main base," occupies approximately 221 acres (including easements) in the northeast corner of the airport, including the entry control facility ("main gate") and driveway leading from Airport Road to the main base. Additional 148 FW facilities are located on four outparcels on the north and south sides of the airport. Those outlying facilities consist of the Munitions Storage Area (MSA), Aircraft Rescue and Firefighting (ARFF) facility, the Base Exchange (BX), and the Precision Measurement Equipment Laboratory (PMEL).

1. Proposed Action

The proposed action is to implement construction and infrastructure projects presented in the 148 FW's Installation Development Plan (IDP) over the next five to seven years. The purpose of the proposed action is to provide the facilities and infrastructure necessary to support the mission of the 148 FW, as defined in the IDP. The proposed action is needed because functional space for multiple activities is inadequate, fails to meet the space authorization for those activities, or is altogether lacking on the installation. In addition, the inadequate spatial arrangement of, and functional relationships between, multiple related facilities prohibits the 148 FW from achieving optimal operating efficiency.

¹ As they pertain to the 148 FW property at Duluth International Airport, "installation" and "base" are used synonymously in this Finding of No Significant Impact.

2. Alternatives

Two alternatives are evaluated in the EA: the No Action Alternative and the Proposed Action Alternative. The individual projects comprising the Proposed Action Alternative are summarized in Table 1.

Table 1: Summary of Proposed Action

EA Project Number ¹	Project ²	Year
Construction Projects		
1	Renovate and Modify Building 250	2018 2020
2	Construct Addition to Building 280	2016
3	Construct Hydrazine Facility	2015
4	Expand and Renovate Building 222 and Construct DRMO ³ Yard	2018
5	Demolish Aircraft Shelters 497, 498, 499 and Construct New Aircraft Shelter	2020
6	Construct Ground Vehicle Fueling Station and Demolish Existing Fueling Station	2015
7	Construct New PMEL Facility and Demolish Existing PMEL Facility	2022
8	Construct Mail Facility	2020
9	Construct Small Arms Range	2017
10	Construct Addition to Building 223	2017
11	Construct Addition to Building 252 and Relocate Security Forces from Building 255	2017
12	Construct Recycling Facility	TBD
Infrastructure Projects		
13	Demolish Building 224, LOX ⁴ Storage and Relocate Building 270, Hush House	2018
14	Construct Secondary Access/Industrial Gate	2015
15	Complete Pedestrian Sidewalk Network	2020
16	Improve On-base Road Network	2020
17	Demolish Buildings 231, 238 and Expand AT/FP ⁵ -compliant Non-organizational Vehicle Parking	2019
Notes: 1. Numbers indicate approximate project locations as shown on Figure 2-1 and do not reflect priority. 2. IDP projects qualifying for a Categorical Exclusion are not included. See Appendix D. 3. DRMO = Defense Reutilization and Marketing Office 4. LOX = Liquid Oxygen 5. AT/FP = Antiterrorism/Force Protection		

3. Impacts

Consistent with 40 CFR 1501.7(a)(3), socioeconomics and visual resources are not considered in the EA because the proposed action has no potential to have impacts on those resources.

No Action Alternative

Implementation of the No Action Alternative would represent the continuation of existing conditions on the 148 FW base. This would have a long-term adverse impact on safety and parking on the installation because approximately 200 non-organizational parking spaces would remain non-compliant with applicable anti-terrorism/force protection (AT/FP) requirements. Although these impacts would be adverse, they would be non-significant because they would remain manageable, as they currently are.

The No Action Alternative would also have an adverse impact on land use because it would fail to consolidate functions that are scattered in multiple facilities throughout the base, thereby prolonging inefficient spatial relationships. While this would be an adverse impact, it would remain manageable and non-significant because it would not substantially degrade the routine operations of the base.

The No Action Alternative would have no adverse impacts on any of the other resources evaluated in the EA.

Proposed Action Alternative

Safety

Implementation of the Proposed Action Alternative would have no adverse effects on safety on or in the vicinity of the 148 FW base. Safety practices during the construction phase of each project would be in accordance with relevant regulations established by the ANG and other federal and state agencies. Construction sites would only be accessible to authorized persons. Any risks to the safety of workers and passers-by would be minimized and no unusual risks would be created.

None of the proposed facilities would be built within the Clear Zone (CZ) or Accident Potential Zones (APZ) associated with the base's runways and no violations to the Part 77 surfaces would occur. The design and construction of all new or renovated facilities and the reconfiguration of non-organizational vehicle parking areas would comply with the requirements set forth in UFC 4-010-01, as applicable, thereby resulting in a positive impact on antiterrorism/force protection (AT/FP) requirements. The proposed projects would be reviewed, as applicable, to ensure their compliance with the DoD BASH program and minimize the potential for conflicts between aircraft between birds or other wildlife. Thus, there would be no BASH-related adverse impact on the safety of pilots, crew members, passengers, cargo and aircraft.

Project 9 would be built within the quantity-distance (QD) arc on the south-central side of the main base; however, it would not be a permanently-occupied facility and would constitute a

light-industrial use that would not be incompatible with the facility with which the QD arc is associated. Thus, there would be no long-term adverse impacts on explosives safety.

Air Quality

The proposed projects would have short-term adverse impacts on air quality from the generation of fugitive dust from construction, renovation and demolition activities, and from emissions of criteria pollutants regulated under the National Ambient Air Quality Standards (NAAQS) from diesel-powered construction equipment and workers' vehicles traveling to and from the project sites. The use of standard best management practices and the distribution of the projects over a period of five to seven years would further minimize impacts. Thus, short-term adverse impacts on air quality would remain minor and non-significant.

In the long term, the net increase in built space would generate some additional emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases. However, these emissions would be partly or wholly offset by the proposed demolitions and the use of newer, more efficient systems in the new facilities. The projects comprising the proposed action would result in emissions that do not exceed the *de minimis* thresholds applicable to the criteria pollutant (carbon monoxide) for which the project area is in maintenance; would constitute only a negligible fraction of the 2011 regional emissions for the other criteria pollutants; emissions of HAP would be very small; and carbon dioxide emissions would not be such as to have a meaningful effect on global climate change. For these reasons, short- and long-term adverse impacts on air quality would be minor and non-significant.

Noise

Construction, demolition and renovation activities as well as construction-related traffic associated with the proposed projects would have short-term adverse effects on ambient noise on and in the vicinity of the 148 FW base. The intensity of these impacts would vary throughout the construction phase of each project, and would be further minimized by the implementation of the projects over a period of five to seven years. Adverse impacts from construction-related noise would also be attenuated by the substantial distances between the project sites and the nearest residences to the 148 FW base and Duluth IAP, and would generally be negligible in the context of noise produced by routine aircraft operations occurring at the airport and 148 FW base. Thus, short-term impacts on the ambient noise environment on and in the vicinity of the 148 FW base would be negligible and non-significant.

Only Project 9 has the potential to result in adverse long-term noise impacts. However, the nearest off-base residential area is located approximately one mile from the project site, with a forested area in-between that would screen and attenuate noise from the proposed range. The use of the range would be limited to daytime hours, would be temporary and intermittent throughout the week and thus would not create a new continuous source of noise, further minimizing impacts. Based on these distances and frequency of use, operation of the range is not anticipated to result in significant adverse noise impacts.

The proposed action does not involve any change to aircraft operations by the 148 FW or Duluth IAP. Therefore, no change to aircraft noise conditions would occur.

Land Use and Coastal Zone Management

While the implementation of the proposed action would temporarily turn some areas of the 148 FW base into construction sites, none of the potential adverse effects (e.g., noise or dust) would make adjacent or nearby facilities unusable. Construction-related effects resulting from the proposed projects would be temporary, and would be further attenuated by the implementation of the projects over a five- to seven-year period. Thus, short-term effects on land use would be negligible or minor and non-significant.

The proposed projects would be consistent with underlying and nearby land uses; none would prevent, inhibit or degrade the operation of adjacent or nearby land uses. The implementation of the Proposed Action Alternative would reorganize multiple functions that are currently scattered in multiple facilities throughout the base, thereby optimizing spatial and functional relationships. For these reasons, the proposed action would have no adverse and some positive long-term impacts on land use on the 148 FW base.

The ANG has determined that the Proposed Action Alternative would be consistent to the maximum extent practicable with the enforceable policies and programs of Minnesota's Lake Superior Coastal Program (MLSCP).

Geological Resources

The Proposed Action Alternative would have no impacts on geologic resources underlying the projects sites and negligible adverse impacts on topography from minor grading associated with site preparation. No unique or noteworthy topographic features would be altered or destroyed, and impacts would remain non-significant. None of the proposed projects would involve topographic alteration as part of their operational phase. Thus, the proposed action would have negligible and non-significant short-term adverse impacts on topography, and no long-term impacts.

Construction activities associated with the proposed action would disturb up to an estimated 332,774 square feet (7.6 acres) or 73,950 cubic yards of soils. Potential short-term impacts on soils resulting from construction-related disturbances would primarily consist of increased erosion risk from the effects of water or wind. Standard best management practices (BMP) would be used for all earth-disturbing projects, and the ANG would obtain a Construction Stormwater General Permit (General Permit) from the State of Minnesota and prepare a construction stormwater pollution prevention plan (SWPPP) for all projects disturbing one or more acres of land. Based on estimates presented in the EA, Projects 9, 16, and 17 would be required to obtain coverage under the General Permit and prepare a construction SWPPP. Adherence to these requirements would ensure that adverse construction-related impacts on soils would remain minor. The implementation of the proposed projects over a period of five to seven years would further minimize short-term soil impacts and ensure that they remain non-significant.

Impervious area on the 148 FW base would increase by up to approximately 79,620 square feet (1.8 acres) as a result of the proposed action. While this would have an adverse impact on soil permeability on the base, it would be negligible in the context of the mostly-rural and mostly permeable geographic area (i.e., St. Louis County) surrounding the base and airport. Soils

characterized as limited for development would be evaluated prior to the implementation of each project and would be supplemented with fill soils suitable to support each project as necessary. At each project site, undeveloped surfaces would be vegetated, eliminating the risk of long-term erosion. Adverse impacts on soils designated as Farmland of Statewide Importance would be negligible because those soils are not currently used for agricultural purposes, and are unlikely to be used for such purposes in the future given their location on a secure military installation; and because it is likely that the soils underlying those sites have been disturbed to the extent that many if not all the characteristics marking them as Farmland of Statewide Importance are substantially degraded or no longer present. For these reasons, long-term adverse impacts on soils would be negligible and non-significant.

Water Resources

The sedimentation and pollution of downstream watercourses could increase as a result of construction-related soil disturbance. These impacts would be minimized by the implementation of standard BMP for each earth-disturbing project, and as required by the General Permit and construction SWPPP for projects disturbing on or more acres of land. Due to the proximity of Miller Creek, which is designated as Special Waters and Impaired Waters by the State of Minnesota, the ANG would also incorporate total maximum daily load (TMDL) requirements for construction stormwater into the project SWPPP, as applicable. Adherence to these requirements would ensure that adverse short-term impacts on water resources remain minor and non-significant.

The Proposed Action Alternative would have no direct long-term impacts on surface water because none of the projects involve construction on, in or over bodies of surface water; channel alteration; or the filling of surface water bodies. In addition, none of the project sites are located adjacent to bodies of surface water.

The proposed action would have no short-term adverse impacts on groundwater because none of the proposed projects would require the installation of new wells or require increased withdrawals of groundwater from existing wells, nor would monitoring wells associated with the ongoing remediation of Environmental Restoration Program (ERP) sites be disturbed. While the anticipated net increase in impervious surface resulting from the implementation of the proposed projects would have a long-term adverse indirect impact on groundwater recharge in the vicinity of the 148 FW base, it would be negligible and non-significant in the context of the larger, mostly-rural and mostly permeable geographic area (i.e., St. Louis County) surrounding the base.

The Proposed Action Alternative would have no effects on 100-year floodplains because none of the proposed projects would occur within floodplains on the 148 FW base.

Construction-related erosion could increase sedimentation and compromise water quality in on-base drainages and off-base watercourses such as Miller Creek. The use of BMP for all earth-disturbing projects, including those required by the General Permit and construction SWPPP for projects disturbing one or more acres of land, would minimize soil erosion, resulting in minimal pollution and sedimentation of downstream watercourses. As applicable, the SWPPP for each project would also incorporate TMDL for Miller Creek to minimize the runoff of pollutants from each project site. While impacts from construction-related runoff cannot be entirely eliminated, they would remain minor and non-significant.

Up to approximately 1.8 acres of new impervious surface would be created on the 148 FW base as a result of the proposed action, with a corresponding potential increase in the stormwater runoff generated on the base. In accordance with Section 438 of the Energy Independence and Security Act (EISA), projects with a footprint of 5,000 square feet or greater would incorporate, to the maximum extent technically feasible, low impact development (LID) techniques to maintain the pre-development hydrology of the site. Adherence to these measures and continuing updates to and compliance with the 148 FW's base-wide SWPPP would ensure that adverse impacts on water quality in the bodies of water draining the base, including Miller Creek, remain minor and non-significant.

Biological Resources

No vegetation providing unique or valuable wildlife habitat would be lost. Thus, short-term and long-term adverse impacts on vegetation on the 148 FW base would be negligible and non-significant.

None of the proposed projects would be sited within or require the filling of areas suspected of being wetlands on the 148 FW base. The erosion control measures described above would minimize the risk of impacts from erosion. Thus, the Proposed Action Alternative would have no impacts on wetlands on or in the vicinity of the 148 FW base.

The vegetation that would be disturbed by the proposed action is unlikely to provide habitat for species other than those that are capable of living in highly disturbed, urbanized environments and in close proximity to human activity. No pristine or sensitive ecological communities would be disturbed or lost. Clearing of vegetation on the project sites would likely disturb and displace some individual animals. Many would probably return to the area upon the completion of construction activities. Therefore, adverse effects on wildlife would be minor and non-significant.

The proposed action would have no effect on species protected under the Endangered Species Act or their critical habitat. The projects included in the Proposed Action Alternative would not result in the clearing of any vegetation or habitat that is particularly valuable or attractive to birds protected under the Migratory Bird Treaty Act or Bald and Golden Eagle Protection Act. No bald eagle nests or foraging habitat are known to occur on the 148 FW base. Although noise and traffic generated by construction activities could cause annoyance to individual birds, any such effects would be localized and temporary. The implementation of the proposed action over a period of five to seven years would further minimize these impacts. In the long term, the noise generated by the proposed small arms range could also disturb individual birds but such disturbance, which would be intermittent and would not have a significant impact on the survival of the affected birds.

With respect to both short- and long-term impacts, activities that keep birds away from airport property (consistent with the Bird/Aircraft Strike Hazard [BASH] Program) can be considered to have a positive impact since they reduce the risk of conflicts with aircraft, conflicts that are generally lethal to birds. Thus, short-term and long-term impacts on the bird species protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act would not be significant.

Transportation and Circulation

Construction activities associated with Project 5 would be coordinated with the control tower to ensure that the potential for conflicts between aircraft, aircraft support vehicles and equipment, and construction vehicles and equipment are prevented. Thus, the Proposed Action Alternative would have no short-term adverse impacts on airside facilities. There would be no long-term impacts on the 148 FW's airside facilities because operations would return to pre-construction conditions following the implementation of the proposed action.

Construction-related activities would generate additional personal vehicle and truck traffic on the internal roadway network on the 148 FW base as well as on nearby off-base roads. The duration and intensity of this impact would vary throughout the construction phase of each project, and the implementation of the proposed projects over a period of five to seven years would further minimize impacts on vehicular circulation. It is not anticipated that construction-related traffic would exceed the capacity of the on-base and off-base road networks. Thus, short-term impacts on vehicular circulation would be minor and non-significant. None of the projects included in the Proposed Action Alternative would increase the number of personnel assigned to the base or generate additional vehicle trips. For these reasons, the implementation of the proposed action would have no long-term adverse impacts on on-base or off-base transportation networks.

Projects included in the Proposed Action Alternative would better define the roadway network and improve vehicular circulation throughout the 148 FW base, thereby resulting in beneficial long-term impacts on vehicular circulation on the installation.

Construction-related closures of pedestrian sidewalk segments and/or the rerouting of pedestrian movements on the base would be temporary and minor. The implementation of the proposed projects over five to seven years would further minimize these impacts. In the long term, the Proposed Action Alternative would have beneficial impacts on pedestrian circulation by completing the pedestrian sidewalk network throughout the base.

Adequate parking for construction-related vehicles would be provided on or near the project sites and would not impact the parking requirements of 148 FW staff or personnel. The Proposed Action Alternative would have a long-term beneficial impact on parking by reconfiguring non-organizational parking to meet AT/FP requirements; eliminating non-AT/FP compliant parking spaces throughout the base; and meeting the 148 FW's authorization of 725 AT/FP-compliant non-organizational vehicle parking spaces.

Cultural Resources

A survey conducted in 2007 identified no archaeological sites on the 148 FW base and found that there is low likelihood for such sites to be present due to prior disturbance. Thus, the proposed action is not anticipated to have an adverse effect on archaeological resources. In the case of inadvertent discovery of archeological materials or human remains during construction and demolition activities, standard operating procedures outlined in the 148 FW's Integrated Cultural Resources Management Plan (ICRMP) would be followed to ensure that potential adverse effects on archaeological resources are minimized and remain minor and non-significant.

Building 500 is eligible for listing in the National Register of Historic Places. None of the proposed projects would directly affect Building 500. One project, Project 5, is located in the vicinity of Building 500. This project would replace three existing aircraft shelters (Buildings 497, 498, and 499) with a single new facility. The proposed new facility would be similar in size and appearance to the three existing shelters and would fulfill a similar function. Thus, Project 5 is not anticipated to result in any indirect adverse effects on Building 500 that could reduce its historic integrity. The other projects included in the proposed action have no potential for indirect effects as they are located well away from Building 500 and would not introduce any new visual or functional elements that could affect the integrity of the building. No other National Register-eligible or potentially eligible resources have the potential to be directly or indirectly affected by the proposed action.

Hazardous Substances

The quantities of hazardous substances used and stored on the project sites would be limited and would be managed in accordance with federal, state, and ANG regulations and procedures. Standard measures would be taken to prevent pollutants from reaching the soil, groundwater, or surface water. Hazardous waste produced on the project sites would be managed and disposed of in accordance with all applicable federal, state, DoD and ANG procedures and regulations. If determined to be hazardous waste, excavated soils that would not be reused on site would be disposed of at a disposal facility permitted to accept such waste; otherwise, they would be disposed of at an appropriate permitted facility. Given the scale of the proposed projects and their staggered implementation, any short-term increase in the quantity of hazardous materials would be small in the context of such substances generated on the 148 FW, Duluth IAP and the surrounding region. Thus, short-term impacts would be minimal and non-significant.

In the long term, implementation of the Proposed Action Alternative would not change the quantity or type of hazardous substances stored and used or hazardous waste generated at the 148 FW base. All hazardous materials and waste would continue to be used and managed and disposed of in accordance with all applicable regulations. Thus, the proposed action would have no long-term adverse impacts on hazardous materials or hazardous waste management.

No impacts pertaining to pesticides are anticipated. None of the proposed projects have the potential to draw more pest species to the installation or to affect how pesticides are stored, handled, and used.

Project 6 includes the installation of new aboveground storage tank (AST) and the demolition of the AST supporting the existing ground vehicle fueling station. The capacity of and substances stored in the new AST would be similar to the existing tanks. Further, the new AST would include all necessary secondary containment and life safety equipment, and would be installed and operated in accordance with all applicable federal and state regulations. Thus, the proposed action would have no short-term or long-term adverse impacts on these types of equipment.

Buildings affected by the proposed action that are suspected to contain asbestos containing materials (ACM) or lead-based paints (LBP) would be evaluated for those substances. If determined to be present, those materials would be handled and removed in accordance with applicable federal, state and DoD regulations and procedures. Thus, there would be no adverse short-term impacts from and long-term beneficial impacts on ACM and LBP.

None of the proposed projects would interfere with ongoing ERP remediation activities. None of the proposed projects would be located in areas where exceedances of human health Preliminary Remediation Goals for lead and antimony associated with the former skeet range were detected. If contaminated soils or other materials from undocumented releases are encountered during construction of any of the proposed projects, the ANG would address such materials in accordance with all applicable federal, state, DoD and ANG regulations. Thus the Proposed Action Alternative would have no adverse effects on ERP sites and remediation activities on the 148 FW base.

Cumulative Impacts

The proposed action, when considered in combination with past, present, and reasonably foreseeable future actions on and in the vicinity of the 148 FW base, would not result in significant cumulative impacts.

4. Public Notice

NEPA, 40 CFR 1500-1508, and 32 CFR 989 require public review of the EA before approval of the FONSI and implementation of the proposed action. The Draft EA for this proposed action was sent to 34 federal, state, and local agencies, organizations, or Native American tribes or component bands for review and comment. A notice of availability for public review was published in the *Duluth News Tribune* on September 1 and 8, 2015. The public review period lasted from September 1 through October 1, 2015. The Draft EA was made available at a local public library for the duration of the public review period.

5. Finding of No Significant Impact

After careful review of the potential impacts of this proposed action, I have concluded that implementation of the proposed action would not have a significant impact on the quality of the human environment or generate significant controversy; therefore, the preparation of an environmental impact statement is not required. This analysis fulfills the requirements of NEPA and the CEQ regulations.



BENJAMIN W. LAWLESS P.E. GS-15
Chief, Asset Management Division

4/11/16

DATE