

1 The SEA considered six potential action alternatives, including the Preferred
2 Alternative/Alternative 1.

3 **Description of the Preferred Alternative/Alternative 1**

4 The Proposed Action is described in Section 2.1 of the SEA and includes the 2,900 foot
5 runway extension with two supporting taxiways, shoulders, grading, drainage, and other
6 supporting infrastructure. The Proposed Action also changed the re-route of the road
7 Airlifter Drive from the original design under Alternative F in order to improve the road's
8 safety when in use by emergency response vehicles and by vehicles carrying munitions.
9 Ground improvements have been included in the Proposed Action to reduce the
10 hydrologic impacts of the runway extension as well.

11 **Other Alternatives Eliminated from Further Consideration**

12 The following additional alternatives were eliminated from further consideration:

- 13 • Alternative 2: Construct Runway Extension and Fill Fish and Triangle Lake
14 Wetland Complex with Runway Extension Excavation Spoils
- 15 • Alternative 3: Construct Runway Extension and Fill Wetlands East of Fish Lake
16 with Runway Extension Excavation Spoils
- 17 • Alternative 4: Construct Runway Extension and Ground Improvement, Fill Fish
18 Lake with Runway Extension Excavation Spoils
- 19 • Alternative 5: Construct Runway Extension by Regrading the Runway
- 20 • Alternative 6: Extend RW 16/34 by 2,500 feet to the South

21 As required by 40 CFR §1502.14(a), the SEA briefly discusses the reasons Alternatives
22 2-6 were eliminated from consideration. These alternatives failed to meet the definition
23 of "reasonable alternatives" under CEQ regulations. NEPA and the CEQ regulations
24 mandate the consideration of reasonable alternatives to the Preferred Alternative. 40
25 CFR 1508.1(z) defines "reasonable alternatives" as those alternatives that are
26 "technically and economically feasible, meet the purpose and need for the proposed
27 action, and, where applicable, meet the goals of the applicant."

28 Section 2 of the SEA contains descriptions of the alternatives, selection criteria, and the
29 basis for eliminating Alternatives 2-6. The following is a brief summary of that
30 discussion:

31 Alternatives 2, 3, and 4 would result in significantly more impacts to the Fish and
32 Triangle Lake wetlands complex. Alternative 2 would result in the complete loss of these
33 water resources, Alternative 4 would fill Fish Lake, and Alternatives 3 does not take any
34 steps to stabilize the wetland complex. The anticipated impacts of Alternatives 2, 3, and
35 4 on these wetland resources are contrary to the goals of the Air Force and federal law
36 to minimize impacts to wetlands and other natural resources. Alternative 5 is not
37 reasonable because it is not economically or technologically feasible to raise the entire
38 runway and associated support structures and facilities to avoid hydrologic impacts to
39 the surrounding wetlands complex. Finally, Alternative 6 is not reasonable, because it
40 would require relocating a railroad line and road, crossing a waterbody, and
41 encroaching on a local park. This fails to meet the Air Force's goals to minimize the
42 project's impacts on wetlands, surface water, and cultural resources. Additionally,
43 Alternatives 5 and 6 are not consistent with JBER's existing infrastructure and planned

1 development. Their implementation would cause intolerable interference to the ongoing
2 military mission and activities at JBER.

3 ***Description of the No Action Alternative***

4 40 CFR §1502.14(c) mandates that a No Action Alternative be included in the
5 environmental assessment. This alternative would maintain current operations under
6 the 2018 EIS “Alternative A.” The 2018 RoD chose to implement Alternative A until
7 Alternative F, the runway extension, could be completed. Alternative A distributed
8 annual F-22 sorties to concentrate departures on RW 34 and arrivals on RW 06,
9 allowing F-22 operations to depart directly toward the most commonly used training
10 airspaces. Alternative A did not include construction of a runway extension. The SEA
11 also considers the reasonably foreseeable environmental impacts originally examined in
12 the 2018 EIS for the No Action Alternative.

13 ***Summary of Findings***

14 The Air Force has concluded that the Preferred Alternative would have no further effect
15 on the following resources, relative to the conclusions drawn in the 2018 EIS: Airspace
16 Management and Use, Acoustic Environment, Transportation and Circulation,
17 Socioeconomics, and Environmental Justice. This environmental analysis focused on
18 the following areas: Safety, Air Quality, Physical Resources (Earth Resources,
19 Wetlands, and Surface Water), Hazardous Materials and Hazardous Waste, Biological
20 Resources (Vegetation, Fish and Wildlife, and Special Status Species), Cultural
21 Resources, and Recreation/Land Use. The analysis of these resource areas revealed
22 new impacts, the potential for significant impacts, and/or the mitigation steps necessary
23 to avoid, lessen, or compensate for those impacts.

24 ***SAFETY***

25 The SEA evaluated the potential impacts of the Preferred Alternative on safety. BASH
26 concerns are minimal as long as installation’s BASH plan is followed. The
27 implementation of the Preferred Alternative would have positive impacts on aircraft
28 safety over the Anchorage bowl by reducing airspace congestion.

29 ***AIR QUALITY***

30 The SEA evaluated potential impacts to air quality from the construction of an additional
31 400-feet of the runway necessary for compliance with current operational standards, as
32 well as the addition of three stationary emergency generators, necessary to support
33 airfield lighting; not previously evaluated in the 2018 EIS. Operationally, there was no
34 change in effect resulting from the 400-foot increase in the runway. Implementation of
35 the Preferred Alternative would not contribute to an exceedance of an ambient air
36 quality standard and would produce less than significant air quality impacts due to a
37 decrease in F-22 flight operations below 3,000 AGL as described in the 2018 EIS. The
38 air quality impacts resulting from the installation of the three emergency generators
39 were found to be insignificant and well below the de minimis thresholds allowed by the
40 JBER Flight Line Stationary Source Operating Permit.

41 ***PHYSICAL RESOURCES***

1 **(1) EARTH RESOURCES (SOIL)** – In the Preferred Alternative, 12 million cubic
2 yards (mcy) of excavated material will be disposed in two previously analyzed
3 borrow pits. This is a 3.3 mcy reduction compared to the 2018 EIS and RoD.
4 With respect to any PFAS affected soils encountered in the excavation limits, the
5 Air Force will coordinate with Federal and State regulatory agencies and take
6 appropriate action to protect human health and the environment, which may
7 include the removal, management, and /or disposal of PFAS-impacted soil in
8 accordance with applicable legal and regulatory requirements.

9 **(2) WETLANDS** – The Preferred Alternative will directly impact 38.5 acres of
10 isolated wetlands which have been determined not to meet the requirements for
11 “Waters of the U.S.”. The Air Force will construct ground improvements to
12 minimize surface water and wetland impacts to the extent practicable. The
13 wetland impacts cannot be completely avoided due to the grading requirements
14 of the extended runway and distribution of wetlands in the project area. As was
15 determined appropriate mitigation in the 2018 ROD, the Air Force will provide
16 mitigation to bring the overall impacts of the project down to insignificance. The
17 Air Force will purchase adequate wetland mitigation credits to offset unavoidable
18 wetland impacts, consistent with the general wetland mitigation objectives
19 described in the 2018 EIS and RoD.

20 **(3) SURFACE WATER** – Like the impacts to wetlands, the SEA found that mitigation
21 is required to ensure that there are no significant impacts on the water resources
22 in the project area, particularly Fish and Triangle Lakes. To ensure the hydrology
23 of these waterbodies and the associated wetland complex is not significantly
24 degraded, the Air Force will construct ground improvements to prevent significant
25 loss of function to Fish and Triangle Lakes.

26 **HAZARDOUS WASTE AND HAZARDOUS MATERIAL**

27 The SEA also acknowledges and analyzes the recent discovery of PFAS impacted soils
28 within the project area. While PFAS are not yet designated under federal law as a
29 hazardous waste or hazardous substance, PFAS are recognized as a potential health
30 concern, and the Air Force will mitigate potential significant impacts of excavating these
31 soils through measures which may include minimization of excavation in chemically
32 affected areas, stockpiling affected soils in a specified lined and capped location for
33 future removal, or relocation of the material to an appropriate landfill location. Such
34 actions would be taken consistent with applicable legal and regulatory requirements and
35 after coordination with Federal and State regulatory agencies. The Air Force’s actions
36 will minimize the effect to insignificant.

37 **BIOLOGICAL RESOURCES**

38 **(1) VEGETATION** – The clearing limits for the Preferred Alternative have been
39 enlarged since the 2018 EIS and ROD, increasing the area of vegetation
40 impacts. Selective removal of large trees from within the project limits to prevent
41 objects extending into the navigable airspace will also be included with the
42 Preferred Alternative, which will represent a minor increase in vegetation impacts
43 compared to the 2018 EIS.

1 **(2) FISH AND WILDLIFE** – Minor increases to impacts on fish and wildlife will occur
2 due to expansion of the excavation limits and additional vegetation impacts since
3 the 2018 EIS. The habitats impacted and acoustic impact from operational
4 changes would not change from the 2018 EIS.

5 **(3) SPECIAL STATUS SPECIES** – Based on an analysis of the potential effects of
6 F-22 overflights to marine mammals, JBER has determined that the potential for
7 F-22 overflights to cause significant alteration or abandonment of natural
8 behaviors both in air and underwater, such as would constitute a Level B
9 harassment under the MMPA by a military readiness activity is unlikely and
10 therefore insignificant.

11 **CULTURAL RESOURCES**

12 The expanded footprint of Preferred Alternative encompasses historic sites that will be
13 avoided to ensure the proposed alternative does not have significant negative impacts
14 on these cultural resources. The Air Force has modified the design of project features to
15 avoid impacting historic resources and will monitor the project during construction to
16 ensure cultural resources are not impacted by construction activities.

17 **RECREATION/LAND USE**

18 The Preferred Alternative will have beneficial impacts on military training land use by
19 improving training opportunities for F-22 pilots. However, due to the enlarged grading
20 limits from the 2018 EIS, there will be minor impacts to the recreational land use. These
21 impacts will be minor because the types of resources that will be impacted are not
22 particularly rare within the context of JBER lands.

23 **ALL OTHER FINDINGS**

24 As the proponent for the proposal to improve the F-22 operational efficiency at JBER,
25 the 673d CES/CEIEC will be responsible for ensuring that the mitigations listed above in
26 the environmental findings section and in the SEA are in place prior to or concurrent
27 with execution of the Preferred Alternative. The proponent will ensure that mitigations
28 are fully funded and are in place as identified in this FONSI/FONPA and the mitigation
29 monitoring plan (MMP). The MMP will be developed subsequent to this FONSI and will
30 include points of contact for oversight and completion of the mitigation as well as the
31 anticipated timing for mitigation completion. It is expected that mitigative measures
32 described in the 2018 *Proposal to Improve F-22 Operational Efficiency at Joint Base*
33 *Elmendorf-Richardson, Alaska*, 2018 RoD continue to apply to the Proposed Action.

34 **Public Review**

35 An Early Public Notice was published in the Anchorage Daily News and Mat-Su Valley
36 Frontiersman on 24 October 2021 announcing commencement of the EA detailing that
37 the action would take place in a wetland and seeking advanced public comment. No
38 comments were received. Notification of Availability was posted on the Official JBER
39 website on 25 March 2022. Tribes and community outreach partners were also notified.
40 A Public Notice was placed in the Anchorage Daily News and Mat-Su Valley
41 Frontiersman on 27 March 2022 announcing the availability of the Draft EA and Draft
42 FONSI/FONPA for public review and comment. The documents were made available

1 for review on the internet at <https://www.jber.jb.mil/Services-Resources/Environmental/Environmental-Planning/> from 24 March 2022 to 23 April
2 2022. The Air Force received comments from [##] public agencies during the review
3 period. [Provide brief description of the comments received].
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5 Tribal consultation letters were mailed to federally recognized tribes on 1 October 2021.
6 Eklutna Inc. responded by email and letter requesting additional information about the
7 borrow material, waste disposal sites, and borrow sites. The Chickaloon Village Tribal
8 Council responded by phone requesting information on cultural resources and wetland
9 impacts. Additional attempts to contact tribal representatives were made throughout the
10 duration of EA development by the JBER Community Partnerships Office. A
11 Government-to-Government meeting was held for 2 February. Appendix A includes
12 records of all correspondence with the tribes.

13 ***Finding of No Practical Alternative (FONPA)***

14 Pursuant to Executive Order (EO) 11990, Protection of Wetlands, if a federal
15 government agency proposes to conduct an activity in a wetland, it will consider
16 alternatives to the action and modify its actions, to the extent feasible, to avoid adverse
17 effects or potential harm. The attached SEA considered six action alternatives and the
18 No Action Alternative, but found only the Preferred Alternative to be reasonable,
19 practicable, and meet the Air Force's purpose and need.

20 As a result of the ground disturbance and fill operations, the Preferred Alternative will
21 impact 38.5 acres, representing approximately 0.2 percent more JBER wetlands of the
22 affected classes than were described in the EIS based on the current field-based
23 wetland delineation. The implementation of ground improvements to stabilize the Fish
24 and Triangle Lakes wetland complex avoids and minimizes wetland impacts to the
25 extent practicable. Avoidance of wetland impacts is not practicable because RW 16/34
26 cannot be extended to the south due to acoustic, topographic, real estate, and
27 infrastructure conflicts. Unavoidable wetland impacts will be mitigated by purchasing
28 wetland mitigation bank credits or in lieu payments.

29 Based on my review of the facts and analyses contained in the attached SEA, I find that
30 there is no practicable alternative to construction in a wetland. This finding fulfills both
31 the requirements of the referenced Executive Order and the EIAP regulation, 32 CFR §
32 989.14 for a Finding of No Practicable Alternative.

33 ***Finding of No Significant Impact (FONSI)***

34 Based on my review of the facts and analyses contained in the attached SEA,
35 conducted under the provisions of NEPA, CEQ Regulations, and 32 CFR §989, I
36 conclude that the Preferred Alternative, Alternative 1, **Construct Runway Extension
37 and Ground Improvements to Stabilize Fish and Triangle Lake Hydrology**, would
38 not have a significant environmental impact, either by itself or cumulatively with other
39 known projects. Accordingly, an Environmental Impact Statement is not required. This
40 analysis fulfills the requirements of NEPA, the President's CEQ 40 CFR §§ 1500-1508
41 and the Air Force EIAP regulations 32 CFR § 989. The signing of this Finding of No
42 Significant Impact and Finding of No Practicable Alternative completes the
43 environmental impact analysis process.

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David B. Novy
Colonel, USAF
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Date