

**FINDING OF NO SIGNIFICANT IMPACT
AREA B IMPROVEMENTS ENVIRONMENTAL ASSESSMENT
WRIGHT-PATTERSON AIR FORCE BASE, OHIO**

The 88th Civil Engineer Group completed an environmental assessment (EA) analyzing the effects associated with implementing three proposed projects in Area B at Wright-Patterson Air Force Base (WPAFB), Ohio. This EA has been prepared in compliance with the National Environmental Policy Act (NEPA) as amended by Public Law 118-5, the Fiscal Responsibility Act of 2023 (42 United States Code (USC) § 4321 et seq.), and in accordance with the Department of Defense (DoD) NEPA Implementing Procedures effective July 1, 2025. The EA, incorporated by reference in this Finding of No Significant Impact (FONSI), presents the potential environmental consequences associated with this action.

Purpose and Need (EA Section (§) 1.1, page 1-2) – The purpose of the Proposed Action is to modernize over a period of five years facility space, infrastructure, and/or land utilization within the southwestern portion of Area B to support future mission development. The need for the action is driven by the overall requirement to optimize, consolidate facility space that supports existing missions and allows for future growth by correcting deficiencies, protecting assets, and improving working conditions.

DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

Under the Proposed Action, the DAF would undertake the following three projects:

Project 1: Gate 22B Gate/Road Realignment (EA § 2.1.1, pages 2-3 to 2-4) – Gate 22B would be reconfigured by constructing a new gate house with canopy, denial barriers, and ballistic-rated identification check stands as well as realigning the road with lighting and traffic signage (EA Figure 2-1). Gate 22B provides southern access to Area B from Colonel Glenn Highway and Interstate (I)-675. The goal of this action is to implement operational and physical changes to improve traffic flow, reduce vehicle congestion, and improve safety. The new gate would be designed to meet anti-terrorism/force protection (AT/FP) standards. A commercial vehicle inspection facility would be installed to improve commercial vehicle access to Area B, which currently does not exist today. Other upgrades include relocating Thirteenth Street to improve access to Wright Field, and widening, resurfacing and installing additional drainage on Skyline Drive and the east end of Thirteenth Street. Several traffic circles would be installed to enhance traffic flow in all directions after entering through the new Gate 22B.

Project 2: National Museum of the U.S. Air Force (NMUSAF) Café (EA § 2.2.1, pages 2-4 to 2-5) – A new visitor café approximately 7,200 gross square feet would be constructed to better serve the needs of over 800,000 patrons to the NMUSAF each year. The new café would be constructed between two of the NMUSAF hangers, Facilities 20487 and 20494, close to the museum’s center point (EA Figure 2-2). This would allow visitors an opportunity to take a break, then continue with their visit. Once the new café is in operation, the existing Café in Facility 20489 will be converted into offices, conference/collaboration areas, and event spaces shared by the Air Force Museum Foundation and NMUSAF. This is ideal since the existing café is located on the second floor of the Museum and out of the way of most visitors.

Project 3: Emergency Staging Areas for Federal Emergency Management Agency (FEMA) Trailers (EA § 2.3.2, pages 2-7 to 2-8) – WPAFB would grant FEMA temporary access to the Area B runway and surrounding area for staging trailers, generators, mobile homes and other cargo equipment during a

regional and/or national incident (EA Figure 2-3). Known as an Incident Staging Base (ISB), the size of the ISB would depend on the size of the response operation. FEMA may need to accommodate between several hundred to several thousand 53-foot trailers containing emergency commodities such as ice, bottled water, ready-to-eat meals, beds & blankets; tens to hundreds of generators mounted on flatbeds; mobile homes; and other time-sensitive project-type cargo. Shipments would originate from FEMA, Defense Logistics Agency centers, or vendors and then be staged at WPAFB for several days before being sent onward to points of distribution in support of disaster relief. WPAFB would allow temporary access by FEMA personnel to conduct training exercises every two to three years in preparation of emergency response efforts. These exercises involve approximately 100 participants conducting field training for three days. Trailers and generators would be utilized as part of the exercise.

ENVIRONMENTAL CONSEQUENCES

Based on the analyses in the EA, the Proposed Action would have no significant direct, indirect, or reasonably foreseeable effects on airspace, air quality, noise, land use, cultural resources, biological resources, water resources; earth resources, infrastructure, hazardous materials/waste, safety/occupational health, and socioeconomics as summarized below:

Airspace (EA § 3.2.2.3, page 3-6) – Projects 1 and 2 occur outside the WPAFB active flightline and planned construction would have no effect on airspace. Project 3 would allow temporary use of the Area B runway as an emergency staging area by FEMA, which could be unscheduled and interfere with planned NMUSAF activities and special events utilizing this space. FEMA would coordinate their schedule with WPAFB especially as it relates to training. Because these effects are temporary, there would be no long-term, permanent significant effect on airspace.

Air Quality (EA § 3.3.2.1 to § 3.3.2.3, pages 3-10 to 3-12) – WPAFB is in Greene and Montgomery Counties, which are classified as an Orphan Maintenance Area for ozone and in attainment for all other criteria air pollutants. Projects 1 and 2 would generate temporary emissions from ground disturbance (i.e. grading/trenching), construction, and demolition activities. Under Project 3, there would be temporary emissions generated from tractor-trailer supply deliveries, outgoing distribution trucks, FEMA vehicles, and power generators. There is also a potential for low level insignificant foreseeable effects with other construction projects occurring in Area B at the same time. The Air Force Air Conformity Applicability Model was used to evaluate effects on air quality (EA Table 3-5). Results indicate emissions from all three projects would not exceed any Clean Air Act General Conformity de minimis thresholds; therefore, a General Conformity Determination is not applicable. Based on modeling, there are no significant effects on air quality from the Proposed Action.

Noise (EA § 3.4.2.1 to § 3.2.4.3, pages 3-10 to 3-12) – All three projects fall in areas averaging between ambient noise levels of 53 - 65 decibels (dB). Noise related activities are associated with construction as well as during a FEMA exercise. Construction noise will cease once projects are completed. During FEMA exercises, trailers would be utilized for approximately three days while use of ten generators is expected to last approximately 24 hours. The nearest residential area is located over 900 feet from the Area B runway and currently falls within the 70-75 dB noise contour from aircraft noise. Based on this, there will be no significant effects from noise with implementation of the Proposed Action.

Land Use (EA § 3.5.2.1 to § 3.5.2.3, page 3-20) – There is no effect on land use with implementation of Project 2, construction of a new NMUSAF café. While Project 1 would not result in a direct land use change for both on-base or off-base properties, the proposed gate and road improvements would result in a change in on-base circulation, which would be addressed by the WPAFB land use planning program. The FEMA staging area under Project 3 runway would cause a temporary change in land use, allowed under terms of the Real Property Permit that will be issued by WPAFB. Because there will be no permanent changes in land use, effects to this resource area are insignificant.

Cultural Resources (EA § 3.6.2.1 to § 3.6.2.3, page 3-23) – Within Area B, the principal known cultural resources are the Wright Field Historic District and several National Register of Historic Places (NRHP) eligible structures. Projects 1 and 3 would not affect the character of the Wright Field Historic District or the nearby NRHP eligible buildings. The proposed café under Project 2 would add a new exterior building connected to the NMUSAF. As the NMUSAF is the architectural center piece of the Wright Field Historic District, the architectural character of the proposed café will be consistent with the existing NMUSAF buildings. As agreed during the March 2025 consultations with the Ohio State Historic Preservation Officer (SHPO), WPAFB shall submit design drawings of Projects 1 and 2 for SHPO review once available. Prior cultural resource mapping identified two potential nearby archaeological sites. Current project boundaries do not anticipate any direct construction disturbance in these areas, but given their proximity, subsurface cultural artifacts could be encountered during construction. Contractors will observe standard WPAFB archaeological resource observation and reporting practices should any resources be encountered during construction. If the proposed Acquisition Management Complex and AFTC Modernization projects are concurrent during Project 2, all actions could foreseeably affect the architectural character of Wright Field and the Historic District; therefore, designs shall be coordinated with the SHPO prior to construction.

As outlined in the Installation Tribal Relations Plan (Last tribal meeting held November 28, 2023), the federally recognized Native American tribes (Keweenaw Bay Indian Community, Sac and Fox of the Mississippi in Iowa, Saginaw Chippewa Indian Tribe, Oklahoma Seneca Cayuga Nation, and Seneca Nation of Indians) only request notification/consultation when an action involves ground disturbance near the Adena Mounds in Area B or when on base construction involves areas of previously undisturbed ground. None of the projects fall within the vicinity of Adena Mounds, they lie in the northeast corner of Area B. Only Project 1 will involve ground disturbance in undeveloped land. WPAFB will engage with the tribes once project design is known. Because follow-on project-specific consultations under Section 106 of the National Historic Preservation Act are required for Projects 1 and 2, WPAFB will be required to re-evaluate cultural resources within the EA and update the analysis accordingly prior to commencing any construction activities.

Biological Resources (EA § 3.7.2.1 to § 3.7.2.3, pages 3-27 to 3-28) – There would be no effect to biological resources from Projects 2 and 3. The proposed café would be located between two existing NMUSAF buildings, which is currently maintained lawn and sidewalks. The proposed FEMA emergency staging area is located on the existing Area B runway comprised of pavement and turf grass. Wildlife in this area is limited to common species of burrowing mammals and songbirds. Wildlife exists in forest stands to the east and north of Project 1. Much of the new gate and entry road footprint is north of Loop Road on existing mowed grass areas, with the new connector to existing Skyline Drive running north-south displacing a row of existing trees. Vegetation and wildlife habitat would be removed in these construction areas. A portion of a wooded forest located east of Gate 22B and on the southern portion of

the realigned entry to the new gate would be removed during construction. This area could provide habitat for the federally endangered Indiana bat, the federally threatened northern long-eared bat, and the proposed for federal listing tricolored bat, or for bald eagles. Funding is currently not approved for Project 1. Once approved, WPAFB will be required to complete a biological survey of the wooded area as part of Section 7 Consultation with U.S. Fish and Wildlife Service (USFWS) as well as with the Ohio Department of Natural Resources (ODNR). Initiation of the new entry and road realignment cannot begin until Section 7 Consultation is complete to determine if the woods provide critical habitat to these threatened and endangered bat species (USFWS / ODNR consultations on February 26, 2025, and March 20, 2025). Prior to tree removal for any of the three projects, all trees greater than or equal to 3 inches at breast height will be marked and inventoried. All tree removal required for construction will only be conducted between October 1 and March 31 and be replaced in accordance with the WPAFB Installation Facility Standard Section GO3.10.3. By conducting the follow-on USFWS and ODNR consultations, implementation of the Project 1 will not significantly affect biological resources.

Water Resources (EA § 3.8.2.1 to § 3.8.2.3, pages 3-34 to 3-36) – All three projects are located outside the 100-year floodplain and the Huffman Retarding Basin as confirmed by the Miami Conservancy District on February 27, 2025. Project 1 will result in a net increase in impervious areas from gate and road development requiring storm water collection, detention, and treatment. This treatment will meet post-construction runoff controls as required by the WPAFB Storm Water Management Plan and Section 438 of the Energy Independence and Security Act (EISA). Low impact development (LID) techniques will be selected by the construction contractor to meet these requirements. The contractor will also obtain coverage under the Ohio Environmental Protection Agency (OEPA) Construction General Permit (CGP) and implement a storm water pollution prevention plan (SWPPP). The contractor will revegetate following ground disturbance activities. A wetland is located directly east of the new gate and could be indirectly impacted from runoff. The CGP and SWPPP along with required best management practices (BMPs) would mitigate these effects resulting in no significant impact on the wetland. Project 2 would also trigger Section 438 of EISA requiring pre-construction runoff rates to be maintained. LID control techniques would be implemented to capture runoff from the new Café roof before entering the existing NMUSAF storm water drainage system. A 1,700 cubic foot swale or bioretention facility could also be constructed to meet LID requirements. Total earth disturbance for Project 2 should be less than the 1-acre requiring OEPA CGP coverage, especially if new construction laydown and parking are minimized. The contractor will work with WPAFB and NMUSAF to identify existing paved areas that could be used. Project 3 would have no significant effects on water resources as the FEMA staging area would not create any new impervious surfaces. The area is flat with no surface waters present. While it is the intent of FEMA to operate their vehicles on existing paved roads, there may be operations occur within turf areas. FEMA will utilize BMPs such as placement of hay bales and/or erosion control fences to minimize sediment leading into structural drainage inlets. Wetlands are located at the east end of the runway and would be fenced off with orange snow/silt fence when FEMA is present. By adhering to required storm water permits, SWPPPs, and erosion BMPs, implementation of the Proposed Action will have no significant effects to water resources.

Earth Resources (EA § 3.9.2.1 to § 3.9.2.3, page 3-39) – Project 1 will require a significant amount of excavation and embankment as part of construction. The contractor will be charged with implementing engineering measures and BMPs to stabilize slopes and prevent erosion during and after construction. Disturbed vegetation will be re-established following construction preventing long-term impacts. Proximity to multiple earth fill disposal zones (EFDZ) and burial sites (BS) may require consultation with

USEPA and OEPA to determine if preparation and approval of an OEPA Rule 513 plan is required. The Aqueous Film-Forming Foam Area 1 Per- and Polyfluoroalkyl Substances Groundwater Facility is located downgradient of the new entry gate and already at capacity. The contractor will be required to design a solution to accommodate the additional runoff flow. Construction from Project 2 is limited due to the café's small footprint and the generally flat terrain. Implementation of erosion and sediment control BMPs would minimize impact to the existing stormwater drainage. The NMUSAF is not close to any Area B environmental restoration program (ERP) sites. No excavation is proposed for Project 3, and the site is also flat. Erosion and sediment controls would be utilized in the vicinity of existing stormwater drainage inlets to minimize any stormwater runoff from vehicle disturbance when travelling off paved areas of the runway. FEMA will revegetate any disturbed areas following demobilization. The closest EMP site is BS 5 located on the south side of the Area B runway, just east of Spinning Gate. While no construction is planned, WPAFB would coordinate with OEPA to determine whether any protective measures are required to prevent surface damage from traffic and potential spread of subsurface contaminants. Overall, implementation of the Proposed Action would have no significant effects on soils with adherence to storm water permitting and consultation with USEPA and OEPA after project specific designs are available.

Infrastructure/Utilities (EA § 3.10.2.1 to § 3.10.2.3, pages 3-42 to 3-44) – Construction and operation on any of the three projects would not have a significant effect on utility systems, they have existing capacity to support. Project 1 will have a negative effect on the local public roadway systems (i.e., I-675, Colonel Glenn Highway, and Airway Road) as well as on the WPAFB entrance gates. During construction, the existing Gate 22B may be closed for a period requiring traffic to be re-routed impacting level-of-service (LOS) on area roadways. A construction phase traffic plan will be prepared and coordinated with Greene County, Montgomery County, and Ohio Department of Transportation (ODOT) to maintain acceptable LOS during the construction. These traffic effects will further be exacerbated if Project 1 construction concurs with other reasonably foreseeable future projects (e.g., Intelligence Complex Expansion, Gate 15A modifications). Project 2 would have no effect on traffic. Under Project 3, many vehicles would be accessing WPAFB during a FEMA emergency response or a training exercise. To minimize traffic effects, WPAFB would allow FEMA to access their staging area using the Spinning Road Secondary Gate off Airway Road/Colonel Glenn Highway. If vehicles need to queue as they enter the base, one or two of the 4-lane roads could be temporarily shut down by the supporting agencies. This would allow local traffic to flow through the area while FEMA access is provided, assuming the existing bridge off Airway Road is adequate for anticipated emergency traffic entering the base. FEMA will be responsible for coordinating logistics, including lane closures and safety signage, with local law enforcement and/or base security for traffic management. While traffic congestion could occur with Projects 1 and 3, it will be mitigated by working with state and local agencies (i.e., Greene and Montgomery Counties and ODOT) through the traffic plan.

Hazardous Materials/Waste (EA § 3.11.2.1 to § 3.11.2.3, pages 3-50 to 3-53) – The contractor will adhere to the WPAFB Hazardous Waste Management Plan as it relates to hazardous materials / waste. Under Projects 1 and 2, asbestos-containing material, lead-based paint, and other facility hazardous materials would be surveyed to identify and abate in accordance with all federal and state regulations prior to demolition. No new construction is anticipated for Project 3. The FEMA staging area does not require use of hazardous materials or generation of hazardous waste. Because occasion fuel and/or oil leaks could occur, FEMA will maintain a spill response kit at the staging area. Overall, there will be no significant effects from hazardous materials/waste with implementation of the Proposed Action.

Safety and Occupational Health (EA § 3.12.2.1 to § 3.12.2.3, pages 3-56 to 3-59) – The contractor would be responsible for preparing and implementing all construction health and safety plan (HASP) in accordance with the Occupational Health and Safety Act. Standard operating procedures (SOPs) along with a demolition plan will be required as part of the HASP for Project 1. The existing NMUSAF does not meet UFC 4-010-01, *DoD Minimum Antiterrorism Standards for Buildings*. It requires a 108-foot standoff distance between exterior walls and vehicle roadways / parking lots. In addition, a larger standoff is required at the Museum entrance atrium and theater. A separate project is being developed to address these deficiencies. Because Project 2 is located between two existing NMUSAF buildings and within the NMUSAF exterior footprint, it will not aggravate the existing AT/FP standoff deficiencies. Project 3 will require FEMA to develop their own HASP, which will be approved by WPAFB prior to any on-site activities. An interior security fence will be used to separate FEMA’s staging area from other secure portions of Area B, so no adverse effects to AT/FP would be expected.

Socioeconomics (EA § 3.13.2.1 to § 3.13.2.3, pages 3-61 to 3-62) – A short-term beneficial effect would be expected on the local economy from jobs and revenue generated by construction activities and increase in FEMA personnel during emergency and/or training events. No direct or indirect impacts to children would be anticipated as WPAFB has controlled access.

PUBLIC NOTICE

To meet the requirements of Executive Order (EO) 11990, *Protection of Wetlands*, WPAFB published an early public notice stating the Proposed Action could impact a wetland area to encourage early and meaningful public involvement. An announcement was posted within the *Dayton Daily News* and the *Fairborn Daily Herald/Xenia Gazette* from December 26, 2025 to January 25, 2026. No comments were received.

FINDING OF NO SIGNIFANT IMACT

Based on review of the facts and analysis summarized above and contained within the EA, I find the Proposed Action for the DAF to implement any of the three projects in Area B at WPAFB would not have a significant effect on the natural and human environment. An environmental impact statement is not required. Considering the above information, I also find there is no practicable alternative for WPAFB to temporarily effect the wetland during construction of the Gate 22B New Gate/Road Realignment action. While the contractor would avoid the wetland to the greatest extent possible, there will be indirect effects from sedimentation and runoff from ground disturbance activities. The contractor will adhere to all federal and state stormwater permits, SWPPPs, and erosion BMPs to minimize harm to the wetland. This fulfills the requirements of NEPA, the DoD NEPA Implementing Procedures, and EO 11990.

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