

DRAFT FINDING OF NO SIGNIFICANT IMPACT (FONSI) ARMY NATIONAL GUARD

Environmental Assessment of the Construction and Operation of a Permanent Limited Army Aviation Support Facility in Billings, Montana

Introduction

Montana Army National Guard (MTARNG), in cooperation with the National Guard Bureau (NGB) prepared Environmental Assessment (EA) to analyze the potential environmental impacts of constructing, and operating from, a permanent LAASF. The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code [U.S.C.] 4321 et seq.), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651 (*Environmental Analysis of Army Actions, Final Rule*).

1. Description of the Proposed Action and Alternatives

Proposed Action – The MTARNG’s Proposed Action is to construct a permanent LAASF near the Billings Airport in Montana. The building would be constructed on a 40-acre site, approximately 620 feet west of a leased hangar, west of the airport from which MTARNG currently conducts aviation activities. NEPA analysis for the current leased facility is set forth in *Montana Army National Guard Environmental Assessment for the Development and Operation of a Limited Army Aviation Support Facility at Billings, Montana*. The proposed permanent facility would be approximately 66,000 square feet for the primary facility (plus parking and apron). The new LAASF would provide MTARNG with additional space when compared to the 12,000 square foot leased hangar (plus parking and apron).

The current leased hangar allows for limited aviation operations in Eastern Montana. However, it does not meet 42 U.S.C. §4154 *Standards for design, construction, and alteration of buildings*; and National Guard Pamphlet 415-12 *Army National Guard Facilities Allowances*. Further, the leased LAASF facility does not meet the standards of UFC 1-200-02 *High Performance and Sustainable Building Requirements, With Change 2* since it is not based on sustainable design and lacks energy efficiencies. Finally, the leased hangar does not include Anti-terrorism/Force Protection measures that meet UFC 4-010-01 *DoD Minimum Antiterrorism Standards for Buildings, With Change 2*.

The proposed MTARNG-owned LAASF facility would be constructed to meet all Industry Standards and local, state, and federal building codes, while accommodating a

Finding of No Significant Impact
Environmental Assessment of the Construction and Operation of a
Permanent Limited Army Aviation Support Facility in Billings, Montana

permanent hangar with backup/emergency generators, paved parking, unheated aircraft storage, and fire detection, alarm, and suppression equipment. Other features would include utility connections, information systems, roads, sidewalks, curbs, gutters, storm drainage, and site improvements. This larger, long-term permanent facility includes space for training rooms, office space, etc. and would accommodate the emerging growth needs and coverage requirements of the MTARNG aviation assets in Eastern Montana. The permanent facility would improve on-the-ground drill and training activities and would include the following activities that cannot be conducted at the leased hangar due to the inadequate facilities:

- Aircraft wash
- Improved classroom and administrative capabilities
- Additional flight runups
- Avionics and engine maintenance
- Store petroleum, oil, and lubricants (POL)
- Store hazardous wastes on site

The LAASF would continue to support up to six helicopters (including, but not limited to, the Chinook [CH-47], Blackhawk [UH-60], and Lakota [UH-72]). Flights would occur primarily during the day, with approximately three (3) percent returning after dark.

Alternatives Considered – The MTARNG’s Proposed Action includes two variations, Option 1, to construct the project, including the helipad, within the 40-acre State of Montana-owned parcel, and Option 2, to construct the helipad and associated clear zones to the north of the State parcel on adjacent City of Billings property. The second action alternative would be to add the use of the Billings Armed Forces Reserve Center (BAFRC) while keeping the helicopter operations at the leased hangar. The No Action Alternative consists of continuing activities out of the leased hangar.

The MTARNG’s alternatives were screened based on five screening criteria. These include:

- 1) Adequate long-term training and classroom/administrative facilities
- 2) Secure storage for up to six helicopters and space to conduct all LAASF maintenance activities
- 3) Air traffic control and land use compatibility
- 4) Security and Minimum AT/FP requirements
- 5) Government-owned facilities, preferably on a military installation

Only the Proposed Action Alternative (either Option) would effectively meet all the MTARNG’s screening criteria. The No Action Alternative fails to meet the purpose and need because it does not allow for adequate hangar space and AT/FP or comply with DoD and NGB requirements to only use leased facilities on a temporary basis. However, as required by NEPA, the No Action Alternative was retained in the analysis to provide a basis of comparison with the proposed action. The BAFRC Alternative fails

Finding of No Significant Impact
Environmental Assessment of the Construction and Operation of a
Permanent Limited Army Aviation Support Facility in Billings, Montana

to meet three of the MTARNG's five screening criteria, adequate long-term training and classroom/admin facilities, secure storage for up to six helicopters (leased hangar accommodates four aircraft), and government-owned facilities (hangar on leased private property).

The EA recommends the approval of Option 1 of the Proposed Action Alternative. Option 1 meets the purpose and need of an LAASF while remaining on State of Montana-owned property which allows for complete control of the helipad and comprehensive AT/FP security of the entire LAASF facility.

2. Environmental Analysis

The potential environmental impacts associated with the Proposed Action are fully described in the EA. The EA identifies the environmental resources that could be affected by the Proposed Action, and determines the significance of the impacts, if any, to each of these resources. Based on the EA's analysis, the MTARNG determined that the potential adverse impacts from the Proposed Action on land use, air quality, climate change/greenhouse gases, noise, geology, topography, soils, water resources, biological resources, cultural resources, socioeconomics, protection of children, Environmental Justice, infrastructure, and hazardous and toxic materials and wastes would not be significant. The Proposed Action would not result in any disproportionate adverse impacts on minority or low-income populations or result in adverse health or safety risks to children. There would be no impact on traffic except during construction when equipment and construction personnel would enter and leave the property. There would be a minor increase in noise and air pollutants, but these increases would be below federal noise thresholds for significant impact and all federal, state, and local noise regulations would be met. There would be a minor loss of disturbed habitat (approximately 40 acres), and a short-term increase in water use during construction. No significant cumulative impacts were identified.

3. Best Management Practices and Mitigation

The MTARNG will employ Best Management Practices (BMPs) to minimize potential minor adverse environmental impacts and maintain good stewardship. These BMPs would be implemented as appropriate for the proposed improvements and include measures that minimize vehicle emissions, noise, water quality, biological resources, any cultural resources uncovered during construction, and contamination of land or water. No site-specific mitigation measures are required for the Proposed Action because no potentially significant adverse impacts were identified.

Finding of No Significant Impact
Environmental Assessment of the Construction and Operation of a
Permanent Limited Army Aviation Support Facility in Billings, Montana

4. Regulations

The Proposed Action complies with NEPA, the CEQ Regulations and 32 CFR Part 651 *Environmental Analysis of Army Actions*.

5. Commitment to Implementation

The National Guard Bureau (NGB) and MTARNG affirm their commitment to implement this EA in accordance with NEPA.

6. Public Review and Comment

The Final EA and Draft FONSI are available for a 15-day public review and comment period following publication a public notice in the *Billings Gazette*. The comment period runs from February 25, 2024 until March 11, 2024. Comments can be provided via email to rebekah.l.myers2.nfg@army.mil or postal mail to Rebekah Myers, DMA Environmental Bureau, JFHQ-MT, P.O. Box 4789, 1956 Mt. Majo Street, Fort Harrison, MT 59636-4789. MTARNG will reply directly to substantive comments received during the public comment period or address comment within the Final FONSI. The Final FONSI will be posted to the project website following approval and signature.

7. Finding of No Significant Impact

After careful review of the EA, I have concluded that implementation of the Proposed Action would not generate controversy or have a significant adverse impact on the quality of the human or natural environment. This analysis fulfills the requirements of NEPA and the CEQ regulations. An Environmental Impact Statement will not be prepared, and the NGB is issuing this Final FONSI.

Date

ANTHONY HAMMETT
COL, GS
G-9, Army National Guard