

FINAL
FINDING OF NO SIGNIFICANT IMPACT FOR
PROGRAMMATIC ENVIRONMENTAL ASSESSMENT FOR
REAL PROPERTY MASTER PLANS ON
U.S. ARMY INSTALLATION MANAGEMENT COMMAND GARRISONS

The U.S. Army Installation Management Command (IMCOM) has completed a Programmatic Environmental Assessment (PEA) in accordance with the National Environmental Policy Act of 1969 (NEPA) (Title 42 of the *United States Code* Section 4321); Council on Environmental Quality (CEQ) NEPA regulations (Title 40 of the *Code of Federal Regulations* [C.F.R.] Parts 1500–1508); and the Army's NEPA implementing regulation, *Environmental Analysis of Army Actions* (32 C.F.R. Part 651).

The Proposed Action evaluated in the PEA is for IMCOM garrisons to develop, adopt, implement, and update Real Property Master Plans (RPMPs) and component documents using a standardized process in accordance with Department of Defense (DoD) and Army guidance, and to encourage community partner participation in this process.

The purpose of the Proposed Action is for IMCOM garrisons to plan for and manage their real property assets comprehensively and to permit installation expansion, reduction, and changes in mission sustainably over a 20-year planning horizon. The Proposed Action is needed to provide a standard process to guide sustainable and energy-efficient development across IMCOM installations that supports mission requirements. The PEA will serve to integrate the NEPA process more efficiently into the master planning process, avoid unnecessary duplicative NEPA analyses, better inform decision makers, and encourage active public involvement.

The PEA, which is incorporated by reference into this Finding of No Significant Impact (FONSI), considers the environmental impacts of the Proposed Action and a No Action Alternative:

No Action Alternative. The CEQ regulations in 40 C.F.R. § 1502.14(d) and 32 C.F.R. Part 651 require analysis of a No Action Alternative in all NEPA documents. The No Action Alternative provided a baseline against which the impacts of implementing the Proposed Action were measured. Under the No Action Alternative, RPMPs would not be developed, adopted, implemented, or updated using a standardized process across all IMCOM garrisons in the United States and its territories in accordance with DoD and Army guidance. The existing RPMP process would remain in effect, so ad hoc master planning and associated NEPA analysis would continue. Selection of the No Action Alternative would mean that IMCOM installations would be unable to tier from the PEA analysis and would have to continue to conduct repetitive analyses for each installation RPMP and component documents.

Proposed Action. The Proposed Action is for IMCOM garrisons to develop, adopt, implement, and update RPMPs and their component documents using a standardized process in accordance with DoD and Army guidance, and to encourage community partner participation in this process.

The RPMP serves as a garrison's road map for short- and long-term investment, management and development of its real property assets, including land, facilities, and infrastructure. It provides guidelines for sustainable installation development, regulates project siting, and ensures sustainable and orderly development that supports the installation's mission.

Army master planning activities are addressed in Army Regulation 210-20, *Real Property Master Planning for Army Installations* (May 16, 2005) and Unified Facilities Criteria (UFC) 2-100-01, *Installation Master Planning* (November 28, 2018). The process of developing RPMPs and component documents has become more standardized through the promulgation of UFC 2-100-01. In accordance with UFC 2-100-01, IMCOM's master planning process results in five standard RPMP components: Vision Plan, Installation Planning Standards, Long Range Component (including Area Development Plans), Capital Investment Strategy, and Plan Summary. The types of projects proposed in an RPMP vary widely and include facility renovation, construction, and demolition; transportation; utility; outdoor recreation and open space; and energy and climate resilience.

While the master planning process does not substitute for or fulfill the requirements of NEPA analysis, many of its aspects align with NEPA's goal to evaluate potential impacts on the human and natural environments. It includes developing and screening multiple alternatives to arrive at the preferred alternative, involves stakeholders in identifying critical issues, identifies environmental constraints, and includes plans to avoid and protect sensitive resources. The master planning process also involves analysis of resource areas that include biological, cultural, land use, traffic and transportation, and utilities.

Summary of Environmental Impacts

No significant impacts are anticipated as a result of implementing either the Proposed Action or the No Action Alternative. The short- and long-term impacts that would result from implementing the Proposed Action range from moderate-beneficial to moderate-adverse and would all be less than significant. Impacts on each of the analyzed resource areas are summarized in Table 1. No mitigation measures would be necessary to reduce impacts to less than significant. Potential impacts would be managed through avoidance; compliance with applicable laws, regulations, permits, policies, and plans; and the implementation of best management practices, many of which are already standard practice at IMCOM garrisons. Cumulative effects would include minor beneficial and less-than-significant adverse effects.

Environmental Checklist

When considering the implementation of an individual proposed action, IMCOM garrisons would complete the Environmental Checklist in the PEA to determine whether tiering from the PEA and FONSI would be appropriate and what type of additional site-specific NEPA documentation, if any, would be required. If a garrison determines that a specific installation RPMP, RPMP component document, or project requires additional NEPA analysis tiered from the PEA, the garrison would be required to complete the appropriate NEPA documentation before it made any irreversible and irretrievable commitments of resources related to that action.

Public Review and Interagency Coordination

The Army invited public, agency, and tribal participation in the NEPA process. The PEA and draft FONSI were made available for review on April 24, 2020, when a Notice of Availability was published in the *Federal Register* as the action is of nationwide interest, involving IMCOM garrisons in the United States and its territories. That same day, electronic copies of the PEA and draft FONSI were made available on the U.S. Army Environmental Command's website at <https://aec.army.mil/index.php?cID=352>.

During the 30-day review period, IMCOM received four comments: a letter from the Commonwealth of Virginia Department of Environmental Quality (DEQ), a letter from Not 1 More Acre! (N1MA!, a nonprofit corporation), and two comments via email from the general public. The two comments from the general public were not germane to the analysis in the EA.

The Virginia DEQ comments noted which state agencies have jurisdiction over resource areas addressed in the PEA, listed federal and state regulations pertaining to these resources, and outlined requirements for state agency review and compliance with regulations during the development of RPMPs for IMCOM garrisons in Virginia. The Army will comply with these regulations as applicable.

N1MA! commented that IMCOM garrisons could adopt master plans without allowing the public the opportunity to comment on the plans. The Army will comply with all applicable federal, state, and local regulations and has no intent to deny the public the opportunity to comment on local IMCOM garrison decisions regarding changes in land use. N1MA! commented that the PEA improperly requires use of its significance criteria even if the context at a given installation requires a different criterion. The Army responds that significance remains an issue of context and intensity, and use of the PEA will not require any installation to mischaracterize otherwise significant impacts as less than significant. N1MA! commented that it is improper for a Record of Environmental Consideration (REC) to be used to tier from the PEA. The Army's NEPA regulation states that a REC can be used when an action is adequately covered by existing analysis (see 32 C.F.R. § 651.12 (a)(2) and 651.14(c)). Tiering is also called for in the CEQ's NEPA regulation at 32 C.F.R. § 1508.28.

All comments were considered by the decision maker prior to signing this FONSI and are included in the PEA Administrative Record. The comments do not affect the conclusions of the PEA and further environmental analysis is not required.

FINDING OF NO SIGNIFICANT IMPACT

Based on careful review of the facts and analyses contained in the PEA conducted under the provisions of NEPA, CEQ regulations, and 32 C.F.R. Part 651, and based on review of the agency and public comments submitted during the 30-day public comment period, I conclude that no significant environmental impacts are anticipated to result from implementing the Proposed Action, subject to application of the checklist for consideration of specific proposed actions, either by itself or cumulatively with other known projects. The short- and long-term impacts that would result from implementing the Proposed Action range from moderate-beneficial to moderate-adverse and would all be less than significant. Impacts on each of the analyzed resource areas are summarized in Table 1. Accordingly, an Environmental Impact Statement is not required and will not be prepared. The signing of this FONSI completes the environmental impact analysis process.



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7/30/2020
Date

Table 1. Summary of Potential Effects

Resource area	Proposed Action (Preferred Alternative)	No Action Alternative
Air quality and greenhouse gases	Short-term minor-to-moderate adverse; long-term minor beneficial to moderate adverse	Short-term minor-to-moderate adverse; long-term minor beneficial to moderate adverse
Biological resources	Short-term minor-to-moderate adverse; long-term beneficial to minor adverse	Short-term minor-to-moderate adverse; long-term beneficial to minor adverse
Cultural resources	Short-term minor adverse; long-term ranging from none to moderate adverse	Short-term minor adverse; long-term ranging from none to moderate adverse
Earth resources	Short- and long-term minor beneficial to minor adverse	Short- and long-term minor beneficial to minor adverse
Hazardous substances and waste	Short- and long-term minor beneficial to minor adverse	Short- and long-term minor beneficial to minor adverse
Human health and safety	Short-term minor adverse; long-term minor beneficial	Short-term minor adverse; long-term minor beneficial
Land use	No short-term; long-term minor beneficial	No short-term; long-term minor beneficial
Noise	Short-term minor-to-moderate adverse; long-term minor beneficial to minor adverse	Short-term minor-to-moderate adverse; long-term minor beneficial to minor adverse
Socioeconomics	Short-term minor beneficial; long-term minor beneficial to moderate adverse	Short-term minor beneficial; long-term minor beneficial to moderate adverse
Transportation and traffic	Short-term negligible-to-moderate adverse; long-term impacts moderate adverse to moderate beneficial	Short-term negligible-to-moderate adverse; long-term impacts moderate adverse to moderate beneficial
Utilities	Short- and long-term minor beneficial to minor adverse	Short- and long-term minor beneficial to minor adverse
Water resources	Short-term minor-to-moderate adverse; long-term moderate adverse to moderate beneficial	Short-term minor-to-moderate adverse; long-term moderate adverse to moderate beneficial