FINAL FINDING OF NO SIGNIFICANT IMPACT
ENVIRONMENTAL ASSESSMENT OF
MISSISSIPPI CYBER AND TECHNOLOGY CENTER ENHANCED USE LEASE
KEESLER AIR FORCE BASE, BILOXI, MISSISSIPPI
(UNIQUE IDENTIFICATION NUMBER 00152)

Pursuant to the National Environmental Policy Act of 1969, as amended (NEPA) (Title 42 of the *United States Code* §§ 4321–4347); the Council on Environmental Quality (CEQ) NEPA implementing regulations (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508), and the Environmental Impact Analysis Process (EIAP) regulations (32 CFR Part 989), the Department of the Air Force (DAF) has prepared an environmental assessment (EA) to evaluate potential environmental effects associated with the DAF entering an enhanced use lease (EUL) with Mississippi State University Research and Technology Corporation (MSU RTC) for an approximately 15-acre parcel on Keesler Air Force Base (AFB) in Biloxi, MS, and MSU RTC building and operating a 100,000-square foot (-SF) building on the leased parcel. The new building under Phase 1 of the Mississippi Cyber and Technology Center (MCTC), which is central to the Mississippi Cyber Initiative, would be a cutting-edge facility providing capabilities, services, and training space. The MCTC would serve as a hub for promoting and integrating cyber and technology talent. Additionally, it would offer a facility for cyber experts to use to collaborate on addressing cybersecurity challenges across federal, state, private, and industry sectors. MCTC Phase 2 would provide future expansion opportunities to potentially build two additional buildings on the 15-acre parcel. The DAF will ensure the appropriate level of NEPA evaluation of MCTC Phase 2 when it becomes ripe for analysis. Any reference in the EA or in this document to the MCTC facility pertains to MCTC Phase 1. The EA is hereby incorporated by reference.

PURPOSE OF AND NEED FOR ACTION (EA § 1.3, page 1-4): The purpose of the Proposed Action is for the DAF to make the best use of an approximately 15-acre, underutilized non-excess real property asset on the installation; provide statewide leadership in addressing cybersecurity and workforce needs for Mississippi into the future; attract innovative cyber and advanced technology industries; provide cybersecurity training for Keesler AFB and the Mississippi Army National Guard; and support its strategic goal of optimizing the value of its existing real property assets.

The proposed EUL is needed to support the DAF's strategic goals of optimizing DAF non-excess assets. The MCTC is needed to support Keesler AFB's training mission and other government goals as well as to provide training and workforce development services. By bringing together expertise from academia, government, law enforcement, defense, the National Guard, and the private sector, the MCTC will accelerate advanced education, research, and innovation.

DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

PROPOSED ACTION (EA § 2.1, pages 2-1 and 2-2): The DAF would enter a 50-year EUL with MSU RTC to lease a 15-acre parcel on which to build and operate the MCTC. The MCTC would be a 100,000-SF, 3-story building of approximately 33,333 SF per floor (EA Figure 2-1, page 2-1). The proposed EUL site previously housed eight dormitories but is currently vacant, comprising mowed areas and a parking lot. The site also contains 156 trees, 52 of which are live oaks (*Quercus virginiana*). The MCTC would house event space, classrooms, administration facilities, parking for 270 vehicles, and associated infrastructure and would occupy approximately 5 acres of the proposed EUL site. Of those 5 acres, 1.2 acres would be

green space after construction. Approximately one-quarter acre of temporary construction laydown and parking area would be located east of the MCTC within the 15-acre parcel. Prior to initiating construction activities, MSU RTC would construct approximately 2,100 feet (ft) of temporary fencing to enclose the proposed EUL site. The temporary fencing would run along the east side of Larcher Boulevard on the west, M Street on the south, and the southside of L Street on the north and tie into the existing base fence east of Fifth Street. Access from Judge Sekul Avenue would be only to the closed-off proposed EUL site. Approval of the Keesler AFB Security is required for the temporary fence construction. Construction traffic would be routed via Judge Sekul Avenue. The MCTC building would have a maximum occupancy of approximately 1,200 administrative personnel, instructors, and students. MSU RTC would employ approximately 10 full-time, permanent MCTC staff. The MSU Cyber Range would have approximately 300 students per year for Cyber Range training and an additional 300 participants per year for at least two multiday symposia.

ALTERNATIVES (EA § 2.3, pages 2-5–2-8): The EA evaluates a No Action Alternative and two action alternatives. The only difference between the two action alternatives is the entrance into the proposed EUL site.

- **No Action Alternative (EA § 2.3.1, page 2-5)**: CEQ regulations require analysis of the No Action Alternative. Under the No Action Alternative, the DAF would not enter into the 50-year EUL with MSU RTC. Therefore, MSU RTC would not construct the MCTC. The parcel would remain vacant and underutilized.
- **Alternative 1, MCTC Access from Larcher Boulevard-White Avenue (Preferred Alternative) (EA § 2.3.2.1, pages 2-7 and 2-8)**: The EUL would be executed and MSU RTC would construct the MCTC (EA Figure 2-4, page 2-8). Under Alternative 1, the entrance to the MCTC would be from Larcher Boulevard with access through the Larcher Boulevard-White Avenue Gate.
- **Alternative 2, MCTC Access from Judge Sekul Avenue (EA § 2.3.2.2, page 2-8)**: The EUL would be executed and MSU RTC would construct the MCTC (EA Figure 2-4, page 2-8). Under Alternative 2, the entrance to the MCTC would be from Larcher Boulevard with access through the Judge Sekul Avenue Gate.

ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION (EA § 2.2, pages 2-2–2-5; EA § 2.4, pages 2-8–2-9): The DAF applied selection requirements to five candidate locations on-base in evaluating them for an EUL site on which to build the MCTC (EA Figure 2-2, page 2-4). Based on that evaluation, four candidate locations considered for the Proposed Action were not carried forward for detailed analysis in the EA.

ENVIRONMENTAL CONSEQUENCES

SUMMARY OF EFFECTS (EA §§ 3.2–3.16, pages 3-3–3-52; § 4.0, pages 4-1–4-4). The EA analyzed environmental effects of the Proposed Action on land use and 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 emissions and climate change, sustainability and greening, environmental justice, and protection of children. No significant adverse effects on any of the resource areas analyzed in the EA would be expected from implementing either Alternative 1 or Alternative 2. The No Action Alternative would not meet the purpose and need of the Proposed Action.

The effects of implementing the Proposed Action under either action alternative are summarized below and discussed in detail in the EA.

The MCTC would be built on previously developed land. 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 the Proposed Action (under Alternative 1 or Alternative 2) would be expected to result in less-than-significant adverse effects. Stormwater runoff from construction activities (e.g., clearing, grading, excavating, and other land-disturbing activities) of 5 acres or more must be permitted under the Large Construction Storm Water General National Pollutant Discharge Elimination System Permit. MSU RTC's contractor would file a Mississippi Department of Environmental Quality Large Construction Notice of Intent. That application would include a site-specific stormwater pollution prevention plan 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. Post construction, the MCTC would result in approximately 3.8 acres of increased impervious surface. Facility design would incorporate low impact development 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. MSU RTC's contractor also would be required to comply with the Keesler AFB stormwater management plan.

Within the proposed area for the MCTC, approximately 80 trees would be removed, including three live oak trees: one of 5-inches diameter at breast height (dbh) and two over 25-inch dbh. The Wing Commander's approval would be required to remove live oak trees larger than 24 inches dbh. Removal of the trees, however, would not substantially reduce or affect the viability of local populations of the affected tree species. The Proposed Action 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) concurred with the DAF's proposed determination that, with implementing the BMP of any tree removal for the project occurring between July 16 and April 30, outside the May 1–July 15 tricolored bat pup season, the Proposed Action may affect, but is not likely to adversely affect, the bat. In April 2024, a Phase I cultural resources survey conducted by the Mississippi State University Cobb Institute of Archaeology (MSU CIA) of the proposed EUL site identified only two artifacts of note from disturbed contexts, indicating that they did not come from intact archaeological deposits. The survey did not identify any Native American tribal resources on the site. Additionally, a ground penetrating radar investigation did not indicate that the Old Biloxi Cemetery extends into the proposed EUL site. In June 2024, on behalf of MSU RTC and the DAF, MSU CIA submitted the Phase I cultural resources survey draft report to the Mississippi Department of Archives and History (MDAH) for concurrence and comment. Additionally, in accordance with National Historic Preservation Act Section 106, the DAF consulted with MDAH and affiliated Native American Tribes. In a September 11, 2024, letter to MSU CIA, MDAH concurred with the survey report that no resources eligible for listing in the National Register of Historic Places (NRHP) were identified within the project area or are likely to be affected by the project and stated it had no objection to the proposed undertaking. The Choctaw Nation of Oklahoma concurred with the DAF assessment of no historic properties being affected by the proposed undertaking and requested that work be stopped and their office contacted immediately if Native American artifacts or human remains are encountered. The DAF will ensure the two artifacts of note from the cultural resources survey are curated with the MDAH, in accordance with the base's pending Memorandum of Understanding with the agency.

The MCTC facility would be connected to utility services from the City of Biloxi, except for stormwater drainage, for which it would be connected to the Keesler AFB drainage system. The City of Biloxi infrastructure and utilities and the Keesler AFB drainage system together have sufficient capacity to meet demands during construction and operations.

Under both alternatives, short-term, less-than-significant adverse effects would be caused by construction traffic on Judge Sekul Avenue. Under Alternative 1, long-term operations traffic on Larcher Boulevard-White Avenue would marginally increase. Under Alternative 2, long-term operations traffic on Judge Sekul Avenue would marginally increase.

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. The proposed EUL site would be restricted from the rest of the base during construction; the construction contractors would not interact with base traffic or personnel. No long-term effects on safety and occupational health are anticipated. There would be less-than-significant adverse effects on climate change and sustainability. Estimated greenhouse gas (GHG) emissions from a year of MCTC construction would be 1,120 metric tons per year (mtpy) and 11,400 mtpy from operations over an estimated 25-year life, both of which would be considerably less than the DAF's indicator for the annual threshold of 75,000 tons per year of carbon dioxide equivalent (or 68,039 mtpy). The social cost of carbon would be roughly $805,000 from the MCTC's projected GHG emissions over a 25-year life cycle. Adverse effects on environmental justice or the protection of children would be less than significant and short- term from construction activities and long- term from operations.

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

PERMIT AND APPROVAL REQUIREMENTS AND BMPS

(EA §§ 5.1–5.3, pages 5-1–5-3): No mitigation measures would be necessary to reduce adverse impacts to below significant levels. Permit and approval requirements and BMPs specified in the EA would be implemented to manage potential effects.

PUBLIC REVIEW AND INTERAGENCY COORDINATION

(EA §§ 1.5 and 1.6, pages 1-5–1-7): On May 3, 2024, the DAF distributed Interagency and Intergovernmental Coordination for Environmental Planning letters to the agencies, including the MDAH, Mississippi State Historic Preservation Officer, USFWS, other interested agencies and organizations, and stakeholders.

Also on May 3, 2024, the DAF distributed letters to four federally recognized Native American Tribes each known to 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.

The DAF received responses from the MDAH; Mississippi Department of Environmental Quality; Mississippi Department of Wildlife, Fisheries, and Parks; Mississippi Natural Heritage Program; USFWS; and U.S. Army Corps of Engineers. The USFWS responded that the proposed EUL site falls within the range of the tricolored bat and that the USFWS anticipates publishing the

Final Rule for the species in the summer of 2024. The MDAH responded that there would be no adverse effects on archaeological resources, provided the MSU CIA conducted Phase I cultural resources survey results are negative. As noted, MDAH concurred with the survey report that no resources eligible for listing in the NRHP were identified within the project area and stated it had no objection to the proposed undertaking. Appendix A of the EA includes all comments and correspondence.

On August 1 and 2, 2024, the DAF distributed a notice of availability (NOA) of the Draft EA and Draft FONSI to the agencies and to the four federally recognized Native American Tribes.

On August 3 and 5, 2024, the DAF published the NOA in the *Biloxi Sun-Herald*. The August 3, 2024, NOA publication initiated the 30-day public review period of the Draft EA and Draft FONSI. During the 30-day public review period, the documents were available for review and comment at https://www.keesler.af.mil/about-us/resources/environmental-information/. Copies of the Draft EA and Draft FONSI also were available for review and comment at the Biloxi Library at 580 Howard Avenue, Biloxi, MS 39530.

The DAF received responses from the Southern Mississippi Planning and Development District, U.S. Army Corps of Engineers, and USFWS and from the Choctaw Nation of Oklahoma. The DAF did not receive any responses or comments from the public. None of the responses received raised concerns about the Proposed Action and alternatives, the EA, or the FONSI. Appendix B of the EA includes the NOA and responses.

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, CEQ regulations, and EIAP 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 [alternative to be implemented] would not have a significant environmental impact, either by itself or cumulatively with other known projects. The signing of this finding of no significant impact completes the environmental impact analysis process.

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