FINDING OF NO SIGNIFICANT IMPACT and FINDING OF NO PRACTICABLE ALTERNATIVE for FLOOD RECOVERY REBUILD AT OFFUTT AIR FORCE BASE, NEBRASKA ENVIRONMENTAL ASSESSMENT

Pursuant to the Council on Environmental Quality (CEQ) regulations for implementing the procedural provisions of the National Environmental Policy Act of 1969 (NEPA), Title 40 of the Code of Federal Regulations (CFR) Parts 1500-1508 and the Air Force Environmental Impact Analysis Process Regulations (32 CFR Part 989), the U.S. Air Force (USAF) has prepared this Environmental Assessment (EA) to evaluate the potential impacts on the natural and human environment associated with the proposed Flood Recovery Rebuild at Offutt Air Force Base (AFB), Nebraska.

Purpose and Need

In March 2019, Offutt AFB was inundated with floodwaters as part of a record flooding event. The purpose of the Proposed Action would be to recover areas of Offutt AFB damaged by the flood, and to rebuild and re-establish critical facilities and infrastructure in a manner that reduces the risk of future flood damage in order to support the full functioning of missions at Offutt AFB. The purpose would also include consolidating functions that are spread around the installation in a manner not conducive to efficient and effective operational and mission requirements. The lack of consolidation pre-dated the flood in some areas and is a result of relocations due to flooding in other areas. Finally, the purpose of the project would also include ensuring the location, size, and configuration of proposed facilities and infrastructure support current and anticipated future mission requirements. The need for the Proposed Action is evident in the current condition of critical facilities and infrastructure at Offutt AFB that were impacted by the flood. Under current conditions, the mission of Offutt AFB would continue to be negatively impacted by the loss of critical mission and support facilities. Tenant organizations' operational missions would continue to be negatively impacted as they would be forced to continue to operate in a diminished capacity in facilities dispersed across the installation that are undersized, overcrowded, poorly configured and inadequately equipped with the utilities and communications infrastructure necessary for them to successfully accomplish their assigned mission.

Proposed Action

The Proposed Action would re-establish critical facilities and infrastructure to support the full functioning of Offutt AFB and would consolidate functions that were spread around Offutt AFB prior to the flood. The Proposed Action would also consolidate related functions into eight different campuses that would allow for more effective and efficient operations. The Proposed Action would involve demolition of damaged structures and construction of new facilities and infrastructure in each of the functions that experienced flood damage. Overall, there would be approximately 61 buildings demolished, 22 buildings repaired, and 21 new buildings constructed. It is anticipated that 13 above ground storage tanks (ASTs) and 9 underground storage tanks (USTs) would be removed as part of the Proposed Action. The proposed new buildings would consolidate the function of the buildings that would be demolished. In order to be in compliance with floodplain regulations, non-

mission critical facilities would be built to a height of two feet above the flood elevation of 972 msl. Mission critical facilities would be built to an elevation three feet above the flood elevation.

The Proposed Action would include demolition of flood damaged facilities, site preparation, and construction of new facilities and associated infrastructure on eight different campuses:

Nuclear Command, Control, and Communications (NC3) Alert Campus. Proposed activities at the NC3 Alert Campus would involve construction of a two-story alert facility, a one-story aircraft maintenance/spares storage building, a one-story family visitor center, and a one-story simulator building for a total of approximately 170,000 square feet (SF) of new construction. Proposed activities would also include demolishing 10 buildings (approximately 112,000 SF) that were damaged by the flood. It is estimated that seven ASTs and six USTs would need to be removed. The proposed construction activities on the NC3 campus would occur from May of 2021 through May of 2023.

Satellite Communications (SATCOM) – Proposed activities would include constructing a consolidated SATCOM Satellite Communications Station with adjacent antennae farm. Primary facilities would include a communications facility, special foundations, and redundant power generators. The proposed construction activities on the SATCOM campus would occur from January of 2022 through January of 2024.

Non-Kinetic Operations Campus – Proposed activities in the Non-Kinetic Operations (NKO) area would include constructing an approximately 420,000 SF Non-Kinetic Operations Facility, an approximately 4400 SF Courier Station building, and a family visitation facility at approximately 20,000 SF. Nine buildings damaged by the flood would be demolished in this area (approximately 147,000 SF). The proposed construction activities on the NKO campus would occur from February of 2022 to February of 2026

Security Campus – Proposed activities in this area would include constructing a new approximately 45,000 SF facility for a Security Forces Operations Center and other facilities. The new operations center facility would replace existing facilities that were flooded and damaged beyond repair. There would be demolition of 17 flood damaged buildings in this area (approximately 88,240 SF). It is estimated that four ASTs and three USTs would need to be removed. The proposed construction activities on the Security campus would occur from June of 2021 through June of 2023.

Flightline Hangars Campus – Proposed activities in this area would demolish buildings that were flood damaged beyond repair, build replacement facilities including a consolidated Liquid Oxygen storage facility (approximately 4,800 SF), a de-icing liquid storage facility (approximately 1,100 SF), and a supply and equipment storage facility (approximately 1,900 SF). Approximately 18,500 SF of damaged facilities would be demolished along with an aircraft test cell that is no longer used. A total of 13 buildings would be demolished. It is estimated that two ASTs would need to be removed. The proposed construction activities on this campus would occur from May of 2021 through November of 2022.

Logistics Readiness Campus – Proposed activities in this area would include construction of a Consolidated LRS warehouse with loading docks (approximately 27,000 SF), and an Open Storage Area (approximately 64,000 SF). The project would demolish approximately 25,000 SF of existing substandard warehouse space and other facilities (eight buildings). The proposed construction activities would occur from July of 2021 through January of 2023.

Emergency Power Microgrid – Proposed activities would include replacing lost power generation capability and the associated distribution infrastructure in or near the existing Power plant to provide backup generation capability. The system and associated infrastructure would be resized and reconfigured to better serve new and existing facilities. The proposed plan for new generators would be to spread them in strategic locations and tie them back to a Control system. The proposed generators would provide redundancy and resiliency to meet energy capacity to provide full mission support during prime power failure. The proposed construction activities would occur from May of 2022 through October of 2023.

Lake Campus – Proposed activities in this area would include constructing a new consolidated recreational facility (approximately 10,200 SF) and includes a reception hall, equipment rental and check-out, restrooms, laundry, shower facilities, snack bar, kitchen, dining room, mechanical room and supporting infrastructures. Proposed activities also include a MWR maintenance shed (approximately 3,000 SF). Four buildings would be demolished in this area (approximately 10,800 SF). Two existing playgrounds would also be removed and eventually replaced. The proposed construction activities would occur from July 2021 through January 2023.

Alternatives

Planning efforts identified potential means of meeting the purpose and need for the Proposed Action. Similar to the Proposed Action, another alternative (hereafter referred to as Alternative 1) would also include eight campuses with consolidated functions. Alternative 1 would include repair, demolition, or replacement of structures in each of the eight campuses as described under the Proposed Action; however, the size, location, and configuration of some buildings have been modified under the Proposed Action to better achieve the project objectives. The main difference would be that the SATCOM infrastructure would be located further north on the installation away from other campuses under Alternative 1. This alternative was eliminated from detailed analysis because it was determined that this location would not support the SATCOM mission requirements. Specifically, this location does not allow communication network look angles needed to see the front underside of parked aircraft and the entire runway, thereby not supporting SATCOM mission requirements.

CEQ regulations require consideration of the No Action Alternative as a baseline against which the impacts of the Proposed Action can be evaluated. Under the No Action Alternative, new facilities and infrastructure would not be constructed and Offutt AFB would continue to operate in a diminished capacity. Displaced functions would continue to operate in facilities that do not fully support mission effectiveness under the No Action Alternative. This alternative would not meet the Purpose and Need or fully meet any of the selection standards identified in the EA.

Environmental Consequences

The EA focuses on environmental resources considered potentially subject to impacts from the Proposed Action and alternatives. These environmental resources are: land use, air quality, noise, topography, geology, soils, water resources, biological resources, cultural resources, hazardous materials and waste, health and safety, and infrastructure. The evaluation performed as documented within the EA concludes that while some adverse effects from the Proposed Action would occur, the adverse effects would be less-than-significant and managed with Best Management Practices (BMPs). There would be no significant adverse impact, either individually or cumulatively to the human environment as a result of implementing the Proposed Action Alternative.

Mitigation Measures, Best Management Practices, and Permit Requirements

The following mitigation measures, BMPs, and permit requirements are required in the areas of air quality, noise, water resources, biological resources, cultural resources, safety, and hazardous materials and waste:

Air Quality

- Conduct appropriate dust suppression methods during the proposed on-site construction activities (i.e. application of water, soil stabilizers, or establishment of vegetation; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-movement or disturbance activities during high wind conditions).
- A speed of less than 15 miles per hour for construction equipment on unpaved surfaces would be required.
- Low volatile organic compounds, architectural materials, supplies, and equipment would be used.
- Construction equipment would be repaired and serviced as needed to prevent excess emissions.
- Heavy equipment would be turned off when not in use.
- Excess soil would be cleaned from heavy equipment and trucks leaving the construction zone to prevent off-site transport.

Noise

- Appropriate noise-dampening/muffler devices on construction equipment would be used to minimize noise generation.
- Proposed construction activities would be limited to daytime hours, as allowable.

Water Resources

- Implement best management practices as defined in a Stormwater Pollution Prevention Plan (SWPPP) to reduce or eliminate the potential for eroded soils and contaminants from entering surface water bodies and groundwater. The Final SWPPP Template from the Environmental Protection Agency is required to be used by contractors.

- Vehicular traffic associated with proposed construction and operational activities would remain on paved areas to the maximum extent practicable to minimize disturbance of surface soils. Surface disturbance would be kept to the minimum required to construct structures associated with the proposed area.
- Erosion-prevention measures would be implemented such as silt fences and water breaks, sedimentation basins, filter fences, sediment berms, interceptor ditches, straw bales, rip- rap, and/or other sediment control structures. Soils would be watered and stockpiled during proposed construction to prevent erosive losses from excavation and other proposed activities.
- Soil-stabilizing vegetation would be planted and maintained on disturbed areas.
- Because over 1 acre of land would be disturbed, a National Pollutant Discharge Elimination System Construction Storm Water Permit along with a SWPPP would be prepared and implemented by the construction contractor.in accordance with the Offutt AFB existing permit and SWPPP. The contractor would need to use the EPA's 2017 Final SWPPP Template which is required by Offutt AFB. The contractor would also need to obtain a de-watering permit from the NDEE and follow any necessary permit required BMPs for de-watering.
- Because this federal development would exceed 5,000 square feet, the design and construction of the Proposed Action would comply with Energy Independence and Security Act Section 438 requirement to reduce stormwater runoff from development activities to protect water resources.
- Proposed construction and operation would comply with the Offutt AFB Municipal Separate Storm Sewer System permit and Stormwater Management Plan, which would be updated to include the Proposed Action and associated activities.
- Temporary collection and containment systems for domestic and industrial wastewater would be provided during the construction phase of the proposed area in the form of portable toilets, designated concrete washout containment facilities, and similar practices as needed.
- The total amount of ground and vegetative cover disturbance would be minimized to the amount practicable.
- Construction staging areas would be limited to areas that have previously been disturbed, if possible.
- All chemicals and petroleum products would be stored and contained away from water sources.
- Secondary containment and barriers, or similarly effective means designed to prevent discharge of pollutants, would be implemented between any disturbed storage tanks and waterways. This would also include compliance with applicable state and federal laws regarding Spill Prevention, Control, and Countermeasure Plan requirements.

Biological Resources

- If vegetation removal were to occur during the primary migratory bird nesting season (April 1 to July 31) or raptor nesting season (March 1 to August 31), a preconstruction nest survey would be conducted by a qualified biologist in vicinity of the proposed area. If active bird nests are identified, proposed construction activities would avoid disturbing any active nest. A qualified

biologist would determine the appropriate no- work avoidance buffer distance, which would be implemented until nestlings have fledged from the nest and the nest is no longer active. Conduct proposed construction and demolition activities outside of shorebird breeding seasons (generally April, but potentially as early as mid-February, through August), where feasible.

- To minimize impacts on the northern long-eared bat, a federally-threatened tree roosting species, any potential tree removal activities would occur outside of the June 1 to July 31 pup season.
- Short-term disturbance areas would be revegetated with native plants and seed mix where appropriate.
- Trees would be avoided or salvaged where practicable. Salvaged trees would be transplanted to other locations on the property or would be used for additional landscaping. Transplanting of salvaged trees would be done in accordance with the Offutt AFB tree plan in the Integrated Natural Resources Management Plan.

Cultural Resources

- If the proposed demolition and construction activities occur, any suspected archaeological materials or human remains are encountered, all proposed construction activity in the vicinity of the remains would cease immediately and a qualified archaeologist or SHPO would be contacted. Construction would not continue until the site is cleared by a qualified archaeologist or the SHPO.

Safety

- To minimize the health and safety risk, construction contractors would be required to use appropriate PPE and establish and maintain site-specific health and safety programs for their employees. Access to the proposed construction site would follow all appropriate laws and regulations minimizing harm to visitors and base employees from proposed construction activities.

Hazardous Materials and Waste

- Contractors would report the use of hazardous materials to the appropriate Offutt AFB entity in an effort to control any potential impacts on hazardous materials management. Contractors would use environmental protection measures to prevent releases and ensure that any releases, should they occur, do not result in contamination.
- A procedure for the proper handling, storage, use, disposal, and cleanup of hazardous wastes and/or toxic materials to be used during proposed construction and operations would be handled in accordance with the installation's Hazardous Materials and Hazardous Management Plans.
- Prior to the start of proposed construction within or adjacent to an active ERP site, contractors would coordinate with Offutt AFB ERP staff to ensure that contamination from these sites is not impacted or spread from proposed construction activities a health and safety plan would be developed in accordance with OSHA regulations to protect contractors.

- Contractors conducting proposed project activities within or adjacent to ERP sites with shallow groundwater contamination would take appropriate control measures should ground disturbance reach the depth of groundwater. Contractors would also ensure proper handling and disposal of any contaminated soils encountered when working within or adjacent to sites with soil contamination.
- If soil or groundwater that is believed to be contaminated is discovered, the contractor would immediately stop work, report the discovery to the installation, and implement appropriate safety measures. Commencement of proposed field activities would not continue in this area until the issue was investigated and resolve.
- In removal of storage tanks, contractors would need to follow API 1604, *Closure of Underground Petroleum Storage Tanks*.

Public Review and Stakeholder Coordination

Federal, state, and local agencies with jurisdiction that could be affected by the Proposed Action have been notified and consulted during the development of the EA including: the U.S. Fish and Wildlife Service (USFWS), the Environmental Protection Agency (EPA), the Federal Aviation Administration (FAA), the Nebraska State Historic Preservation Office (SHPO), the Nebraska Department of the Environment and Energy (NDEE) and the Nebraska Game and Parks Commission (NGPC). Other entities/stakeholders notified include the Papio Missouri River Natural Resources District (PMRNRD), the City of Bellevue, Nebraska, and Sarpy County, Nebraska. Tribes were also asked for input on any concerns or information of traditional resources within the proposed project area potentially impacted by the Proposed Action. Upon request from the Ponca Tribal Historic Preservation Officer (THPO) copies of previously conducted cultural surveys on Offutt AFB were shared with the THPO office.

The Draft EA and Draft FONSI/FONPA will be released for public review for 30 days in July, 2020. Notices of availability will be published in the *Omaha World Herald* and *Bellevue Leader*. The Draft EA and Draft FONSI/FONPA will be made available on the Offutt AFB homepage.

Finding of No Significant Impact

Based on my review of the facts and analyses presented in the attached EA, I conclude that the Proposed Action would not have a significant impact on the natural or human environment either by itself or cumulatively. The requirements of NEPA and the CEQ's regulations have been fulfilled. An Environmental Impact Statement is not required and will not be prepared.

Finding of No Practicable Alternative

Executive Order (EO) 11990, *Protection of Wetlands*, (24 May 1977) directs agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. Federal agencies are to avoid new construction in wetlands, unless the agency finds there is no practicable alternative to construction in the wetland and the proposed construction incorporates all possible measures to limit harm associated with development in the wetland. Agencies should use economic and environmental data, agency mission statements, and any other pertinent information when deciding whether or not to build in wetlands. EO 11990 directs each agency to provide for early public review of plans for construction in wetlands. In accordance with EO 11990 and 32 CFR Part 989, a Finding of No Practicable Alternative (FONPA) must accompany the Finding of No Significant Impact (FONSI) stating why there are no practicable alternatives to development within or affecting wetland areas.

Similarly, EO 11988, *Floodplain Management* (May 24, 1977), requires Federal agencies to avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. If it is found that there is no practicable alternative, the agency must minimize potential harm to the floodplain and circulate a notice explaining why the action is to be located in the floodplain prior to taking action. Finally, new construction in a floodplain must apply accepted flood proofing and flood protection to include elevating structures above the base flood level rather than filling in land. In accordance with EO 11988, a FONPA must accompany the FONSI stating why there are no practicable alternatives to development within or affecting floodplains.

The Proposed Actions would result in impacts to both wetlands and floodplains. The following FONPA is therefore presented with the FONSI, pursuant to EO 11990 and EO 11988.

Executive Order 11988 (Floodplain Management) defines the term “floodplain” to mean the lowland and relatively flat areas adjoining inland and coastal waters including any floodprone areas of offshore islands, including at a minimum that area subject to a one percent or greater chance of flooding in any given year. Much of the area presently occupied by Offutt AFB had historically been located within the floodplains of the Missouri River and Papillion Creek. The R616-613 levee along Papillion Creek provides flood risk protection for the project area. The levee system that surrounds Offutt AFB is intended to reduce flood risk, and consequently removes Offutt AFB from the regulatory special flood hazard area defined by the Federal Emergency Management Agency. Because of the levee protection, the project area is not mapped as occurring within the 100-year floodplain or “base flood” area, however the project area is located in a “floodplain” in the broader definition of the term as defined in E.O. 11988. The Proposed Project would also impact non-jurisdictional emergent wetlands associated with a storm water drainage ditch system located within the project area. Wetland impacts are estimated to be 0.87 acre of non-jurisdictional wetlands.

In order to ensure current and future mission requirements are met, and promote efficient and effective mission execution, new facilities need to be located near the existing flightline. The purpose of the project also includes consolidating functions that are spread around the installation in a manner not conducive to efficient and effective operational requirements. Because of these reasons, there is no

practicable alternative to re-establishing facilities and infrastructure in the campus areas identified in the Proposed Action. In order to meet floodplain regulation requirements and reduce the risk of future flooding, non-mission critical facilities need to be raised at least 2-feet above the levee minimum elevation, and mission critical facilities need to be raised at least 3-feet above the levee minimum elevation. Raising these facilities requires fill within the project area that would impact approximately 0.87 acre of non-jurisdictional stormwater drainage ditch wetlands. In addition to the fill requirement, the stormwater drainage ditch that supports the wetlands would need to be relocated to accommodate new stormwater drainage features surrounding the new facilities. Because of these reasons, there is no practicable alternative to locating project features within the identified wetlands. Taking all the environmental, economic, and other pertinent factors into account, pursuant to EO 11988, the authority delegated by Secretary of the Air Force Order 791.1, and taking into consideration the submitted information, I find that there is no practicable alternative to this action and the proposed action includes all practical measures to minimize harm to the environment.

DEE JAY KATZER, Colonel, Date

U.S. Air Force Chief, Civil Engineer Division HQ Air Combat Command (ACC/A4C)