## DRAFT FINDING OF NO SIGNIFICANT IMPACT (FONSI) AND FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA) FOCUS STUDY IMPLEMENTATION AT PITTSBURGH AIR RESERVE STATION PITTSBURGH, PA

**INTRODUCTION:** The United States (U.S.) Air Force Reserve Command (AFRC), with the Federal Aviation Administration (FAA), has assessed the environmental impacts of the Proposed Action described below in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code [USC] 4321, et seq.); the Council on Environmental Quality (CEQ) NEPA implementing regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508); the Air Force Environmental Impact Analysis Process (32 CFR Part 989); and FAA Orders 1050.1F, *Environmental Impacts: Policies and Procedures,* and 5050.4B, *NEPA Implementing Instructions for Airport Actions.* The attached Draft Environmental Assessment (EA) evaluates the potential environmental impacts associated with the implementation of 11 projects outlined in the Facilities Operations Capability and Utilization Survey (FOCUS) study at the Pittsburgh Air Reserve Station (PARS). These projects are federal actions subject to NEPA.

This Draft Finding of No Significant Impact (FONSI) provides AFRC's preliminary determination of no significant impact to the quality of the human and natural environment based on analyses described in detail within the Draft EA. PARS hosts the 911th Airlift Wing (911th AW) whose mission is to organize, recruit, and train Air Force Reserve personnel to provide strategic airlift of airborne forces, their equipment and supplies, and delivery of these forces and materials by air. The Proposed Action is in support of recommended projects documented in the FOCUS study to ensure that PARS facilities are properly configured and available to perform the mission efficiently and effectively. Implementation of the FOCUS study would include improvements that may be subject to the Airport Layout Plan (ALP), which would require approval from the FAA on behalf of the Allegheny County Airport Authority; therefore, the FAA is a Cooperating Agency for the EA because ALP approval is also a federal action subject to NEPA.

**PROJECT LOCATION:** PARS is collocated with the Pittsburgh International Airport (PIT) in Moon Township, Pennsylvania, approximately 10 miles northwest of the City of Pittsburgh.

**PURPOSE AND NEED:** PARS currently lacks the infrastructure necessary to fully meet training requirements and conduct base operations. The Proposed Action would support the operational plans for the AFRC and the 911th AW. The purpose of the Proposed Action is to provide the 911th AW with the facilities and infrastructure necessary at PARS to meet current and future mission requirements, and fulfill the strategic vision of the base as presented in the FOCUS study. Facilities at PARS should be optimally configured to ensure they are suitable for the respective missions of the various units, and that activities are not constrained by outdated, deficient, or undersized facilities and buildings. The Proposed Action is needed because aging facilities and infrastructure are no longer able to support their originally planned uses, and existing buildings do not support sizes and layouts needed for mission operations, training activities, and airfield operations.

**PROJECT DESCRIPTION (PROPOSED ACTION):** The Proposed Action includes the following 11 projects:

- Renovate Building (B) 226 for Consolidated Wing Training Facility (CWTF)
  - Renovate 29,000 square feet (SF) of B226.
  - Replace supporting utilities, communications infrastructure, and exterior landscaping and pavements.
- Demolish B208, B209, and B210 and Construct Parking

- o Demolish B208, B209, and B210 which cumulatively total 39,000 SF.
- Construct asphalt parking area for CWTF.
- Demolish B403 and Construct Parking
  - Demolish 5,400 SF building and its foundation components.
  - Construct asphalt parking area on the regraded site.
  - Demolish B405 and Construct Communications Facility
    - Partially demolish 11,300 SF building.
    - Construct 23,000 SF building to consolidate 911th Communications Squadron functions and accommodate about 27 new personnel.
- Repair Storm Drains and Outfalls
  - Replace 360 feet of corrugated metal drainpipe with watertight plastic pipe.
  - Install a new catch basin and manhole.
  - Remove 800 SF of riprap.
- Demolish B206
  - Demolish 12,000 SF building and 5,700 SF parking lot.
  - Regrade site, stabilize, and reseed as lawn.
- Construct Munitions Access Road
  - Construct asphalt drive with concrete curbs and block retaining wall between munitions maintenance and inspection and munitions storage buildings.
  - Demolish 200 feet of existing chain-link fence.
  - Install electrically controlled sliding fence.
- Construct B414 Hangar Access Road and Parking
  - Construct new roadway and retaining wall.
  - Strip existing concrete section of pavement for new roadway.
  - Install a new security fence, stormwater drainage for the roadway, parking lot lighting, a dumpster enclosure, and landscaping.
  - Repair the existing asphalt parking area.
- Construct Liquid Oxygen (LOX) Storage Facility
  - Construct a 2,000 SF facility consisting of three masonry and metal panel walls with an overhang.
  - Install energy efficient lighting, an emergency telephone, a water connection, a fence, and a stormwater box culvert.
  - Replace asphalt surrounding the site with concrete.
- Construct LOX Equipment Storage Shelter
  - Construct 1,385 SF three-sided support equipment parking shelter.
  - o Install energy efficient lighting and a stormwater box culvert.
- Construct Aerospace Ground Equipment (AGE) Covered Storage
  - Construct 8,000 SF covered parking area with weatherproof lighting, switches, and maintenance power outlets.

ALTERNATIVES: The alternatives analyzed in detail include:

- Alternative 1 Preferred Alternative
- Alternative 2
- No Action Alternative

The Preferred Alternative fulfills the purpose and need and would implement the 11 projects included in the Proposed Action. These 11 projects are not dependent on each other and AFRC may choose to implement one or more without the others. These projects are AFRC directive actions that are analyzed together in the EA for efficiency and due to the similarities in their potential environmental impacts. Therefore, all 11

projects are fully analyzed as part of the Preferred Alternative in the EA. Under Alternative 2, nine of the projects would be implemented as described in the Preferred Alternative. However, instead of being demolished, B403 and B405 would be renovated, the communications facility would not be constructed to consolidate the 911th Communications Squadron functions, and additional parking would not be constructed in place of B403. Although Alternative 2 would meet the purpose and need, 911th Communications Squadron operations would be less efficient than in if they were consolidated into a new communications facility (as proposed under the Preferred Alternative), as some functions would need to be located separately from the building that contains the base's communications equipment. The No Action Alternative would not implement any of the 11 projects and would not address infrastructure upgrades; therefore, the No Action Alternative does not meet the purpose and need.

**PUBLIC REVIEW AND INTERAGENCY COORDINATION:** The AFRC initiated the Interagency and Intergovernmental Coordination of Environmental Planning (IICEP) process for this Proposed Action in accordance with U.S. Air Force policy, and Executive Order 12372, *Intergovernmental Review of Federal Programs*. A Notice of Availability (NOA) for the Draft EA and Early Notice of Impacts to the Floodplain was published in the *Coraopolis Record* to initiate the 30-day public review and comment period. Copies of the Draft EA are available at the Moon Township Public Library, 1700 Beaver Grade Road #100, Coraopolis, PA 15108 and online at <a href="https://www.pittsburgh.afrc.af.mil/">https://www.pittsburgh.afrc.af.mil/</a>. Any public comments received during the 30-day review period will be considered and addressed as applicable in the Final EA.

## **ENVIRONMENTAL CONSEQUENCES (Alternative 1 – Preferred Alternative):**

**Air Quality:** The Proposed Action would primarily involve mobile sources of emissions related to construction activities and vehicles, as well as fugitive emissions of volatile organic compounds (VOCs) from asphalt paving and particulate matter (PM) from windblown dust. These emissions are expected to create only localized impacts to the area surrounding the construction sites. Ongoing, long-term annual operational emissions would result from fuel combustion in space heating equipment at newly constructed or expanded facilities and 27 new personnel manning the newly constructed communications facility. The AFRC used the Air Conformity Applicability Model (ACAM) to analyze the potential air quality impacts associated with the Proposed Action. The ACAM results indicate criteria pollutant emissions would be well below applicable insignificance indicators and well below *de minimis* thresholds for VOCs, nitrous oxides, and particulate matter. To further avoid or minimize and limit possible impacts, best management practices (BMPs) would be put in place. Therefore, no significant impacts with respect to air quality are anticipated.

**Climate:** The Proposed Action would result in a temporary increase in greenhouse gas (GHG) emissions related to construction activities and vehicles. Long-term annual operational emissions would result from 27 additional personnel manning the newly constructed communications facility. The AFRC used ACAM to estimate construction and operational GHG emissions for the construction years and one representative operational year. GHG emissions in each year would be well below applicable insignificance indicators. The estimated total social cost of GHG would be savings of approximately \$161,790 for the Preferred Alternative, resulting from reduced space heating requirements in the future. Anticipated changes in the climate would not significantly impact the Proposed Action. Therefore, no significant impacts with respect to climate are anticipated.

**Noise:** Construction and demolition activities would result in a temporary increase in noise levels in the vicinity of the Proposed Action Area. Noise impacts would be the greatest at each project site and would decrease with distance, generally attenuating to ambient levels (e.g., between 50-60 A-weighted decibels [dBA]) about 1,000 feet from each site. Sensitive receptors nearest to PARS include the Ready to Play Childcare Center (approximately 0.1 mile east of PARS), the Moon Township Public Library (approximately 0.25-mile northeast of PARS), and residences on Beaver Grade Road (approximately 0.3 mile from PARS). Each of these sensitive receptors are buffered from noise originating at PARS by major roadways, trees,

and other structures, and construction noise levels would mostly dissipate to levels 69 dBA or less. Noise reduction BMPs would minimize noise impacts during construction and demolition. Following completion of construction, operation of the new facilities and parking lots would be consistent with existing conditions and changes to the noise environment would be negligible and not discernable on-base or to nearby sensitive receptors. Therefore, no significant impacts with respect to noise are anticipated.

**Earth Resources:** Construction and demolition activities would require excavation and soil disturbance/removal. Bedrock may be encountered during excavation for the foundation of the communications facility. However, potential excavation impacts on underlying bedrock would be minimal. No geologic hazards or seismic events are expected to interfere with, or pose an operational risk to, construction activities, nor would construction activities exacerbate the local risk of a seismic event occurring. Construction activities may disturb up to 5.5 acres of soils. PARS would obtain a PAG-02 General National Pollutant Discharge Elimination System (NPDES) permit for discharges of stormwater associated with construction activities from PA DEP for each project with greater than one acre of ground disturbance. Repairing the storm drains and outfalls would have a beneficial effect on soils, as the new pipe would prevent further erosion and loss of ground stability around the existing degraded metal pipe. Therefore, no significant impacts with respect to earth resources are anticipated.

**Water Resources:** Overall, the Proposed Action minimizes impacts to water resources and is not expected to cause significant impacts. Exact impacts would be determined and minimized to the extent practicable during final design, permitting, and construction.

- Surface Water: There are no natural surface water features present within the interior of PARS. Stormwater on the base is primarily transported through existing conveyance systems, which drain in a southeasterly direction towards Meeks Creek, a perennial stream which runs in a generally north-south direction along the eastern boundary of PARS. PARS would comply with all local, state, and federal stormwater management regulations and adhere to applicable stormwater permits. PARS would obtain a 25 Pennsylvania Code Chapter 105 General Permit for intake and outfall structures and a Section 401 Water Quality Certification from the Pennsylvania Department of Environmental Protection for the storm drain and outfall repair project. For projects greater than one acre, PARS would obtain a PAG-02 General NPDES permit and comply with the provisions included in its Stormwater Pollution Prevention Plan (SWPPP).
- **Wetlands:** No wetlands are located within, in the vicinity of, or downstream of any project sites for the FOCUS study projects. Therefore, the Proposed Action would have no potential to affect wetlands.
- Floodplains: The storm drain and outfall repairs would partially occur within the 100-year floodplain of Meeks Creek. PARS intends to avoid impacting the floodplain to the extent practicable; however, existing infrastructure to be repaired is located within the floodplain. Therefore, in accordance with Executive Order 11988, *Floodplain Management*, this Draft FONSI also includes a Draft Finding of No Practicable Alternative (FONPA) for impacts to the floodplain to repair the storm drains and outfalls. No new development would be conducted within the floodplain.
- **Groundwater:** Construction activities would not be anticipated to intersect groundwater, involve groundwater withdrawals, or intentionally release or inject materials into groundwater resources and aquifers. Inadvertent releases or spills of petroleum products or solvents may impact groundwater. BMPs would be implemented to address spills and minimize potential impacts to groundwater.

**Biological Resources:** The Proposed Action would clear minimal, primarily landscaping, vegetation during construction activities, which would largely occur in areas of actively maintained grasslands/turf. The installation would remain a mostly developed area, with low-value and fragmented wildlife habitat. PARS would continue with existing management protocols to reduce bird/aircraft strike hazards (BASH) and other

wildlife hazards. Indirect impacts to wildlife would be temporary and mobile wildlife would be expected to avoid work areas. The AFRC initially queried the USFWS Information for Planning and Consultation (IPaC) database to identify federally listed threatened and endangered species with the potential to occur within the Proposed Action Area. IPaC identified two endangered species: the northern long-eared bat (NLEB, Myotis septentrionalis) and the Indiana bat (Myotis sodalis). IPaC also identified the monarch butterfly (Danaus plexippus), which is a candidate species. AFRC completed a Determination Key in IPaC for the NLEB and determined that the Preferred Alternative may affect the NLEB due to increased noise from construction in the vicinity of potential bat habitat on the eastern boundary of the base. However, existing noise levels on the base range from approximately 65 dB to 75 dB and only a small area of potential bat habitat is present between the base and a highway. Therefore, due to the temporary nature of the construction noise, elevated baseline noise levels, and the small area of potential bat habitat, the Preferred Alternative is not likely to adversely affect the NLEB. Since Indiana bats would occupy the same on-base habitat and experience the same potential effects as the NLEB, AFRC has also determined that the Preferred Alternative may affect, but is not likely to adversely affect, the Indiana bat. No suitable habitat for the monarch butterfly exists within the Proposed Action Area. Migratory birds of conservation concern (BCCs) are not anticipated to be affected, as vegetation removal would be minimal and consist of maintained grasslands/turf. Overall, no significant impacts with respect to biological resources are anticipated.

**Cultural Resources:** No historic or archaeological resources are located within the Area of Potential Effect (APE) and the Proposed Action would have no effect on historic properties. All PARS buildings and structures were previously surveyed and deemed ineligible for National Register of Historic Places registry. Therefore, no significant impacts with respect to cultural resources are anticipated.

**Utilities:** Under the Proposed Action, utilities would be abandoned and installed in accordance with the requirements of the 11 construction projects. Interruptions to electrical and water connections could be experienced by end users at PARS when the new connections are installed, although no interruptions would be expected for public users off-base. Work on these systems would be temporary and all area users would be notified prior to the start of construction activities. To avoid any disruption to the base communication systems, a small portion of B405 would not be demolished. Repair of the storm drains and outfalls under the Proposed Action would ensure that all stormwater infrastructure assets on the base continue to function optimally. Operation of the Proposed Action would not increase overall utility usage at PARS. Therefore, no significant impacts with respect to utilities are anticipated.

**Socioeconomics and Environmental Justice:** Proposed construction activities would likely be completed by local contractors, increasing employment opportunities, personal incomes, and materials purchases within the community. Public services would not be impacted during construction, nor would they be diminished during operation. No communities with environmental justice concerns are present surrounding PARS and no children would be present in the vicinity of the proposed project sites. Therefore, no significant impacts with respect to socioeconomics and environmental justice are anticipated.

**Transportation:** Construction and demolition occurring under the Proposed Action would result in temporary increases in construction-related traffic to PARS that would include workers' personal commuting vehicles and heavy construction vehicles. Temporary on-base road closures and detours may be required to facilitate building demolition and the construction of the communications facility. Overall increases in traffic near the project sites from construction vehicles would be temporary and within the capacity of the on-base roadways; these roads are not publicly accessible and construction traffic is not anticipated to impede or prevent the flow of traffic at PARS or outside of the base. Once construction of the Preferred Alternative is complete, there would be additional parking available for base personnel and more efficient flows of on-base traffic via the munitions access road and hangar access road. Therefore, no significant impacts with respect to transportation are expected.

**Safety, Health, and Hazardous and Toxic Materials and Waste:** Small amounts of hazardous materials (e.g., oils, solvents, petroleum products, etc.) may be used, and hazardous wastes may be generated during construction, renovation, and demolition activities. However, these would be managed and disposed of in accordance with federal, state, and local regulations and requirements. PARS would adhere to their Hazardous Waste Management Plan (HWMP), Spill Prevention, Control, and Countermeasure (SPCC), and Preparedness, Prevention, and Contingency (PPC) Plan in the event of an accidental spill. No Installation Restoration Program (IRP) sites are located within the vicinity of the FOCUS study projects. Following the construction of the munitions access road, risks from transporting munitions across the airfield and more populated portions of the base would be reduced by the new direct route. Any necessary lead-based paint (LBP), asbestos containing material (ACM), or mold abatement completed during project implementation would protect the health and safety of construction workers and building occupants. Therefore, no significant impacts with respect to safety, health, and hazardous and toxic materials and waste are anticipated.

**Cumulative Impacts:** The AFRC identified and reviewed past, present, and reasonably foreseeable actions that have or are planned to occur at PARS and the surrounding off-base areas. The evaluation concluded there would be no significant cumulative impacts as a result of implementing Alternative 1, which includes compliance with all federal and state laws and regulations, including consultation and permitting, and routine best management practices.

## **ENVIRONMENTAL CONSEQUENCES (Alternative 2):**

Alternative 2 would generally have the same impacts as the Preferred Alternative. Construction emissions under Alternative 2 would generally be similar to emissions expected under Alternative 1. However, no new emergency generators are anticipated to be installed under Alternative 2; therefore, operational emissions would be lower than under Alternative 1. The estimated total social cost of GHG would be approximately \$72,000 of greater savings for Alternative 2 compared to Alternative 1.

Renovating B403 and B405 would produce less noise than demolishing those buildings and constructing a new communications facility and parking, so there would fewer impacts to noise under Alternative 2. Likewise, there would fewer potential impacts to biological resources under Alternative 2 because less noise would be produced during construction.

Impacts to earth resources and water resources would generally be the same under Alternative 2 as under Alternative 1, except less ground disturbance would occur, resulting in less soil disturbance, less runoff, and fewer opportunities for groundwater contamination. Construction activities would disturb approximately 5 acres of soil instead of 5.5 acres. No bedrock would be encountered as a foundation for the communications facility would not be constructed.

Impacts to cultural resources, socioeconomics and environmental justice, and safety, health, and hazardous and toxic materials and waste would be the same under Alternative 2 as described under Alternative 1. Overall, no significant impacts are anticipated under Alternative 2.

Potential cumulative impacts under Alternative 2 would generally be the same as under Alternative 1, but slightly less due to the fewer demolition and construction activities; as such, no significant cumulative impacts are anticipated as a result of Alternative 2.

**MINIMIZATION MEASURES, MITIGATION, AND BEST MANAGEMENT PRACTICES:** These were identified for each resource area that could be potentially affected. Summarized BMPs to be implemented are found below and are described in detail by resource category in the Draft EA. All BMPs apply to both Alternative 1 and Alternative 2. With implementation of these measures, the Proposed Action would be anticipated to have no significant impacts. As such, no resource-specific mitigation measures are recommended.

- To ensure air quality and climate impacts remain at or below less-than-significant levels, control
  measures for visible emissions would be implemented such as applying water or using other
  stabilization measures on areas of bare soil or soil piles and covering dump trucks that transport
  materials that could become airborne. Contractors would also maintain construction equipment in
  accordance with manufacturers' specifications to reduce exhaust emissions.
- To further minimize and limit possible noise impacts, BMPs would be applied such as the use of mufflers on construction equipment and vehicles.
- To manage and minimize potential impacts from stormwater runoff and sedimentation, PARS would obtain a PAG-02 General NPDES permit for each construction project that disturbs one or more acres of soil, develop and adhere to site-specific SWPPPs, and incorporate low impact development measures to maintain pre-development hydrology on projects subject to the Energy Independence and Security Act.
- Should any unanticipated cultural resources be encountered during construction, or other activities
  associated with the FOCUS study projects, PARS would immediately cease work and report the
  discovery to the Pennsylvania Historical and Museum Commission (PHMC) and federally
  recognized tribes for consultation on how to proceed.
- To manage construction-related traffic, the contractor would implement and adhere to a project-specific transportation management plan for each proposed project.
- To minimize the impacts of utility disruptions during construction activities, PARS would provide end users with advance notice of anticipated service disruptions.
- To manage and minimize potential impacts from hazardous and toxic materials and waste, PARS would adhere to their HWMP, SPCC Plan, and PPC Plan in the event of an accidental spill of materials used during construction and operation.
- A survey for ACM would be completed by a PA Department of Labor and Industry licensed asbestos building inspector. If greater than 160 square feet of ACM is identified in the survey, PARS would obtain a demolition permit from the Allegheny County Department of Health. Any asbestos abatement would be completed by a contractor licensed to perform asbestos abatement in Allegheny County.
- A survey for LBP would be conducted prior to any building demolition to determine if LBP abatement is necessary.
- To protect the safety of construction workers, a survey for mold would be conducted prior to any building demolition to determine if mold abatement is necessary.

## FINDINGS

**Finding of No Practicable Alternative:** The infrastructure to be repaired for the storm drain and outfall repair project is located within the floodplain. If the storm drains and outfalls are not repaired, soil will erode from the surrounding area and the pipes will continue to deteriorate, causing ground instability and increased infiltration of foreign objects into the storm drain system. Therefore, there is no practicable alternative to working in the floodplain to repair this infrastructure. No new development would occur within the floodplain. Pursuant to Executive Order 11988 and taking the above information into account, I find that there is no practicable alternative to this action and that the proposed project includes all practicable measures to minimize harm to the environment. This decision has been made after taking into account all submitted information and considering a full range of practical alternatives that meet project requirements and are within the legal authority of AFRC. This finding fulfills both the requirements of Executive Order 11988, 32 CFR Part 989, and FAA Order 1050.1F for a FONPA.

**Finding of No Significant Impact:** After reviewing the Draft EA and all of its related materials, I have carefully considered the goals and objectives of the Proposed Action discussed in the Draft EA, including the purpose and need to be met by this project, the alternative means of achieving them, the environmental

impacts of these alternatives, and the mitigation and BMPs necessary to preserve and enhance the environment.

Following careful consideration of the facts contained in the Draft EA, the reviews by other federal, state, and local agencies, tribes, and input from the public, the undersigned finds that the Proposed Action is consistent with existing state and national environmental policies and objectives set forth in NEPA, the CEQ regulations, and other applicable environmental requirements (e.g., 32 CFR Part 989). Accordingly, it is my determination that the Proposed Action, as described under both Alternative 1 and Alternative 2, will not significantly affect the quality of the natural or human environment. Therefore, an environmental impact statement (EIS) is not required for this action. Those who may have information that may alter this assessment and lead to a reversal of this decision should notify me within 30 days. If no comments that would alter this finding are received within the 30-day review period, or, after such comments have been addressed, this FONSI will be signed and filed with the project documentation.

DOUGLAS A. STOUFFER, Colonel, USAF Commander

I have carefully and thoroughly considered the facts contained in the attached EA. Based on that information, I find that the proposed federal action is consistent with existing national environmental policies and objectives as set forth in Section 101(a) of NEPA and other applicable environmental requirements. I also find the proposed federal action will not significantly affect the quality of the human environment or include any condition requiring consultation pursuant to Section 102(2)(C) of NEPA. As a result, FAA will not prepare an EIS for this action.

RECOMMENDED:

Heather Davis-Jenkins
Environmental Protection Specialist
Harrisburg Airport District Office

APPROVED:

Rick Harner Manager Harrisburg Airport District Office Date

Date

Date

Attachment: Draft Environmental Assessment