

Draft
FINDING OF NO SIGNIFICANT IMPACT (FONSI)
FOR
AN ENVIRONMENTAL ASSESSMENT ADDRESSING INSTALLATION
DEVELOPMENT AT JEFFERSON BARRACKS AIR NATIONAL GUARD
STATION, ST. LOUIS, MISSOURI

Introduction

The National Guard Bureau (NGB) has prepared an Environmental Assessment (EA), which is enclosed with this letter and incorporated by reference, to consider the potential consequences to the human and natural environment associated with required facility and infrastructure improvement projects at the Jefferson Barracks Air National Guard Station (ANGS), St. Louis County, Missouri. The 131st Bomb Wing (131 BW) at Jefferson Barracks ANGS proposes to implement 17 Installation Development Plan (IDP) projects, including 7 construction projects, 8 addition or alteration (ADAL) projects with renovations, and 2 demolition projects; and add up to 35 security personnel to the installation. This EA identifies applicable management actions and best management practices (BMPs) that would avoid or minimize impacts relevant to the implementation of the Proposed Action or alternatives (to include the No Action Alternative).

Purpose of and Need for the Proposed Action

Section 1.1 of the EA provides the purpose of and need for the Proposed Action. The purpose of the Proposed Action is to provide the 131 BW with new and properly upgraded, sized, and configured facilities, and sufficient security personnel, that are required to effectively accomplish its mission at Jefferson Barracks ANGS and meet United States (U.S.) Department of Defense (DoD) anti-terrorism/force protection (AT/FP) standards. The Proposed Action is needed because existing installation facilities and infrastructure are not appropriately sized for their usage with some being overcapacity; mission functions are spread across multiple facilities; and some facilities do not meet AT/FP concerns.

Description of Proposed Action and Alternatives

Proposed Action. The Proposed Action, defined in Section 2 of the EA, includes construction, renovation, and demolition projects that would accommodate existing and future mission activities at Jefferson Barracks ANGS. Many existing facilities on the installation do not adequately support current or future mission requirements and/or are not adequately sized. Additionally, the Proposed Action includes the addition of up to 35 security personnel to Jefferson Barracks ANGS. Under the Proposed Action, the NGB would implement 17 development projects, which include demolition activities to provide adequate space needed to fulfill mission requirements, consolidation of job functions, and improved workflow. For planning and operational efficiency, the proposed projects would need to be developed in phases between 2024 and 2031 (with some projects possibly extending to 2034). **Table 1** describes the proposed construction, renovation, and demolition projects.

Table 1. Proposed Installation Development Projects

Project ID	ANG Project Number	Project Title	Project Year ¹	Description	Change in Developed Area ^{2,3} (+/-)
Construction					
1	LTUY209002	Construct AOG Facility	2026	Construct a facility to consolidate the functions of the 157th AOG.	+24,000 SF (0.6 acre)
6	LTUY192004	Construct BCE Storage Shed	2025	Construct a prefabricated storage facility for Civil Engineer Squadron storage.	+4,000 SF (0.1 acre)
8	LTUY209005	Construct CATM Range	2031	Construct a fully enclosed 10- to 14-lane small arms firing range.	+16,050 SF (0.4 acre)
9	LTUY202005	Construct Vehicle Parking Shed	2024	Construct a parking shed on existing pavement in the southern portion of the base to protect government vehicles from extreme weather damage.	NA
12	LTUY202015	Construct POV Parking along Grant Road	2030	Construct a new parking lot north of Building 1.	+68,850 SF (1.6 acres)
14	LTUY202115	Construct 239th CBCS Warehouse	2031	Construct a facility for Combat Communications equipment.	+4,000 SF (0.1 acre)
16	TBD	Construct Army Vehicle Storage Lot	2031	Construct military vehicle parking area, including lighting and retaining wall, in lower southeast portion of the installation, adjacent to railroad easement.	+54,000 SF (1.25 acres)
Renovation					
2	LTUY199004	ADAL Building 64	2027	Renovate and add an addition to Building 64 for Security Forces and BDOC. A vault would be included in the addition.	+2,800 SF (0.06 acre)
3	LTUY212004	ADAL River Road ECP	2031	Construct an entry control facility at the River Road Gate to accommodate commercial truck traffic.	+15,885 SF (0.4 acre)
5	LTUY222009	Repair Running Track	2023	Repair the running track in the northwest portion of the West Field Parade Ground; restore existing unused track.	NA
7	LTUY232001	ADAL Hancock Avenue ECP	2031	Construct an entry control facility that meets and brings Jefferson Barracks ANGGS up to DoD UFC security standards.	+169,080 SF (3.9 acres)

11	LTUY222041	ADAL Vehicle MX, Building 41	2031	Repair Building 41 to meet the mission needs of LRS vehicle maintenance, and construct a drive-through bay addition to the south of the facility.	+7,300 SF (0.2 acre)
13	LTUY2020027	Repair Moses Street & Southern Boundary	2031	Repair and reconfigure drainage & road network along southern installation perimeter.	NA
15	TBD	Restore Historic Facilities, Buildings 25, 26, 48, 78	2031	Retrofit currently vacant facilities for Seismic and Life Safety code compliance.	NA
17	TBD	Repair by Replacement HVAC Systems in Buildings 1, 28, 36, 37	2031	Replace antiquated R-22 refrigerant systems with modernized equipment and latest refrigerant technology.	NA
Demolition					
4	LTUY212003	Demolish Buildings 45, 46, 47	2024	Companion project to construction of the AOG Facility (Project 1). Demolish three facilities and reclaim bricks to use in construction of AOG Facility and donate to the Missouri Civil War Museum, as needed.	-45,630 SF (-1.0 acre)
10	LTUY230001	Demolish Building 40	2031	Demolish excess space at Building 40 to free real estate for expansion of LRS facility (Project 11).	-9,850 SF (-0.2 acre)
Net Change in Developed Area ^{3,4}					+310,485 SF (7.4 acres)

Source: Jefferson Barracks ANGS 2020a

Key (in order of occurrence): AOG – Air Operations Group; SF – square feet; BCE – Base Civil Engineering Squadron; CATM – Combat Arms Training and Maintenance; NA – not applicable; POV – personal operating vehicle; CBCS – Combat Communications Squadron; TBD – to be determined; ADAL – Addition or Alteration; BDOC – Base Defense Operations Center; ECP – Entry Control Point; ANGS – Air National Guard Station; DoD – Department of Defense; UFC – Unified Facility Criteria; MX – maintenance; HVAC – heating, ventilation, and air conditioning; LRS – Logistics and Readiness Squadron

Table Notes:

1 – Indicates the start of the anticipated development timeframe for each project.

2 – (+) indicates added developed area resulting from construction and renovation actions. (-) indicates reduced developed area resulting from demolition actions.

3 – Represents the change in developed area, not impervious surface. Project areas initially provided by the installation in square yards were converted to SF to enable consistent estimation of total proposed development. Most of the projects would be constructed on already developed land that contains pavement that would be utilized or replaced for the Proposed Action or left in place.

4 – Reflects the net sum of added SF (acres) resulting from construction and renovation actions minus the SF (acres) associated with demolition actions. For accuracy, net change in developed area acreage calculation is conversion of total SF to acres, rather than a sum of acres provided in the “Changed in Developed Area” column, which are rounded conversions.

All proposed construction would be designed in accordance with the DoD UFC 1-200-01, *General Building Requirements* and UFC 1-200-02, *High Performance and Sustainable Building Requirements*. In addition, DoD and DAF AT/FP standards were considered in siting and planning all construction and renovation projects to enhance and ensure security on the installation, which would include secure fencing, sufficient lighting, and entry control access. AT/FP standards are outlined in DoD Instruction 2000.16, *DoD Antiterrorism (AT) Standards*; Air Force Policy Directive (AFPD) 10-2, *Readiness*; Air Force Instruction (AFI) 10-245 (ANG Supplement) *Antiterrorism*; AFI 10-701, *Operations Security (OPSEC)*; and UFC 4-010-01, *DoD Minimum Anti-Terrorism Standards for Buildings*, which outline various planning, construction, and operational standards that address potential terrorist threats.

Under the Proposed Action, the installation development would result in a net increase of up to 310,485 SF (7.4 acres) of developed area on the installation. This change would represent an 8 percent increase in the overall developed area at Jefferson Barracks ANGS. Proposed improvements would maximize, to the extent possible, existing developed and paved areas to minimize addition of impervious surfaces and to minimize encroachment on the facilities and contributing elements of the Historic District. Analysis in the EA will use the largest possible construction footprint for each proposed project to conservatively evaluate environmental effects.

Alternatives Considered. Due to spatial and resource constraints (including historic buildings and the Jefferson Barracks Historic District, potential presence of protected species, and areas potentially encompassing UXO hazards) at Jefferson Barracks ANGS, siting of most projects was limited to the sites identified in the EA. Potential alternatives for individual projects were considered but dismissed and not carried forward for full environmental analysis in the EA in accordance with the three selection standards discussed in **Section 2.1.2** of the EA.

No Action Alternative. The No Action Alternative was also carried forward for analysis in the EA and served as a baseline against which the impacts of the Proposed Action and other potential action alternatives could be evaluated. The No Action Alternative assumes the Proposed Action would not occur and would maintain the current state of facilities that do not meet life safety requirements to be inhabited; lack of sufficient and right-sized facility work, storage, and parking capacities to support personnel and the ongoing mission activities; and insufficient compliance with DoD's AT/FP security requirements.

Environmental Analysis

The analysis of environmental effects provided in **Section 3** of the EA focused on the following environmental resources: safety, air quality, noise, land use, geological resources, water resources, biological resources, transportation and circulation, visual resources, cultural resources, environmental justice, and hazardous materials and wastes, toxic substances and other contaminants. A summary of the environmental consequences is provided in **Table 2**. A cumulative effects assessment was also conducted. The analysis in the EA for each of the environmental resource areas identified less than significant adverse effects under the Proposed Action.

Table 2. Summary of Environmental Consequences

Resource	Proposed Action Alternative	No Action Alternative
Safety	Short-term, negligible, adverse impacts would occur during construction, renovation, and demolition of the proposed projects from increased risk to workers and personnel. Long-term, minor, beneficial impacts would be expected due to improved personnel and pedestrian safety and installation security as a result of new and renovated facilities that are properly sited with adequate space and a modernized supporting infrastructure, pedestrian crossings, parking areas, and designated fitness areas.	Long-term, minor, adverse impacts on safety would be expected because AT/FP requirements would continue not to be met and associated security liabilities would remain a threat to safety on the installation.
Air Quality	Short-term, minor, adverse impacts would occur during construction because emissions of criteria pollutants would be directly produced from operation of heavy equipment, building and pavement demolition, heavy duty diesel vehicles hauling supplies and debris to and from the project sites, workers commuting daily to and from the projects' sites in their personal vehicles, and ground disturbance. Long-term, negligible, adverse impacts would be expected due to increased operational emissions and a net increase of CO ₂ e emissions.	No change from the existing condition.
Noise	Short-term, minor to moderate, adverse impacts would occur due to the use of heavy equipment and construction vehicle traffic during construction, renovation, and demolition activities, particularly pile-driving associated with construction of the AOG Facility (Project 1). Noise levels experienced by individuals would depend upon their proximity to the construction activities as they are being conducted. Because operations would not involve any excessive noise-producing activities, no long-term impacts on the noise environment would be expected.	No change from the existing condition.
Land Use	Long-term, minor, adverse impacts would be expected due to changes in land use and a decrease in open space and developable land on the installation associated with the proposed installation development projects. Long-term, moderate, beneficial impacts would be expected from the increased mission efficiency from facility use changes and consolidation of mission functions associated with the proposed projects.	The current installation layout and operational space available does not meet mission needs or function. There would continue to be land use deficiencies. Therefore, continued, long-term, minor to moderate, adverse impacts on land use would be expected.
Geological Resources	Short- and long-term, minor to moderate, adverse impacts would be expected on topography, geology, soils, and geologic hazards due to temporary ground disturbance during construction, a net increase in impervious surfaces, increased stormwater runoff and erosion and sedimentation potential, and increased vehicle and pedestrian traffic resulting in soil compaction. Siting of	No change from the existing condition.

Resource	Proposed Action Alternative	No Action Alternative
	<p>projects along the railroad easement would be designed to avoid overlap with the area of severe erosion hazard and minimize potential increases in erosion and sedimentation.</p>	
Water Resources	<p>Short-term, negligible, adverse impacts on water resources would be expected due to ground disturbance during construction activities that could result in increased stormwater runoff and subsequent erosion and sedimentation potential. Long-term, minor to moderate, adverse impacts would be expected on surface water and groundwater due to an increase in stormwater runoff and erosion and sedimentation potential associated with the net increase in impervious surface under the Proposed Action. Long-term, negligible to minor, beneficial impacts would be expected on water resources due to drainage repairs and reconfigurations (Project 13).</p>	<p>No change from the existing condition.</p>
Biological Resources	<p>There would be short- and long-term, minor, adverse impacts on vegetation from temporary disturbance of vegetation and soil compaction during construction, demolition, and renovation activities and from permanent vegetation removal for new facilities. Short- and long-term, negligible, adverse impacts on wildlife may occur from increased noise and potential temporary displacement associated with the proposed construction, renovation, and demolition projects. Short-term, negligible, adverse impacts on wildlife would occur from noise associated with heavy equipment use, including potential pile-driving from construction of the AOG Facility (Project 1), and increased human presence during project construction, renovation, and demolition. The Proposed Action would result in similar impacts on special status species as described for wildlife. Impacts on special status species would be avoided or minimized to the extent possible via implementation of BMPs, standard operating procedures, and mitigation measures.</p>	<p>No change from the existing condition.</p>
Transportation and Circulation	<p>Short-term, negligible to minor adverse impacts on transportation and circulation would be expected from construction, renovation, and demolition projects because construction-related traffic would disrupt daily traffic circulation from potential road closures and detours, and construction-related activities would increase congestion in and around the project areas. Long-term, negligible to minor, beneficial impacts on parking and traffic circulation at Jefferson Barracks ANG S would result from construction of additional parking on the installation. Long-term, minor to moderate, beneficial impacts on traffic and circulation at Jefferson Barracks ANG S would result from improved ECPs and roadways on the installation, which correct current security and DoD UFC-compliance deficiencies and improve traffic ingress, egress, and general circulation.</p>	<p>Ingress and egress at the existing ECPs would continue to be slow and inefficient and result in further traffic circulation problems on the installation. Additionally, parking capacity would continue to be insufficient. Therefore, continued long-term, minor to moderate, adverse impacts on transportation and circulation would be expected.</p>

Resource	Proposed Action Alternative	No Action Alternative
Visual Resources	Short-term, minor, adverse impacts on visual resources would be expected during construction due to the presence of construction equipment on the installation, including on and around the historic Parade Grounds. Long-term, minor, adverse impacts on visual resources would be expected from the introduction of new facilities and infrastructure on the installation, including within important sightlines.	No change from the existing condition.
Cultural Resources	Jefferson Barracks ANGS is consulting with the Missouri SHPO and federally recognized tribes under Section 106 of the NHPA to determine impacts on cultural resources, such as potential adverse effects to historic properties, from the Proposed Action. Type of impacts from construction, renovation, and demolition under the Proposed Action that could occur on historic properties (e.g., individually eligible and contributing elements), should they be present within the APE, could include physical disturbance; alteration of a property's surrounding environment; and introduction of visual and audible elements that alter the setting. NGB has completed consultation and executed MOAs with the Missouri SHPO on several of the undertakings included in this EA, including demolition of Buildings 45, 46, and 47 (Project 4), and renovations to Building 64 (Project 2).	Long-term, minor, adverse impacts could occur as historic structures would continue to fall into disrepair and neglect of the properties would cause further deterioration.
Environmental Justice	Short-term, minor to moderate, adverse noise impacts on the Hispanic/Latino environmental justice population, children, and elderly individuals located nearest the installation. Additionally, short-term minor effects from construction-related air emissions and traffic. Measures that would be implemented to avoid or minimize these effects on nearby populations to the extent practicable would include advance notification of construction activities and use of noise barriers and appropriate mufflers on equipment and vehicles. No long-term effects on environmental justice or vulnerable (youth or elderly) populations would be expected from operation of the various improvement projects.	No change from the existing condition.
Hazardous Materials and Wastes, Toxic Substances, and Other Contaminants	Short-term, negligible to minor, adverse impacts from the use and generation of hazardous materials and petroleum products during construction, renovation, and demolition. Short-term, minor, adverse impacts would result from the potential for exposure to ACM, LBP, and universal wastes. Long-term, negligible to minor, adverse impacts would result from operations and maintenance of newly constructed and renovated facilities. Renovation and demolition of buildings containing toxic substances would result in long-term, minor, beneficial impacts on toxic substances from the reduced potential for human exposure and reduced amounts of ACM and LBP necessary to maintain at Jefferson Barracks ANGS.	Toxic substances in the buildings proposed for renovation and demolition would remain and would continue to require maintenance by installation personnel resulting in continued long-term, negligible to minor, adverse impacts.

Mitigation. BMPs would be implemented to avoid or minimize effects on resources and to conform to existing policies and construction guidelines to the extent practicable. Additionally, the Jefferson Barracks ANGS will obtain all necessary permits and construction site approvals prior to implementation of this action.

Public Review and Comment

Based on the description of the Proposed Action as set forth in the EA, all activities were found to comply with the criteria or standards of environmental quality and were coordinated with the appropriate federal, state, and local agencies. There was coordination with agencies throughout the EA development process, and agency comments were incorporated into the analysis of potential environmental impacts performed as part of the EA. The draft EA was made available for public review and comment from February 22 through March 25, 2024 at the St. Louis County Library – Cliff Cave Branch, located at 5430 Telegraph Rd, St. Louis, MO 63129, and the St. Louis County Library – Weber Road Branch, located at 4444 Weber Rd, St. Louis, MO 63123. <<Insert ##>> comments were received, and information was incorporated into the analysis, as appropriate.

Finding of No Significant Impact

Based on the information and analysis presented in the EA and based on review of the public and agency comments submitted during the 30-day public comment period, I conclude that the environmental effects of approving the proposed installation development projects at Jefferson Barracks ANGS would not be significant, that preparation of an Environmental Impact Statement (EIS) is unnecessary, and that concluding the NEPA effort with a FONSI is appropriate.

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Date

Enclosure: *Environmental Assessment (EA) Addressing Installation Development at Jefferson Barracks Air National Guard Station, St. Louis, Missouri*