

**DRAFT FINDING OF NO SIGNIFICANT IMPACT /  
FINDING OF NO PRACTICABLE ALTERNATIVE**

**IMPROVEMENTS TO INSTALLATION PERIMETER SECURITY  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA**

**EAXX-007-57-UAF-1730709460**

Pursuant to provisions of the National Environmental Policy Act (NEPA), as amended by Public Law 118-5, *Fiscal Responsibility Act of 2023* (42 United States Code 4321 et seq.), Department of Defense NEPA Implementing Procedures (30 June 2025), and Executive Order (EO) 14154, *Unleashing American Energy*, the Department of the Air Force (DAF) assessed the potential environmental consequences associated with rectifying security deficiencies along the installation perimeter at Joint Base Elmendorf-Richardson (JBER), Alaska. This Finding of No Significant Impact (FONSI) / Finding of No Practicable Alternative (FONPA) hereby incorporates by reference and attaches hereto the “Draft Environmental Assessment (Draft EA), Improvements to Installation Perimeter Security, Joint Base Elmendorf-Richardson, Alaska.”

The purpose of the Proposed Action is to improve installation security, prioritizing critically deficient locations and then addressing other vulnerable areas to prevent unauthorized pedestrian access onto the installation from uncontrolled access points. The Proposed Action is necessary to protect installation operations and unit readiness. The acceptable threshold for installation breaches is zero, but it is not practicable to fully secure and patrol every reach of the installation perimeter. Critical areas, however, must be reasonably secured and protected from threats posed by trespassers and unauthorized entry of foreign intelligence entities. Currently, there are sections of the installation’s cantonment area that are unacceptably vulnerable to trespass. Areas of the installation that interface with public lands and residential areas are also vulnerable, and trespass introduces risk to installation security, operations, and military training. Existing physical security measures have weak points, such as incomplete, ineffective, or discontinuous perimeter fencing, which do not prevent trespass onto the installation, where trespass is defined as “entry [that] is illegally gained” (Department of the Air Force Manual 31-101 Volume 3, *Installation Perimeter Access Control*, 2020). The proposed action will modify existing fences, erect new fences, and/or install or upgrade non-structural security measures, including but not limited to signage, cameras, lighting, and sirens to address installation security deficiencies in designated areas.

The Draft EA, incorporated by reference into this finding, analyzes the potential environmental consequences of improving JBER perimeter security and provides environmental protection measures to avoid or reduce adverse environmental impacts. The EA considers potential impacts of the Proposed Action Alternative (Implement structural and non-structural security measures in critically deficient and vulnerable areas, and only non-structural measures in remote vulnerable areas), Alternative 2 (Implement structural security measures in critically deficient areas only, and non-structural security measures across critically deficient and vulnerable areas), and the No-Action Alternative. The EA also considers other reasonably foreseeable effects on resources.

## ALTERNATIVE 1

Under the Proposed Action, “critically deficient locations” along the installation perimeter—(1) Ship Creek Crossing at Reeve Boulevard, (2) Ship Creek Crossing at Glenn Highway (Cottonwood Park), and (3) Glenn Highway (north side) between Davis Highway and the Anchorage Municipal Landfill—will receive additional structural security measures (e.g., fencing) and non-structural security measures (e.g., sensors, signs). “Other vulnerable areas” along the installation perimeter, including (A) Richardson Training Areas (RTAs) 424, 429, and 430, (B) RTA 420, and (C) RTA 411, will also receive these combined structural and non-structural security measures. The installation perimeter along the eastern boundary from Eagle River north to Beach Lake (“Vulnerable Area D”) will receive only non-structural security measures (e.g., sensors, signs, security lighting, sirens).

## ALTERNATIVE 2

Under Alternative 2, critically deficient locations on the installation perimeter (identified in Alternative 1) will receive additional structural security measures (i.e., fencing) and non-structural security measures, while other vulnerable areas (identified in Alternative 1) will receive only non-structural security measures.

## NO-ACTION ALTERNATIVE

Under the No-Action Alternative, no improvements will be made to installation perimeter security.

## SUMMARY OF FINDINGS

The analysis of the affected environment and environmental consequences of the Proposed Action and Alternatives concluded that by implementing standard environmental protection measures during construction activities and operations, the Proposed Action and Alternatives will result in no impacts on cultural resources; and will result in non-significant impacts on earth resources, water resources, biological resources, safety and occupational health, noise, air quality, recreation, and the ambient light environment. Protective measures incorporated into the Proposed Action (identified in the EA) and incorporated into the analysis will be implemented to avoid and minimize the potential for significant impacts on resources. A summary of resources for which protective measures and best management practices (BMPs) support the finding of no significant impact is presented in the following paragraphs.

**Earth Resources.** Minimal ground disturbance will be required, and the Proposed Action will avoid blasting or major excavation, and grading for utilities will be limited and confined to previously disturbed areas. Although some temporary soil compaction and erosion risk may occur during construction, especially where vegetation is removed, the mostly flat terrain and use of BMPs will minimize impacts. Impacts on soils from construction activities (e.g., compaction, disturbance, erosion) are expected to be temporary, minor, and readily minimized with protective measures and BMPs.

**Water Resources.** Construction in wetlands and floodplains cannot be avoided while meeting the purpose and need of the Proposed Action. In critically deficient areas, construction of security measures will occur within wetlands and floodplains associated with Ship Creek. In other vulnerable areas, construction of security measures will occur within wetlands and floodplains associated with South Fork Chester Creek and North Fork Campbell Creek. The designs for proposed structural security measures were developed to avoid and minimize impacts on wetlands and floodplains to the maximum extent practicable; no structures will be placed within 25 feet of the edge of Ship Creek, and structures will be oriented parallel to flow in the Ship Creek floodplain. Fencing atop culverts will be placed across other, smaller streams in the Proposed Action Area, including Jerry's Creek, South Fork Chester Creek, and North Fork Campbell Creek. Across the Proposed Action Area, a total of 3.3 acres of wetlands and more than 1,609 linear feet of floodplain will be impacted by clearing but are not expected to impact floodplain function. The installation of post footings is expected to result in negligible loss of wetlands and floodplains.

**Biological Resources.** The Proposed Action is expected to further restrict, but not prevent, wildlife movement between seasonal habitats. Impacts on large mammals are expected to be adverse in the short term, while animals adjust to the new fences and habituate to other migration routes, then lessen over time. Impacts on wildlife, and especially on moose, will be minimized by the implementation of several measures. A Memorandum of Agreement will be executed between JBER and the Alaska Department of Fish and Game, who will cooperate to identify and respond to animal strandings, with JBER Conservation Law Enforcement Officers unlocking the locked wildlife gates included in the Proposed Action as needed to facilitate wildlife movement. DAF will assess opportunities to enhance and create shrubland at JBER, a preferred foraging habitat for moose, through activities such as controlled burning, cutting mature woodlots, mechanical crushing of vegetation, or hydroaxing. Finally, monitoring and adaptive management of the moose population will continue as part of JBER's Ecosystem Management Program.

**Safety and Occupational Health.** Impacts on public safety (related to risk of human-wildlife conflict and wildlife-vehicle collisions) are expected to be adverse in the short term and lessen over time as large mammals acclimate to the presence of new fencing. Long-term impacts related to public safety and personnel health and safety (e.g., reduced trespassing) are expected to be beneficial. The Proposed Action will follow established standard safety protocols during construction, minimizing risks to personnel through safety plans, daily equipment inspections, and secure storage of materials. Although added fencing will restrict wild animal movement onto highways and into neighborhoods in some places, the same fencing will also restrict animal movement out of these areas once access is gained. With planned resource protection measures for wildlife and coordination with wildlife agencies, overall adverse impacts on human-wildlife conflict and occupational health and safety will be minimized.

**Noise.** Noise impacts (related to construction and sirens) are expected to be minor and readily minimized with protective measures and BMPs. There will be temporary increases in noise levels due to construction activities; these impacts will only last for the duration of construction. Although sirens may be used as part of non-structural security measures, their placement will

avoid residential and noise-sensitive areas, minimizing potential disruption to the extent practicable.

**Air Quality.** Air quality impacts from construction and maintenance of security measures will be minor and readily minimized with protective measures and BMPs. Estimated construction and operational emissions will not result in annual exceedances relative to insignificance thresholds for any criteria pollutants.

**Recreation.** The Proposed Action will not affect legal recreational access to JBER; authorized recreational access points will be maintained. Impacts on recreation (related to response of wildlife to the presence of new fencing) will be limited to potential impacts on big game hunting opportunities. Temporary disturbance in moose distribution or abundance may result in permitting changes for the annual moose hunt at JBER in the short-term. With planned resource protection measures for wildlife and coordination with wildlife agencies, overall impacts on recreational hunting throughout the greater Game Management Unit (14C) will be minimized.

**Ambient Light Environment.** Impacts on the ambient light environment (related to construction and controlled security lighting) are expected to be minor and will be readily minimized with protective measures and BMPs. Since work is planned during the shorter winter daylight period to protect soils and wetlands, construction-associated lighting may temporarily impact natural dark conditions and be visible from off the installation. Non-structural security measures will include lights that may be visible from outside the installation and will be visible in remote, undeveloped areas during short periods when triggered by sensors. Lighting will be designed and sited to avoid and minimize disruption to adjacent land users and degradation of natural darkness conditions.

## **PUBLIC INVOLVEMENT**

Potential jurisdictional wetlands were found in the Proposed Action Area and may occur upstream or downstream from the Proposed Action Area. Ship Creek, North Fork Campbell Creek, and South Fork Chester Creek, which flow through the Proposed Action Area, meet the criteria for federal (non-wetland) waters. Potential impacts on these wetlands and Waters of the U.S. (WOTUS) may occur because of the proposed activities. A Notice for Early Public Review of a Proposed Activity within Wetlands and Floodplains was published in the *Anchorage Daily News* on 30 March 2025, the *Mat-Su Valley Frontiersman* on 2 April 2025, and on the JBER Environmental Planning Webpage for the duration of the planning effort.

A Notice of Availability of the Draft EA and Draft FONSI/FONPA was published on the JBER Environmental Planning Webpage and distributed to federal, state, and local agencies, Federally Recognized Tribes, and Alaska Native Entities, announcing the availability of the Draft EA and Draft FONSI/FONPA for review on 30 April 2026 for a period of 30 days, ending on 30 May 2026.

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Other alternatives were reviewed during the EA development process under NEPA requirements but were eliminated from further detailed analysis in the EA because they did not meet the stated purpose and need for the action, were not practicable, or would have led to greater overall environmental impact. The only practicable alternatives are the Proposed Action and Alternative 2. For the reasons stated in the EA, the dismissed alternatives are not practicable alternatives to avoiding the potential impacts on wetlands or WOTUS. Similarly, there is no practicable alternative to implementing the Proposed Action outside of the Ship Creek floodplain.

Based on my review of the facts and analyses contained in the attached EA, conducted under the provisions of NEPA and the Department of Defense NEPA Implementing Procedures, I conclude that the Proposed Action Alternative will not have significant adverse environmental impact. Pursuant to EO 11990, *Protection of Wetlands*, EO 11988, *Floodplain Management*, and Department of the Air Force Manual 32-7003, *Environmental Conservation*, and taking into account the information in the EA and incorporating it by reference, I find that there is no practicable alternative to this action and that the Proposed Action includes all practicable measures to minimize harm to wetlands and floodplains. Accordingly, an Environmental Impact Statement is not required. The signing of this FONSI/FONPA completes the environmental impact analysis process.

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Date