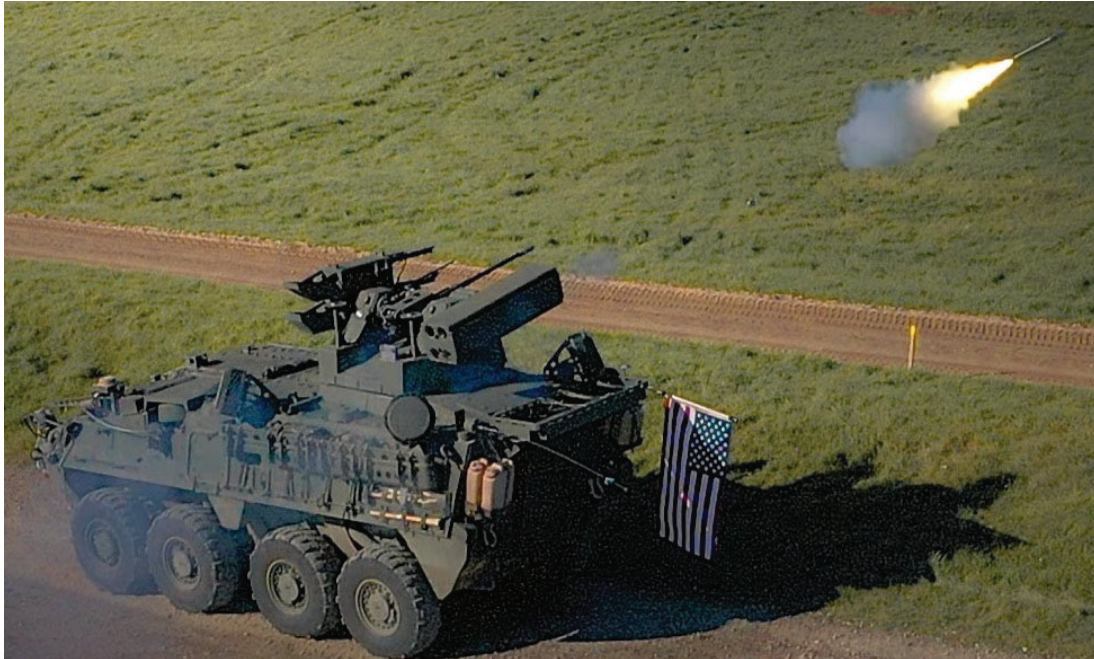


**FINDING OF NO SIGNIFICANT IMPACT**  
**PROGRAMMATIC ENVIRONMENTAL ASSESSMENT FOR THE FIELDING OF THE**  
**MANEUVER - SHORT RANGE AIR DEFENSE CAPABILITY**

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



June 2022

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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 Fielding of the Maneuver - Short Range Air Defense Capability (M-SHORAD)." The M-SHORAD PEA is incorporated by reference in this Finding of No Significant Impact (FONSI) and addresses environmental effects of the proposed fielding of the M-SHORAD as a battalion. The 2014 Piñon Canyon Maneuver Site (PCMS) Training and Operations Environmental Impact Statement and corresponding 2015 Record of Decision (PCMS EIS & ROD)<sup>1</sup> are also incorporated by reference into this PEA. The intent of the fielding is to enhance the Army's air defense capabilities.

The PEA provides a broad and programmatic analysis to determine potential impacts on the environmental and socioeconomic areas of concern at each of the six installations under consideration. The PEA also considers the general capacity of each installation to support an M-SHORAD battalion 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 M-SHORAD battalions. 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.

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<sup>1</sup> The 2014 Piñon Canyon Maneuver Site Training and Operations Environmental Impact Statement and corresponding 2015 Record of Decision are referred to in the PEA as the 2015 PCMS EIS, the 2015 PCMS EIS and ROD or the 2015 PCMS ROD. In this document they are referred to as the 2014 Training and Operations (T&O) Environmental Impact Statement (EIS), the 2014 T&O EIS, the May 2015 Record of Decision (ROD), the old T&O EIS, the 2015 EIS, and the May 2015 ROD.

Decisions on where to station the M-SHORAD units will be made by Army decision-makers based on the information in the PEA, FONSI, and Finding of No Practicable Alternative (FONPA) as well as other mission-related considerations.

## **PROPOSED ACTION**

The Army plans to field<sup>2</sup> M-SHORAD battalions to enhance the defensive capability of divisions against the increased capability of near peer adversaries to project lethal air power. M-SHORAD will improve air defense capability in current maneuver formations. The proposed action would address the priority to protect tactical maneuver forces from aerial threats. The PEA analyzes the fielding at six installations in more detail, Fort Bliss, Fort Hood, Fort Riley, Fort Stewart, Fort Carson, and Fort Sill.

It must be noted that during the period while the PEA has been under review the Army has decided to field the M-SHORAD without the Longbow Hellfire missile. The M-SHORAD is now planned to field with eight Stinger missiles. The Stinger missile is smaller than the Longbow Hellfire, has a shorter range, and a smaller warhead. Therefore, even though the number of Stinger missiles is greater this change is expected to lessen or have no effect on the environmental impacts at any of the assessed installations.

## **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, fielding the M-SHORAD battalion would not occur. Force structure, personnel, and equipment would not change at any of these installations as a result of this initiative. Therefore, the No Action Alternative would not address the Army's needs for enhanced air defense capabilities at the division level.

### **Proposed Action Alternative**

The Proposed Action analyzed within the PEA was to field an M-SHORAD battalion to any of the six installations assessed with multiple installations receiving a battalion. The Army's current

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<sup>2</sup> "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 M-SHORAD capability.

procurement plan is to field three M-SHORAD battalions in the U.S. Each M-SHORAD battalion would consist of approximately 550 soldiers, 40 M-SHORAD vehicles, and 270 associated support vehicles. In addition, radars, communications equipment, and small arms would outfit the battalion.

## **SUMMARY OF ENVIRONMENTAL EFFECTS**

No significant impacts are anticipated as a result of implementing the Proposed Action at any of the six installations assessed in the PEA. Each of the resource areas identified in Appendix A of this FONSI was analyzed for potential impacts resulting from implementing the Proposed Action as well as the combined impacts of the Proposed Action and past, present, and reasonably foreseeable future actions (cumulative impacts). Potential impacts were broken down into the following categories: beneficial impacts, no impacts, and potential adverse impacts (negligible, minor, moderate/ less than significant, 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 the number of soldiers at the installation, and where construction activities are planned. Examples of environmental protection measures would include implementing erosion and stormwater control measures, maintaining vehicles and equipment, and sustaining vegetation cover at the construction and training sites. Buffers for sensitive resources (biological and cultural) would be used 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 operation 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. The relatively small population changes associated with the proposed action as compared to the population of each installation assessed would produce negligible socioeconomic changes. Detailed consideration of affects to EJ communities was dismissed; any changes would be distributed throughout the ROI with no disproportionate impacts to EJ communities or children. Also, any specific sites proposed as potential locations of facilities have been screened for other impacts such as construction or operational noise, hazardous materials and waste, or safety through the real property master planning process.

## **PUBLIC REVIEW AND INTERAGENCY COORDINATION**

The PEA, draft FONSI, and draft FONPA were made available for public, agency, and Tribal review on May 19, 2021, when a Notice of Availability was published in the Federal Register. That same day, electronic copies of the PEA, draft FONSI, and draft FONPA 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 US Army Environmental Command, ATTN: M-SHORAD Public Comments, 2455 Reynolds Road Mail Stop 112, JBSA-Fort Sam Houston, Texas 78234-7588 or by email to: [usarmy.jbsa.aec.nepa@mail.mil](mailto:usarmy.jbsa.aec.nepa@mail.mil) using the subject line M-SHORAD Public Comment. If you have questions regarding these documents please contact the USAEC Public Affairs Office by email at [usarmy.jbsa.aec.mbx@mail.mil](mailto:usarmy.jbsa.aec.mbx@mail.mil) or by phone at 443-243-0313, 210-792-6683, or toll-free 855-846-3940. Paper copies of the documents were also placed in libraries on and near the assessed installations to facilitate public review.

A second comment period for government agencies and Native American Tribes was provided in an effort to initiate intergovernmental and interagency coordination of environmental planning (IICEP). Letters from USAEC were provided to State Historic Preservation Offices and the US Fish and Wildlife Service (USFWS) offices associated with each of the six installations. Letter templates were provided to each installation for completion by the Garrison Commander and forwarding to their affiliated federally recognized Native American Tribes. The comment period was open from September 14, 2021 to November 30, 2021. Electronic copies of the document were again available at the USAEC website and were also provided to agencies who requested them.

Due to communication issues IICEP letters for the second comment period were not sent from all six installations to their affiliated Native American Tribes. To correct this oversight, letters from three installations were sent to their affiliated Native American Tribes between January 31 and February 22, 2022 with an additional 30 days allowed to receive their comments at the original mailing address or by email to the new USAEC website at: [usarmy.jbsa.imcom-aec.mbx.nepa@army.mil](mailto:usarmy.jbsa.imcom-aec.mbx.nepa@army.mil). Revised phone numbers were also provided: 210-466-1590 or 210-466-1655. No government-to-government consultations have been initiated related to fielding the M-SHORAD.

The initial public comment period closed on June 18, 2021 and the IICEP comments closed on March 24, 2022. Most public comments received were in support of fielding the M-SHORAD to the commenter's local installation.

Positive comments cited the perception that the installation could support the soldiers and their families, and the facilities and ranges needed for M-SHORAD training were available. Positive commenters also frequently cited the economic benefits that would accrue to the local area after arrival of the M-SHORAD.

Comments received from Native American Tribes are mostly characterized as neutral and included appreciation for providing the opportunity to review and comment, determinations of no properties affected, and a request to keep the Tribe informed of future efforts related to the action. Other government agency comments acknowledged the possibility of fielding M-SHORAD to their associated installation, requested to be included in future consultation or coordination once final fielding selections were made.

A comment with recommendations was received from Region Four of the EPA regarding fielding M-SHORAD at Fort Stewart. These concerns were taken into account in the PEA or would be addressed in site-specific NEPA analysis if Fort Stewart were selected for the M-SHORAD.

Comments from a private organization expressed concern with impacts to the PCMS if M-SHORAD were fielded to Fort Carson. The Army response indicated, among other things, that the limited training of the M-SHORAD unit at PCMS would be within the parameters of an action analyzed in a 2014 EIS.

Another comment expressed reservations about potential impacts to traditional cultural properties (TCP) and sacred sites at Fort Riley. Fort Riley is currently undertaking the initial steps to complete a TCP survey with their affiliated Tribes. If Fort Riley is selected for the M-SHORAD, site-specific analysis will include compliance with all laws and executive orders affecting Native American resources, and government-to-government discussions will occur.

These comments and the Army's responses are addressed in Appendix F of the PEA. All comments have been made part of the administrative record for this PEA.

## **CONCLUSION**

Based on a careful review of the PEA and the PCMS EIS & ROD, which are incorporated by reference, and comments received as a result of the May 19, 2021 Notice of Availability publication and subsequent IICEP comment periods, I have determined that no significant direct, indirect, or cumulative impacts to the human or natural environment are anticipated at any of the six 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 and of this document and Appendix F of the PEA 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 are no significant impacts from either alternative is still valid. There are no substantial changes to the proposed action that are relevant to environmental concerns or significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts that would require supplementation. 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 and socioeconomic 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 considering all submitted information and examining a full range of reasonable alternatives and all environmental impacts. This concludes the NEPA process for this action.

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LTG KEVIN VEREEN  
Deputy Chief of Staff, G-9

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LTG PATRICK E. MATLOCK  
Deputy Chief of Staff, G-3/5/7

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Date



FONSI APPENDIX A: Summary of the Effects from Both Alternatives

*Summary of the Potential Effects of the Evaluated Alternatives*

<b>Resource Area</b>	<b>Proposed Action</b> <i>Direct, Indirect, and Cumulative</i>	<b>No Action Alternative</b> <i>Direct, Indirect, and Cumulative</i>
<b>Air Quality</b>	Less than significant adverse effects	Less than significant adverse effects
<b>Airspace</b>	Minor adverse effect	Minor adverse effect
<b>Biological Resources</b>	Less than significant adverse effects	Less than significant adverse effects
<b>Cultural Resources</b>	Less than significant adverse effects	Less than significant adverse effects
<b>Soils</b>	Less than significant adverse effects	Less than significant adverse effects
<b>Land Use and Compatibility</b>	Less than significant adverse effects	Less than significant adverse effects
<b>Socio-economics</b>	Less than significant beneficial effects	Minor beneficial effects
<b>Traffic and Transportation</b>	Less than significant adverse effects	Less than significant adverse effects
<b>Facilities</b>	Less than significant adverse effects	Less than significant adverse effects
<b>Water Resources</b>	Less than significant adverse effects	Less than significant adverse effects