

FINDING OF NO SIGNIFICANT IMPACT

**PROGRAMMATIC ENVIRONMENTAL ASSESSMENT FOR THE
IRON DOME DEFENSE SYSTEM - ARMY**

Prepared by

**UNITED STATES ARMY ENVIRONMENTAL COMMAND
JOINT BASE SAN ANTONIO - FORT SAM HOUSTON**



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**DEPARTMENT OF DEFENSE
UNITED STATES ARMY
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The National Environmental Policy Act of 1969 (NEPA) (42 U.S. Code Section 4321 et seq.) requires Federal agencies to consider potential environmental impacts prior to undertaking a major Federal action. The Department of the Army (Army) prepared a Programmatic Environmental Assessment (PEA) in accordance with NEPA, the regulations issued by the Council on Environmental Quality (CEQ), 40 Code of Federal Regulations (CFR) Parts 1500-1508 (40 CFR § 1500-1508), and the Army's procedures for implementing NEPA, Environmental Analysis of Army Actions (32 CFR Part 651). This PEA is titled "Programmatic Environmental Assessment for the Iron Dome Defense System - Army (IDDS-A)." The IDDS-A PEA is incorporated by reference in this Finding of No Significant Impact (FONSI), and addresses environmental effects of the proposed fielding of one or two batteries of the IDDS-A. The intent of the fielding is to begin the process of enhancing the Army's air defense capabilities in accordance with the 2019 Army Modernization Strategy and the 2019 National Defense Authorization Act.

The PEA provides a broad and programmatic analysis to determine potential impacts on the environmental and socioeconomic areas of concern at each of the seven installations under consideration. The PEA also considers the general capacity of each installation to support one or two IDDS-A batteries given its existing baseline conditions. The programmatic approach is designed to allow for early planning, coordination, and flexibility throughout implementation of the Army's process of fielding IDDS-A batteries. If a potential impact has not been analyzed in sufficient detail in the PEA, it would require additional analysis such as tiering from the PEA.

Prior to making a final decision on which installation(s) of the Action Alternative to field the IDDS-A, or implement the No Action Alternative, other relevant information, such as deployment time, cost, and strategic implications will be considered. The Army decision-maker regarding the environmental impacts of this action is the Department of Army's Deputy Chief of Staff, G-9. The final decision on fielding location will be made by the Department of Army's Deputy Chief of Staff, G-3/5/7.

PROPOSED ACTION

The Army plans to field¹ two IDDS-A batteries to enhance the defensive capability of fixed and semi-fixed assets against cruise missile (CM), unmanned aerial system (UAS), and rocket, artillery, and mortar (RAM) attacks. The IDDS-A is a mobile all-weather air defense system designed to intercept RAM fired from distances of up to approximately 70 km but is also effective against CM, UAS, airplane, and helicopter threats. The PEA addresses the fielding at seven installations in more detail: Fort Bliss, Fort Hood, Fort Campbell, Fort Riley, Fort Sill, Fort Stewart, and Joint Base Lewis-McChord (JBLM). Two locations at JBLM were assessed, JBLM-Lewis in the Puget Sound area and JBLM-Yakima in south-central Washington.

ALTERNATIVES

The PEA looked at one Action Alternative and a No Action Alternative. The alternatives considered and analyzed in the PEA were:

No Action Alternative

The No Action Alternative is required by CEQ regulations and provides baseline conditions and a benchmark against which to compare environmental impacts from the Proposed Action alternatives (40 CFR § 1502.14(d)). Under the No Action Alternative, IDDS-A batteries would not be fielded to any installation. Training and operations at the assessed installations would continue in the current manner and rate. This would not meet the objectives of the 2019 Army Modernization Strategy or the intent of the 2019 National Defense Authorization Act and fail to begin the process of enhancing the air defense capability of Army fixed and semi-fixed assets.

Proposed Action Alternative

The Proposed Action analyzed within the PEA was to field one or two batteries of IDDS-A to one or more of the seven installations assessed. One IDDS-A battery would consist of approximately 60 soldiers, 13 Heavy Expanded Mobility Tactical Trucks, six Missile Firing Units, one radar system, battle management and communications systems, and support equipment. In addition, all soldiers would be equipped with a standard selection of small arms and equipment.

SUMMARY OF ENVIRONMENTAL EFFECTS

No significant impacts are anticipated as a result of implementing the Proposed Action at any of the seven installations assessed in this PEA. Each of the resource areas identified in the Appendix to this

¹ “Field” – refers to sending new equipment and technology to an installation(s). As part of the fielding action, soldiers will be stationed at an installation(s) to train with and maintain the IDDS-A.

FONSI was analyzed for potential impacts resulting from implementing the Proposed Action and any known cumulative actions. Potential impacts were broken down into the following categories: beneficial impacts, no impacts, and potential adverse impacts (negligible, minor, moderate, or significant). These impacts are summarized in the table in the FONSI Appendix A.

Impacts are anticipated to be minimized through avoidance, and the implementation of existing environmental protection measures. Avoidance strategies depend on the installation selected, the increase in training tempo, and the increase in the number of soldiers at the installation. Environmental protection measures such as erosion and stormwater controls; maintaining vehicles and equipment; and sustaining vegetation cover at the training sites would be implemented. Currently, no construction activities are planned to support the IDDS-A fielding. In the future, if construction activities were to occur, the protection measures would be implemented at those sites also. Buffers for sensitive resources (biological and cultural) would be employed during construction and training, depending on the requirements of the installation. For the proposed action, no new mitigation measures are needed nor have any been identified. The Army will continue to adhere to legal and regulatory requirements, and continue to implement its approved management plans, standard operating procedures, and best management practices (BMPs).

In compliance with Executive Orders 12898 and 14008 the Army reviewed the potential for impacts of the proposed action to Environmental Justice (EJ) communities. Detailed consideration of affects to EJ communities was dismissed. The relatively small population changes associated with the proposed action as compared to the population of each installation assessed would produce negligible socioeconomic changes. Also, the lack of any specific sites assessed in the PEA prevents screening for other impacts such as construction or operational noise, hazardous materials and waste, or safety.

PUBLIC REVIEW AND INTERAGENCY COORDINATION

The PEA and draft FONSI were made available for public, agency, and Tribal review on March 3, 2022 when a Notice of Availability was published in the Federal Register. That same day, electronic copies of the PEA and draft FONSI were made available for download from the United States Army Environmental Command (USAEC) website at: <https://aec.army.mil/index.php?cID=352>. Comments were requested to be submitted at U.S. Army Environmental Command, ATTN: IDDS-A Public Comments, 2455 Reynolds Road Mail Stop 112, JBSA-Fort Sam Houston, Texas 78234-7588, or by email to: usarmy.jbsa.imcom-aec.mbx.nepa@army.mil using the subject IDDS-A Public Comment.

Prior to the public comment period, the IDDS-A PEA and Draft FONSI were made available and notices were sent to federally recognized Native American Tribes affiliated with the assessed installations. They were invited to review the documents and initiate government-to-government consultations if they deemed them necessary. No government-to-government consultations have been initiated related to fielding the IDDS-A.

Comments were received from Tribal Governments and state historic preservation offices (SHPO). Also, the US Environmental Protection Agency (EPA) Region Four provided comments pertaining to Fort Campbell and Fort Stewart. Most of the comments are characterized as neutral and included appreciation for providing the opportunity to review and comment, determinations of no properties affected, requests to keep the Tribe or SHPO informed of future efforts related to the action, and requests to be included in future consultation or coordination once final fielding selections are made.

The number and characterization of the comments received per installation is:

- Fort Bliss: two neutral comments;
- Fort Hood: one neutral comment;
- Fort Campbell: four neutral comments;
- Fort Riley: one neutral comment and one negative comment;
- Fort Stewart: three neutral comments;
- Fort Sill: two neutral comments.
- JBLM-Lewis: one neutral comment
- JBLM-Yakima: two neutral comments

Responses to comments that were extensive or specific in nature are provided in the FONSI Appendix B.

CONCLUSION

Based on a careful review of the PEA and comments received as a result of the March 3, 2022 Notice of Availability publication, I have determined that no significant direct, indirect, or cumulative impacts to the human or natural environment are anticipated at any of the seven installations as a result of implementation of either Alternative. The information in public comments and other new information discussed in the Public Review and Interagency Coordination section of this document do not constitute significant new circumstances or information relevant to environmental concerns that would require supplementation of the PEA. Nevertheless, all comments were taken into account in making this decision. The Army's review indicates that the PEA's analysis is adequate and that its conclusion that there would be no significant impacts from either alternative at any combination of the assessed installations is still valid. The Army concludes that the Proposed Action and No Action Alternative are not major Federal actions that would significantly affect the quality of the environment per Section 102(2)(c) of NEPA; an environmental impact statement is not required, and will not be prepared. My decision is based on the PEA's analysis of potential environmental impacts associated with the Proposed Action and No Action Alternative. This decision meets the requirements of the NEPA and its implementing regulations and has been made after taking into account all submitted information and considering a full range of reasonable alternatives and all environmental impacts. This concludes the NEPA process for this action.

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Deputy Chief of Staff, G-9

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FONSI APPENDIX A: Summary of the Effects from Both Alternatives

Summary of the Potential Effects on the Evaluated Alternatives

Resource Area	Proposed Action <i>Direct, Indirect, and Cumulative</i>	No Action Alternative <i>Direct, Indirect, and Cumulative</i>
Biological Resources	Less than significant adverse effects	Less than significant adverse effects
Cultural Resources	Less than significant adverse effects	Less than significant adverse effects
Soils	Less than significant adverse effects	Less than significant adverse effects
Land Use and Compatibility	Less than significant adverse effects	Less than significant adverse effects
Facilities	Less than significant adverse effects	Less than significant adverse effects
Water Resources	Less than significant adverse effects	Less than significant adverse effects

FONSI APPENDIX B: Detailed Responses to Comments

The EPA's comment is considered neutral. They noted: "EPA has not identified any significant environmental impacts to the proposed action that would require substantive changes to the PEA or require the Army's consideration of other alternatives for the location of the proposed fielding sites."

The EPA also enclosed detailed technical comments for consideration if the IDDS-A is fielded to Fort Campbell or Fort Stewart. The comments are quoted below and will be implemented to the maximum extent practicable or would be acted on as indicated in the associated sub-paragraph.

- Air Quality and Climate Change – "implementing measures to reduce diesel emissions, such as switching to cleaner fuels where possible, retrofitting current construction equipment with emission reduction technologies, repowering older engines with newer cleaner engines, replacing older vehicles, and reducing idling through operator training and/or contracting policies. We also encourage controlling fugitive dust by watering or the application of other controlled materials. Analysis using computer-based air conformity modeling may provide further details on the extent of possible emissions resulting from the proposed activity."
- Water Resources and Wetlands – "cooperating with the United States Army Corps of Engineers for possible Section 404 permitting and mitigation credit requirements. Additionally, the EPA recommends that water retention and detention structures be incorporated into project designs that necessitate the construction of impervious surfaces due to new facility construction, in accordance with Section 438 of the Energy Independence and Security Act of 2007. Federal facilities should not alter preconstruction stormwater runoff profiles associated with 95% and lesser rainfall events."
- Land Use and Range Operations – "incorporating the environmental contamination status and location data within the PEA, including Installation Restoration Program data. Proposed activities should avoid contaminated sites and monitoring wells. The EPA agrees with the Army's planned use of existing firing ranges and impact sites, where possible. Explosive residues and heavy metals associated with ranges can lead to long-term land use restrictions and costly cleanup requirements that restrict future land use."
- Biological Resources – "any additional conservation measures identified by the FWS during consultation be included in the Final EA and/or Finding of No Significant Impact (FONSI)."
 - Each installation selected for fielding IDDS-A would initiate coordination with the USFWS to ensure all required protective measures are observed when fielding the system.
- Energy and Recycling – "divert recyclable materials such as concrete, steel, and asphalt away from landfills and repurpose the material instead. The appropriate NEPA document should also address potential environmental impacts to construction workers, to include the hazards of demolishing existing facilities, such as lead and asbestos latent materials.

Please consider sustainable building practices that utilize variable forms of proven renewable energy and resource conserving technology.”

- Environmental Justice and Cultural Resources – “please incorporate an environmental justice analysis in the Final PEA should significant off-base actions be taken in support of the Proposed Action, and ensure protected populations are not disproportionately or adversely impacted by the proposed projects.”
 - Each installation selected for fielding would review the impacts of any projects planned to support the IDDS-A to ensure there are not disproportionate or adverse impacts to minority, low income, or child populations.
- Alternatives Considered – “Please consider using the NEPAssist tool (<https://www.epa.gov/nepa/nepassist>), as part of the NEPA analysis process. NEPAssist combines multiple Geographic Information System (GIS) and internet databases to help screen for environmental concerns.”
 - Each installation selected for fielding would review the locations of projects planned to support the IDDS-A using the NEPAssist tool.

A generally negative comment was received for Fort Riley on behalf of an affiliated Tribal Government. The commenters concerns are addressed below.

- “I question the decision to determine a ‘finding of no significant impact’ (FONSI), for the proposed action. And to conduct only an environmental assessment (EA), rather than a full environmental impact statement (EIS)...”
- “The FONSI and EA are premature decisions.”
 - The FONSI, at the time of review, is only a draft document. The Army is required to provide a draft of the FONSI for review by the public, other agencies, and affiliated Tribes. The Draft FONSI represents the initial findings of the Army and is not a final decision. The FONSI cannot be finalized and signed until all comments received are taken into account. If significant impacts were to be brought to the Army’s attention during consultations and comments, the FONSI would be abandoned and additional analysis could be undertaken. The two outcomes of an EA are a FONSI or a Notice of Intent to prepare an EIS if there are significant impacts. The FONSI is not a foregone conclusion of an EA, therefore, completing an EA is an appropriate first step for any major Federal action.
- “Section 106 Consultation Process instructs parties to consult, identify, evaluate, and determine effects, prior to the issuance of permits or expenditures of funds.”
 - The PEA is not initiating the Section 106 Consultation Process. Additionally, there are no specific projects planned or funded in the PEA that might impact cultural resources, as the decision is related to which installation(s) the IDDS-A would be fielded. If such actions were undertaken in the future, additional, site-specific analysis such as an assessment tiering from this PEA would occur. The

NHPA Section 106 Consultation Process as well as compliance with all other required laws, EOs, and regulations would be part of the site-specific NEPA process.

- “Has there ever been a traditional cultural property (TCP), survey/study of Fort Riley compounds?”
- “If a TCP study has not been conducted, it's impossible for me to inform you what our concerns or effects would be unless a Tribal TCP is conducted.”
- “I suggest Fort Riley decision makers discuss this recommendation and offer us the opportunity to survey the facility.”
 - Installations conduct the identification of historic properties, to include TCPs, under the NHPA Section 106 or 110. Therefore, the decision maker for the PEA cannot address this matter through the NEPA review process. Instead, the matter will be addressed directly by installation staff, separate from this PEA, if Fort Riley is selected for fielding of the IDDS-A.
- “Your President issued Executive Order 14008 addressing the "Climate Crisis" and how all Federal agencies will contribute, with Tribal involvement. The meeting in December with Tribes and Federal agencies, including ACHP, brought out the inclusion of sacred sites into the EO 14008. How will a premature FONSI and a simple EA comply with this order?”
 - Executive Order 14008 *Tackling the Climate Crisis at Home and Abroad* requires a broad array of considerations and actions by all Federal agencies including: Use of the Federal Government’s Buying Power and Real Property and Asset Management; and Securing Environmental Justice and Spurring Economic Opportunity.
 - The Army is committed to mitigating the effects of the “Climate Crisis.” Implementing the Army Climate Strategy will utilize the Army’s buying power and real property and asset management to improve our defense capabilities and become a more efficient force, while securing a better future.
 - Fielding the IDDS-A does not disproportionately affect environmental justice communities since there will be only negligible impacts on all communities.
 - Fielding the IDDS-A supports economic opportunity by providing employment opportunities to disadvantaged communities.
 - Identification and assessment of impacts to sacred sites, to include all required consultation, would occur through the NHPA Section 106 and 110 compliance as well as government-to-government discussions.