#### FINDING OF NO SIGNIFICANT IMPACT PROPOSED HYDRAULIC DEFICIENCIES CORRECTIONS WRIGHT-PATTERSON AIR FORCE BASE, GREENE COUNTY, OHIO

Pursuant to the procedural provisions of the National Environmental Policy Act (NEPA), the United States Department of Air Force (DAF) Environmental Impact Analysis Process (EIAP) regulation (32 CFR Part 989), the Intergovernmental Coordination Act and Executive Order (EO) 12372, Intergovernmental Review of Federal Programs, the 88th Civil Engineer Group (CEG), Installation Management Division prepared an Environmental Assessment (EA) to analyze the environmental impacts associated with plans to implement a series of projects to correct identified hydraulic deficiencies at Wright-Patterson Air Force Base (WPAFB or Base), Ohio.

#### Purpose and Need (EA Sections 1.1 and 1.3)

The National Defense Authorization Act of fiscal year 1998 authorized the Department of Defense (DoD) to transfer ownership of its utility systems and added legislative authority under 10 U.S. Code Section 2688. Goals include bringing degraded utility systems to industry standards, correcting deficiencies, ensuring regulatory compliance, and increasing reliability to support mission continuity. Utility privatization is a permanent conveyance of one or more utility systems to a utility company or public utility and includes an award of a 50-year utility services contract to provide repair, replacement, operations, and maintenance. These conveyances allow installations to focus on core defense missions instead of the responsibilities of utility ownership. Privatizing at the Base also allowed the Base to benefit through innovative industry practices, private sector financing and efficiencies, and reliable system maintenance at current industry standards.

In September 2017, American Water Military Services Group/American Water Operations and Maintenance Inc. (collectively, AW) was awarded a 50-year contract to own and operate the water distribution and wastewater collection systems at WPAFB, as part of the DoD's Utility Privatization Program. AW's responsibilities include system capital investment, regulatory and environmental compliance, and long-term operations and maintenance. The water and wastewater systems serve a population nearing 50,000 people who live and work on the Base. The water system contains approximately 100 miles of pipe, over 750 hydrants, 14 storage tanks, and several wells and pump stations. The wastewater system contains over 50 miles of pipe, 27 lift stations, and over 1,000 manholes.

As part of the efforts to bring degraded utility systems to industry standards, correcting deficiencies ensuring regulatory compliance, and increasing reliability to support mission continuity, AW, on behalf of WPAFB, plans to implement a series of projects to correct identified hydraulic deficiencies at WPAFB.

The DoD's transfer of ownership of its utility systems was specifically to meet the goals of bringing degraded utility systems to industry standards, correcting deficiencies, ensuring regulatory compliance, increasing reliability, and creating system redundancies to support mission continuity. As such, the purpose of the proposed hydraulic deficiency projects is to support AW's efforts to efficiently provide a safe, reliable, and sustainable drinking water system to WPAFB. A healthy and safe drinking water distribution system is a mission critical resource for WPAFB.

The proposed projects are needed to remedy the condition and functional hydraulic deficiencies of the water distribution system at WPAFB (reduced water main capacities, increased energy losses due to friction, lack of water system redundancies, and potential water quality issues) by completing a

closed-loop system, upgrading the existing water system to current standards, correcting reliability and redundancy issues, and ensuring overall regulatory compliance—all critical to supporting mission continuity. In addition, WPAFB received a Safe Drinking Water Act Notice of Significant Deficiency from the U.S. Environmental Protection Agency (USEPA), issued December 2023, stating that the lack of a backup or emergency drinking water source for Area B was identified as a significant deficiency with regard to the drinking water system at WPAFB, furthering the justification for the need of the Proposed Action.

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

# Proposed Action (EA Section 2.1)

Much of the water distribution mains throughout the Base are constructed of aging cast iron pipe installed in the 1940s and 1950s, with reduced water main capacity, increased energy losses due to friction, and potential water quality issues. Current water demands and pressure for the Base are largely controlled by the level of the existing elevated storage tanks; however, the limitations of the aging water distribution system limit some of the elevated storage tanks from being filled to their designed capacity, reducing overall system pressure and demand capacity. In addition, inadequate redundancy between and within Areas A and B mean regulatory compliance and reliability to support mission continuity is limited. As such, AW, on behalf of WPAFB, plans to implement a series of projects to correct identified hydraulic deficiencies at WPAFB.

The Proposed Action is divided into four parts and includes the following:

- Construction of an approximately 2,100-square-foot (SF) Booster Pump Station on the south side of the airfield in Area A of the WPAFB, at the East Wellfield.
- Installation of a new, approximately 7,200-linear-foot water main near Tower 6 and west to the proposed Booster Pump Station in order to complete the closed-loop water distribution system for Area A.
- Installation of an approximately 16,000-linear-foot water main from the proposed Booster Pump Station to the West Ramp and Tower 10 to replace the existing, unused water main from the 1940s and 1950s (North Loop Water Main).
- Installation of an approximately 5,900-linear-foot water main from the proposed Booster Pump Station to the WTP in Area B to replace the existing water main from the 1940s and 1950s and reestablish a redundant water supply between Areas A and B at WPAFB (Areas A and B Interconnection).

Additional details pertaining to the four parts of the Proposed Action are included in Sections 2.1.1 through 2.1.4 in the EA.

# Selection Standards (EA Section 2.2)

The NEPA regulations state that "reasonable alternatives means a reasonable range of alternatives that are technically and economically feasible and meet the purpose and need for the Proposed Action and that would cause a reasonable person to inquire further before choosing a particular course of action." To warrant detailed evaluation, an alternative must be suitable for decision-making, capable of implementation, and sufficiently satisfactory with respect to meeting the purpose of and need for the action. In evaluating alternatives, the DAF used the following selection standards to determine whether an alternative was considered reasonable to support the objective of bringing degraded utility systems to industry standards, correcting deficiencies, ensuring regulatory compliance, and increasing reliability to

support mission continuity. The primary objective of the Proposed Action is to identify solutions that would allow identified hydraulic deficiencies at WPAFB to be corrected.

In evaluating alternatives, the DAF considered whether each alternative met the following standards:

- Adhere to the utility privatization contract;
- Located to minimize disturbance to traffic and surrounding areas;
- Allow backup/emergency drinking water source between the Area A and Area B drinking water systems in accordance with 40 CFR §141.403;
- Be located within compatible land use designations for a drinking water system;
- Available land area required to support installation of a booster station, water mains, and/or associated infrastructure;
- Provide maximum water redundancy (100 percent) for both the Area A and Area B drinking water systems; and
- Improve Area A and Area B overall water storage capacity as well as water flow/pressure by a certain percentage in order to support the maximum number of users on the system.

## No-Action Alternative (EA Section 2.4.5)

Under the No Action Alternative, the Proposed Action would not be implemented. Without the Proposed Action, the identified hydraulic deficiencies would remain, compromising the health, safety, and effectiveness of the Air Force's warfighters. The Area A water distribution system would remain with reduced hydraulic grade and capacity and would not enable WPAFB to bring degraded utility systems to industry standards, correct deficiencies ensuring regulatory compliance, and increase reliability to support mission continuity and, thus, would not meet the purpose of or need for the Proposed Action. More importantly, the No Action Alternative would not support AW's efforts to efficiently provide a safe, reliable, and sustainable drinking water system to WPAFB. A healthy and safe drinking water distribution system is a mission critical resource for WPAFB. WPAFB received notification from the USEPA that their drinking water system is currently not in compliance with drinking water standards and mandated that WPAFB correct its hydraulic deficiencies.

#### Alternatives Considered but Eliminated from Further Study (EA Section 2.5)

Several potential alternatives were identified to resolve the hydraulic deficiencies at WPAFB.

## Booster Pump Station

Three locations on the north side of Area A were evaluated for a northern booster station: Booster Station Adjacent to Tower 10, Booster Station at Old West Ramp Gate Entrance, and Booster Station Near Tower 7. However, all three of these Booster Pump Station locations were eliminated from further consideration due to low-pressure conditions, location in proximity to restricted airfield operations, and/or inadequate existing infrastructure.

## Level Control Valve at Tower 7

In addition to the new Booster Pump Station, a level control valve was proposed to be installed at Tower 7 to close off the tank when it reaches the desired high-level setpoint, which would allow the other elevated tanks to be filled completely. However, in this alternative, Tower 7 would be closed off from the rest of the water system during the time it takes to fill Tower 10. It would not resolve any of the hydraulic issues in the water system but would only allow the distribution pumps to operate at a higher pressure required to fill Tower 10 when the Tower 7 altitude valve is closed. This option was not considered further in this evaluation.

## Environmental Consequences (EA Sections 3.1 through 3.10)

Analysis of potential environmental effects focuses on resource areas that are appropriate for consideration, in light of a Proposed Action. All resource areas were initially considered, but some were eliminated from detailed examination because they were determined to have no impact as a result of implementation of the alternatives.

- <u>Airspace:</u> Proposed Action activities would not result in any obstructions to airspace or hazards to airspace management at WPAFB nor do they include the use of nor any modifications to existing airspace. Therefore, there would be no impacts to airspace.
- <u>Visual Resources:</u> Implementation of the Proposed Action would not adversely change the views of or from WPAFB.
- <u>Socioeconomics</u>: The implementation of the Proposed Action would have a non-significant impact on the local workforce. A short-term beneficial impact would be expected on the local economy from revenue generated by construction activities; however, no additional permanent personnel are expected to be added. The Proposed Action does not involve changes in off-Base land use; therefore, no impacts on social conditions are expected.
- <u>Utilities:</u> The Proposed Action is specific to improvements to the WPAFB water distribution system, and the existing water distribution system, although beyond the end of its useful life, remains in place, which allows the Proposed Action to be implemented using a direct approach by utilizing existing infrastructure to maximize efficiencies during the implementation of the Proposed Action. Water consumption rates after the implementation of the Proposed Action would continue at levels similar to the current consumption rates. In addition, the proposed Booster Pump Station area is accessible to existing electrical lines, enabling the construction of the proposed Booster Pump Station to be connected to the existing electrical system. Electrical consumption rates would increase as a result of the implementation of the Proposed Action. The increase in consumption rates would vary based on water demand and would be influenced by season and number of personnel at WPAFB.
- **Land Use:** The Proposed Action would occur in areas where current land use designations are compatible, and any land use re-designations are not anticipated.

## Noise (EA Section 3.2)

The Proposed Action would result in minor short-term impacts on ambient noise generated from construction-related activities during implementation. Impacts would be minor since construction activities would be carried out during normal working hours, would be short in duration, and would occur within isolated areas at WPAFB. The Proposed Action would result in no long-term adverse impacts to noise. The No Action Alternative would have no short- or long-term impacts *over* current conditions.

## Air Quality (EA Section 3.3)

Activities associated with the implementation of the Proposed Action would result in non-significant emissions of criteria pollutants from the equipment engine exhaust and particulate matter emitted as fugitive dust from excavation and grading activities, movement of material and equipment, and other standard activities associated with construction projects. Additionally, vehicle emissions from worker commuter emissions would result in emissions. All of these criteria pollutant emissions from the construction activities would be temporary and minimal.

The Proposed Action would include the installation of one 500-kilowatt diesel backup emergency power generator with the proposed Booster Pump Station. The emergency generator would likely require a permit to install (PTI) or permit by rule (PBR) application to be obtained by AW and their contractors. All AW air emission sources are disaggregated, from the WPAFB Title V operating permit. No other stationary sources or new source reviews are anticipated as part of the Proposed Action projects.

Operational activities would result in non-significant emissions of criteria pollutants from the emergency generator engine exhaust. Additionally, vehicle emissions would result from the long-term operation of the proposed Booster Pump Station; however, these emissions would be negligible since the proposed Booster Pump Station would be largely automated with the need for periodic adjustments and maintenance, and the remaining Proposed Action projects (water mains) would only require temporary activities during implementation and periodic maintenance and repairs, as needed.

#### Water Resources (EA Section 3.4)

A large portion of WPAFB, including the majority of Area A and portions of Area B, lie within the Mad River floodplain. These portions of the Base are classified as Zone A; Zone A is defined by Federal Emergency Management Agency (FEMA) as an area with a 1 percent annual chance of having a flood. The flood elevations at the project site are controlled by the Huffman Dam, which is located downstream of WPAFB. Huffman Dam is maintained by the Miami Conservancy District (MCD).

One water resource, Hebble Creek, was identified as a Waters of the U.S. (WOTUS) regulated under the jurisdiction of the U.S. Army Corps of Engineers (USACE). Hebble Creek has been channelized and has a limited riparian zone, and would not be impacted by the Proposed Action.

The WPAFB Storm Water Management Plan (SWMP) and the Storm Water Pollution Prevention Plan (SWPPP) provide descriptions of storm drainage areas and their associated outfalls, potential storm water pollution sources, and material management approaches to reduce potential storm water contamination. The SWPPP was last updated in September 2023 while the SWMP was last updated in July 2023. Three OEPA industrial permits (National Pollutant Discharge Elimination System [NPDES] permits) and a municipal NPDES General Permit (OHQ00002) cover the WPAFB storm water program. The SWPPP, SWMP, and NPDES permits provide specific Best Management Practices (BMPs) to prevent surface water contamination from activities such as construction, storing and transferring of fuels, storage of coal, use of deicing fluids, storage and use of lubrication oils and maintenance fluids, and solid and hazardous waste management.

Short-term, minor, adverse impacts on ground and surface water would be expected from implementation of the Proposed Action. Construction activities would have non-significant adverse impacts on surface water quality as a result of the Proposed Action. As part of an Erosion, Sedimentation, and Pollution Control Plan developed as part of the design process and approved by the appropriate Base personnel, BMPs would be developed for and implemented during construction activities to prevent excessive soil erosion, runoff, and minor spills. At a minimum, BMPs would include inlet protection, reinforced silt fence, sediment storage, provisions to minimize tracking onto roadways, appropriate material storage and spill response equipment and controls, appropriate waste disposal practices, a concrete washout area and temporary and permanent stabilization. Non-significant adverse impacts could occur due to increases in impervious surfaces resulting from the construction on previously vegetated areas. Construction on WPAFB would follow the appropriate environmental specifications and current Base Facility Standards regarding provisions for storm water runoff. Although the limits of disturbance for the proposed Booster Pump Station approaches 36,000 SF, only the proposed Booster Pump Station building will create additional impervious surfaces (approximately

2,450 SF) that do not exceed the EISA additional impervious surfaces threshold of 5,000 SF. All other areas associated with the proposed Booster Pump Station would maintain their infiltration characteristics. In addition, no other impervious surfaces are anticipated to be installed as a result of the Proposed Action. All construction activities associated with the Proposed Action would be completed in accordance with the United Facilities Criteria (UFC) for Low Impact Development (LID).

Minimum standard BMPs include, but are not limited to, inlet protection, reinforced silt fence, sediment storage, provisions to minimize tracking onto roadways such as construction entrances or street sweeping, appropriate material storage and spill response equipment and controls, appropriate waste disposal practices, a concrete washout area, and temporary and permanent stabilization.

## Safety and Occupational Health (EA Section 3.5)

No adverse effects regarding fire hazards or public safety, munitions or explosives safety, construction safety, or anti-terrorism/force protection would be expected to occur from the implementation of the Proposed Action. Implementation of the Proposed Action would result in potential impact to workers during construction activities. Proper adherence to health and safety procedures would minimize these impacts. The Proposed Action location is not currently used for hazardous material storage, and the implementation of the Proposed Action would not require regular use of or storage of hazardous materials, nor would the Proposed Action generate hazardous wastes. No long-term risks associated with hazardous materials and wastes are anticipated. Implementation of appropriate safety methods during these activities would be expected to adhere to site-specific health and safety plans; construction areas would be secured to prevent unauthorized personnel from entering the work sites; and in accordance with OSHA, AFOSH standards, and applicable WPAFB plan(s), all workers would be provided with appropriate personal protective equipment.

# Hazardous Material/Waste (EA Section 3.6)

Impacts to hazardous material management would be considered adverse if the federal action resulted in noncompliance with applicable federal and state regulations or increased the amounts generated or procured beyond current WPAFB waste management procedures and capacities. Impacts on pollution prevention would be considered adverse if the federal action resulted in worker, resident, or visitor exposure to these materials or if the action generated quantities of these materials beyond the capability of current management procedures. Impacts on the Environmental Restoration Program (ERP) would be considered adverse if the federal action disturbed (or created) contaminated sites resulting in negative effects on human health or the environment.

The Proposed Action would have no effect on hazardous materials and waste, although some of the projects included in the Proposed Action could potentially generate minimal hazardous materials and waste. However, with adherence to DAF standards and the WPAFB HAZMAT Plan, no impacts would be expected. Sources of hazardous wastes are not anticipated during the implementation of the Proposed Action; however, if encountered, it is anticipated that the volume, type, classifications, and sources of hazardous wastes would be similar in nature with the baseline condition waste streams. Hazardous waste would be handled, stored, transported, disposed of, or recycled in accordance with the WPAFB Hazardous Waste Management Plan.

As the implementation of the Proposed Action would include ground disturbances in proximity to areas of known residual and/or undefined contamination resulting from historic Base operations, proper coordination with WPAFB's Environmental Branch to prevent unanticipated exposures to Base

personnel and workers and/or exacerbation of residual and/or undefined contamination would be required.

During normal operations, the Proposed Action would not generate hazardous waste. All hazardous materials and wastes, to the extent practical, would be stored at AW's Operations Center and would be detailed in an Initial Accumulation Point (IAP) of Hazardous Materials/Wastes Plan.

## **Biological Resources (EA Section 3.7)**

The areas that would be impacted as a result of the Proposed Action consist of wooded land and maintained grassy areas. Disturbed vegetation includes maintained areas that are frequently mowed, such as rights-of-way, lawns, and recreational areas, and have been designated by the Base as turf and landscaped areas. In addition, wildlife habitat within the improved areas of the Base is limited due to fragmentation by the existing facilities, roads, and impervious surfaces at WPAFB.

The Proposed Action is not expected to adversely affect biological resources. All previous projects and the Proposed Action are located within areas that have been previously developed; therefore, impacts to biological resources would not be expected. Any potential impacts to threatened, endangered, or sensitive species would require consultation with the U.S. Fish and Wildlife Service (USFWS) and Ohio Department of Natural Resources (ODNR).

The Proposed Action would not result in changes in current land uses, and the proposed construction activities would not include any habitat required for any threatened or endangered species identified on the Base. Therefore, noise-related effects from proposed construction activities would result in non-significant adverse effects on wildlife as a result from implementation of the Proposed Action. In addition, the proposed Booster Pump Station building would be fully enclosed to preclude unwanted wildlife inhabitants.

There would be a non-significant impact on threatened and endangered species or species of concern, candidate species, and potentially threatened species because of construction activities associated with the implementation of the Proposed Action. Tree clearing would be limited and seasonally timed to minimize any adverse impacts to protected bat species.

One forested wetland area (C-18) was identified in the WPAFB Integrated Natural Resources Management Plan (INRMP); however, the portion of the Areas A and B Interconnection project that traverses this area would utilize trenchless installation techniques for any construction activities in this area; as such, the only related ground disturbance would occur at the end points (ingress/egress) of the segment. With adherence to the WPAFB SWMP, SWPPP, and NPDES permit requirements and the use of standard BMPs for sediment and erosion control, direct and indirect adverse impacts to C-18 are not anticipated. However, due to the need for Proposed Action construction activities in proximity to C-18 and C-18's status as a WOTUS, a Section 404 of the Clean Water Act (CWA) permit from the USACE would be obtained as part of the Proposed Action to ensure compliance with the CWA. In addition, it is anticipated the activities that could have direct and indirect, non-significant adverse impacts to C-18 as part of the Proposed Action would be less than the 300-linear-foot-or-0.5-acre-or-greater-in-area threshold that would trigger the requirement for a CWA Section 401 Water Quality Certification from Ohio Environmental Protection Agency (OEPA).

## Cultural Resources (EA Section 3.8)

With the exception of the proposed Booster Pump Station, all activities associated with the Proposed Action include temporary ground disturbance for the installation of upgraded piping for the WPAFB drinking water distribution system. All portions of the Proposed Action are located in areas where

previously archeological investigations have been completed with no archeological National Register of Historic Places (NRHP) eligible resources were identified or are located in areas where the belowground are of potential effect (APE) has been significantly disturbed and unlikely to contain NRHP-eligible resources. In a letter dated September 10, 2024, State Historic Preservation Office (SHPO) concurred, stating that the implementation of the Proposed Action should not impact the significance or integrity of protected cultural resources.

The Proposed Action is not expected to have an effect on cultural resources. In the event of an unanticipated discovery of archaeological resources during any project at WPAFB, actions detailed in the Integrated Cultural Resources Management Plan (ICRMP) would be initiated to minimize impacts.

#### Earth Resources (EA Section 3.9)

The Proposed Action would result in temporary disturbed ground surfaces and short-term, minor adverse impacts on earth resources. Although soils would be disturbed by earthmoving and other construction activities, any effects would not be expected to exceed individual project boundaries and would not result in significant impacts on earth resources since BMPs, erosion and sediment controls, and other management measures would be implemented. Soil erosion would be minimized during construction activities using BMPs in accordance with the NPDES storm water discharge permit. Any spills of hazardous chemicals, materials entering sewers or drains, and/or releases of materials that have the potential to damage or pollute the environment would be reported to the Base Fire Department by calling 911 or calling the WPAFB Fire Dispatch. In the short term, construction vehicles would disturb the surface and compaction could be altered. Minor, short-term impacts would be minimized because erosion controls would be implemented. There would be no long-term adverse effects because disturbed vegetation would be re-established upon completion of construction activities.

## Traffic and Transportation Resources (EA Section 3.10)

Traffic impacts are anticipated to be non-significant as the Proposed Action would result in a short-term, minor temporary increase in use of roadways in and around the Proposed Action locations. With the exception of the southern extent of the Water Main and the western extent of the Areas A and B Interconnection, minor impacts to surrounding areas caused by construction traffic and activities would be generally reduced by the distance of the Proposed Action locations from primary Base operational areas. The impacts associated with the implementation of the Proposed Action at the southern extent of the Water Main and the western extent of the Areas A and B Interconnection area are also expected to be minor since both of these locations are on the periphery of operational areas and do not experience a large volume of activities. A small portion of the Water Main project is located approximately 1,000 feet northwest of the Area A security gate entrance from State Route 444. Construction activities in this area could cause some traffic delays; however, any traffic delays would be minimal since several alternate routes and secondary entrances to Area A exist.

Similarly, a small portion of the western extent of the Areas A and B Interconnection is located in proximity areas south of the Area B entrance (outside of the secure fence). Construction activities in this area could cause some traffic delays; however, any traffic delays would be minimal since the implementation of the Proposed Action in this area is a crossing of roads, which would include trenchless installation techniques to minimize ground disturbance and disruption to roads.

Long-term traffic would be limited to vehicle trips to and from the proposed Booster Pump Station, which would be limited to AW and Base personnel for maintenance and testing. Any construction equipment required for implementation and construction would be driven to the Proposed Action

locations and would be stowed on Base in areas designated by WPAFB personnel. These designated areas cannot be determined prior to the implementation portion of the Proposed Action; however, designated areas for equipment would be selected so that they do not interfere with or obstruct Base operations and do not create potential adverse impacts to environmental and related social and economic resources.

The Proposed Action locations are situated both inside and outside of the secure fenced portions of the Base in areas with limited access and use, where children are not regularly present. The absence of children in the area of the Proposed Action locations maintains the requirements of EO 13045, Protection of Children from Environmental Health Risks and Safety Risk. The proposed Booster Pump Station would include secure perimeter fencing and a secure entrance gate. In addition, the Proposed Action locations are patrolled by Base security, which would also limit access to the Proposed Action locations.

## **PUBLIC NOTICE**

To meet the requirements of EO 11988, Floodplain Protection, an early Public Notice of Proposed Action in a Floodplain announcing that an action is being proposed within the floodplain (Appendix 3 of EA) was published in the Dayton Daily News on October 6, 8, and 11, 2024, and in the Fairborn Daily Herald and Xenia Gazette on October 4 and 8, 2024, initiating a 30-day public review period to capture public concern. No comments were received in response to the Public Notice of Proposed Action in a Floodplain.

In addition, a Finding of No Practical Alternatives (FONPA), Public Notice of Availability (Appendix 3 of EA) for the Draft EA and Finding of No Significant Impact (FONSI) were published in the Dayton Daily News on May 18, 2025, and in the Fairborn Daily Herald and Xenia Gazette on May 20, 2025, initiating a 30-day public review period. The Draft Final EA and FONSI were also made available on the WPAFB Public Affairs internet website (<u>https://www.wpafb.af.mil/Units/88th-ABW/Public-Affairs/</u>) and in the Fairborn Branch of the Greene County Public Library from May 18, 2025, through June 18, 2025.

## FINDING OF NO SIGNIFICANT IMPACT

Based upon my review of the facts and analysis summarized above and contained within the subject EA, I find the Proposed Action to construct and operate a modular LDT facility will not have a significant impact on the natural or human environment. An environmental impact statement is not required for this action. Taking the above information into consideration, I also find there is no practicable alternative to constructing the LDT facility within the l00-year floodplain, and the Proposed Action includes all practicable measures to minimize harm to the natural environment. This analysis fulfills the requirements of NEPA, the USAF EIAP regulations 32 CFR Part 989, and EO 11988, Floodplain Management.

Date:\_\_\_\_\_

RONALD J. ONDERKO, P.E. Command Senior Civil Engineer Logistics, Civil Engineering and Force Protection