

DRAFT
FINDING OF NO SIGNIFICANT IMPACT AND FINDING OF NO PRACTICABLE
ALTERNATIVE
ENVIRONMENTAL ASSESSMENT OF INSTALLATION DEVELOPMENT AND
MODERNIZATION PROJECTS AT
KEESLER AIR FORCE BASE, BILOXI, MISSISSIPPI

Pursuant to the National Environmental Policy Act of 1969, as amended (NEPA) (Title 42 of the United States Code §§ 4321–4347), the Department of the Air Force (DAF) has prepared an environmental assessment (EA) to evaluate potential environmental effects associated with implementing 15 installation development and modernization projects, which stem from the 2015 Installation Development Plan (IDP) at Keesler Air Force Base (AFB) in Biloxi, MS. The Proposed Action would provide the facilities and infrastructure necessary for mission activities. The unique identification number for the EA is EAXX-007-57-UAF-1736259122. The EA is hereby incorporated by reference.

PURPOSE OF AND NEED FOR ACTION (EA § 1.3, pages 1-3–1-4): The purpose of the Proposed Action is to maintain Keesler AFB’s mission capabilities through development and modernization of its facilities.

The Proposed Action is needed to address the condition and capability of base facilities and infrastructure that do not meet current and projected mission requirements. The buildings and infrastructure systems either are outdated and in poor condition or lack the functionality required to accomplish the mission. These facilities and infrastructure require maintenance, renovation, expansion, or replacement to remain operable and to accommodate future mission execution. The Proposed Action would address these deficiencies by implementing the proposed projects. Table 2-1 in the EA presents a specific purpose of and need for each of the 15 projects included in the Proposed Action.

DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

PROPOSED ACTION (EA § 2.1, page 2-1): The DAF would implement 15 construction projects and associated demolition at Keesler AFB. The projects would be implemented (1) as replacements in place after demolition or (2) in previously disturbed open areas. No change in the number of personnel would be required.

The facilities’ construction would include all necessary utility connections, pavements (roads, equipment pads, parking areas, and building aprons), communication support, exterior lighting, security and fire protection systems, cooling systems, and other elements necessary to provide complete and usable facilities. All facilities would comply with Department of Defense (DoD) standards, and DoD and DAF principles for high performance and sustainable building requirements would be incorporated into the design and construction of each project in accordance with federal laws and executive orders (EOs). Low impact development (LID) also would be included in project design and construction, as appropriate. Site preparation would include earthwork/ excavation, stormwater management, erosion control, and LID measures. Construction on floodplains at Keesler AFB would comply with the requirement that all finished first floors of new permanent facilities be elevated to 20 feet above mean sea level (AMSL) and all structures be built on land at least 16 feet AMSL. Additionally, it would adhere to the guidelines set forth in Directive-type Memorandum 22-003, *Flood Hazard Area Management for DoD Installations*, which include implementing appropriate flood risk mitigation based on

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mission essentiality, as outlined in Unified Facilities Criteria (UFC) 3-201-01, *Civil Engineering*. The DAF anticipates that construction of the projects would be phased in starting in Fiscal Year 2026 and beyond, based on their mission dependency index, status, and funding.

Table 1 lists the 15 projects under the Proposed Action by EA project number; DAF project number, with a prefix of “MAHG,” the DAF’s designated Installation Control Code for Keesler AFB 81st Training Wing (TRW), followed by a six-digit number; and the type of project.

ALTERNATIVES (EA § 2.2, pages 2-1–2-11): The EA evaluates an action alternative and a no action alternative. Some of the projects have two and, in one case, three locations, which are presented as options A, B, and C (Table 1).

Table 1: Project Descriptions

EA Project Number ^a , MAHG Project Number	Project Title	Project Type	Location Options
Project 1, MAHG233000	Air Traffic Control Tower	Construction and demolition	2
Project 2, MAHG193000	Permanent Party Dormitories	Construction	2
Project 3, MAHG143000			
Project 4, MAHG103000			
Project 5, MAHG043002	New Student/ Fitness and Resiliency Center	Construction and demolition	3 ^b
Project 6, MAHG213000	Professional Military Education Center	Construction and demolition	2
Project 7, MAHG223000	Headquarters Center	Construction and demolition	2
Project 8, MAHG083001	Training Facility-Hewes Hall Replacement	Construction	1
Project 9, MAHG273001	Training Facility-Wolfe Hall Replacement	Construction	1
Project 11, MAHG053002	Training Facility-Allee Hall Replacement	Construction	1
Project 13, MAHG113001	Transportation Complex	Construction and demolition	2
Project 14, MAHG123002	Relocate 85 EIS Facility	Construction and demolition	2
Project 15, MAHG093002	Visiting Quarters Lodging Facilities	Construction and demolition	2
Project 16, MAHG103001			
Project 17, MAHG201031	Resiliency Pool and Pool (Bath) House	Construction and demolition	2 ^c

Notes: 85 EIS = 85th Engineering Installation Squadron.

^a Project 10/MAHG073001 and Project 12/MAHG093004 were deleted through the DAF planning process; however, the subsequent EA project numbers were not changed to maintain consistency with contract documents.

^b Section 106 consultation for the Proposed Action resulted in Mississippi Department of Archives and History’s determination that Building 1201 is eligible for listing in the National Register of Historic Places. Consequently, the DAF will eliminate Project 5B and exclude the building’s demolition and construction in its footprint from the current Proposed Action.

^c One option is to renovate the current pool and bath house.

No Action Alternative (EA § 2.2.2, page 2-2): Under the No Action Alternative, the Proposed Action would not be implemented. Therefore, the base would continue operating in noncompliant facilities in poor conditions with inefficiencies and safety and access issues, all of which affect Keesler AFB’s ability to accomplish its mission.

ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION (EA § 2.3, page 2-11):

The Proposed Action would implement the projects proposed in the 2015 IDP, which identifies them as necessary and critical to conducting the base’s mission more efficiently and effectively. The 2015 IDP identifies those projects based on environmental sustainability, energy use, asset optimization and space use, 81 TRW and tenant initiatives, and mission needs and requirements. Therefore, the DAF analyzed no other action alternatives. In April 2024, the DAF conducted a planning charrette for the air traffic control tower that evaluated four locations for the project. The location to the west of the runway was removed from consideration because it

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would be within the explosive safety arc of the ammunition supply point and potential sun glare posed by the southern cab orientation. Of the three remaining locations, the EA analyzes Option A, the preferred option, and Option B, which comprise the areas of two sites evaluated during the charrette (EA, Figure 2-1).

ENVIRONMENTAL CONSEQUENCES

SUMMARY OF EFFECTS (EA §§ 3.2–3.19, pages 3-1–3-69). The EA analyzed environmental effects of the Proposed Action on airfield operations, land use, visual resources, air quality, noise, earth resources, water resources, biological resources, cultural resources, hazardous materials and wastes, infrastructure and utilities, transportation and traffic, safety and occupational health, greenhouse gas (GHG) emissions, socioeconomics, and protection of children. No significant adverse effects on any of the resource areas analyzed in the EA would be expected from implementing any options of the action alternative. The No Action Alternative would not meet the purpose of and need for the Proposed Action.

The effects of implementing the Action Alternative under Option A, B, or C are summarized in this section and discussed in detail in the EA.

The Action Alternative would build on previously developed land. Depending on the options selected, the 15 projects would add 12 acres of new impervious surface to the installation from new construction activities and remove approximately 9 acres of impervious surface from demolition activities.

Less-than-significant adverse effects on airfield operations are anticipated from construction and beneficial effects from operations. The air traffic control tower would be designed and constructed in accordance with Federal Aviation Administration and DoD UFC guidelines. A temporary construction airfield waiver would be required for Project 1A and 1B.

Effects on land use would range from less-than-significant adverse to beneficial. They would result from either a continuation of current land uses or realignment with compatible land uses.

The outdoor playground area of the Child Development Center would experience perceptible increases in noise, particularly during peak construction activities of Project 7B. During construction, the DAF and its contractors would implement appropriate measures to protect the health and safety of the children who could be in that area. There would be less-than-significant effects on noise from construction and operation. All activities would occur on-base.

Short-term increases in emissions of air pollutants, noise, soil erosion, sediment in stormwater and surface waters, and spills and leakage of hazardous materials and waste from implementing Option A, B, or C would be expected to result in less-than-significant adverse effects. In compliance with National Pollutant Discharge Elimination System (NPDES) requirements, the DAF construction contractor would obtain a Small Construction General Permit (SCGP) issued by the Mississippi Department of Environmental Quality (MDEQ) for projects disturbing more than 1 acre but less than 5 acres and MDEQ's Large Construction General Permit (LCGP) for projects disturbing more than 5 acres to minimize long-term erosion and sediment production at each site. The permits require development of a site-specific stormwater pollution prevention plan (SWPPP) detailing best management practices (BMPs) and erosion control features to reduce potential soil erosion, minimize effects on surface waters, and prevent contaminated stormwater from leaving the construction site. Implementing the

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LCGP, SCGP, SWPPP, and LID controls would minimize potential erosion, impacts on stormwater quality from sediment, and alteration of existing drainage patterns during construction and operations. Post-construction, the Action Alternative would result in approximately 3 acres of increased impervious surface. Facility design would incorporate LID controls to emulate the site's predevelopment hydrology through passive and active design features that infiltrate, store, and evaporate runoff close to its source of origin. The construction contractor also would be required to comply with the Keesler AFB Stormwater Management Plan.

Short- and long-term, less-than-significant adverse effects on surface water would be expected. Short-term, less-than-significant adverse effects would be caused by site-specific temporary changes in surface hydrology and the potential for soil erosion and transport during construction and demolition activities. Long-term, less-than-significant adverse effects would be due to an increase in impervious surfaces from new construction. Proposed activities would not reduce water availability or supply; exceed safe annual yield of water supplies; adversely affect water quality; damage or threaten hydrology; or violate water resources laws, regulations, or permits. No modifications would be expected to be made to the existing Small Municipal Separate Storm Sewer System permit, BMPs, or monitoring programs. Eight of the construction projects are planned within a 100-year floodplain, situated in uplands or previously developed areas. The finished first floors of those projects would be at or above 20 feet AMSL. If contaminated groundwater is encountered during construction, including per- and polyfluoroalkyl substances (PFAS), it will be managed by installation or contractor personnel in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act; the Resource Conservation and Recovery Act; and guidance from the DAF, MDEQ, and U.S. Environmental Protection Agency, including dewatering permit requirements.

Within the proposed project areas, trees, including live oaks, will be removed. Approval from the Wing Commander is required to remove live oak trees larger than 24 inches in diameter at breast height. However, the removal of these trees would not significantly impact the viability of local populations of the affected tree species.

The Action Alternative may affect, but is not likely to adversely affect, the tricolored bat (*Perimyotis subflavus*), which is proposed for federal listing as an endangered species. The U.S. Fish and Wildlife Service (USFWS) has concurred with the DAF determination that, by implementing the BMP of removing trees only between July 16 and April 30—outside the May 1 to July 15 tricolored bat pup season—the Action Alternative may affect, but is not likely to adversely affect, the bat. If bats are believed to occupy buildings at Keesler AFB, structure demolition and large-scale renovations to roof and wall areas would be avoided during the bat maternity period from May 1 to August 30.

There would be less-than-significant adverse effects on cultural resources. The proposed project sites do not contain archaeological sites eligible for listing in the National Register of Historic Places (NRHP) or Native American tribal resources. The DAF will eliminate Project 5B and exclude the demolition and construction of Building 1201 from its footprint, as the Mississippi Department of Archives and History (MDAH) has determined through National Historic Preservation Act (NHPA) Section 106 consultation that the building is eligible for listing in the NRHP under Criterion C. Consequently, the DAF will regard Building 1201 as an NRHP-eligible structure.

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There would be less-than-significant adverse-to-beneficial effects on local utilities because the existing systems have sufficient capacity to meet demands during construction and operations and energy-efficient systems would be installed in the new modern facilities.

There would be short-term, less-than-significant adverse effects on transportation and traffic during construction of the Action Alternative projects. No long-term effects on transportation and traffic are anticipated because the Action Alternative would not change the base operational workforce.

Short-term, less-than significant adverse effects on safety and occupational health are expected and they would be minimized using established industry-accepted safety practices and standard operating procedures. Operations would have long-term beneficial effects on safety and health at Keesler AFB from replacement of noncompliant buildings with modern structures that meet health and safety codes and from removal of hazards.

Estimated total aggregated GHG emissions from construction and operations would be approximately 2,576 tons per year.

Adverse effects on the protection of children would be less than significant and short term from construction activities and long term from operations.

Two of the three reasonably foreseeable future projects on-base, when combined with the Action Alternative, could contribute to cumulative effects. Cumulative effects, however, would be less than significant.

PERMIT, WAIVER, AND APPROVAL REQUIREMENTS AND BMPS

(EA §§ 4.1–4.3, pages 4-1–4-3): No mitigation measures would be necessary to reduce adverse effects to below significant levels.

Requirements for permit, waiver, and approval specified in the EA would be met to manage potential effects.

Airfield Operations: A temporary construction airfield waiver from the Base Commander would be required for Action Alternative, Project 1A and 1B.

MDEQ CGPs: Contractors must file a notice of intent for coverage under the Large Construction Storm Water General NPDES Permit for projects over 5 acres, including a site-specific SWPPP. For projects disturbing 1–5 acres, a SCGP is required.

Air Quality – New Source Review: Emergency generators or boilers would require a New Source Review and may require permitting if emissions exceed thresholds.

Hazardous Materials and Wastes: Before discharging PFAS to the publicly owned treatment works, the Keesler AFB Water Resource Manager must notify the Harrison County Utility Authority and obtain necessary permits.

Approval Requirements: Contractors must obtain the Wing Commander's approval to remove live oak trees larger than 24 inches in diameter at breast height.

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Similarly, BMPs discussed in detail in the EA and summarized below would be applied to manage potential effects.

Air Quality: Implement BMPs such as dust control, equipment maintenance, minimizing idling, obtaining permits, and complying with air operating permits.

Noise: Refer to the current Air Installation Compatible Use Zones Report for the tower design.

Schedule construction during business hours, maintain equipment, and use hearing protection.

Earth and Water Resources: Use LID controls and prepare an SWPPP to manage stormwater and erosion.

Biological Resources: Follow USFWS guidelines for tree clearing and construction to protect the tricolored bat.

Cultural Resources: Adhere to the Cultural Resources Management Plan contingency plan and protect archaeological finds.

Hazardous Materials and Wastes: Follow management plans, conduct safety training, and prevent contamination.

Transportation and Traffic: Minimize traffic conflicts and equip vehicles with safety features.

Safety and Occupational Health: Implement BMPs for hazardous materials, wastes, and traffic to ensure safety.

PUBLIC REVIEW AND INTERAGENCY COORDINATION

(EA § 1.5, pages 1-4–1-6): On September 18, 2024, in accordance with EO 11988, *Floodplain Management*, the DAF published an advance public notice in the *Biloxi Sun Herald* to inform the public of the Action Alternative's potential effects on 100-year floodplains and to invite public comment on the proposal and any practicable alternatives that might reduce the effects on floodplains or other resources. The DAF received no comments from the public.

On September 18, 2024, the DAF distributed Interagency and Intergovernmental Coordination for Environmental Planning letters to MDAH, U.S. Army Corps of Engineers (USACE), USFWS, U.S. Department of Veterans Affairs, other interested agencies and organizations, and stakeholders. A complete list of the agencies to which the letters were sent is included in Appendix A of the EA.

Also on September 18, 2024, the DAF distributed government-to-government consultation letters signed by the Keesler AFB Deputy Base Civil Engineer and Tribal Liaison Officer to four federally recognized Native American Tribes known to each have a historical connection to the land on the base. They are the Choctaw Nation of Oklahoma, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, and Tunica-Biloxi Tribe of Louisiana.

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The DAF received responses from the Choctaw Nation of Oklahoma, MDAH, Mississippi Department of Marine Resources, Mississippi Natural Heritage Program, and USACE. The responses the DAF received are provided in Appendix A of the EA.

In accordance with Section 106 consultation requirements, in January 2025, the DAF shared with the consulting parties the draft report of the 2024 cultural resources survey. Between January 2025 and May 2025, the DAF and MDAH engaged in correspondence regarding Section 106 consultations. In May 2025, MDAH concurred with the final cultural survey report that the nine archaeological sites identified in the report are ineligible for listing in the NRHP and that no further work is needed and that Buildings 3821 and 3823 also are ineligible for the NRHP. MDAH also stated that Building 4106 is outside its purview because of the structure's status as a World War II building on an active military installation. In the same letter, MDAH did not concur that Building 1201 is ineligible for listing in the NRHP, having determined that it is eligible under Criterion C: Architecture, as a notable example of New Formalist design. Consequently, the DAF will consider Building 1201 as an NRHP-eligible structure and will adhere to Section 106 guidelines whenever detailed plans for the building are proposed. In a separate e-mail communication with Keesler AFB on March 18, 2025, the MDAH concurred that Building 7701 is not eligible for the NRHP. In April 2025, the Choctaw Nation of Oklahoma, responded that the Tribe has no affiliation with the archaeological sites uncovered during the survey and deferring to MDAH and other consulting parties to decide on their eligibility. Furthermore, the Choctaw Nation requested that work be halted and their office contacted immediately if any Native American artifacts or human remains are discovered. Appendix A provides copies of the letters the DAF sent and responses it received.

The DAF meets the NEPA requirement for public notification and input regarding potential environmental effects by implementing a 30-day public comment period. To facilitate this, the DAF publishes a Notice of Availability (NOA) for the Draft EA, Draft finding of no significant impact (FONSI) and Draft finding of no practicable alternative (FONPA) in the Biloxi Sun-Herald. Additionally, the NOA is distributed to relevant agencies and the four federally recognized Native American tribes.

For public access, the NOA and draft documents are available for review and comment on the DAF website at <https://www.keesler.af.mil/about-us/resources/environmental-information/>. Copies of these documents can also be reviewed at the Biloxi Library, located at 580 Howard Ave, Biloxi, MS 39530.

All public comments received during this period will be considered and integrated into the Final EA, FONSI, and FONPA. The DAF will provide explanations on how the feedback was addressed or resolved in the final documents.

FINDING OF NO SIGNIFICANT IMPACT

Based on my review of the facts and analyses contained in the attached EA conducted under the provisions of NEPA regulations and based on the results of the various consultations and review of the responses and comments submitted during the 30-day public comment period, I conclude that the implementation of Action Alternative with the 15 projects and their underlying options would not have a significant environmental impact, either by itself or cumulatively with other known projects; therefore, an environmental impact statement would not be required. The signing of this FONSI completes the environmental impact analysis process.

FINDING OF NO PRACTICABLE ALTERNATIVE

Pursuant to EOs 11988, *Floodplain Management*, and 13690, *Establishing a Federal Flood Risk Management Standard and a Process for Further Solicitation and Considering Stakeholder Input*, the DAF must find there are no practicable alternatives to constructing in a floodplain or a wetland, and to do so, all practicable measures should be taken to minimize harm to the affected floodplain and wetlands. After careful consideration of the information presented in the attached EA, I find there is no practicable alternative to constructing the Proposed Action in the floodplain. I further find that all practicable measures have been taken to minimize harm to the floodplain, and those measures are documented in this decision document. This finding fulfills the requirements of EO 11988 for a FONPA.

BIRJU H PATEL
Major
USAF AETC AETC/A4PC