DRAFT

ENVIRONMENTAL ASSESSMENT

ADMINISTRATIVE OFFICE SPACE

WRIGHT-PATTERSON AIR FORCE BASE, OHIO

PREPARED BY:

88 CEG/CEIEA
ENVIRONMENTAL BRANCH
INSTALLATION MANAGEMENT DIVISION
WRIGHT-PATTERSON AFB

MARCH 2019
COVER SHEET

ENVIRONMENTAL ASSESSMENT
ADMINISTRATIVE SPACE
WRIGHT-PATTERSON AIR FORCE BASE, OHIO

Responsible Agency: 88th Civil Engineer Group (88 CEG), Wright-Patterson Air Force Base (WPAFB/Base), Ohio

Affected Location: Greater Dayton Area, WPAFB, Ohio

Proposed Action: Provide temporary administrative space for organizational growth and swing space during facility renovations across the installation over the next five years.

Report Designation: Draft-Final Environmental Assessment (EA)

Written comments and inquiries regarding this document should be directed to 88th Air Base Wing (ABW)/Public Affairs, 5135 Pearson Road, Building 10, Room 252, WPAFB, Ohio, 45433, 88abw.pa@us.af.mil.

Abstract: The purpose and need of this environmental assessment is to provide temporary office space for the immediate and future growth of organizations and swing space for organizations during renovation and construction of existing facilities on WPAFB over the next five years. These actions require administrative space for personnel. This includes the proposed AFLCMC growth and organizational swing space for facility renovation projects for people while offices across the base are being renovated/expanded in the time period of FY19-25.

The analysis in the EA considers alternatives and the No Action Alternative and will aid in determining whether a Finding of No Significant Impact (FONSI) can be prepared or whether an Environmental Impact Statement (EIS) is needed.
Pursuant to the Council on Environmental Quality regulations for implementing the procedural provisions of the National Environmental Policy Act (40 Code of Federal Regulations [CFR] 1500-1508), Department of Defense Directive 6050.1 and Air Force Regulation 32 CFR Part 989, the 88th Civil Engineer Group, Environmental, Installation Management Division (88 CEG/CEIEA) has prepared an Environmental Assessment (EA) to identify and assess potential environmental effects of obtaining administrative office space for the growth of base organizations and during major facility renovations at Wright-Patterson Air Force Base (WPAFB), Ohio. The EA is incorporated by reference into this finding.

**Purpose and Need**

The purpose and need of this EA is to provide temporary office space for the immediate and future growth of organizations, and swing space for organizations during renovation of existing facilities and construction of new facilities on WPAFB over the next five years. These actions require administrative space for personnel, and including but is not limited to, the proposed Air Force Life Cycle Management Center (AFLCMC) growth and Air Force Materiel Command (AFMC) and other organizational swing space for facility renovation projects conducted FY19-25.

**Description of Proposed Action and Alternatives**

Office space for tenant and base organizations must meet the following criteria:

- Provide approximately 80 square feet (SF) per person along with adequate parking
- Office space available by 1 September 2019 for the initial operating capacity covering the first phase of growth
- Located within a 50-mile radius of WPAFB
- AFLCMC projected growth FY19-23
- AFMC renovations FY20-25 swing space, FY19-23 renovation swing space

For this Proposed Action, WPAFB screened three possible alternatives: 1) renovate/enlarge existing facilities, 2) lease administrative space off-base, and 3) no action. After evaluating each alternative against the selection criteria, WPAFB determined that only Alternatives 2 and 3 met the purpose and need date of 1 September 2019, and were carried forward for further evaluation.

**Alternative 2 Lease Administrative Space Off-Base (Proposed Action):** relocate selected Program Executive Offices (PEO) off-base in accordance with the AFMC/CC guidance not to exceed single funding source approval level of $750K annual lease cost. Individual PEO(s) funding source leased space is anticipated to be approximately 43,000 SF for each group of personnel. Off-base leased space will consist of non-classified missions and will be modified to provide required administrative interior configuration, communications and Anti-Terrorism Force Protection (ATFP) requirements.
Alternative 3/No-Action: Do not provide administrative space for the potential growth of AFLCMC nor the swing space for on-base renovation of facilities. This will negatively impact any growth of AFLCMC accomplishment of the mission and negatively impede the renovation of existing facilities.

Alternatives Eliminated from Further Study:

Construct new facilities on Base: This alternative, involving facility construction, was evaluated in the Environmental Assessment Acquisition Management Complex Phase V EA, signed 27 February 2017. Funding was not received for construction of this facility. The temporary office space is to meet this need until construction funds are secured, in addition to the swing space needed for the AFMC and future construction swing space requirements.

On-Base lease of modular trailers: This alternative, involving the location of modular trailers on base, was considered during an August 2017 NEPA analysis. It has since been determined that the growth of the organization will grow over a five year period and that there is inadequate infrastructure on base to meet the requirement.

Environmental Consequences

The Proposed Action would have minimal or no environmental impacts on the following issues: water, geology, cultural, natural resources, noise/safety, safety, utility systems, and land use. The no-action alternative would have no environmental impacts on any natural or man-made resources. Swing space is for personnel already driving/living in the greater Dayton area, so no additional impacts are expected.

Air (EA Section IV.B.): The Proposed Action would have minor impacts to air quality from additional cars once the organizations ramps up.

Transportation (EA Section IV.H.): The Proposed Action would have minor impacts on transportation from additional cars once the organizations ramps up.

Socioeconomics (EA Section IV.L.): The Proposed Action would have long-term positive economic impacts to the area with additional personnel living, shopping and eating in the area. Since the four county area surrounding WPAFB encompasses over 900,000 people, any projected increase will have positive impact on the greater Dayton area.

Cumulative Impacts

The cumulative effects of the Proposed Action when added to other past, present, and reasonably foreseeable future actions were evaluated and found to be insignificant since no construction activities will take place, existing office facilities will be utilized. The impacts of additional cars is only a slight increase to the population of the greater Dayton area. There are no unavoidable adverse impacts associated with the Proposed Action or the No Action Alternative.

Public Notice

A public notice was posted in the Dayton Daily News on 22 Mar 19 for a 7-day public comment period. No comments were received.
Finding of No Significant Impact

The Proposed Action consists of leasing off-base administrative space for the growth of AFLCMC and swing space due to the renovation of several other facilities at WPAFB. Based upon my review of the facts and analyses contained in the EA, which is hereby incorporated by reference, I conclude that the Proposed Action will not have a significant impact on the natural or human environment. An environmental impact statement is not required for this action. This analysis fulfills the requirements of the NEPA, the President’s Council on Environmental Quality, and 32 CFR 989.

_____________________________  Date:_______

DAVID A. PERKINS, NH-04, DAF
Director, 88th Civil Engineer Group
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I. PURPOSE AND NEED FOR ACTION

A. Purpose and Need for Action

The Air Force Life Cycle Management Center (AFLCMC) is headquartered at Wright-Patterson Air Force Base (WPAFB), Ohio. Its mission is to hand deliver true life cycle management support vital to United States Air Force (USAF) dominance in air, space, and cyberspace. They provide the warfighter’s edge by acquiring and supporting war-winning aircraft, engines, munitions, electronics, and cyber weapon systems and sub-systems.

The purpose and need of this environmental assessment is to provide temporary office space for the immediate and future growth of organizations and swing space for organizations during renovation and construction of existing facilities on WPAFB over the next five years. These actions require administrative space for personnel, and includes but is not limited to, the proposed AFLCMC growth and AFMC and other organizational swing space for facility renovation projects conducted FY19-25.

There are numerous AFLCMC personnel in multiple facilities at WPAFB. AFLCMC operations require program offices with modern, safe and efficient office, conference, and support spaces, including mission-related Special Access Programs (SAP)/Sensitive Compartmented Information Facility (SCIF) areas. With over 50 acquisition programs at WPAFB experiencing rapid growth, AFLCMC cannot meet projected acquisition goals for these weapon systems without a significant increase in administrative and mission-related usable space. Additional AFLCMC personnel growth is expected over the next five years. This growth will result in 16 facilities exceeding their occupancy capacity and maximization of capacity at the other facilities. The 88th Civil Engineer Group (88 CEG) has evaluated available administrative space on base and has determined that there is no additional space available for AFLCMC's anticipated expansion since many of WPAFB facilities are decades old and require renovation.

Since some facilities are already at capacity, multiple program executive offices are experiencing delays in program milestones and are at risk for acquisition delays. In addition, there are delays to accommodate expanding support to foreign military customers. The lack of office space may result in an ongoing loss of sales and support to coalition partners supporting U.S. interests worldwide. The constant influx of classified and cyber security programs has created an insatiable need for secure space on the installation. Workarounds to date include increased density and conversion of vital conference rooms and other support space to accommodate the increasing personnel. The loss of these critical collaborative workspaces prevents simultaneous negotiations for multiple programs on parallel delivery schedules. Therefore, the purpose of this action is to provide office space for the AFLCMC growth. The need for the action is to ensure AFLCMC has adequate workspace for their current and projected acquisition workforce personnel; otherwise, the acquisition milestones and agile support to the warfighter will be jeopardized.

B. Project Description

Provide temporary administrative space for WPAFB organizational growth and swing space during installation facility renovations conducted FY19-25. To alleviate current and future
space constraints, AFLCMC had proposed to construct a 214,202 square feet (sf) facility as Phase V of the Acquisition Management Complex (AMC). The Environmental Assessment (EA) for Phase V was completed in 2017, resulting in a Finding of No Significant Impact (FONSI) signed 27 February 2017. If constructed, this facility would be adjacent to AMC I - IV facilities that have been in place since 1990.

A Military Construction (MILCON) project was submitted by 88 CEG for the AMC Phase V. However, due to priorities across the USAF, the project has yet to receive congressional approval for funding. As of January 2019, this project did not make the Integrated Priority List (IPL) for Fiscal Year (FY) 2021 and it is unknown when approval will be given.

Current AFLCMC force structure at WPAFB has consumed available space on the installation, and in the next five years, AFLCMC's workforce is projected to grow at a rate commensurate to mission growth (i.e. new Air Force and Foreign Military Sales Acquisition Programs). 88 CEG's evaluation has shown that space is not available in existing facilities to accommodate AFLCMC's growth or AFMC's swing space requirement. However, obtaining temporary leased space, within a 50-mile radius of WPAFB, will provide the necessary administrative space for AFLCMC and AFMC.

Temporary off-base leased space will also provide needed swing space during AFLCMC’s building reconfiguration/renovation plan for FY18 through FY23 to support agrowth of positions, including new hires, during that timeframe. Though specific locations for the requirement are yet to be determined, leased space will also provide swing space for an people during AFMC’s three-phase renovation of Buildings 10262 and 10266 beginning in FY20.

The base is located in the southwest portion of the state of Ohio in Greene and Montgomery counties, approximately 10 miles east of the city of Dayton. The base encompasses 8,145 acres and is classified as non-industrial with mixed development. The base is subdivided into two areas: Areas A and B. Area A consists primarily of administrative offices and contains an active airfield. Area B is located across State Route 444 to the southwest of Area A and consists primarily of research and development as well as educational functions. Figure 1-1 shows WPAFB and the surrounding area.
C. Scope of Environmental Analysis

If the analyses presented in the EA indicate that implementation of the Proposed Action would not result in significant environmental impacts, a FONSI would be prepared. A FONSI briefly presents reasons why a proposed action would not have a significant effect on the human environment and why an environmental impact statement (EIS) is unnecessary. If significant environmental issues would result that cannot be mitigated to insignificance, an EIS would be required, or the Proposed Action would be abandoned and no action would be taken.

The USAF has prepared this EA in accordance with the National Environmental Policy Act (NEPA) of 1969; 40 Code of Federal Regulations (CFR), Parts 1500-1508, the Council on Environmental Quality (CEQ) regulations implementing NEPA; the USAF Environmental Impact Analysis Process (EIAP) [32 CFR Part 989]. The Proposed Action and alternative are evaluated for potential environmental impacts to these elements of the natural and human environment:

- Air Installation Compatible Use Zone/Land Use;
- Air Quality;
- Water Resources;
- Safety and Occupational Health;
- Hazardous Materials and Waste;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Socioeconomics;
- Other (Infrastructure; Communications, Environmental Restoration Program).

The USAF considered a broad range of potential environmental impacts associated with the implementation of the Proposed Action and alternatives. The scope of the Proposed Action and alternatives is limited, since it does not entail demolition, land use changes, construction or other activities evaluated in NEPA analysis that routinely lead to environmental impacts. Because of the nature of activities being proposed, the potential for environmental impacts on many of the environmental resource areas normally evaluated in an EA are not warranted for this project. In accordance with CEQ guidance, all environmental resources were initially considered, but some were subsequently eliminated from further consideration if a determination was made there would be no potential and/or minimal impact with implementation of the Proposed Action.

C.1 Issues and Concerns Eliminated from Detailed Study

The following issues and concerns were determined to have limited potential for environmental impacts and therefore are not being evaluated in this EA: Air installation compatible use zone/land use, water, safety and occupational health, hazardous materials/waste, biological resources, cultural resources, and geology.
Air Installation Compatible Use Zone (AICUZ)/Land Use. The leased spaces will be located in a compatible land use zone.

Existing AFMC facilities are not located within an AICUZ and are located outside the 65 dB noise contour. Per Air Force Handbook 32-7084, the use of this facility is appropriate for administrative office space with no requirement for sound attenuation. The Base’s area development plan has the facility in conformance for administrative office use. Based on this analysis the Proposed Action will have no impact to this resource as re-classification of the existing land-use is not required and the action falls outside the AICUZ noise contours.

Water Resources.

Surface Water. WPAFB and the Greater Dayton Area lie within the Mad River Valley. The Mad River, which boarders Area A of WPAFB, originates approximately 40 miles north of Springfield, Ohio, flowing south and southwest past WPAFB to its confluence with the Great Miami River in Dayton, Ohio, and ultimately flows into the Ohio River near Cincinnati, Ohio. Ohio EPA has identified the lower segment of the Mad River, which flows through WPAFB, as an impaired water under the Clean Water Act (CWA) for not meeting aquatic life and recreational use standards.

WPAFB has prepared both a Base wide Storm Water Management Plan (SWMP) and Storm Water Pollution Prevention Plan (SWPPP), which describe the storm drainage areas along with management approaches to reduce potential storm water contamination. The installation has been issued an Ohio EPA industrial permit and a municipal National Pollutant Discharge Elimination System (NPDES) general permit covering their storm water program. The SWPPP and SWMP provide specific best management practices to prevent surface water contamination from activities such as major construction and/or building renovation projects and are required to be followed for all construction sites greater than one acre. Renovations to Building 10262 and 10266 will be required to adhere to the Base’s storm water permits as applicable.

Wetlands. Leased space will not be selected in a wetlands area.

Forty wetlands covering approximately 19.8 acres are within the limits of WPAFB; 23 are found within Area A. Of these 23 wetlands, 13 have been identified as jurisdictional waters of the United States; however, none of these wetlands fall within the immediate vicinity of Building 10262 or 10266.

Floodplains. Leased space will not be intentionally selected in a floodplain location.

Approximately 80 percent of WPAFB lies within the 100-year floodplain (813.4 feet above mean sea level) with most of Area A falling within this area. The Miami Conservancy District reserves the right to flood much of Area A, if necessary, which is located behind Huffman Dam within its retarding basin. The retarding basin is defined as the area of land that would be submerged if floodwater backed up to the top of the Huffman Dam spillway, at an elevation of 834.10 feet above sea level. The Area A floodplain boundary runs to just north of the current NASIC complex within the Prairie Trace Golf Course. Buildings 10262/10266 lie just southeast of the NASIC complex and is outside both the 100-year floodplain and Huffman retention basin.
Safety and Occupational Health. Leased spaced will meet all safety and occupational health requirements. There are no anticipated issues with safety and occupational health related to construction/demolition by leasing office space. All ATFP requirements will be evaluated by the appropriate organizations.

Hazardous Materials/Waste

Any wastes generated during renovations for leased space should be handled and disposed of according to state and local regulations.

Wastes generated at WPAFB include flammable solvents, contaminated fuels and lubricants, paint/coating, stripping chemicals, waste oils, waste paint-related materials, mixed-solid waste, and other miscellaneous wastes. The installation produces more than 1,000 kilograms of hazardous waste per month and is considered a large quantity hazardous waste generator. It is anticipated that some interior renovations will be required for Building 10262 and 10266. Hazardous materials/waste (i.e., solvents, paints, and adhesives) would be generated during these activities and would be managed/disposed of in accordance with the WPAFB Hazardous Waste Management Plan.

Asbestos Containing Material (ACM) / Lead-Based Paint (LBP) / Mercury / Polychlorinated Biphenyls (PCBs). AFLCMC has identified a potential temporary lease location where an Environmental Site Assessment was conducted by Omni Associates, Inc. in 2015. They concluded that Based on the age of the buildings, there were no suspected asbestos containing materials and that none of the painted surfaces were suspected of being covered with lead Based paint. (Appendix C) The majority of the facilities at WPAFB have ACM, LBP, mercury, and PCBs associated with them due to their age. Throughout its history, Building 10262/10266 have undergone numerous building renovations. Heavy remodeling of the interior has occurred and the buildings were surveyed each time for these hazards and abated accordingly. Prior to future renovation activities at the buildings, surveys will be required to determine the presence of ACM, LBP, PCB, or any other potentially hazards’ materials followed by abatement if found.

Radon. AFLCMC has identified a potential temporary lease location where an Environmental Site Assessment was conducted by Omni Associates, Inc. in 2015. The site selected for the first phase of off Base leasing is located in a county designated by the EPA Map of Radon Zones as being in Zone 1/ High Potential with a predicted average indoor radon screening level above 4.0 picocuries per liter (pCi/L). There are no requirements for testing at commercially occupied spaces. In addition, there are no subgrade spaces which reduces the potential for radon gas exposure to an occupant. Based on these parameters, radon testing is not warranted at this time. (Appendix C). Radon is a gas emitted by soil and rock, which can seep into buildings through gaps in the foundation, construction joints, and through cracks in floors and walls. Since radon levels are highest in rooms closest to the ground, spending lots of time in Basement rooms can increase the risk for exposure. Bioenvironmental Engineering sampled the Basement of Buildings 10262/10266 in 2014. Results show each testing location below 4 pCi/L, USEPA’s minimal level required for radon mitigations.

Biological Resources. Leased space will not be intentionally located near threatened or endangered species. The current proposed lease site and Buildings 10262/10266 are located on land designated for administrative use. Vegetation consists of mowed turf and ornamental trees/ shrubs. Wildlife seen within the area are common mammals such as eastern gray squirrel, eastern chipmunk, groundhog, etc. and common avian species such as Canada goose, European
starling, American robin, mourning dove, etc. While four federally threatened and endangered species have been known to occur at WPAFB, their habitat locations are well outside the boundaries of the AFMC buildings.

**Cultural Resources.** Space identified for leased will not be located in a site known to have any cultural resources such as Native American burial sites, archaeological sites or historical significance. The current proposed lease facility was built in 1989. Building 10262 was built in 1942 and originally served as the Army Air Service Command (ASC) during World War II. Throughout its history, major command decision makers were housed within Building 10262. This building is a large, two-story concrete Art Deco structure with a flat roof. The main entrance is a raised monolithic entry bay with an Art Deco motif that extends above the roofline. Ribbon windows are located on each floor. Wide concrete steps lead up to the main entry, which is flanked by large vertical pillars. A decorative concrete canopy protects the entrance. Additional smaller symmetrical entrances are located near the comers of the front elevation. One of the most significant features of Building 10262 is the Bridge of Wings Mural; painted in 1944. Located on the west wall of the second floor lobby, the mural represents a Pan-American postwar world united by air power and commerce. As such, Building 10262 is eligible for listing on the National Register of Historic Places (NRHP).

Building 10266 was built in 1964 as a replacement for Building 10262A. The building’s purpose was to house overflow personnel attached to the headquarters that were unable to be located within Building 10262. A breezeway was constructed connecting the two buildings together. It has been determined Building 10266 is not eligible for listing on the NRHP for two main reasons: (1) Command decisions as part of the Cold War were not made within this building and (2) There are no particularly distinguished feature(s) of mid-century modern architectural design.

**Geology and Soils.** No ground disturbance is anticipated for leasing space for the AFLCMC growth or the swing space during the AFMC renovations since the action is to locate personnel into an existing building location; therefore, there will be no impacts to the resource area from the Proposed Action. Existing communication lines will be utilized so that no new trenching/construction would be required.

**C.2. Notice of Availability**

A Notice of Availability (NOA) for the Draft Final EA was published in the Dayton Daily News. A hard copy of the Draft Final EA was made available in the Greene County Public Library, Fairborn Branch. An electronic copy of the EA was also provided on the WPAFB Environmental Management website at http://www.wpafb.af.mil/units/cev. During the public review period, XX comments were received. The NOA is included in Appendix A of the Final Document.
II. DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

A. Selection Criteria

Office space for tenant and Base organizations must meet the following criteria:

- Provide approximately 80 SF per person along with adequate parking (5 people per 1000 SF)
- Office space available by 1 September 2019 for the initial operating capacity covering the first phase of growth
- Located within a 50-mile radius of WPAFB
- AFLCMC projected growth FY19-23
- AFMC renovations FY20-25 swing space, FY19-23 renovation swing space

88 CEG looked at several options to provide additional workspace for AFLCMC and AFMC. These include: construction of new base facilities, leasing temporary on-base facilities, purchasing modular trailers, and leasing off-Base space. However, Based upon the selection criteria established above, it was determined that several of the alternatives, including a No- Action alternative, were not feasible and were eliminated from further evaluation in this EA. The only alternative that meets the purpose and need is to lease off-Base administrative space.

B. Alternatives Eliminated from Further Study

1. Construct New Base Facilities. The EA of the AMC Phase V evaluated this alternative, which resulted in a signed FONSI on 27 February 2017. As stated earlier, congressional approval for this MILCON has yet to occur (FY21 IPL) and it is unknown at this time when funding will occur. This alternative was dismissed from further review because of the Initial Occupancy Condition (IOC) requirement to have office space available by 1 September 2019.

2. On Base lease and/or purchase of modular trailers. This alternative involves the either the lease and/or purchase of 42,558 SF of temporary facilities that would be located on base. Lead time to acquire these temporary building(s) would take approximately eighteen months, which does not meet the 1 September 2019 IOC date.

C. Proposed Action: Obtain Off-Base Lease

Relocate selected Program Executive Offices (PEO) off-Base in accordance with the AFMC/CC guidance not to exceed single funding source approval level of $750,000 annual lease cost.

Individual PEO(s) funding source leased space anticipated to be approximately 43,000 SF for each group of approximately 300 personnel. Off-Base leased space will be modified to provide required administrative interior configuration, communications and ATFP requirements.

The initial off-Base lease site is within 10 miles of the Base.
When the need is identified, according to the Real Property Transactions Playbook and Air Force Instruction (AFI) 32-9001, before an organization can obtain an off-base lease, the properties on base must be explored, other government space within a 50 miles radius researched before a request is made to General Services Administration (GSA). The authority vested with AFCEC/CI (AFI 32-9001, Ch. 3.1) will allow an off base lease if GSA cannot accommodate the request. The location of the Proposed Action, which will support space requirements identified for the next five years, is identified and described in the consultation letter in Appendix B. Due to security concerns, this document will minimize specifics.

D. No Action Alternative

Status quo will not provide the personnel growth/swing space necessary for the AFLCMC building reconfiguration/renovation plan executed FYI 8 through FY 23 and will negatively impact AFLCMC ability to accomplish new Air Force and Foreign Military Sales Acquisition Programs. Missions would be impacted since they could not be expanded with additional personnel to accomplish increased workloads. USAF and contractor personnel would continue to use existing space. Relocating personnel to multiple office locations to additional space would negatively impact the mission by not collocating organizations that work together, affecting the future end state of AFLCMC personnel. In addition, swing space would not be obtained for building renovations at AFMC, or other facilities on Base. Project inefficiencies would continue since the workforce would remain scattered throughout several different buildings at WPAFB. Per the Council of Environmental Quality (CEQ), the No Action Alternative will be used as a Baseline to determine impacts the Proposed Action and/or any other alternative will have on the environment and will be carried forward for further analysis.
III. AFFECTED ENVIRONMENT / POTENTIAL ENVIRONMENTAL IMPACT

A. Introduction

The Greater Dayton Area, located in the southwest portion of Ohio, encompasses Montgomery, Greene, Miami and Clark Counties. WPAFB is located in Greene and Montgomery counties.

B. Air Quality

The U.S. Environmental Protection Agency (USEPA) has classified the National Ambient Air Quality Standards under the Clean Air Act (CAA) for the metropolitan Dayton region in which WPAFB falls under as attainment for all criteria pollutants.

- Ozone – Attainment
- Nitrogen Dioxide – Attainment
- Sulfur Dioxide – Attainment
- Lead – Attainment
- Carbon Monoxide – Attainment
- Particulate Matter – Attainment

Air quality is typically good in the vicinity of WPAFB, and is generally affected only locally by military and civilian vehicle emissions, particulate pollution from vehicle traffic, emissions from wastewater treatment plants, industrial sources, and construction activities. Mobile sources, such as vehicle and aircraft emissions, are generally not regulated and are not covered under existing air permits. Stationary emission sources at WPAFB include natural gas and coal-fired boilers; research and development sources, such as laboratory fume hoods and test cells; paint spray booths; refueling operations; and emergency power generators. The Base has been issued a Title V operating permit covering approximately 1,050 air sources, many of which are insignificant. The initial lease site and Buildings 10262/10266 are located in Greene County.

The initial phase to lease space for the movement of people off base and the AFMC temporary lease requirement for people would have no additional impact to the greater Dayton area air quality since the personnel are already working in the area. In order to analyze the impact of an additional personnel the Air Force’s Air Conformity Applicability Model (ACAM) was used to perform an analysis to assess the potential air quality impact/s associated with the action. This is done in accordance with the Air Force Instruction 32-7040, Air Quality Compliance And Resource Management; the Environmental Impact Analysis Process (EIAP, 32 CFR 989); and the General Conformity Rule (GCR, 40 CFR 93 Subpart B). This report provides a summary of the ACAM analysis which indicates no impact to the air quality (Appendix D).

The No Action Alternative would have no impact to the air quality of the area.
C. Socioeconomics:

Wright-Patterson AFB is the largest employer in the region. Approximately 30,000 people are employed at the Base, consisting of nearly 1 in 12 people in the greater Dayton area. Approximately 92% of WPAFB’s military and civilian employees live in the Dayton-Springfield Ohio Metropolitan Statistical Area that includes Greene, Montgomery, Clark and Miami counties. The base has an annual payroll of approximately $1.25 billion, making the Base a major social and economic force in the Dayton area. The base's economic impact of $5.1B extends into an 18 county region within a 50-mile radius of the base. The base awards numerous contracts every year to local business, further supporting the local economy. Statistics provided by the Ohio Department of Development and Federal Census Bureau indicate that the percent of the population below poverty level in 2017 in Ohio and two of the four-county area was higher than the national average. In 2017, per capita income in Ohio and the average of the four-county area was below the national average. Greene County was 13% higher than the national average. Since 2014, Ohio’s unemployment rate also has been consistently higher than the national rate.

Montgomery counties’ poverty and unemployment rates have been higher than the national average four of the past five years, higher than the state average two of the past five years while Greene County has consistently been lower than the state average (Table 1).

### Table 1. Regional Economic Profile

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</tbody>
</table>

Population growth statistics for the four-county area are provided in Table 2. Greene and Miami counties show a slight increase in population, while Montgomery and Clark counties show a slight decrease in population since 2010. The average vacant housing rate in Ohio is 11%, which includes homes for sale and seasonal homes. Miami County has the lowest rate of 6.6%, followed by Montgomery County, Greene County, and Clark County.

### Table 2. Area Population Growth Statistics

<table>
<thead>
<tr>
<th>County</th>
<th>Total population for 2010a</th>
<th>Estimated population for 2020b</th>
<th>Percent change in population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greene</td>
<td>161,573</td>
<td>164,940</td>
<td>2.1% increase</td>
</tr>
<tr>
<td>Montgomery</td>
<td>535,153</td>
<td>513,830</td>
<td>4.0% decrease</td>
</tr>
<tr>
<td>Clark</td>
<td>138,333</td>
<td>133,240</td>
<td>3.7% decrease</td>
</tr>
<tr>
<td>Miami</td>
<td>102,506</td>
<td>102,590</td>
<td>0.1% increase</td>
</tr>
</tbody>
</table>

aU.S. Census Bureau (2010)  
bOhio Department of Development (2018)

An additional increase of personnel would be supported by the area since the overall population is projected to decrease by 2.4% in the greater Dayton area and have a small, positive impact on the local economy by having additional personnel and their families shop, eat and dine in the local area. The movement of personal into the temporary
office locations would not have an impact to the socioeconomics of the area, other than a localized change in where they might dine for lunch.

The No Action Alternative would have no impact to the socioeconomics of the area.

**D. Other (Transportation/Traffic)**

Traffic in the vicinity of WPAFB tends to be problematic during early morning and mid-afternoon shift changes. Traffic approaching Gate 12A from State Route (SR) 444 has been reported to repeatedly back up over 1 mile as employees wait to enter the base. Construction of the new commercial traffic gate will help alleviate this congestion, which is expected to be completed by December 2019.

A number of major highways are located in close proximity to WPAFB, including Interstate 675, a major north/south highway situated to the east and south of the Base. State Route 444 bisects the base, separating Area B from Area A. Interstate 70, a major east/west highway, is located north of the base. Access to the main base complex is limited to a number of gates which are controlled by the base security police. Most of those who would stay at the proposed new facility would most likely enter the Base from SR 444 through Gate 12A.

The Proposed Action would have minimal environmental impacts to the traffic in greater Dayton area since an increase of personnel is 0.2% of the greater Dayton population. During the renovations of the AFMC complex, it might have a slight positive impact to the traffic at the base gates while the people are working off-base.

The No Action Alternative would have no impact to the traffic of the greater Dayton area.

**E. Cumulative Impacts**

A cumulative effect is defined as an effect on the environment that results from the incremental effect of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place locally or regionally over a period of time. The purpose of analyzing the cumulative effects of a proposed action is to ensure that federal decisions consider the “big picture” of the consequences of the Proposed Action.

Cumulative effects are identified by defining the direct and indirect effects of the Proposed Action, determining which environmental resources are affected, and deciding which effects on these resources are important from a cumulative effects perspective. Also, when analyzing cumulative effects, the spatial (geographical area) and temporal (time frame) components must be expanded beyond the scope of the Proposed Action.

There are no foreseeable, significant, indirect, or cumulative effects associated with the Proposed Action nor the No Action Alternative since there are no construction activities associated with the action. The addition to the air, socioeconomics and traffic of the greater Dayton area are minimal as discussed in each section above.
F. Unavoidable Adverse Impacts

If the Proposed Action were implemented, there might be very minor impacts to air and traffic due to the increase in personnel. Since the four county area is home to 937,973 people, with Montgomery and Greene counties comprising 698,294 (Census.gov) people, an increase is not significant, a slight increase of the population of the greater Dayton area. There are no unavoidable adverse impacts associated with the Proposed Action or the No Action Alternative.

G. Relationships of Short-Term Uses and Long-Term Productivity

Neither the Proposed Action nor the No Action Alternative would affect the long-term productivity of the environment; no significant impacts to the environment or socioeconomic factors have been identified through this EA process.

H. Irreversible and Irretrievable Commitments of Resources

CEQ regulations in 40 CFR §1502.16 require that an agency identify any irreversible or irretrievable commitments of resources that would be involved in the Proposed Action, should it be implemented. Capital, energy, materials, and labor would be required for the Proposed Action. These resources are not retrievable.
IV. CONCLUSION

The results of this EA indicate that the Proposed Action lease off-base existing office space for tenant and base organizations, would have no significant environmental impacts. Based on this study, the preparation of an environmental impact statement is not warranted. It is recommended that a FONSI be issued. The evaluation of the potential environmental impacts from the Proposed Action and no-action alternative is summarized in Table 3.
Table 3. Summary of Potential Environmental Impacts

<table>
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<th>Resource</th>
<th>Environmental Impacts Proposed Action</th>
<th>Environmental Impacts No-Action</th>
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<tbody>
<tr>
<td>Land Use</td>
<td>Short-term: No impacts</td>
<td>Short-term: No impacts</td>
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<tr>
<td></td>
<td>Long-term: No impacts</td>
<td>Long-term: No impacts</td>
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<tr>
<td>Air</td>
<td>Short-term: Potential minor impacts from increase in traffic.</td>
<td>Short-term: No impacts</td>
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<tr>
<td></td>
<td>Long-term: Potential minor impacts from increase in traffic.</td>
<td>Long-term: No impacts</td>
</tr>
<tr>
<td>Water Resources</td>
<td>Short-term: No impacts.</td>
<td>Short-term: No impacts</td>
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<tr>
<td></td>
<td>Long-term: No impacts</td>
<td>Long-term: No impacts</td>
</tr>
<tr>
<td>Safety &amp; Occupational Health</td>
<td>Short-term: No impacts</td>
<td>Short-term: No impacts</td>
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<td></td>
<td>Long-term: No impacts</td>
<td>Long-term: No impacts</td>
</tr>
<tr>
<td>Hazardous Materials/Waste</td>
<td>Short-term: No impacts</td>
<td>Short-term: No impacts</td>
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<td>Long-term: No impacts</td>
<td>Long-term: No impacts</td>
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<tr>
<td>Biological/Natural Resources</td>
<td>Short-term: No impacts</td>
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<td>Cultural Resources</td>
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<td>Geology Resources</td>
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<td>Socioeconomics</td>
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<td>Long-term: Potential minor increase to local economy from additional employees</td>
<td>Long-term: No impacts</td>
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<tr>
<td>Other (Transportation /Traffic)</td>
<td>Short-term: Potential minor impacts from increase in traffic.</td>
<td>Short-term: No impacts</td>
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<td></td>
<td>Long-term: Potential minor impacts from increase in traffic.</td>
<td>Long-term: No impacts</td>
</tr>
</tbody>
</table>
V. Persons Contacted

Jason Besser, Real Property Branch Chief, 88 CEG/CEI

Don Fosnight, Program Manager, 88 CEG/CENPL

Cheryl Butler, IMC Real Estate Management LLC
1105 Schrock Road, Suite 204
Columbus, OH 43229
614.601.5553
614.374.2342 cell

References:


Environmental Assessment for Acquisition Management Complex Phase V, 2017

Prepared By:

Melanie A. Pershing
MS, Geological Sciences
EIAP/Environmental Program Manager
88 CEG/CEIEA
Environmental Branch
Installation Management Division
Wright-Patterson Air Force Base
Appendix A Notice of Availability
PUBLIC NOTICE

Notice of Availability
Draft Final Environmental Assessment Administrative Space
Wright-Patterson Air Force Base (WPAFB)

Beginning 22 through 28 March 2019, the United States Air Force will accept comments on the Environmental Assessment (EA) to evaluate alternatives to provide administrative space for growing organizations and during renovation of existing facilities at WPAFB, Ohio. The results, as found in the EA, show that the Proposed Action of temporarily leasing existing administrative space in the greater Dayton area would not have an adverse impact on the environment—indicating that a Finding of No Significant Impact would be appropriate. The public is invited to review the document at the Greene County Public Library, Fairborn Branch, located at 1 East Main Street, Fairborn, Oh 45324, (937) 878-9383 or access the document on the WPAFB public website at http://www.wpafb.af.mil/units/cev/.

Written comments and inquiries on the Public Notice should be directed to:

88 ABW/Public Affairs
5135 Pearson Rd. Bldg 10, Rm 252
Wright-Patterson AFB, OH 45433
or
E-mail to: 88abw.pa@us.af.mil
If there are no T&E species and/or habitat affected then consultation with USFWS is not required. State such in EA.

If there are no floodplains/retarding basins affected then consultation with MCD is not required. State such in EA.

This is my opinion, as well as that of Megan Seymour, Wildlife Biologist/WPAFB-USFWS Liaison, USFWS Columbus Field Office.

Darryn M. Warner  
Natural Resources Program Manager  
Wildland Fire Program Manager  
88 CEG/CEIEA  
Com. Ph. (937)257-4857 DSN 787-4857  
Fax (937) 656-1534  
Darryn.Warner@us.af.mil

https://www.facebook.com/WrightPattersonNaturalResources/

"Don't judge each day by the harvest you reap but by the seeds that you plant." ~Robert Louis Stevenson
Appendix C Environmental Site Assessment
07.00 ASBESTOSCOXLIDTH'C LU[R]I.U.S
Based on the age of the building, none of the painted surfaces exceeded the expected limit of asbestos-containing materials (ACM).

08.00 LEADBASED-NT SCR Lorenzo.
Based on the age of the building, none of the painted surfaces exceeded the lead-based paint limit.

09.00 PRELIMINARY V R J)JONSCREE."
This facility is located in a county designated by the EPAs Raccoon Zoos as being in Zone 1, having a predicted average indoor radon screening max of 4.0 pCi/L. There are no requirements for testing in commercially occupied spaces. In addition, there are no subspaces, which reduces the potential for radon gas to an occupant. Based on these parameters, radon testing is not warranted at this time.

10.00 LL DiliWAITRTESTE:"G
The supply water is from the City of Fairborn. All public systems were required to perform source water radon testing. The results are as follows:

- Corrective measures to reduce the lead present in the system.
- Review of the Annual Water Quality Report revealed no other randomly tested locations exceeded the lead action level of 15 parts per billion (ppb), and the water supply is certified Lead and Copper Regulations.. Based on these parameters, water testing is not warranted at this time.

11.00 OLDST"HRY
We completed the following tasks:
- Looked for evidence of "Drizzle" mold and mold
- Inspected for evidence of mold and mold
- Conducted visual observations for evidence of mold and mold

We did not note obvious signs of mold and mold. Based on these parameters, no further action or investigation is warranted at this time.

1:00 .n. LTIMEDL\ COMPLL\WCCE
The site was not listed as a CUST Ed generator of hazardous waste.

- Based on the property of the property, no further action is required.

13.00 SOIL-"//ICROL.,.llVHTI:RTISTIXC
Our observations, interviews, and research revealed no curricular activity at the subject site, at any adjacent property, or at the property located within a future action level of 0.16 mile radius and beyond. Based on these parameters, no further action is warranted at this time.
1. General Information: The Air Force’s Air Conformity Applicability Model (ACAM) was used to perform an analysis to assess the potential air quality impact/s associated with the action in accordance with the Air Force Instruction 32-7040, Air Quality Compliance And Resource Management; the Environmental Impact Analysis Process (EIAP, 32 CFR 989); and the General Conformity Rule (GCR, 40 CFR 93 Subpart B). This report provides a summary of the ACAM analysis.

a. Action Location:
   - Base: WRIGHT-PATTERSON AFB
   - State: Ohio
   - County(s): Greene
   - Regulatory Area(s): NOT IN A REGULATORY AREA

b. Action Title: Provide Temporary Leased Administrative Space for AFLCMC Personnel Growth

c. Project Number/s (if applicable):

d. Projected Action Start Date: 9 / 2019

e. Action Description:
   - Alternative 1 (Preferred): Relocate personnel off base over a 5 year period.
   - Alternative 2: 88CEG and AFLCMC sought leased modular trailers.
   - Alternate 3: AFLCMC has sought MILCON for a new building within its existing Acquisition Management Complex, however continues to fall below the funding line.
   - Alternate 4: Status quo will not provide the personnel growth/swing space necessary for the AFLCMC building reconfiguration/renovation plan executed FY18 through FY 23 and will negatively impact AFLCMC ability to accomplish new Air Force and Foreign Military Sales Acquisition Programs.

f. Point of Contact:
   - Name: Chris Tumbusch
   - Title: NH03
   - Organization: 88 CEG/CEIEA
   - Email: christopher.tumbusch@us.af.mil
   - Phone Number: 937-257-2455

2. Air Impact Analysis: Based on the attainment status at the action location, the requirements of the General Conformity Rule are:

   applicable
   X not applicable
Total combined direct and indirect emissions associated with the action were estimated through ACAM on a calendar-year basis for the “worst-case” and “steady state” (net gain/loss upon action fully implemented) emissions.

“Air Quality Indicators” were used to provide an indication of the significance of potential impacts to air quality. These air quality indicators are EPA General Conformity Rule (GCR) thresholds (de minimis levels) that are applied out of context to their intended use. Therefore, these indicators do not trigger a regulatory requirement; however, they provide a warning that the action is potentially significant. It is important to note that these indicators only provide a clue to the potential impacts to air quality.

Given the GCR de minimis threshold values are the maximum net change an action can acceptably emit in non-attainment and maintenance areas, these threshold values would also conservatively indicate an actions emissions within an attainment would also be acceptable. An air quality indicator value of 100 tons/yr is used Based on the GCR de minimis threshold for the least severe non-attainment classification for all criteria pollutants (see 40 CFR 93.153). Therefore, the worst-case year emissions were compared against the GCR Indicator and are summarized below.

Analysis Summary:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Action Emissions (ton/yr)</th>
<th>AIR QUALITY INDICATOR</th>
<th>Exceedance (Yes or No)</th>
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# AIR CONFORMITY APPLICABILITY MODEL REPORT

## RECORD OF AIR ANALYSIS (ROAA)

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## 2022

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</tr>
<tr>
<td>NOT IN A REGULATORY AREA</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
None of estimated emissions associated with this action are above the GCR indicators, indicating no significant impact to air quality; therefore, no further air assessment is needed.

Chris Tumbusch, NH03

DATE