

**DRAFT FINDING OF NO SIGNIFICANT IMPACT (FONSI)
BEDDOWN FOR THE SPCS #4 AND SPCS #5 BASING ACTIONS**

Pursuant to provisions of the National Environmental Policy Act (NEPA), (42 *United States Code* 4321–4370h); Council on Environmental Quality (CEQ) Regulations, Title 40 *Code of Federal Regulations* (CFR) Parts 1500–1508; and 32 CFR Part 989, *Environmental Impact Analysis Process (EIAP)*, the United States Air Force (USAF) prepared the attached Draft Environmental Assessment (EA) to address the potential environmental consequences associated with the proposed beddown of two Air National Guard (ANG) Space Control Squadrons (SPCSs), SPCS #4 and SPCS #5, at two of three candidate locations.

This Draft Finding of No Significant Impact (FONSI) is being provided in accordance with 32 CFR § 989.15(e). This FONSI will not be finalized and signed until the public review period is complete and all comments have been considered and addressed, as applicable.

Purpose and Need

The purpose of the Proposed Action is to identify specific locations meeting the criteria for placement of facilities associated with the beddown of two SPCS missions: one offensive and one defensive mission.

SPCS #4 offensive space control is needed to meet the 2015 USAF Space Command (AFSPC) Commander Air Reserve Component Initiative priority to generate four additional ANG unit-equipped Unit Type Codes to meet Combatant Command needs. Offensive space control operations consist of offensive measures conducted for space negation, where negation involves measures to deceive, disrupt, deny, degrade, or destroy space systems or services, and includes actions targeting an enemy's space-related capabilities and forces. SPCS #1, #2, and #3 were previously established to execute the offensive mission. SPCS #4 would accomplish this goal by establishing the fourth ANG SPCS offensive mission.

SPCS #5 defensive space control is needed to meet the 2018 AFSPC Commander Air Reserve Component Priority Memorandum to generate eight ANG unit-equipped Unit Type Codes to meet Combatant Command requirements. Defensive space control operations consist of all active and passive measures taken to protect friendly space capabilities from attack, interference, or hazards. Currently, there is no defensive SPCS in the ANG. SPCS #5 would be a key initial step toward accomplishing the overall goal by establishing the first of eight ANG SPCS defensive missions.

Description of Proposed Action and Alternatives

The Proposed Action analyzes three candidate locations for ANG SPCS #4 and ANG SPCS #5: PMRF-Barking Sands and JBPHH, HI, and Andersen AFB, Guam. The USAF, as the lead agency for SPCS actions, proposes to construct and operate facilities for the beddown of a total of two SPCS missions, one offensive and one defensive, at the three candidate locations. Under the Proposed Action, each SPCS would require the following facilities:

- 12,100-square-foot (ft²) building that consists of 3,000 ft² of administration area, 3,600 ft² of operational area, 5,200 ft² of maintenance area, and 300 ft² of hazardous storage area
- Open floor plan with Secure Compartmented Information Facility space capable of accommodating personnel; facility and equipment require Protection Level 3
- 5,000-square yard equipment pad with an unobstructed view of geosynchronous satellites
- 2,500-square yard parking lot within 0.25 mile of facilities
- 50-foot security clearance setback throughout perimeter of equipment pad
- Infiltration basin or approved Low Impact Development solution pursuant to Uniform Facilities Criteria 3-210-10
- 50-ton air conditioner unit

Each SPCS would require the relocation of additional personnel in order to support the SPCS mission, including a sufficient number of ANG space operators and operations support personnel. SPCS #4 would require between 88 and 115 new ANG personnel in support of an offensive mission, while SPCS #5 would require the addition of between 62 and 105 ANG personnel in support of a defensive mission.

Alternative A: Pacific Missile Range Facility-Barking Sands (Preferred Alternative for SPCS #4)

The proposed SPCS location at the Hawaii Air National Guard (HIANG) is completely within PMRF-Barking Sands. The site is bounded on three sides by PMRF-Barking Sands and on the other by Kawai'ele Bird Sanctuary (**Figure 2-3** in the EA). The site is located approximately 0.7 mile north of the intersection of Tartar Drive and North Sidewinder Road. In 2008, the HIANG's 293rd's Combat Communications Squadron's command element and half of its assigned manpower were transferred to the U.S. Navy's PMRF-Barking Sands to replace the inactivating 154th Air Control Squadron as the HIANG lead command and control element for any natural or human-caused disasters on the Island of Kaua'i. The 293rd Combat Communications Squadron was divested in the fiscal year (FY)13 National Defense Authorization Act and inactivated in 2016. At present, the HIANG facility is not actively being used for mission activities. PMRF-Barking Sands is the preferred alternative for SPCS #4 offensive mission. It is the first reasonable alternative for SPCS #5 defensive mission.

Alternative B: Joint Base Pearl Harbor-Hickam

JBPHH is home to Headquarters HIANG and the 154th Wing. Over 1,900 full time and Drill Status Guardsman are part of this origination and work on the Installation. The HIANG has identified Hickam Softball Field on JBPHH as a suitable location for the proposed mission (**Figure 2-4** in the EA). The site is bounded by Worchester Avenue/Mamala Bay Drive and in proximity of a runway operated by the Daniel K. Inouye International Airport. This site is owned by the U.S. Navy and would require a real property acquisition to allow the HIANG to beddown the proposed mission. Site surveys conducted indicated that no other facilities are available to support the proposed mission. JBPHH is the second reasonable alternative for both SPCS #4 offensive mission and SPCS #5 defensive mission.

Alternative C: Andersen AFB (Preferred Alternative for SPCS #5)

The site on Andersen AFB identified by 36th Wing Command Center for the Proposed Action is approximately five acres in size and is located near the Base Exchange, which is bounded by New York Avenue, 4th Street, Mobile Avenue, and 5th Street on Andersen AFB proper (**Figure 2-5** in the EA). The area has sufficient open space to allow for up to 10 acres in the event that additional space is required. Site surveys conducted indicate that no other facilities are available to support initial operational capability by FY22. Space Control military construction has been submitted into the FY21 President's Budget Commitment to Congress of FY21 construction contract award. A new Guam Air National Guard (GUANG) facility at Andersen AFB is required to accommodate proposed mission requirements. The proposed site is owned by the U.S. Navy and would require a real property acquisition to allow the GUANG to beddown the proposed mission. Andersen AFB is the preferred alternative for SPCS #5 defensive mission. It is the first reasonable alternative for SPCS #4 offensive mission.

No Action Alternative

Selection of the No Action Alternative would result in no basing decision resulting from this Environmental Assessment for either SPCS #4 or SPCS #5. NEPA requires an EA to analyze the No Action Alternative in accordance with 40 CFR 1502.14. Analysis of the No Action Alternative provides a benchmark, enabling decision-makers to compare the magnitude of the potential environmental effects of the Proposed Action. No action at each location would be expected to correspond with no environmental effect to each resource area.

Summary of Findings

Potentially affected environmental resources were identified through communications and coordination with state and federal agencies and review of past environmental documentation. The Proposed Action would have less than significant adverse effects on noise; safety; air quality; water resources; geological resources; land use; socioeconomics; environmental justice and protection of children; cultural resources;

hazardous materials and wastes, contaminated sites, and toxic substances; and infrastructure, transportation, and utilities at Alternatives A, B, and C.

The Proposed Action would have less than significant adverse effects on biological resources at Alternative C. The Proposed Action would have less than significant adverse effects on biological resources at Alternative A with adherence to the 2014 and 2018 Biological Opinions for PMRF-Barking Sands (outlined in further detail below) and Section 7 consultation with USFWS for protected species and at Alternative B with adherence to environmental commitments outlined in the Section 7 consultation with USFWS for protected species.

The Proposed Action would have less than significant adverse effects on hazardous materials, hazardous wastes, contaminated sites, and toxic substances at Alternatives A and B and would have less than significant adverse effects to these resource areas at Alternative C with the implementation of radon mitigation measures as needed.

No potentially significant impacts would result from the Proposed Action combined with past, present, and reasonably foreseeable future actions at any of the Alternative locations. Flight safety, explosives safety, airspace, and visual resources were not carried forward for further analysis.

Noise. Noise associated with the beddown of SPCS #4 or SCPS #5 would not result in significant direct or indirect impacts on noise-sensitive receptors at Alternative locations A, B, or C. Noise effects would be short term and minor for all alternative locations associated with construction or renovation activities. There would be no long-term operational increases in noise from implementation of the Proposed Action at Alternative locations A, B, or C.

Safety. No impacts to ground or flight safety would occur under the Proposed Action at Alternative locations A, B, or C. Short-term, negligible-to-minor, adverse impacts on contractor health and safety are anticipated to result from proposed construction and renovation projects under the Proposed Action. All construction contractors at the selected SPCS locations would be required to follow ground safety regulations and worker's compensation programs to avoid posing any risks to workers or personnel on or off Base.

Air Quality. Implementation of the Proposed Action would cause minor effects to regional air quality at Alternative locations A, B, and C. The estimated project emissions for these alternatives are not anticipated to result in significant emissions of criteria pollutant air emissions, and thus, no adverse impacts are expected to occur.

Biological Resources. Due to the lack of intact native vegetation in the areas designated for development at Alternative locations A, B, and C, no significant impacts to vegetation would occur under the Proposed Action. The noise and movement temporarily caused by construction and renovation activities is anticipated to have negligible short-term impacts on wildlife at Alternative locations A, B, and C.

Implementation of the Proposed Action at Alternative location A would result in no significant impacts to special status species, as the terms of the 2014 Biological Opinion, *Formal Consultation for Pacific Missile Range Facility Base-wide Infrastructure, Operations, and Maintenance, Kaua'i*, the 2018 Biological Opinion, *Biological Opinion of the U.S. Fish and Wildlife Service for the Proposed Base-wide Infrastructure, Operations, and Maintenance Activities at the Pacific Missile Range Facility, Island of Kaua'i, Hawaii*, and environmental commitments resulting from consultation with the United States Fish and Wildlife Service (USFWS) would be adhered to during construction and operation of the proposed SPCS. Under the Proposed Action, a vegetation management plan would be drafted to include a mowing schedule to prevent the growth of vegetation within the proposed SPCS site in order to discourage the nēnē (Hawaiian Goose) from nesting on Base. Specifically, vegetation located along the northeastern side of the Base would be mowed at regular intervals to prevent the vegetation from reaching a height that would be attractive to nēnē for nesting. PMRF-Barking Sands would survey for nēnē nests if nēnē are observed within the project area during breeding season (September through April); no nēnē nests would be removed under the Proposed Action. Any activities that could impact the nēnē would be conducted in accordance with the terms of the

Biological Opinions and consultation with USFWS and would follow the implementation of mitigation measures. Accordingly, implementation of Alternative A is *Not Likely To Adversely Affect* the nēnē.

In order to prevent harm to the nocturnal fledglings of Newell's shearwater, Hawaiian petrel, and the band-rumped storm-petrel, lighting design plans associated with the proposed construction would be required to comply with the annual mid-September to mid-December Dark Skies Program by only using lighting at night if required for Force Protection or safety and using shades to prevent indoor lighting at windows from being visible to birds outside. Implementation of the Proposed Action at Alternative location A would include focusing outside lighting downward (fully shielded so that the bulb can only be seen from below bulb height); installing motion sensors on outdoor lights that turn off when human activity is not occurring in the lighted area; and using the appropriate colored bulbs for all outside structures, towers, and electrical distribution lines. Construction slated to occur during the nocturnal seabird fledgling period (mid-September through mid-December) would occur only during daylight hours. Accordingly, implementation of Alternative location A is *Not Likely To Adversely Affect* the Newell's shearwater, Hawaiian petrel, and the band-rumped storm-petrel.

Hawaiian waterbirds occupy the Kawai'ele Waterbird Sanctuary, which is adjacent to the PMRF-Barking Sands parcel. Standing water on the SPCS site could temporarily attract Hawaiian waterbirds. Environmental commitments associated with protecting the Hawaiian waterbirds, including limiting standing water at the SPCS site, are outlined in **Section 2.6.2**. Mitigation measures to ensure that these environmental commitments are met are outlined in **Section 2.7**. Accordingly, implementation of Alternative A is *Not Likely To Adversely Affect* Hawaiian waterbirds.

The Hawaiian hoary bat can be harmed by flying into barbed wire. Under Alternative locations A and B, 1,920 feet of barbed wire would be installed. Using the formula established to estimate take of bat species by barbed wire ($0.3636/\text{mile} \times 0.013 \times 30 \text{ years}$), less than one bat would be taken over the life of the project. Additionally, the proposed SPCS site at Alternative location A has only one tree that would be removed, and it is unlikely to host the hoary bat; no trees would be removed at Alternative location B. Out of an abundance of caution, the tree would not be removed during the pupping season (1 June–15 September). Therefore, implementation of Alternative locations A and B are *Not Likely To Adversely Affect* the Hawaiian hoary bat.

Only the Micronesian starling and the Mariana fruit bat have the potential to occur on the proposed SPCS site at Alternative location C while flying through the location; however, these species have not been identified on the property. The National Guard Bureau (NGB) has determined that implementation of Alternative location C is *Not Likely To Adversely Affect* the Mariana fruit bat because the proposed facilities would not require barbed wire fencing and no tree removal is anticipated. Because the presence of this species has not been confirmed and the proposed SPCS site contains no suitable habitat, NGB has determined that implementation of Alternative location C is *Not Likely To Adversely Affect* the Micronesian starling and Mariana fruit bat.

No impacts to special status species would be anticipated to occur at Alternative locations B and C, as ground disturbance related to the proposed projects would occur primarily in areas with existing development and no natural habitat for special status species. Implementation of the Proposed Action at Alternative locations A, B, or C would not have the potential to directly impact invasive species.

USFWS concurred with the finding of *Not Likely To Adversely Affect* for impacts to protected species by letter dated 16 December 2021.

Water Resources. Approximately 2 acres of new impervious surface area would be added for the Proposed Action at Alternative locations B and C, which would increase stormwater runoff in the long term. No increase in impervious surfaces would be anticipated at Alternative location A, as the site is already paved. The use of appropriate best management practices, as included in the site-specific National Pollutant Discharge Elimination System (NPDES) stormwater pollution prevention plan (SWPPP) and erosion and sedimentation control plan (ESCP) that would be prepared for each Alternative location would prevent significant impacts to ground or surface water from occurring under the Proposed Action. No impacts to

wetlands or floodplains would occur at any of the Alternative locations. Pursuant to Section 307 of the Coastal Zone Management Act (CZMA), the State of Hawaii Office of Planning, Coastal Zone Management Program may conduct a federal consistency review of the Proposed Action to ensure consistency with the CZMA for Alternatives A and B. If an activity is determined to directly affect the coastal zone, the National Guard Bureau would submit a consistency determination prior to approving the activity, as required under 15 CFR § 930.34(a)(1). The Guam Bureau of Statistics and Plans would be responsible for conducting such a review for Alternative location C. Construction occurring under the Proposed Action at Alternative locations A, B, and C would not be anticipated to impact the coastal zone; therefore, no CZMA consistency determination would be prepared. There would be no impacts to groundwater because no activities associated with the Proposed Action have the potential to affect groundwater. Likewise, wetlands and floodplains would not be affected because these resources do not exist on the proposed SPCS locations. Alternative A is located near a wetland; however, no dredge or fill material would be placed into this wetland area, and adherence to the NPDES permit SWPPP ESCP would prevent the migration sediment into this wetland area.

Geological Resources. Ground surface disturbance from construction projects associated with the Proposed Action would include activities such as clearing, grading, excavating, and recontouring of soils at Alternative locations B and C, which present the risk of potential short- and long-term increased soil erosion and sedimentation (the transport of eroded sediment). Best management practices would be identified and implemented as part of a SWPPP ESCP to mitigate the potential for soil erosion and sedimentation. Ground surface disturbance under the Proposed Action at Alternative location A would also present the risk of potential short- and long-term increased soil erosion and sedimentation; however, the site is already paved, and disturbance would be minimal.

Land Use. Land use under the Proposed Action at Alternative locations A, B, and C would not be negatively impacted. Construction and renovation activities associated with the Proposed Action would occur entirely within the existing boundaries of the respective installations. The proposed projects would be implemented in areas of consistent existing land use including airfield operations, industrial, and outdoor recreation. There would be no permanent changes to the noise environment would occur as a result of implementation of the Proposed Action.

Socioeconomics. No impacts to the local or regional population would occur under the Proposed Action at Alternative locations A, B, or C. Based on current personnel projections, there is sufficient on-Base housing available at PMRF-Barking Sands (Alternative A). If a higher than anticipated number of personnel requests on-Base housing at PMRF-Barking Sands, it is possible that the existing on Base housing supply would be insufficient. However, off-Base housing is available and the small number of personnel that would be housed off Base would not cause significant impacts to housing availability for the local community. Sufficient on-Base and off-Base housing is available at JBPHH and Andersen AFB (Alternative locations B and C, respectively) to house any personnel that could beddown in support of a new SPCS. Under the Proposed Action, construction of new buildings and renovation of existing buildings would result in a temporary increase of 20 to 50 construction personnel; this temporary increase would have no impact on the socioeconomic condition on the region. Because the increase in personnel associated with the Proposed Action is small, there would be negligible impacts to local schools under Alternatives locations A, B and C.

Environmental Justice and Protection of Children. Under the Proposed Action, construction and renovation projects would not result in a disproportionate impact on minorities, low-income, and youth populations in the vicinity of Alternative locations A, B, or C because the impact assessment for each of the resource topics analyzed in this EA identified only negligible-to-low impacts on the physical, natural, and human environment and thus would not result in the disproportionately high and adverse impacts on minority, low-income, or youth populations.

Cultural Resources. No archaeological resources within 0.25-mile of the Proposed Action at Alternative locations A, B, and C have been identified as eligible or potentially eligible for listing on the National Register of Historic Places (NRHP). Alternative location A has been completely paved over, and the Alternative locations B and C are in areas that are highly disturbed and considered to have a low probability of

archaeological resources. No architectural historic resources are located within a 0.25-mile radius of Alternative location A. Three NRHP-eligible architectural historic resources and one NRHP-listed architectural historic resource are located within a 0.25-mile radius of Alternative location B; however, there would be no impacts to these resources under the Proposed Action. One NRHP-eligible architectural historic resource is located within a 0.25-mile radius of the Alternative location C; however, there would be no impacts to this resource under the Proposed Action.

The NGB, working with Navy personnel at PMRF-Barking Sands and JBPHH, reached a determination of *No Historic Properties Affected* for the proposed undertaking at each location. Additionally, the Proposed Action falls under a Regional Programmatic Agreement (PA) signed by the Commander, Navy Region Hawaii; the Advisory Council on Historic Preservation; and the Hawaii State Historic Preservation Office (HI SHPO). The PA states that if Navy personnel determine that an undertaking does not have the potential to cause effects on listed, contributing, or eligible properties, no further review under the PA or the National Historic Preservation Act (NHPA) is required. As terms in the PA supersede standard consultation procedures outlined in Section 106 of the NHPA and implementing regulations (36 CFR Part 800), no further consultation with the HI SHPO is required. The Guam SHPO concurred on the determination of *No Effect* to historic properties at Andersen AFB via letter dated 8 April 2021.

Hazardous Materials, Hazardous Wastes, Contaminated Sites, and Toxic Substances. Short-term, negligible-to-minor, adverse impacts are anticipated to result from the use of hazardous materials and petroleum products during construction and renovation projects associated with the Proposed Action at all Alternative locations. No impacts to fuel storage would occur under the Proposed Action. No impacts to Installation Restoration Program sites would occur under the Proposed Action. There are no lead-based paints at any of the Alternative locations, as the buildings at Alternative location A were constructed after 1978 and Alternative locations B and C are vacant. Alternative locations A and B are located in a low-radon zone, while any building constructed at Alternative location C could have elevated levels of radon above 4 pCi/L based on radon readings in surrounding buildings. Should levels of radon above 4 pCi/L be detected, the Installation Radiation Safety Officer would work with Installation civil engineering personnel to develop an interim mitigation plan and then a long-term mitigation plan to reduce the radon levels to below 4 pCi/L.

Infrastructure, Transportation, and Utilities. No significant impacts to infrastructure, transportation, or utilities would be anticipated to occur as a result of implementation of the Proposed Action at any of the Alternative locations. Temporary disruptions to utilities service could occur when existing lines are connected or capped, as appropriate. However, long-term changes in demand would be minimal.

Best Practices and Environmental Commitments

The EA analysis concluded that the Proposed Action would not result in significant environmental impacts when implemented using the best practices and environmental commitments listed below. The appropriate personnel at each installation would be responsible for ensuring that the following management actions are implemented.

Air Quality

- Employ standard management measures such as watering graded areas, covering soil stockpiles, and applying contour grading (if necessary) to minimize temporary generation of fugitive dust and particulate matter during construction activities.
- Limit idling time for diesel-powered highway and nonroad vehicles and engines used in construction except as necessary for safety, security, or to prevent damage to property.

Biological Resources

- Obtain approval by the Navy before bringing and planting vegetation on Installation to avoid the introduction of invasive species.
- Avoid approaching, feeding, or otherwise disturbing nēnē.

- Survey for nēnē nests if nēnē are observed within the project area during breeding season (September through April).
- Ensure all equipment brought on and/or removed from PMRF-Barking Sands is free of all dirt, debris, straw, and other such materials.
- Adhere to the terms of the PMRF-Barking Sands Biological Opinion (BO) and do not plant new grass or water existing grass.
- Adhere to all the terms of all applicable BOs in order to minimize potential impacts to threatened and endangered species.
- Clean off-site equipment and vehicles prior to use on site in order to limit the potential for introduction of invasive species to the Region of Influence. Fill dirt, straw, and any plantings must also be checked for evidence of invasive non-native plants.
- Check drainage inlets and outlets before and after storm events to remove any debris that would prevent water from flowing off site in order to minimize ponding of water on the parcel. In the rare cases where standing water may occur, employ a leaf blower or other such equipment to move the water. If needed, place a tarp over the ponding water to remove any possible attraction to the area.
- Train all project personnel on the presence of *Endangered Species Act*-listed species on PMRF-Barking Sands and the importance of adhering to posted speed limits to avoid collision with protected species.
- Inform contractors and personnel of the potential presence of endangered waterbirds on site. Notify Natural Resources staff if endangered waterbirds are observed on site.
- Cease outside work if a Hawaiian waterbird or Hawaiian goose nest is discovered within a radius of 46 meters (150 feet) of proposed construction work or a previously undiscovered nest is found within that radius after work begins.
- Develop a vegetation maintenance plan, including a mowing schedule, for PMRF-Barking Sands, paying specific attention to the vegetated areas along the northeastern boundary to ensure the vegetation does not grow to a height that is attractive to the nēnē for nesting.
- Construct facilities only during daylight hours if construction occurs during the nocturnal seabird fledgling period (mid-September through mid-December).
- Provide on-site training in the form of an annual seabird brief to all SPCS contractors and personnel.
- Comply with the annual mid-September to mid-December Dark Skies Program by only using lighting at night if required for Force Protection or safety and using shades to prevent indoor lighting at windows from being visible to birds outside.
- Utilize a lighting design plan that focuses outside lighting downward (fully shielded so that the bulb can only be seen from below bulb height; installs motion sensors on outdoor lights that turn off when human activity is not occurring in the lighted area; and uses the appropriate colored bulbs for all outside structures, towers, and electrical distribution lines.
- Avoid removal of trees at PMRF-Barking Sands or JBPHH during Hawaiian hoary bat pupping season and at Andersen AFB during Mariana fruit bat pupping season (1 June to 15 September).

Water Resources

- Follow recommended best management practices for soil erosion and sedimentation prevention as required by each installation's specific requirements.
- Install and maintain entrenched silt fencing and straw bales or straw/coconut husk waddles along the perimeter of the construction site prior to any ground-disturbing activities and maintain them in effective working order throughout the construction process to prevent fill material, pollutants, and runoff from entering wetlands or other surface waters.

- Incorporate a SWPPP to observe the effectiveness of silt fencing, straw bales or straw/coconut husk wattles, and other erosion and sedimentation control devices and address deficiencies accordingly.

Geological Resources

- Implement a site-specific SWPPP to minimize any unnecessary soil erosion that could occur during construction.

Cultural Resources

The following actions would be taken to prevent potential impacts to cultural resources in accordance with the Standard Operating Procedures outlined in the Integrated Cultural Resources Management Plan for each installation:

- Leave in place and immediately report to the installation Cultural Resources Management team any archaeological artifacts discovered. Construction or demolition activities would cease and efforts to protect the resource from further impact would be taken.
- Cease construction and operational activities and immediately notify the Cultural Resources Management team in the event of the discovery of potential Native Hawaiian artifacts and/or remains.
- Conduct archaeological monitoring during construction activities as needed.
- Follow existing historic preservation agreements.

Hazardous Materials and Hazardous Waste

- Manage hazardous materials/waste in accordance with all applicable environmental compliance regulations and installation environmental management plans.
- Adhere to Air Force Manual 32-7002, *Environmental Compliance and Pollution Prevention*, and existing tracking and reporting requirements as presented in the hazardous waste management plan for each installation.
- Recycle nonhazardous solid waste generated from construction activities to the extent possible.
- Equip all construction sites with adequate waste disposal receptacles for solid, liquid, and hazardous wastes to prevent construction and demolition debris from leaving the work site.

Mitigation Measures

Alternative A (PMRF-Barking Sands) incorporates the following mitigation measures to ensure the Proposed Action meets commitments identified during consultation with USFWS:

- Set up a program to provide training to construction and ANG personnel when onboarding and then annually regarding Hawaiian waterbirds, Hawaiian seabirds, and nēnē.
- Develop a mowing plan to ensure vegetation does not grow to a height that is attractive to the nēnē for nesting.
- Implement the lighting design plan (described in **Section 3.3.4.2** of the EA) to reduce impacts to Hawaiian seabirds.
- During construction of the SPCS facility, do not disturb, remove, or trim woody plants or trees greater than 15 feet tall during the Hawaiian hoary bat birthing and pup-rearing season (June 1 through September 15).

Finding of No Significant Impact. After review of the EA prepared in accordance with the requirements of NEPA; CEQ regulations; and 32 CFR Part 989, *Environmental Impact Analysis Process (EIAP)*, and which is hereby incorporated by reference, I have determined that the proposed activities to beddown SPCS #4 at PMRF-Barking Sands would not have a significant impact on the quality of the human or natural environment as a result of compliance with the requirements of PMRF-Barking Sands' 2014 and 2018 Biological Opinions and Section 7 consultation with USFWS. Additionally, I have determined that the

proposed activities to beddown SPCS #5 at Andersen AFB would not have a significant impact on the quality of the human or natural environment. Accordingly, an Environmental Impact Statement will not be prepared. This decision has been made after considering all submitted information, including a review of agency comments submitted during the 30-day public comment period, and considering a full range of practical alternatives that meet project requirements and are within the legal authority of the United States Air Force.

**MARC V. HEWETT, P.E., GS-15, DAF
Chief, Asset Management Division**

DATE